

# **WELSH GOVERNMENT**

## **Position Statement**

**Examination Hearings: June/July 2012**

**Hearing Session 3: Affordable Housing and  
Housing for Gypsies and Travellers**

**Blaenau Gwent Local Development Plan**

## **SESSION 3 AFFORDABLE HOUSING AND HOUSING FOR GYPSIES AND TRAVELLERS**

### **- Affordable Housing**

It is important that the LPA demonstrates that it has maximised provision given the high levels of need and its stated priority for the Plan. Affordable housing is one of Blaenau Gwent's key priorities (challenge 4 – para.3.13, & Vision Theme 1 para4.2 no.3 of Deposit Plan); it continues to be a Ministerial priority of the Welsh Government. The Housing Minister recently announced an increased target for Wales of 7,500 affordable homes during this term of Government to 2016 (14<sup>th</sup> May 2012); the previous Government target was 6,500. This new target is now contained in the Housing White Paper which issued on 21<sup>st</sup> May 2012.

#### **Question 1.**

**1a. What is the evidence base to justify the Plan's target of "at least" 10% of all developments that exceed the relevant threshold?**

**1b. Is the term "at least" unclear?**

**1c. If so, what are the implications for developers when seeking planning permission?**

(relates to Policy DM8 Affordable Housing)

The Affordable Housing Viability Study (doc SD69, page 30) recommends that the authority should set a target of at least 10% on all sites of ten or more units and 15% on all sites over 100 units.

We consider that term 'at least 10%' is clarified by proposed Focussed Change FC2. FC2 amends the Deposit Plan in accordance with the Updated Affordable Housing Background Paper Feb2012 (doc SD43) which provides additional clarification on the threshold percentage at its revised paragraph 3.18. Draft SPG on Planning Obligations (doc SD128) (referenced at revised para 6.33 of the Deposit Plan), needs to be revised to accord with the Plan.

Whilst our Deposit Rep.B.ii(iii). Affordable Housing Thresholds (LPA Ref: 3D.135, 136 & 137) has been met in the main by Focussed Change FC2, we raised an objection to FC2.F with regard to contributions on sites under 10 units.

We note that Section 9 (Delivery & Implementation) of the Plan doesn't refer to 'at least' when it gives a requirement for 10% affordable housing under infrastructure needs. This should be amended.

#### **Question 2.**

**What is the logic for different sites being required to provide different levels of affordable housing?**

No comment

**Question 3.**

**3a. What is the logic for the two thresholds chosen for requiring affordable housing?**

**3b. Why has the Council chosen the area based threshold of 0.28 ha?**

**3c. What does the term “gross site area” mean?**

No comment

**3d. Should Policy DM8 state more clearly a mix of tenures sought that is consistent with the findings of the LHMA (SD62)?**

No comment

**Question 4.**

**Should the Council rely on a greater proportion of off site affordable housing payments to enable it to deliver other projects, for example, a reduction in the number of vacant homes?**

No comment

**Question 5.**

**Which settlements within the county would be covered by the rural exceptions sites policy (Policy DM9)?**

We note that the Updated Affordable Housing Background Paper Feb2012 (doc SD43 – para 4.2) and the Draft SPG on Planning Obligations (doc SD128 -page 20) both clarify where policy DM9 applies. The Plan itself should provide suitable clarification.

(Proposed change MC18 amends this policy to ‘affordable housing exception sites’ in accordance with Planning Policy Wales (para 9.2.23).)

**Question 6.**

**Is the affordable housing target deliverable and appropriate given current economic challenges, the proportion of housing allocations on brownfield sites within the county and other items of infrastructure provision sought in the Plan?**

The affordable housing policies need to be suitably robust and flexible to ensure delivery is maximised as the market changes. This should be further supported by the Plan’s monitoring framework.

Given that affordable housing continues to be a priority Ministerial concern and that the Welsh Government is keen to maximise the level of provision, it is critical that its delivery is secured. The use of negotiated section 106 planning obligations is a key mechanism and the prioritisation of benefits will be crucial.

Policy DM4 (Infrastructure Provision) includes, in its justification at para 7.33, the various possible planning obligations, and Section 9 of the Plan specifies where affordable housing provision is required. However, no indication of priorities is provided by the Plan; whilst the information at section 9 indicates

the outcome of site analysis work, it only broadly specifies what is required without indicating priorities.

The Draft **SPG on Planning Obligations (doc SD128** –para 4.8) advises that priorities will be on a case by case basis informed by “the Council Service Areas taking into account the site specific circumstances of the development and corporate priorities set out in the Council’s Community Scheme”.

This position does create uncertainty; the LDP should set the framework that the Council wants and the Council Service Areas can then decide the detail.

## **- Gypsy and Travellers’ Housing**

### **Question 7.**

**Should the Plan make provision for the needs of travelling showpeople as well as gypsies and travellers? If not, why not?**

Local authorities have a statutory duty under sections 225 & 226 of the Housing Act 2004 to consider the needs of Gypsies & Travellers.

Travelling showpeople (from organised group travelling together) are excluded from the definition of Gypsies and Travellers in WAGC.30/2007. WO Circular 78/91 (Travelling Show People) says that development plans may make provision for site(s) where there is a tradition of sites or an established need is demonstrated.

Equally, it is not the purpose of an LDP to include a policy to cover every eventuality; rather, Plans should be focussed upon the issues within the area with policies to deliver the resultant Plan strategy (para 2.4 of LDPWales).

### **Question 8.**

**8a. Would the plan be unsound if the Council were to plan for six additional pitches for gypsies and travellers over the Plan period instead of four?**

**8b. Is the survey on which the Council has based its forecast up-to-date?**

The Updated Affordable Housing Background Paper Feb2012 (doc SD43 – section 6) advises that the Gypsy and Traveller Housing Needs Assessment has been updated (Sep 2011 - doc SD64) and identifies a need for 4 pitches between 2011 and 2021 (para 6.18-19 of SD43).

The resultant proposed Focussed Change **FC3** meets our Deposit Rep.B.iii. Gypsies and Travellers (LPA Ref: 3D.138) with regard to the level of need and provision (except in relation to transit pitches).

The Council is only required to identify sites to meet identified unmet need. The reduction from 6 to 4 pitches is informed by the updated evidence base.

It is a matter for the Council whether it wishes to provide a greater number of pitches to provide an element of choice and flexibility over the Plan period.

**Question 9.**

**9.1 What is the logic for the focussed change (FC) to criterion (b) of Policy DM10?**

Our Deposit Rep.B.iii(ii). Gypsies and Travellers (LPA Ref: 3D.140) raised the point that criteria b could be questionable given the point made in WAGC.30/2007 'Planning for Gypsy and Traveller Caravan Sites' at paragraph 25 and the last sentence of paragraph 4 of Annex B. It is an issue of requiring 'screening' of a site, which could imply isolating the site, rather than landscaping for the reasons given at paragraph 4 of Annex B.

We consider that proposed Focussed Change FC8 has adequately addressed the matter.

**9.2 How is the term "primary highway network" defined in criterion (f) of Policy DM10? Should the glossary state what this term means?**

No comment

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