

Blaenau Gwent County Borough Council
Cyngor Bwrdeisdref Sirol Blaenau Gwent



(Updated) Affordable Housing Background Paper Papur Cefndirol Tai Fforddady (Wedi'i Ddiweddarau)

Deposit Local Development Plan
Cynllun Adeneuo Datblygu Lleol

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1.0 INTRODUCTION

Aim of this Paper

- 1.1 The aim of this paper is to set out the background and evidence for Affordable Housing, Rural Exception Sites, Special Needs Housing and Gypsies and Travellers policies in the Local Development Plan.

Overview of how this Paper fits into Plan preparation

- 1.2 This paper will provide information for Officers and Members of the Authority, stakeholders, members of the public and the Inspector to help explain the approach taken to housing needs.

Context

- 1.3 The issue of affordable housing is becoming increasingly important as more and more people find that they cannot afford to buy houses. Blaenau Gwent County Borough Council aims to ensure that everyone in the area has access to a good quality home that meets their housing requirements.
- 1.4 Communities should be mixed, balanced and sustainable, and a choice of housing that is affordable is key to achieving this. The cost of buying and renting a house at market value is greater than many on low incomes can afford, and consequently intervention is needed to offer housing through other mechanisms. The Planning system, through the use of planning obligations and conditions, is one method of securing 'affordable' housing. Rural Exception Sites is another way of ensuring that Blaenau Gwent maximises its affordable housing contribution and meets the needs of its diverse communities.
- 1.5 There are a number of people living in Blaenau Gwent that have specific housing requirements as a result of learning and physical disabilities and/or medical conditions. Such demands cannot often be met within the existing housing stock and new purpose-built dwellings are required.
- 1.6 This Topic Paper examines:

The Policy Context

- National
- Regional
- Local

Affordable Housing

- Affordability and Affordable Housing Need in Blaenau Gwent
- Viability of Delivering Affordable Housing through the Planning System
- Setting a Threshold for Requiring Affordable Housing
- Affordable Housing Percentage
- Housing Market Areas
- Affordable Housing Provision

- Influence of consultation on Policy
- Deposit Plan Affordable Housing Policies
- Deposit Plan Consultation Responses
- Proposed Focussed Changes

Rural Exception Sites

- Influence of consultation on Policy
- Deposit Plan Rural Exception Site Policy
- Deposit Plan Consultation Responses
- Proposed Focussed Changes

Special Needs Housing

- Requirements

Gypsies and Travellers

- Current Position
- Requirements
- Influence of consultation on Policy
- Deposit Plan Gypsy and Travellers Policies
- Deposit Plan Consultation Responses
- Proposed Focussed Changes

2.0 POLICY CONTEXT

NATIONAL

2.1 In developing housing policy, the Council is guided by national policy and guidance.

Planning Policy Wales (2011 Edition 4)

2.2 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Assembly Government. It is supported by a series of Technical Advice Notes (TANs).

2.3 The Assembly Government's vision for housing is for everyone in Wales to have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. The objectives are to provide:

- Homes that are in good condition, in safe neighbourhoods and sustainable communities; and
- Greater choice for people over the type of housing and the location they live in, recognising the needs of all, including those in need of affordable or special needs housing in both urban and rural areas.

(PPW 2011, Paragraph 9.1.1)

2.4 A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies. Affordable Housing includes social rented housing owned by local authorities and registered social landlords and intermediate housing where prices or rents are above those of social rent. Local Housing Market Assessments (LHMA) provide the evidence base supporting policies to deliver affordable housing through the land use planning system. It is desirable in planning terms that new housing development in both rural and urban areas incorporates a reasonable mix and balance of house types and sizes to cater for a range of housing needs and contribute to sustainable communities.

2.5 The development plan must include an authority-wide target for affordable housing (expressed as numbers of homes) based on the LHMA and identify contributions that the policy approaches identified in the development plan will make to meeting this target. The target should take account of the anticipated levels of finance available for affordable housing, including public subsidy, and the level of developer contribution that can be realistically sought.

2.6 In the development plan local planning authorities are expected to include either site thresholds or a combination of thresholds and site-specific targets. Local planning authorities may identify sites for up to 100% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities. Such sites are likely to be small in number, in relation to the total number of sites available in a local planning authority area, and small in scale.

- 2.7 Special provision of affordable housing exception sites must be considered to help ensure the viability of the local community. Affordable housing exception sites are not appropriate for market housing.
- 2.8 Local authorities are required to assess the accommodation needs of Gypsy families. It is therefore important that local planning authorities have policies for the provision of Gypsy sites in their development plans. In drawing up policies local planning authorities should consult providers of social housing, representatives of Gypsies and Travellers and landowners in areas likely to be appropriate for Gypsy sites, in accordance with their Community Involvement Scheme.

Technical Advice Note 2: Planning and Affordable Housing (2006)

- 2.9 Land use planning is one of the mechanisms that can be used to provide affordable housing. The purpose of this Technical Advice Note is to provide practical guidance on the role of the planning system in delivering such housing. The guidance defines affordable housing for the purposes of this TAN and provides advice to local planning authorities on how to determine affordability. The need to work collaboratively is stressed, including the requirement for housing and planning authorities to undertake Local Housing Market Assessments in consultation with key stakeholders to determine the need for affordable housing.
- 2.10 The TAN significantly expands on the role of local planning authorities alongside housing departments, registered social landlords, private developers and other bodies in seeking to define and quantify the need for affordable housing. This information will be used to inform development plan policies, which aim to secure affordable housing that meets the identified need and contributes to sustainable communities.

Affordable Housing Toolkit (2006)

- 2.11 The Affordable Housing Toolkit seeks to complement other documents by providing practical advice to enable local authorities and their partners to increase the supply of affordable housing in line with their housing needs and circumstances. It highlights the tools and powers available and provides examples of good practice in the field of affordable housing.

Delivering Affordable Housing using S106 Agreements (2006)

- 2.12 The aim of this document is to assist local planning authorities to improve the development, negotiation and implementation of s106 agreements so that more affordable housing is delivered through the planning system. The document looks at how local authorities can use the planning process to facilitate and bring forward development, whilst ensuring that they continue to deliver the maximum possible amount of affordable housing. It draws on emerging good practice from across the United Kingdom and provides clear protocols for the review of S106s and evaluation of scheme financial viability.

Delivering Affordable Housing under Section 106 (2009)

- 2.13 Due to the impact of the economic downturn on the housing market the Assembly Government produced an update to the s106 guidance. The update looks at how local authorities can use the planning process to facilitate and bring forward development, whilst ensuring that they continue to deliver the maximum possible amount of affordable housing. It draws on emerging good practice and provides clear protocols for the review of S106s and evaluation of scheme financial viability.

Local Housing Market Assessment Guide (2006)

- 2.14 The Local Housing Assessment Guide is a technical document providing practical advice to enable local authorities, as strategic housing bodies, along with partners to understand the nature and level of housing demand and need in their local housing markets.
- 2.15 The purpose of the guidance is to integrate the existing approach to assessing need into an understanding of how the wider housing market operates. The key objective is to provide clear advice to practitioners on assessing the number of households requiring additional housing, including affordable housing, in their areas. Local Housing Market Assessments are a crucial element of the evidence base underpinning the preparation of Local Development Plans.

Statutory Code of Practice on Racial Equality in Housing – Wales (2006)

- 2.16 Planning Policy Wales identifies that in the preparation of development plans, local planning authorities should take account of racial equality in housing, including Gypsies and Travellers. The Statutory Code of Practice on Racial Equality in Housing – Wales identifies the legal framework of racial equality and highlights good practice in the field of housing. It is noted that the ethnic minority population of Wales has grown in size and diversity due to EU migration, as well as asylum seekers and refugees, and account should be taken of the housing needs of these groups.

WAG Circular ‘Planning for Gypsy and Traveller Caravan Sites’ (2007)

- 2.17 The Circular provides updated guidance on the planning aspects of finding sites for Gypsies and Travellers. The Circular identifies that the Local Housing Market Assessment will provide a key source of information for assessing the level of additional Gypsy and Traveller accommodation provision. It also identifies that where there is an assessment of unmet need for Gypsy and Traveller accommodation, local planning authorities should allocate sufficient sites in Local Development Plans.

Wales Spatial Plan – People, Places, Futures (July 2008)

- 2.18 Blaenau Gwent is within the South East Wales – Capital Region. The vision for the area is:

'An innovative skilled area offering a high quality of life – international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and the rest of Europe, helping to spread prosperity within the area and benefiting other parts of Wales.'

- 2.19 Blaenau Gwent along with the neighbouring authorities of Merthyr Tydfil, Monmouthshire, Torfaen, Rhondda Cynon Taf, Caerphilly, Cardiff, Bridgend, Newport and the Vale of Glamorgan have worked together to identify more detail on how the area is to develop in the future. The Capital Region has been broken down into three areas, Heads of the Valleys Plus, Connections Corridor and the City Coastal Area.
- 2.20 Blaenau Gwent is within the Heads of the Valleys Plus area: an area recognised as facing some of the greatest economic and social change challenges created by economic restructuring of the late 20th Century. In terms of 'Building Sustainable Communities' Ebbw Vale is identified as being a key settlement that has a critical role to play in the success of the Capital Region. It must be successful in its own right and, where appropriate, function as a service and employment hub for smaller settlements. It will provide the central framework around which high capacity sustainable transport links will be developed. Other settlements in the area need modern shopping, leisure, community and cultural facilities, more attractive and affordable housing, clean vibrant town centres, accessible open countryside and employment opportunities

Better Homes for People in Wales (2001)

- 2.21 'Better Homes for people in Wales' is the national Housing Strategy, which provides a vision for the future of Welsh housing and a clear policy framework to facilitate action at the local level, addressing its relationship with the planning system. The Strategy sets out the vision for housing in Wales as: *"We want homes that are in good condition in safe neighbourhoods. We want better housing services and a greater choice for people over the types of housing and locations they live in."*

National Housing Strategy – 'Improving Lives and Communities – Homes in Wales' (2010)

- 2.22 This document sets out the challenges, priorities and actions for the coming years so that more can be done for people, particularly older people and others who may be vulnerable.

The challenges are:

- i The demand for housing continues to outstrip supply, which needs to be met by new houses and by bringing back into use empty properties.
- ii The credit crunch has increased the demand for affordable housing.
- iii The ageing population has significant implications for the design of houses and the support available to help people to live independently for as long as possible.

- iv The age and quality of current social housing stock means that substantial improvement is required, not least on energy efficiency. Stock transfers are addressing this in some areas.
- v There is increased demand on housing and housing-related support services, including those that deal with homelessness.

The approach is about improving people's lives. It will:

- i Provide more housing of the right type and offer more choice.
- ii Improve homes and communities, including the energy efficiency of new and existing homes.
- iii Improve housing-related services and support, particularly for vulnerable people and people from minority groups.

The Action will:

- i Increase the number of affordable homes for purchase or rent, in the right location and specifically in rural areas.
- ii Increase the level of private sector investment in housing.
- iii Improve the quality and standard of all existing houses and rented accommodation, including their energy efficiency.
- iv Give people more choice by broadening the range of homes and tenancy arrangements to suit people's income and circumstances.
- v Give tenants a clear voice in decisions that affect them.
- vi Make it easier for people to find suitable accommodation, particularly people from minority groups.
- vii Ensure services reflect the needs of those who use them not the needs of organisations that deliver them.
- viii Make best use of investment in housing and other regeneration activity to create more jobs and training opportunities, and to improve the look and feel of communities, and the services and facilities available to local people.

2.23 Investment in housing and housing related support services does not only meet people's needs for a home. It brings with it benefits for the economy, for jobs and training opportunities, for people's health and well being, and for the environment. It also helps tackle poverty and inequalities and opens up new opportunities for people.

The Strategy for Older People in Wales (2003)

2.24 The 'Strategy for Older People in Wales' highlights the need to take account of the specific requirements of Older People. In particular, a strategic objective of the Strategy is to "*Promote an adequate supply of special forms of housing which meet the varying and changing needs of older people and ensure they can remain independent as long as possible.*"

REGIONAL

2.25 The Local Development Plan must have regard to other strategies and policy documents produced at a sub-regional level in order to ensure consistency. This section seeks to review the key elements of strategies and studies that form part of the housing evidence base at a local level.

Turning Heads...A Strategy for the Heads of the Valleys 2020 (June 2006)

2.26 The Heads of the Valleys Strategy sets out a broad framework for change in the Heads of the Valleys area. The Strategy provides a framework for regenerating the area with a focus on 5 priority themes:

- An attractive and well-used natural, historic and built environment;
- A vibrant economic landscape offering new opportunities;
- A well-educated, skilled and healthier population;
- An appealing and coherent tourism and leisure experience; and
- Public confidence in a shared bright future.


2.27 The Heads of the Valleys Programme areas covers the whole of Blaenau Gwent. The ambition is that, by the year 2020, the Heads of the Valleys will be a place where people want to live, work and play – with a sustainable, high quality of life and a thriving population. Loss of population is seen as a threat to the vibrancy and long-term stability of the area. (Turning Heads, page 4, 2006)


LOCAL

Making a Difference – The Big 20 Year Plan for Blaenau Gwent 2010 to 2030


2.28 The Community Strategy builds on the work undertaken by the Community Plan and takes forward the Vision of making: Blaenau Gwent a better place to live, work and visit. The Community Strategy has 7 key themes and each theme has its own vision:

 **Lively and Accessible Communities**
Creating communities that people enjoy and want to live in

 **Thriving Communities**
Offering the opportunities, support and resources in our communities for people to thrive

 **Fair and Safe Communities**
Making people feel safer and included in our communities

 **Learning Communities**
Giving people the skills to succeed

 **Healthy Communities**
Helping people to be healthy and get the right care and support when they need it

 **Green & Sustainable Communities**
Improving our environment today for tomorrow

 **Leading Communities**
Working with, and for our communities

- 2.29 Housing is under Lively & Accessible Communities and the aim is to make suitable housing available for people. This will be achieved through improving the quality of housing, making available an appropriate mix of housing types and size to meet need and ensuring that housing is affordable.

Blaenau Gwent Local Housing Strategy – Quality Streets (2007)

- 2.30 The overall aim of the Local Housing Strategy is to:-

“provide a strategic framework to ensure that everyone in Blaenau Gwent has the scope and choice to attain a home that is decent, affordable and is situated in a healthy and safe environment.”

- 2.31 The Strategy sets key housing objectives across tenure for the period to 2012, together with an action planning framework for the achievement of those objectives. The objectives are based around:-

- Tackling Inequality
- Land Use Planning Framework
- Affordable Housing
- Private Sector Renewal Policy
- Sustainable Development
- Energy Efficiency
- Homelessness
- Supporting people
- Housing Management
- Community Regeneration

Local Housing Market Assessment (2007)

- 2.32 Opinion Research Services (ORS) was commissioned by Blaenau Gwent County Borough Council to undertake a local housing assessment, including a comprehensive study of current and future housing requirements and housing need. The assessment was undertaken to inform local policies, in particular relating to the housing strategy and investment programme and planning policies surrounding affordable housing provision.

Local Housing Delivery Statement (BGCBC 2009)

- 2.33 The Welsh Assembly Government is committed to delivering 6,500 affordable homes by 31st March 2011 and each Local Authority is expected to contribute to this overarching figure. To ensure delivery of this affordable housing the Welsh Assembly Government placed a statutory duty on each local authority to prepare a delivery plan for affordable housing, consistent with their housing strategy, to include target numbers. To this end the Local Housing Delivery Statement has drawn from a range of policies and strategies to maximise the delivery of affordable housing in Blaenau Gwent. The document identified that by 2011 it would be possible to deliver the 86 per annum target over the period 2007-2011.

3.0 AFFORDABLE HOUSING

3.1 Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. However, it is recognised that some schemes may provide for staircasing to full ownership (PPW 2011 para. 9.2.14)

3.2 There are two main types of affordable housing as defined by TAN 2:

Social rented housing: provided by local authorities and registered social landlords where rent levels have regard to the Assembly Government’s guideline rents and benchmark rents;

Intermediate housing: where prices or rents are above those of social rented housing but below market housing prices or rents. This can include equity sharing schemes (e.g. Homebuy). Intermediate housing differs from low cost market housing, which the Assembly Government does not consider to be affordable housing for the purpose of the land use planning system. (TAN 2 2006 Annex B)

AFFORDABILITY AND AFFORDABLE HOUSING NEED IN BLAENAU GWENT

3.3 Household affordability critically underpins the housing requirement analysis – determining both the ability to afford market housing (and be an effective housing demand) and the inability to afford market housing (and be a real housing need). Affordability is a complex issue and can be assessed in a number of different ways, but each method depends on common factors that are crucial to the analysis. The affordability of any particular household will depend on the relationship between:

- The cost of appropriate local housing, and
- The amount that the household is able to afford.

3.4 The Local Housing Market Assessment (ORS 2007) provides detailed information on how this is calculated but in summary the amount affordable for owner occupation is: savings minus debts; plus/minus positive/negative equity; plus the borrowable amount (3.5 x the income and lending for joint incomes based on 2.9 x multiplier).

3.5 On the basis of these definitions, the number and percentage of households unable to afford market housing if they were to move is identified in the table below.

Table 1: Blaenau Gwent 5-Year Affordable Housing Requirement

Housing Type	Gross Housing Requirement	Housing Supply	Net Housing Requirement (Surplus)
Market	6,152	5,316	836
Intermediate	200		200
Social	3,259	3,027	233
Total	9,611	8,434	1,269

Source: ORS Housing Market Model, Blaenau Gwent Local Housing Assessment 2006

- 3.6 The Local Housing Market Assessment identified an overall 5-year requirement for 1,269 additional dwellings, with the ratio between social housing, intermediate housing and market housing being 18:16:66.

VIABILITY OF DELIVERING AFFORDABLE HOUSING THROUGH THE PLANNING SYSTEM

- 3.7 Whilst the affordable housing requirement is established through the Local Housing Market Assessment the planning system is required to ensure that the need for affordable housing is balanced against site viability. The authority appointed District Valuer Services (DVS) as consultants to undertake an Affordable Housing Viability Study to inform policy decisions on where to set targets and thresholds.
- 3.8 The study looked at 12 representative development sites within the Authority and ran various viability tests on each site. A Consultation Workshop was held at the VITCC in Tredegar on 19th February 2010, where a range of issues were discussed such as density, land values, test intervals, mix of tenure and the assumption that there would be no social housing grant available on sites. Follow up discussions and investigations were completed by DVS with some of the workshop attendees. The findings were set out for three distinct groups; small sites, mid-range sites and large sites.:

The larger sites (100+dwellings)

- 3.9 The results of these sites were better than the rest of the test sites as a reflection of their ability to spread costs over their higher overall Gross Development values. The results of these larger sites show an ability to easily support 10% affordable housing in the current market and a very good ability to support 15% given some flexibility on density or developer profit, the latter of which will be a case by case “risk & return” judgement call by the developer.

The mid range sites (20-99 dwellings)

- 3.10 The results show an ability to support between 0% and 15% which is worse than expected. There are a number of reasons for this, firstly two of the mid-range sites are in the South of the borough where house prices are generally lower and secondly all are brownfield sites with abnormal remediation/site clearance costs and in some cases identified continuing existing uses that uplift their landowner’s sale price expectations.

For the small sites (up to 19 dwellings)

- 3.11 The results are better than the mid range sites but are again mixed and very site specific. These sites show an ability to support between 0% and 25% affordable housing.
- 3.12 The overall conclusion from the report suggested that the Authority should set an affordable housing policy that requires the provision of at least 10% affordable homes on all sites of 10 or more units and at least 15% affordable homes on all sites of 100 or more. It is suggested that this should be reviewed periodically and that the policy should allow sites to be considered on an individual scheme by scheme basis where appropriate.

SETTING A THRESHOLD FOR REQUIRING AFFORDABLE HOUSING

- 3.13 In light of the 86 affordable dwellings required annually, there is clear evidence to support the inclusion of a threshold at the lowest possible point. However, it is also important that the site threshold for affordable housing is realistic and will be achievable. The Affordable Housing Viability Assessment identifies that a realistic threshold over which affordable housing would be required would be 10 dwellings ‘as pursuit of fractional financial contributions could restrict some sites coming forward for development’ (DVS,2010 paragraph. 7.22). The figure of 10 dwellings is also in line with guidance from the Regional Housing Forum who are seeking a level playing field across South East Wales.
- 3.14 TAN 2 advises that information from the Joint Housing Land Availability Study can be used in the determination of site-capacity thresholds on the basis of past completions by size of development. Over the past 12-year period, house-building rates have varied considerably, both in terms of large and small completions. The percentage of small site completions range from as low as 2% to as high as 61%, this is both a reflection of the changes in large site completions which have generally fallen since 1996 and the growth in small site completions since 2006. Over the period 1996 to 2010 349 dwellings have been provided on small sites that is 23% of the total housing provided.

Table 2: Large and Small Completions

Year	Small	Large	Total	Percentage of small to large site completions
1996	19	104	123	15%
1997	21	115	136	15%
1998	20	116	136	15%
1999	25	19	44	56%
2000	27	17	44	61%
2001	8	98*	106	7%
2002	3	98*	101	2%
2003	4	98*	102	4%
2004	12	98*	110	11%
2005	28	98*	126	22%
**Jan-Mar 2006	11	25	36	30%
April 2007	41	32	73	56%
April 2008	53	49	102	51%
April 2009	<u>53</u>	<u>97</u>	<u>150</u>	<u>35%</u>
April 2010	<u>24</u>	<u>91</u>	<u>115</u>	<u>21%</u>
TOTAL	<u>3349</u>	<u>1,155</u>	<u>1,504</u>	<u>23%</u>

Table 3: Completions 2006 - 2010 by Size of Site

Size of Sites	Number of Dwellings
1 - 4	144
5 - 9	28
10 - 14	24
15 - 19	7
20 - 24	17
25 - 29	26
30 +	204

- 3.15 The above table identifies that the greatest proportion of small sites fall within the 1-4 bracket thus reducing the threshold to 5 would not achieve many new affordable homes.
- 3.16 For the purposes of the Local Development Plan, 'large' sites have been determined as those with the capacity of 10 or more dwellings. This approach is compatible with the Technical Advice Note 1: Joint Housing Land Availability Studies, which considers only sites of 10 or more dwellings. A threshold of 10 units will mean that the Council can realistically seek to secure a proportion of affordable housing on all allocated sites, as well as windfall sites with the capacity of 10 or more dwellings.

AFFORDABLE HOUSING PERCENTAGE

- 3.17 The LHMA notes that there is a need for 254 houses per annum of which 34% are affordable. The Plan makes provision for slightly less than the LHMA figure and thus the percentage required to deliver the affordable housing requirement is slightly more. It is clearly evident from the Affordable Housing Viability Assessment (DVS 2010) that such high a percentage could not be sustained by developers. The Affordable Housing Viability Assessment indicates that 10% is viable on small and medium sites and 15% on larger sites.
- 3.18 The authority consider that a policy of at least 10% would be the correct approach as this would enable it to require a higher percentage where appropriate. There are 3 sites, which fall in the category of large and these are all brownfield sites with varying constraints. The first site MU1 has alternative use value, involves demolition; and is likely to have higher than average S106 costs due to related road improvements. The second site (H1.4) is a brownfield site with alternative use value and in need of remediation. The third site (H1.6) is likely to be less than 100 units when developed due to restrictions in relation to the need for a buffer to the west. Therefore, currently the Authority is unlikely to require allocated sites to provide higher than 10%. Notwithstanding this the policy wording, which refers to at least 10%, provides the flexibility the Council needs to deal with any large windfall sites or changes in circumstances.

HOUSING MARKET AREAS

- 3.19 Housing Market Areas are identified in the Local Housing Market Assessment and these were taken forward as the preferred option in the Affordable Housing Viability Assessment Workshop. However, the Affordability Housing Viability Assessment

(DVS: 2010) identifies that “*Viability is generally better further north within Blaenau Gwent. However, again this is very site specific and viability can be equally as strong within parts of the south so any geographically split affordable housing policy would need strategic drivers to make them worthwhile.*” (DVS: 2010 paragraph 7.23). The authority has decided not to include a geographical split to the affordable housing policy based on this information.

AFFORDABLE HOUSING PROVISION

- 3.20 Technical Advice Note: 2 states that LDPs must set an authority –wide affordable housing target for homes that can be provided through the planning system, based on information included in the Local Housing Market Assessment.
- 3.21 In order to calculate this target figure, it is important to note that additional affordable housing units can only be sought from sites that are larger than the prescribed threshold or are not already committed sites (although where planning consent expires on committed sites, the Council will seek to re-negotiate the affordable housing contribution).
- 3.22 The target figure has been identified from housing allocations, commitments and completions with an allowance for windfall sites. To enable the Plan to consider overall affordable housing provision a calculation has been made of the number of dwellings that are being delivered through the Social Housing Grant system (identified in brackets in the tables below).

Table 4: Affordable Housing Contributions from Allocated Sites

H1 Housing Allocations

Policy Number	Site Name	Affordable	Total Units
Ebbw Vale			
H1.1	Willowtown	2	22
MU1	<i>Ebbw Vale Northern Corridor</i>	70	700
		72	722
Tredegar			
H1.2	Cartref Aneurin Bevan	1	13
H1.3	Greenacres	1	18
H1.4	Jesmondene Stadium, Cefn Golau	18	184
H1.5	Business Resource Centre, Tafarnaubach	4	42
H1.6	Land adjacent to Chartist Way	10	101
		34	358
Upper Ebbw Fach			
H1.7	Garnfach School, Nantyglo	2	28
H1.8	Crawshay House, Brynmawr	2	25
H1.9	Infants School and Old Griffin Yard, Brynmawr	3	36
H1.10	Hafod Dawel Site, Nantyglo#	44	44

UPDATED AFFORDABLE HOUSING BACKGROUND PAPER

H1.11	West of the Recreation Ground, Nantyglo	1	15
H1.12	Land to the East of Blaina Road, Brynmawr	2	25
H1.13	Land to the North of Winchestown, Nantyglo	1	15
MU3	<i>NMC Factory and Bus Depot</i>	6	60
		17 (44)	248
Lower Ebbw Fach			
H1.14	Six Bells Colliery Site, Six Bells	4	40
H1.15	Warm Turn, Six Bells	3	32
H1.16	Roseheyworth Comprehensive, Abertillery	3	33
H1.17	Former Mount Pleasant Court, Brynithel#	18	18
H1.18	Hillcrest View, Cwmtillery#	22	22
H1.19	Quarry Adjacent to Cwm Farm Road, Six Bells	2	22
H1.20	Land at Farm Road, Swffryd	13	130
		25 (40)	297
TOTAL		148 (84)	1,625

Land identified for 100% affordable housing

Table 5: Affordable Housing Contributions from Committed Sites

Policy Number	Site Name	Affordable	Total Units
Ebbw Vale			
HC1.1	North of Cwmyrdderch Court Flats, Cwm	0	16
HC1.2	Letchworth Road	0	16
HC1.3	Old 45 Yard, Steelworks Road	0	82
HC1.4	Adjacent Pant-y- Fforest	0	21
HC1.5	Heol Elan #	43	43
HC1.6	Land at College Road#	41	41
HC1.7	Adj Sports Ground, Gwaun Helyg#	69	69
HC1.8	Higgs Yard	0	29
HC1.9	Mountain Road#	22	22
HC1.10	Briery Hill#	33	33
MU2	<i>'The Works'</i>	104	520
		104 (208)	892
Tredegar			
HC1.11	Derelict Bus Garage, Woodfield Road#	11	11
HC1.12	Former LCR Factory, Charles Street	0	14
HC1.13	Former Factory Site, Pochin	0	28
HC1.14	Land at Poultry Farm, Queen Victoria Street	0	3
HC1.15	Upper Ty Gwyn Farm, Nantybwhch	0	38
HC1.16	Former LCR Factory, opposite Tredegar Comprehensive School#	47	47
HC1.17	Peacehaven	12	147
HC1.18	The Goldmine, Sirhowy	0	16

HC1.19	BKF Plastics, Ashvale	0	54
HC1.20	Sirhowy Infants School Site#	23	23
HC1.21	Corporation Yard	0	23
HC1.22	Park Hill	32	160
		44 (81)	564
Upper Ebbw Fach			
HC1.23	Recticel and Gwalia Former Factory Site, Brynmawr#	45	45
HC1.24	Land at Clydach Street, Brynmawr	0	12
HC1.25	TSA Woodcraft, Noble Square Industrial Estate, Brynmawr	0	25
HC1.26	Roberto Neckwear, Limestone Road, Nantyglo	0	19
HC1.27	Cwm Farm, Blaina	0	78
HC1.28	Salem Chapel, Waun Ebbw Road and Pond Road Junction, Nantyglo	0	11
		0 (45)	190
Lower Ebbw Fach			
HC1.29	At Cwm Farm Road	0	20
HC1.30	Former Swffryd Junior School#	18	18
HC1.31	Land at Penrhiw Estate, Brynithel	0	23
		0(18)	61
TOTAL		148 (352)	1,707

Land identified for 100% affordable housing

- 3.23 The total number of dwellings from S106 agreements that are already agreed (from the committed table) is 148 and the contribution from allocated sites is 148 making a total of 296. In addition there is likely to be a further contribution of 31 dwellings from the 312 windfall dwellings forecast over the plan period. This brings the overall total to 327. This does not take into account contributions from rural exception sites, S106 funding for Empty Properties, nor does it take into consideration any future rise in house prices, which may lead to higher percentages being achieved on sites. The Local Development Plan identifies that 327 dwellings will be delivered through S106 Agreements.
- 3.24 It should also be noted that through Social Housing Grant a total of 352 dwellings are committed and a further 84 are proposed. Taking into consideration completions since 2006 (38) the total figure would increase to 474. No estimate is provided of future provision through Social Housing Grant even though Grant is expected to continue, though at a lower level.
- 3.25 Together, the total provision of affordable housing is 801 dwellings that is 53 per annum. Whilst this figure is below the Local Housing Market Assessment figure of 86 per annum, additional provision through Social Housing Grant, Rural Exception Site policy, the empty property strategy and possible increases in percentage requirements will increase this figure and bring it closer to the figure of 86 per annum identified in the Local Housing Market Assessment.

INFLUENCE OF CONSULTATION ON POLICY

Pre-Deposit Participation - Issues Paper

- 3.26 The Issues Paper was prepared as a discussion document intended to promote debate on the issues of strategic significance for the authority. The document was placed on the Council's website and sent to Members, key officers, statutory consultees and interested parties. In total, 176 individuals were consulted and 14 responses were received.
- 3.27 In terms of housing the key issues identified for the next 15 years were:
- The need to stem out migration
 - The need to create a more balanced population
 - The unknown impact of international migration patterns
 - The implications of Welsh Housing Quality Standard on Council Stock
 - Ensuring a range of house types are built to meet aspirations and retain residents
 - Tackling problem vacant buildings and making the most of voids in the town centres
 - Improving the fitness levels in private sector housing
 - Delivering affordable housing solutions.
- 3.28 Consultees were asked a number of questions on affordable housing:-

Question 2.9

Should the threshold of 30 be reduced to ensure that the affordable housing needs of the population are met?

- 3.29 Half of respondents stated that the threshold should be reduced, whilst 38% preferred for it to remain at 30. The remainder (12%) commented that more work needs to be undertaken in order to ascertain a suitable affordable threshold and target.
- 3.30 The threshold has been identified through further work on Viability Assessment (DVS 2010) and analysis of small site completions.

Question 2.10

What percentage of a housing site should be affordable? (10%, 20% 30%, 40% or other)

- 3.31 Half of all respondents answered that the percentage of a housing site that should be affordable should be dependent on viability while the remaining 50% stated 'other'. One respondent added that it may be appropriate to provide flexibility in any LDP policy to allow lower provision to ensure that the wider challenges and objectives of the LDP are realised.
- 3.32 The percentage has been identified through Viability Assessment work which has been set out earlier in this report.

Pre-Deposit Consultation - Draft Preferred Strategy

- 3.33 The Draft Preferred Strategy was subject to public consultation for a period of six weeks from 7th November until 19th December 2008, during which time a total of 18 exhibitions were held covering every ward across the County Borough. In total, 58 respondents made 414 representation on the Preferred Strategy, 278 of which were comments/objections and 136 expressions of support.

Policy SP9 Affordable Housing

On sites of 10 or more dwellings at least 25% of the total number of dwellings should be affordable.

- 3.34 Two comments were made in support of the policy and 9 objections were received. The following issues were raised:

Issue - Ability to deliver the target figure

- 3.35 A number of comments were centred around the ability of the plan to deliver the affordable housing target given the number of committed sites.

Response

- 3.36 The total provision identified through this paper is 801. This has been identified through a realistic assessment of viability and likely provision from each individual site.

Issue - Affordable Housing Range

- 3.37 There was concern with the range of 600 to 800 affordable units.

Response

- 3.38 As there is no longer a range of overall housing this is no longer an issue.

Issue - Deliverability of the 25% target

- 3.39 Justification was sought for the 25% threshold.

Response

- 3.40 Further work on viability has been undertaken to ensure that target figure is viable. The target has now been set at 10%.

Issue - Exploration of all options

- 3.41 One comment questioned whether all the options for increasing the affordable housing target had been explored.

Response

- 3.42 The approach taken at the start of the process was to attempt to secure a level playing field across South East Wales. The current economic climate has overtaken events and therefore this approach has been reconsidered. A new percentage has been set in accordance with the findings of the Affordable Housing Viability Assessment (DVS, 2010) report.

- 3.43 A strategy of releasing greenfield sites to increase affordable housing percentages was considered but due to the geology, geomorphology and history of the area there are limited opportunities and such an approach would work against a strategy which aims to regenerate the urban areas. To maximise affordable housing potential a rural exception policy has been included in the Plan.

Issue - Link to identifiable need

- 3.44 One comment suggested that the policy should refer to 'identifiable local need'.

Response

- 3.45 The strategic policy has been changed and now refers to 'local housing need'.

Issue - Up to date Housing Market Assessment

- 3.46 One comment recommended that the Local Housing Market Assessment is up to date in terms of its evidence base and is produced in partnership with private developers and other stakeholders as required by National Guidance.
- 3.47 The Housing Market Assessment needed to be in place at the start of the process to enable the authority to identify overall and affordable housing targets. The information has since been updated through Housing Evidence Days where a variety of stakeholders have taken part including the private sector. .

DRAFT LOCAL DEVELOPMENT PLAN POLICY

Strategic Policy

- 3.48 The Strategic policy on affordable housing has been subsumed within the general housing policy SP4.

SP4 Delivering Quality Housing

2. To ensure that local housing need is met and sustainable linked communities are created:
 - a. A mix of dwelling types, sizes and tenure, including approximately 800 units of affordable and special needs housing will be delivered to meet the needs of Blaenau Gwent's current and future population (327 of which will be delivered through S106 Agreements); and
 - b. Provision will be made for 6 pitches for unmet gypsy and traveller accommodation.

Development Management Policy

DM8 Affordable Housing

Where there is evidence of need the Council will seek at least 10% affordable housing on all residential proposals that:

- a. Contain 10 or more dwellings; or
- b. Exceeds 0.28ha in gross site area, or
- c. Exceed the threshold in (a) or (b) above for adjacent sites.

Affordable housing for the purpose of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers (TAN2, 2006, paragraph 5.1). Affordable housing includes Social Rented Housing, which is provided by local authorities and registered social landlords, and Intermediate Housing, which is housing where prices or rents are above those of social rent but below market housing prices or rents.

The Blaenau Gwent Local Housing Market Assessment (2006) identified a need for 86 additional affordable units in Blaenau Gwent per year over the next five years. This need is made up of 46 social rented units and 40 intermediate units. However, the Council will take a flexible approach to stipulating the type of housing to ensure the development meets the need of the local area (as set out in the Local Housing Market Assessment) and assists in the delivery of mixed and balanced communities.

To ensure the delivery of affordable housing in accordance with the identified need, the Council will seek the provision of 10% affordable housing on sites of 10 residential units and over or sites that exceed 0.28 hectares in size (gross site area). When adjacent sites taken together exceed these thresholds affordable housing will be sought.

The Council's Empty Property Strategy identifies over 200 properties that are long term vacant. These properties can have a significant adverse impact on the character and appearance of a settlement. In order to address this issue the Council will, in certain circumstances, seek financial contributions from developers to bring back empty properties into beneficial occupation as affordable dwellings.

Further advice on affordable housing requirements is contained in Supplementary Planning Guidance on Planning Obligations.

Deposit Consultation Responses

- 3.49 The Deposit Plan was subject to public consultation for a period of 6 weeks from 5th May 2011. A number of issues were raised with affordable housing.

Policy SP4 Delivering Quality Housing

Issue - Clarity required on affordable housing need

3.50 WG suggests that the Plan needs to make clear if the Plan deals with backlog and current need over the plan period. Also needs to make it clear if it has taken into account impact of private rental sector as this sector can also be affordable.

Response

3.51 The Council clarified these issues with the authors of the Housing Market Assessment, ORS, who confirmed this was the case. It is suggested to the Planning Inspector that two sentences are added to paragraph 6.32 to provide clarity within the Plan.

Issue - Only identify the affordable housing to be delivered through S106 Agreements

3.52 WG considers that the policy should only identify the target for delivery through the planning system with the broader total being deleted.

Response

3.53 The Council agrees that the policy should only refer to the delivery of affordable housing through the planning system and suggests to the Inspector that criterion 2.a is amended accordingly.

Issue - Policy insufficiently flexible to promote a higher provision of affordable housing (WG)

3.54 WG considers that the plan's target should be based on an ambition to maximise delivery of affordable housing through the planning system and that the policy is insufficiently flexible to promote a higher level of provision.

Response

3.55 The Council agrees that the inclusion of the words 'at least' before the number of dwellings in criterion 2a would improve consistency to the Plan. It is suggested to the Inspector that Criterion 2 a is amended accordingly.

Issue - Clarity on the sources of affordable housing within the plan

3.56 The plan needs to be clear about the sources of affordable housing: what estimate is made for sites which don't fall neatly into multiples of 10; contribution of windfall and small sites; a contribution from affordable exception sites; and a statement on commitments.

Response

3.57 It is considered appropriate to address this issue through changes to the Plan. The following provides the detail of how this new figure has been calculated.

3.58 The target figure has been identified from estimates of what can be provided through housing allocations, commitments, and an allowance for windfall sites and rural exception sites. To enable the Plan to consider overall affordable housing provision a calculation has been made of the number of dwellings that can be delivered through the Social Housing Grant system.

Table 6: Revised Affordable Housing Contributions from Allocated Sites

H1 Housing Allocations

Policy Number	Site Name	Affordable	Total Units
Ebbw Vale			
H1.1	Willowtown	2.2	22
MU1	<i>Ebbw Vale Northern Corridor</i>	70	700
		72.2	722
Tredegar			
H1.2	Cartref Aneurin Bevan	1.3	13
H1.3	Greenacres	1.8	18
H1.6	Land adjacent to Chartist Way	10.1	101
		13.2	132
Upper Ebbw Fach			
H1.7	Garnfach School, Nantyglo	2.8	28
H1.8	Crawshay House, Brynmawr	2.5	25
H1.9	Infants School and Old Griffin Yard, Brynmawr	3.6	36
H1.10	Hafod Dawel Site, Nantyglo#	(44)	44
H1.11	West of the Recreation Ground, Nantyglo	1.5	15
H1.12	Land to the East of Blaina Road, Brynmawr	2.5	25
H1.13	Land to the North of Winchestown, Nantyglo	1.5	15
MU3	<i>NMC Factory and Bus Depot</i>	6	60
		20.4	248
Lower Ebbw Fach			
H1.14	Six Bells Colliery Site, Six Bells	4	40
H1.15	Warm Turn, Six Bells	3.2	32
H1.16	Roseheyworth Comprehensive, Abertillery	3.3	33
H1.17	Former Mount Pleasant Court, Brynithel#	(18)	18
H1.18	Hillcrest View, Cwmtillery#	(22)	22
H1.19	Quarry Adjacent to Cwm Farm Road, Six Bells	2.2	22
H1.20	Land at Farm Road, Swffryd	13.0	130
		25.7	297
TOTAL		131.5	1,399

() 100% affordable housing sites not included in calculation.

Table 7: Revised Affordable Housing Contributions from Committed Sites

Policy Number	Site Name	Affordable	Total Units
Ebbw Vale			
HC1.1	North of Cwmyrdderch Court Flats, Cwm	0	16
HC1.2	Letchworth Road	0	16
HC1.3	Old 45 Yard, Steelworks Road	0	82
HC1.4	Adjacent Pant-y- Fforest	0	21
HC1.5	Heol Elan #	(43)	43
HC1.6	Land at College Road#	(41)	41
HC1.7	Adj Sports Ground, Gwaun Helyg	15	69
HC1.8	Higgs Yard	0	29
HC1.9	Mountain Road#	(22)	22
HC1.10	Briery Hill#	(33)	33
MU2	'The Works'	104	520
		119	892
Tredegar			
HC1.11	Derelict Bus Garage, Woodfield Road#	(11)	11
HC1.12	Former LCR Factory, Charles Street	0	14
HC1.13	Former Factory Site, Pochin	0	28
HC1.14	Land at Poultry Farm, Queen Victoria Street	0	3
HC1.15	Upper Ty Gwyn Farm, Nantybwich	0	38
HC1.16	Former LCR Factory, opposite Tredegar Comprehensive School#	(47)	47
HC1.17	Peacehaven	12	147
HC1.18	The Goldmine, Sirhowy	0	16
HC1.19	BKF Plastics, Ashvale	0	54
HC1.20	Sirhowy Infants School Site#	(23)	23
HC1.21	Corporation Yard	0	23
HC1.22	Park Hill	32	160
		44	564
Upper Ebbw Fach			
HC1.23	Recticel and Gwalia Former Factory Site, Brynmawr#	(45)	45
HC1.24	Land at Clydach Street, Brynmawr	0	12
HC1.25	TSA Woodcraft, Noble Square Industrial Estate, Brynmawr	0	25
HC1.26	Roberto Neckwear, Limestone Road, Nantyglo	0	19
HC1.27	Cwm Farm, Blaina	0	78
HC1.28	Salem Chapel, Waun Ebbw Road and Pond Road Junction, Nantyglo	0	11
		0	190
Lower Ebbw Fach			
HC1.29	At Cwm Farm Road	0	20
HC1.30	Former Swffryd Junior School#	(18)	18
HC1.31	Land at Penrhiw Estate, Brynithel	0	23
		0	61
TOTAL		163	1,707

() 100% affordable housing sites not included in calculation.

3.59 The number of dwellings from S106 agreements that are already agreed is 163 (Table 7) and the contribution from allocated sites is 131 (Table 6) making a total of 294. In addition there is likely to be a further contribution of 31 dwellings from the estimate of windfall sites (10% of 312) and 10 dwellings is estimated to be possible from rural exception sites. This results in a total contribution of 335 dwellings. It is therefore proposed that the Local Development Plan identifies that 335 dwellings will be delivered through S106 Agreements.

Table 8: Affordable Housing Contribution through the Planning System

Source	Contribution
Total from S106 agreements (Table 4)	131
Total from S106 commitments (Table 5)	163
Total contribution from Windfall (312 dwellings at 10%)	31
Total contribution from Rural Exception Sites (est.)	10
Total	335

3.60 To understand the ability of the Council to meet its Affordable Housing Requirement a calculation is made of other sources of affordable housing provision. Initially a calculation was made of how many Social Housing Grant schemes were committed through the planning system but this lacked information on other sites that may come forward in the future. Following the example of other local authorities (Caerphilly and RCT) this has been recalculated based on past completions.

3.61 Between 2006 and 2011 245 affordable units have been provided through Social Housing Grant. If this figure is projected forward over the next 10 years then it is estimated that (3 x 245) 735 units can be delivered from this source over the Plan period.

3.62 Together, the total provision of affordable housing is 1,070 (335+735) dwellings which equates to 71 per annum. Whilst this figure is slightly below the Local Housing Market Assessment figure of 86 per annum, additional provision through possible increases in percentage requirements via S106 Agreements may increase this figure and bring it closer to the figure of 86 per annum identified in the Local Housing Market Assessment.

3.63 No contribution is to be identified on sites under 10 units due to the threshold being identified as 10 units. The reasons for this are two fold, firstly due to viability and the fact that financial contributions could restrict some sites coming forward for development. Secondly, the contribution from the 5-9 bracket would not achieve many new affordable homes.

3.64 It is suggested to the Inspector that paragraphs changes are made to the Plan to update and clarify the position.

Policy DM9

Issue - Clarify position on commuted sums

- 3.65 WG requested that the plan should clarify the position with regard to commuted sums in order to optimise affordable housing delivery and the number of units that can be delivered through S106 agreements.

Response

- 3.66 It is agreed that a sentence should be included at the end of paragraph 7.62 to clarify this. It is suggested to the Inspector that paragraph 7.62 is amended.

Issue - Clarify percentage to be sought on large sites

- 3.67 WG noted that the Viability Assessment identifies that sites of over 100 units should contribute 15% affordable housing. Not clear why housing background paper only refers to one site. It is noted that one existing allocation is contributing 20%.

Response

- 3.68 It is agreed that a higher percentage may be supported on sites over 100 units but it is considered that this is sufficiently covered in the policy through the reference to 'at least' 10% and in the Planning Obligations SPG. However, it is accepted that the position in terms of the percentage to be sought should be clarified in paragraph 7.61.

- 3.69 Paragraph 3.18 of this paper has been updated to address the confusion on how many sites in the Plan are over 100 units at Deposit stage. However, as a result of a proposed Focussed Change one of the large sites H1.4 is to be deleted leaving only two sites over 100 units. One of these sites has a number of issues which means that it will be unlikely to be able to deliver 15% affordable housing and the second site is unlikely to deliver more than 100 units. It is therefore suggested that reference in the policy to at least 10% provides sufficient flexibility to address the issue.

Issue - Amend paragraph 7.61 to read 'at least' (WG)

- 3.70 WG requested that for consistency and clarity with the policy paragraph 7.61 should read 'at least' 10%.

Response

- 3.71 It is agreed that paragraph 7.61 should be amended to improve the consistency within the Plan. It is suggested to the Inspector that paragraph 7.61 is amended accordingly.

PROPOSED FOCUSED CHANGES

FOCUSSED CHANGE 2: AFFORDABLE HOUSING – CLARIFICATION

FC2.A: Amend Objective 3 to read as follows:

By 2021, 3,500 new houses will have been built, approximately **1,000** of which will be affordable. New housing sites alongside improvements to existing houses will have helped create sustainable communities.

FC2.B: Amend Policy SP4 Delivering Quality Housing criterion 2a to read as follows:

2. To ensure that local housing need is met and sustainable linked communities are created:
 - a. A mix of dwelling types, sizes and tenure including **at least 335 affordable dwellings will be delivered to meet the needs of Blaenau Gwent's current and future population;** and

FC2.C: Amend paragraph 6.32 to read as follows:

Of major importance to the Strategy is the delivery of sustainable linked communities. To create sustainable communities, developments must include a mix of dwelling types, sizes and tenure, including new affordable dwellings. The Local Housing Market Assessment (2006) identifies that 86 units per annum need to be provided which equates to 1,290 over the Plan period. **This figure deals with the backlog, current and anticipated need over the Plan period. The level of need has also taken account of any impact of the private rental sector given that this sector could be affordable to some who could not afford to buy or obtain a mortgage on market housing.** The Affordable Housing Viability Study (2010) identifies that housing sites can deliver 10% affordable units without social housing grant. The Plan is therefore able to deliver **335 new affordable dwellings, through the use of planning obligations on qualifying sites and based on an estimate of the number of affordable housing exception dwellings coming forward** over the Plan period.

FC2.D: Delete paragraph 6.33 and replace as follows:

The target of at least 335 units delivered through the planning system forms part of a wider total of 1,000 affordable housing units which it is estimated could be provided using all other delivery mechanisms. Further information in respect of these figures is contained in the Affordable Housing Background Paper (2011). Guidance in relation to the provision of affordable housing is contained in the Supplementary Planning Guidance on Planning Obligations.

FC2.E: Amend paragraph 7.61 of Policy DM8 to read as follows:

To ensure the delivery of affordable housing in accordance with the identified need, the Council will seek the provision of **at least 10% affordable housing on sites of 10 residential units and over or sites that exceed 0.28 hectares in size (gross site area). The percentage is by definition a minimum threshold and a higher percentage of affordable housing provision will be sought where the development can support it.** When adjacent sites taken together exceed these thresholds affordable housing will be sought.

FC2.F: Amend paragraph 7.62 of Policy DM8 to read as follows:

The Council's Empty Property Strategy identifies over 200 properties that are long term vacant. These properties can have a significant adverse impact on the character and appearance of a settlement. In order to address this issue and increase the overall provision of affordable homes the Council will, in certain circumstances, seek financial contributions from developers. **For instance, where the application of the 10% requirement would create 'part' of an affordable dwelling. The Council will expect the whole dwelling to be provided on site**

and the 'partial dwelling' to be provided via a developer contribution in-lieu of on-site provision. It may also occur where on-site provision is not considered appropriate and off site units cannot be delivered as an alternative site is not available.

4.0 RURAL EXCEPTION SITES

- 4.1 In order to ensure communities are sustainable, local authorities must also address affordable housing needs of rural communities. Using the National Statistics Rural Urban Classification of Output Areas (July 2004) to determine whether settlements in Blaenau Gwent are urban or rural, with urban areas being defined as those with a population of 10,000 or more. All wards are classified as urban with the exception of Cwm and Llanhilleth which are classified as Town and Fringe. This equates to 13% of all households.
- 4.2 However, in the context of the LDP, 'rural' can be classified as areas outside of existing settlement boundaries. Notwithstanding this, it should be noted that all 'rural' areas in the County Borough are in close proximity to existing settlement boundaries and it is anticipated that affordable housing can be met within these settlements through the general affordable housing policy framework.
- 4.3 Notwithstanding this, in order to maximise affordable housing provision and take on views of consultees a rural exception policy has been included in the Plan. The contribution from this source is expected to be limited and no estimate has been included in calculation of the overall provision of affordable housing.

INFLUENCE OF CONSULTATION

Pre-Deposit Consultation

Issue – Inclusion of Rural Exception Site

- 4.4 One comment suggested that a rural exception policy should be included in the Plan.

Response

- 4.5 It is agreed that a rural exception policy should be included in the Plan to maximise provision of affordable housing.

DRAFT LOCAL DEVELOPMENT PLAN POLICY

DM9 Rural Exception Sites

Affordable housing development for local needs will be supported as an exception to policy provided the development is acceptable in terms of relevant development management policies and provided that:

- a. Evidence exists in the form of a local housing needs survey that there is a genuine demonstrable need for such accommodation;**
- b. There are no allocated sites coming forward within the development boundary which could meet this need;**
- c. Satisfactory arrangements can be made to ensure that the dwellings are retained as affordable housing for local needs in perpetuity;**
- d. The proposal adjoins and forms a logical extension to the development boundary whilst avoiding ribbon and fragmented patterns of development;**
- e. The proposal would not form an intrusive feature in the landscape;**
- f. The siting, layout, scale, design, density and materials of the proposal are sympathetic and appropriate to the size and character of the settlement.**

In the interests of creating and maintaining sustainable mixed communities, proposals will only be considered for sites of 10 units or less.

The purpose of the rural exception Policy is to release sites for affordable housing where there is a shortage of available sites to meet need. Rural exception sites for affordable housing will only be appropriate where there is a genuine local need for affordable housing within the settlement in question and where the need cannot be met on an alternative site. The Council will require a legal agreement restricting the occupancy of dwellings to local people in need of affordable housing. Further advice on this is contained in Supplementary Planning Guidance on Planning Obligations.

Strict criteria have been identified to ensure that unsuitable developments that would detrimentally affect the environment will not be approved.

Deposit Consultation Responses

- 4.6** The Deposit Plan was subject to public consultation for a period of 6 weeks from 5th May 2011. One minor issue was raised with the Rural Housing Policy.

Issue - Amend policy title

- 4.7 The policy title should be amended to accord with Planning Policy Wales, e.g. 'affordable housing' exception sites.

Response

- 4.8 It is agreed that the title of the policy should be amended to accord with Planning Policy. It is recommended to the Inspector that this change be made together with a consequential change to paragraph 7.64.

PROPOSED FOCUSSED CHANGES

MC.18 Amend the title of Policy DM9 to refer to Affordable Housing rather than Rural to read as follows:

DM9 **Affordable Housing** Exception Sites

Amend Paragraph 7.64 accordingly:

The purpose of the **Affordable Housing** Exception Policy is to release sites for affordable housing where there is a shortage of available sites to meet need. **Exception sites** for affordable housing will only be appropriate where there is a genuine local need for affordable housing within the settlement in question and where the need cannot be met on an alternative site. The Council will require a legal agreement restricting the occupancy of dwellings to local people in need of affordable housing. Further advice on this is contained in Supplementary Planning Guidance on Planning Obligations.

5.0 SPECIAL NEEDS HOUSING

REQUIREMENTS

- 5.1 There are a number of people living in the County Borough that have specific housing requirements as a result of learning and physical disabilities and/or medical conditions. Such demands cannot often be met within the existing housing stock and new purpose-built dwellings are required. In addition, specialist housing may be required for older people, migrant workers, black and ethnic minority groups or students as each of these groups have specific accommodation needs. In order to ensure communities are mixed and inclusive, the needs of people with particular requirements must be taken into account.
- 5.2 As part of the Local Housing Market Assessment, the issue of household with support needs was examined. The study found 46% of households in Blaenau Gwent County Borough had one or more members of the household who defined themselves as having a special need. For this purpose, special needs were categorised as:
- Frail elderly
 - A medical condition
 - A physical disability
 - A learning disability
 - A mental health problem
 - A severe sensory disability
 - Other
- 5.3 It should be noted, however, that these categories were self defined and it cannot be assumed that all households with special needs require alternative accommodation, in particular special needs housing. The LHMA identified that of those households with one or more members with a special need, 1% of all households required other accommodation to satisfactorily meet the health needs of members of the household (ORS, 2007, pp34).

The Supporting People Operational Plan 20010-2011 (BGCBC 2010)

- 5.4 The document identifies Homelessness as the priority need followed by domestic abuse, mental health issues and drug dependency. The Plan acts as a bidding document for additional funds to allow the authority to introduce new services to meet future needs or fund the re-modelling of existing services. Nine projects have been identified providing 58 units of accommodation for people with learning disabilities, physical disabilities and mental health issues. Most of these are on small sites and are therefore not included in the Deposit Plan. The Regeneration Division and RSLs are working with Social Services to identify suitable sites for accommodating this need.

Student Accommodation

- 5.5 Another special needs group are students, however, with no University in Blaenau Gwent County Borough at present the student market is extremely limited. This may change in the future.

Housing for Older People

- 5.6 According to the WAG Strategy for Older People in Wales (2003) over the last century. There has been a significant increase in the proportion of the population aged 60 or over due to increase life expectancy and this age group is projected to increase by 11% across Wales in a 20 year period from 2003. It is also projected that the number of very old people (defined as aged 85 or over) will increase by a third in the next 20 years.
- 5.7 The changes in Blaenau Gwent County Borough Council are estimated to be higher than national trends with 15% increase in over 65 age group and 42% increase in the over 85 age group (Quality Streets – A local housing strategy for Blaenau Gwent p88) and therefore it is important that future policies reflect the needs of an aging society. This group is likely to have a variety of housing needs. According to the Housing Strategy and LHMA:
- 5.8 Households with older members are more likely to be satisfied with their current accommodation than households with no older members.
- 5.9 Cases for thinking about future accommodation include poor health, unsuitable accommodation, under occupied accommodation, and vulnerability / insecurity.
- 5.10 Over 35% of all households respondents aged 60 years felt that it was likely they would consider moving to a bungalow in the future. Around 20% were also likely to consider single floor accommodation.
- 5.11 Essential future housing needs were prioritised as: a safe and accessible location, access to healthcare support and well-designed and affordable accommodation.
- 5.12 The *'Strategy for Older People in Wales'* and the National Housing Strategy *'Building Better Places to Live'* highlight the aims of helping older people to find the housing and support services they need in the most efficient way and encouraging people to remain in their own homes for as long as possible.

'Living Independently in the 21st Century' Blaenau Gwent Older Peoples Strategy (BGCBC 2006)

- 5.13 Blaenau Gwent has developed a *'Living in the 21st Century'* Strategy, to ensure a more co-ordinated and responsive approach to service provision for older people in the 21st century. The strategy proposes a move away from traditional forms of care such as residential/nursing care and home care.

- 5.14 Blaenau Gwent has one of the largest concentrations of care homes in Wales (in terms of its size) with a total of 741 beds. These are divided into
- | | |
|-------------------------------|--------------------------------|
| General Nursing | 198 |
| Elderly Mentally Infirm (EMI) | 124 |
| Residential | 306 (independent 142 L.A. 164) |

- 5.15 The strategy is proposing a move away from standard residential care and proposes the closure of 4 of the 5 local authority homes, with the re-investment in specialist long-term residential provision.

Three Extra Care Schemes have been identified at:

Ebbw Vale - 40 unit

Nantyglo – 40-50 unit

Location to be agreed for third scheme of 40-50 units

- 5.16 The Deposit Plan identifies the first two schemes. The third scheme will either use an allocated site or be dealt with through development management policy.

6.0 GYPSIES AND TRAVELLERS

CURRENT POSITION

6.1 Blaenau Gwent County Borough Council area has traditionally had a very static Gypsy Traveller population. There is one permanent site at Cwmcrachen and a Gypsy settlement has been in this area for over 200 years.

REQUIREMENTS

6.2 Under s.225 and 226 of the Housing Act 2004, local authorities have a statutory duty to assess the accommodation needs of Gypsies and Travellers. A needs assessment for Gypsies and Travellers was conducted as part of the Local Housing Market Assessment undertaken with Newport, Torfaen and Monmouthshire (refer to LHMA extract Housing Needs of Gypsies and Travellers).

6.3 Following this a study was undertaken in 2007 to produce detailed information about local Gypsies and Travellers and to generate reliable estimates of future accommodation and housing-related support needs as required under the Housing Act 2004. The study found that an additional 6 long-term pitches were required in Blaenau Gwent and this could be achieved by an extension of the Cwmcrachen site. (Blaenau Gwent Gypsy and Traveller Housing Needs Assessment, June 2007, p4).

6.4 This study pre-dated the Welsh Assembly Government Circular 30/2007 but followed the Draft Practice Guidance on Gypsy and Traveller Accommodation Assessments issued by the Office of the Deputy Prime Minister in February 2006.

The WAG Circular 30/2007 on Planning for Gypsy and Traveller Caravan Sites requires local authorities to allocate sufficient sites within an LDP where there is an assessment of unmet need for Gypsy and Traveller accommodation. In addition a criteria based policy for Gypsy and Traveller sites must also be included to address future or unexpected demand.

6.5 As a result of these findings a policy was included in the Draft Preferred Strategy.

INFLUENCE OF CONSULTATION ON POLICY

Draft Preferred Strategy

SP10 Gypsy Accommodation

6 pitches of unmet gypsy and traveller housing will be provided between 2006-2021 at Cwmcrachen.

6.6 Four comments were received 1 fully supporting the policy and 3 on matters of detail.

Issue - The needs of Gypsies and Travellers

- 6.7 One comment expressed that reference should be made to the needs of gypsies and travellers in all affordable housing documents and strategies.

Response

- 6.8 An additional piece of work was undertaken on the need of Gypsies and Travellers for the Local Housing Market Assessment. The Housing Strategy also includes reference to Gypsies and Travellers.

Issue - Publication of Evidence

- 6.9 One comment noted that the evidence referred to was not published.

Response

- 6.10 This information has now been made available on the council website.

Issue - Consultation

- 6.11 One comment reflected that consultation should be undertaken with those directly affected.

Response

- 6.12 The study states that its findings are based on interviews with 20 Gypsies families on the Cwmcrachen site.

Need for Criteria Based Policy

- 6.13 One comment suggested that a criteria based policy will be required in the LDP whether or not there is any current identified need in order to meet future or unexpected demand.

Response

- 6.14 A criteria based policy will be included in the Plan.

DRAFT LOCAL DEVELOPMENT PLAN POLICIES

- 6.15 The strategic policy has been subsumed within a general housing strategic policy SP4.

SP4 Delivering Quality Housing

2. To ensure that local housing need is met and sustainable linked communities are created:
 - c. Provision will be made for 6 pitches for unmet gypsy and traveller accommodation.

The Deposit Plan includes a criteria based policy on sites for gypsies and travellers. The following policy is included in the Deposit Plan:

DM10 Sites for Gypsies and Travellers

New sites will be permitted where:

- a. The site is well related to community facilities and services;**
- b. The site is already appropriately screened or capable of being adequately screened and landscaped;**
- c. The site is capable of being provided with foul and surface water drainage, including appropriate infrastructure and facilities to manage wastes;**
- d. The site can accommodate residential and home-based business uses without detriment to the amenity and character of the area;**
- e. The site has well defined boundaries; and**
- f. In the case of a transit or touring site, it has good access to the primary highway network.**

This policy provides a framework for assessing proposals for both new and extensions to existing caravan sites in order to meet any future needs.

GT1 Gypsy and Traveller Accommodation

Land is allocated south of the Cwmcrachen Gypsy and Traveller Site to accommodate 6 pitches

The Blaenau Gwent Gypsy & Traveller Housing Needs Assessment (June 2007) identifies the need for a further 6 pitches in Blaenau Gwent. It is proposed that this demand is met within the existing site at Cwmcrachen.

Deposit Plan Consultation Responses

Policy SP4

Issue – Whether the definition used complies with the WG Circular 30/2007

Response

- 6.16** It is considered that the definition used in the study is sufficiently similar to ensure the right groups have been catered for. The only difference between the definitions relates to 'whatever their race or origin' and the exclusion of organised groups of travelling show people or circus people travelling together as such'. The study did not exclude groups by race or origin and did not consider travelling show people or

circus groups. The reason the Circular definition was not used was that it was not published at the time of the survey.

Issue - The extent to which the consultation undertaken accords with the WG Circular

Response

- 6.17 The Circular requires Ipa's to discuss directly with the Gypsies and Travellers themselves, their representative bodies and local support. The Gypsy and Travellers Assessment identifies that written consultation was undertaken with stakeholders working with Gypsies and Travellers in the Study Area and that there were structured interviews with Gypsy and Traveller families on the Cwmcraehen site and families in local housing. The LDP consultation also involved written consultation with the Gypsy Traveller Law Reform Coalition, Equality & Human Rights Commission and Valleys Race Equality Council. The Development Plans Manager has also met with the Blaenau Gwent's liaison officer, the Site Manager and a lead member of the Cwmcraehen community. The Gypsy & Travellers Assessment identified the site to be included in the Plan through consultation with the Gypsy and Traveller Community.

Issue - The need beyond 2011 which is not addressed in the study

Response

- 6.18 This has now been addressed through an update to the 2007 study. The Gypsy and Traveller Housing Needs Assessment September (2011 update) identifies that since 2007 the Cwmcraehen Caravan Site has been upgraded extensively. The site now provides 20 permanent residential pitches, 19 of which provide individual amenity units for residents. The site now also benefits from a full CCTV system, a children's play area, a new wardens office incorporating a small private meeting room used by school outreach and medical workers. Road signage has been improved and speed humps installed.
- 6.19 The study identifies that there is a need for 4 pitches between 2011 and 2021. This can be accommodated on the land already identified in the Plan.
- 6.20 It is recommended to the Planning Inspector that Policy SP4 and paragraph 6.34 be amended to reflect the need for 4 pitches rather than 6 and the date of the assessment is amended to reflect the 2011 study date. This change also needs to be reflected in Policy GT1, paragraph 8.31 and the monitoring table.

Policy DM10 Sites for Gypsies & Travellers

Issue - reference to boundaries

- 6.21 Interpretation of provision contained in criteria (b) and (e) relating to "appropriately screened" / "adequately screened" / "well defined boundaries" could be questionable given the point made in WAG Circular 30/2007 at paragraph 25.

Response

- 6.22 It is agreed that to conform to Circular 30/2007 criteria e should be deleted and criteria b amended.

Issue - The policy should more clearly apply to ‘caravan’ sites

Response

6.23 It is agreed that this policy should clearly state that it relates to ‘caravan’ sites.

PROPOSED FOCUSSED CHANGES

FOCUSSED CHANGE 3: GYPSIES AND TRAVELLER - NEED

FC3.A: Amend Policy SP4 criterion 2b to read as follows:

b. Provision will be made for **4** pitches for unmet gypsy and traveller accommodation.

FC3.B: Amend paragraph 6.34 to read as follows:

The Blaenau Gwent Gypsy & Traveller Housing Needs Assessment (**September 2011**) identifies the need for a further **4** pitches in Blaenau Gwent.

FC3.C: Amend Policy GT1 Gypsy and Traveller Accommodation as follows:

Land is allocated south of the Cwmcrachen Gypsy and Traveller Site to accommodate **4** pitches

FC3.D. Amend paragraph 8.31 to read as follows:

The Blaenau Gwent Gypsy & Traveller Housing Needs Assessment (**September 2011**) identifies the need for a further **4** pitches in Blaenau Gwent. It is proposed that this demand is met through an extension to the existing site at Cwmcrachen.

FOCUSSED CHANGE 8: GYPSIES AND TRAVELLERS – CRITERIA BASED POLICY

FC8: Amend the title of Policy DM10 and amend the policy by rewriting criterion b and deleting criterion e to read as follows:

DM10 **Caravan** Sites for Gypsies and Travellers

New sites will be permitted where:

- a. The site is well related to community facilities and services;
- c. The site is capable of being provided with foul and surface water drainage, including appropriate infrastructure and facilities to manage wastes;
- b. **Adequate landscaping and planting with appropriate trees and shrubs helps the site blend into its surroundings;**
- d. The site can accommodate residential and home-based business uses without detriment to the amenity and character of the area; **and**
- e. In the case of a transit or touring site, it has good access to the primary highway network.

For further information please contact:

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