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CONTENTS	Page
<b>1.0 INTRODUCTION</b>	<b>1</b>
<b>2.0 POLICY CONTEXT</b>	<b>3</b>
National	3
Regional	8
Local	8
<b>3.0 AFFORDABLE HOUSING</b>	<b>10</b>
Affordability and Affordable Housing Need in Blaenau Gwent	10
Viability of Delivering Affordable Housing through the Planning System	11
Setting a Threshold for Requiring Affordable Housing	12
Affordable Housing Percentage	13
Housing Market Areas	13
Affordable Housing Provision	14
Influence of Consultation on Policy	17
Draft Local Development Plan Policy	19
SP4 Delivering Quality Housing	19
DM8 Affordable Housing	20
<b>4.0 RURAL EXCEPTION SITES</b>	<b>21</b>
Influence of Consultation on Policy	21
Draft Local Development Plan Policy	22
DM9 Rural Exception Policy	22
<b>5.0 SPECIAL NEEDS HOUSING</b>	<b>23</b>
Requirements	23
<b>6.0 GYPSIES AND TRAVELLERS</b>	<b>26</b>
Requirements	26
Influence of Consultation on Policy	26
Draft Local Development Plan Policies	27
SP4 Delivering Quality Housing	27
DM10 Sites for Gypsies and Travellers	28
GT1 Gypsy and Traveller Accommodation	28

### Tables

Table 1: Affordable Housing Requirements

Table 2 Large and Small Site Completions

Table 3: Completions 2006-2010 by Size of Site

Table 4: Affordable Housing Contributions from Allocated Sites

Table 5 Affordable Housing Contributions from Committed Sites





## 1.0 INTRODUCTION

Aim of this Paper

### 1.1

- √ Influence of consultation on Policy
- √ Deposit Plan Affordable Housing Policies

#### Rural Exception Sites

- √ Influence of consultation on Policy
- √ Deposit Plan Rural Exception Site Policy

#### Special Needs Housing

- √ Requirements

#### Gypsies and Travellers

- √ Requirements
- √ Influence of consultation on Policy
- √ Deposit Plan Gypsy and Travellers Policies

2.0 POLICY CONTEXT

NATIONAL

2.1

2.7



## 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

- 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

## 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

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.

## 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 2008 272 dwellings have been provided on small sites that is 28% 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%
TOTAL	272	967	1,239	28%

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



## 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
<b>Ebbw Vale</b>			
H1.1	Willowtown	2	22
MU1	Ebbw Vale Northern Corridor	70	700
		72	722
<b>Tredegar</b>			
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
<b>Upper Ebbw Fach</b>			
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
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	NMC Factory and Bus Depot	6	60
		17 (44)	248
<b>Lower Ebbw Fach</b>			
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

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
<b>Lower Ebbw Fach</b>			
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
<b>TOTAL</b>		<b>148 (352)</b>	<b>1,707</b>

# 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.

## 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.



3.43

## Development Management Policy

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

## 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.

## 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



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 igu

## 6.0 GYPSIES AND TRAVELLERS

### REQUIREMENTS

- 6.1 The Local Housing Market Assessment Guide (WAG, 2005, p156) provides a definition of Gypsies and Travellers' as "persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently , and all other persons with a cultural tradition of nomadism and/or caravan dwelling." This definition is broad and seeks to encompass both ethnic Gypsies and Travellers such as Romany Gypsies and Irish Travellers as well as the 'New' Travellers.
- 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. An accommodation needs assessment for Gypsies and Travellers was conducted as part of the Local Housing Market Assessment.
- 6.3 The WAG Circular 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.
- 6.4 Blaenau Gwent County Borough has 1 authorised site with 17 permanent pitches and 3 transit pitches. 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 additit 200(BI)5(aen)9(au(i)5(r)6(ed und)9(er)6



## 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.

For further Information please contact:

Planning Policy Team  
Blaenau Gwent County Borough Council  
Business Resource Centre