

Replacement Local Development Plan 2018-2033
Background Paper

BP11: Affordable housing for local community need



Deposit Plan
August 2025



Mae'r ddogfen hon ar gael yn Gymraeg hefyd.

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1 Introduction

- 1.1 This is one of a series of Background Papers (BP) accompanying the Replacement Local Development Plan (RLDP). When the Council publishes its Deposit Plan, it must also explain how the policy has been formulated based on the evidence base available to the Council at the time.
- 1.2 The purpose of this background paper is to establish how the RLDP will contribute towards meeting the need for affordable and market housing during the plan period. The paper considers financial viability, deliverability and other planning matters to ensure a robust level of market and affordable housing to be delivered is identified. This has been used to formulate the affordable housing targets in the Plan.
- 1.3 This paper has been prepared alongside BP 1: Growth Level Options Report, BP 2: Spatial Distribution Options Report, BP 6: Site Deliverability Assessment, BP 7: Housing Land Supply, BP 9: Local Housing Market Assessment (LHMA) BP 10: Affordable Housing Viability Study, BP 68 Affordable Housing Led Sites and site specific viability assessments.

2 National planning policy, guidance and legislation

- 2.1 [Planning Policy Wales \(PPW\)](#) outlines that planning authorities should understand their local housing market and factors that influence it. A collaborative approach between development plans and local housing strategies is required, which includes housing and planning stakeholders in both the public and private sectors and communities.
- 2.2 The housing requirement that is identified as part of development and process be realistic and deliverable, reflecting evidence base. The number of market and affordable homes should be clearly set. The RLDP should plan for a mix of market and affordable housing types and consider specific needs such as older people and people with disabilities.

- 2.3 The main evidence base for this includes Welsh Government (WG) household projections, the LHMA and the Well-being plan. These should be considered with other key evidence for the plan. Wider factors should also be considered.
- 2.4 There must be sufficient sites identified to meet identified needs of the community. All sectors of the housing market and house builders should be included in the contribution made to meeting housing need.
- 2.5 Para 4.2.25 of PPW states: “A community’s need for affordable housing is a material consideration which must be taken into account in formulating development plan policies”. It also defines affordable housing as “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”. This includes both social rented and intermediate housing. Schemes which provide staircasing to full ownership must have arrangements in place to ensure capital receipts are secured to provide replacement affordable housing. The LHMA provides guidance on the demand for different types of affordable housing.
- 2.6 Development plans must include a target for affordable housing. This should be based on the LHMA, by setting the expected contribution towards meeting the target from policy approaches. These include site thresholds, site specific targets, commuted sums and exception sites. Deliverability and viability should be considered, including the anticipated levels of finance available, including public subsidy and other contributions towards community benefits that are being sought.
- 2.7 Development plans must clearly set out which affordable housing and other developer contributions are required on specific sites. This provision will be a material consideration at planning application stage. Should the application not comply with this housing mix requirement, the applicant will need to demonstrate justification. Negotiation on an alternative acceptable housing mix can take place. Policies must define what is considered affordable housing and the arrangements in place to secure that housing in perpetuity. Affordable housing provision must meet WG design quality standards.

2.8 Para 4.2.30 states that site thresholds or a combination of thresholds and site specific targets for affordable housing should be set in development plans. Site capacity thresholds should also be set for residential developments where affordable housing should be provided. On-site delivery is the preferred option. This is for both allocated sites and windfall. The specific site targets are indicative only (4.2.31).

2.9 Local planning authorities are required to make provision for affordable housing led sites in development plans. These are where at least 50% of the new dwellings on site are to be affordable. They should reflect local circumstances and relate to the creation of sustainable communities.

2.10 Para 4.2.34 requires affordable housing exception sites to be considered to help meet identified requirements and ensure the viability of the local community. Policies for this approach must be clear that the release of land within or adjoining settlements for affordable housing to meet local need in perpetuity are an exception to the general housing provision policies. This approach must be justified, setting out the type of need and development that will be permitted. All other policy criteria must be met.

2.11 [Technical Advice Note \(TAN\) 2](#) provides further guidance for planning authorities on how to meet their affordable housing requirements in their development plan.

2.12 The [Development Plans Manual](#) provides practice guidance for the preparation and implementation of development plans which are underpinned by robust evidence and meet national planning policy requirements.

2.13 The Manual outlines that a LHMA is a core piece of baseline evidence, which will: “identify the total affordable housing need extrapolated over the plan period, spatial implications and the predominant tenure mix required” (para 5.32).

2.14 The Manual requires all development plans to be supported by an LHMA. It also advises that the sub-market areas identified in the LHMA should be spatially reflected in the viability testing. It should clearly show how the LHMA

and viability work aligns with the settlement hierarchy and affordable housing targets.

- 2.15 [Future Wales the National Plan 2040](#) is a national development plan, which sets a strategy for addressing key national priorities. Policy 7 Delivering Affordable Homes requires planning authorities to develop strong evidence based policy frameworks to deliver affordable housing.
- 2.16 In July 2019, the Minister for Housing and Local Government wrote to all local authorities requiring new LDPs to include provision for affordable housing led sites, where at least 50% of the housing is affordable. Public owned land should be used in the first instance. Privately owned land can be identified if there is none available. Sites should not be inferior in any way to those promoted for market housing.

3 Other national legislation, guidance and strategies

- 3.1 WG has published new [LHMA guidance](#) and a new methodology for local authorities to prepare their LHMA. They are a key part of the evidence base for preparing development plans and local housing strategies. The new methodology produces specific housing requirements for each Housing Market Area. These areas should be spatially reflected in the viability testing for development plans and show how this aligns with the settlement hierarchy and affordable housing policy targets.
- 3.2 The LHMA is the first step in linking the housing and planning process. It is important to note that the additional need estimated in the LHMA is unlikely to directly equate to housing requirement or affordable housing target for the RLDP. A broad range of evidence is needed to be considered to set this. Instead, the housing requirement set in a development plan represents the additional housing that can realistically be delivered over the Plan period. It is a policy based interpretation of estimated housing need included in the LHMA and other evidence.
- 3.3 The importance of LHMA, and using the best possible data on housing need and demand to inform housing policy and decisions regarding affordable

housing supply, was underlined in the 2019 [Independent Review of Affordable Housing Supply](#). The Review placed significant emphasis on understanding the number of households in need, in which geographical areas and in what tenures. A robust LHMA is the key means of identifying this evidence at the local level.

4 Regional guidance and strategies

4.1 The Well-being of Future Generations (Wales) Act 2015 places a statutory requirement on each Public Services Board to produce a Local Well-being Plan for their area. The objective of the [Conwy and Denbighshire Well-being Plan \(2023-2028\)](#) is to make Conwy and Denbighshire a more equal place with less deprivation. The plan has identified four key themes to support this:

- Well-being – Communities are happier, healthier and more resilient in the face of challenges, such as the Climate Change and Nature Emergency, or the rising cost of living.
- Economy – There is a flourishing economy, supported by a skilled workforce fit for the future.
- Equality – Those with protected characteristics face fewer barriers.
- Housing – There is improved access to good quality housing.

4.2 It identifies the availability of housing as a key area to help deliver the overall aim of 'A more equal Wales'. It identifies the following step, which is relevant:

"Review the amount of available housing in our county to ensure that there is quality provision that meets the needs of residents, assisting them to lead independent lives in appropriate accommodation for as long as possible".

5 Local guidance and strategies

5.1 Relevant goals from the [Conwy Corporate Plan 2022-27](#) are below:

- Long-term goal 4: people in Conwy have access to affordable, appropriate, good quality accommodation that enhances the quality of their lives.

5.2 The [Local Housing Strategy 2018-2023](#) sets out Conwy's strategic vision and priorities for housing and housing related services. Conwy's vision is that 'people in Conwy have access to affordable, appropriate and good quality accommodation that enhances their quality of life', which is underpinned by 4 key objectives:

1. Increase the supply of affordable housing
2. Ensure that housing support is available to those who need it
3. Improve the quality of the private sector
4. Ensure people understand their housing options to enable them to make an informed decision

5.3 A new LHMA using the revised methodology and toolkit provided by WG in 2022 has been prepared. Figures have been included in Section 6 below.

5.4 Conwy's Programme Delivery Plan sets out how grant support for the development of affordable housing in the county will be allocated. All schemes included for financial support must be in line with Conwy's strategic housing priorities and contribute towards maximising the provision of affordable housing.

5.5 Conwy [Local Housing Prospectus](#) has been developed to provide Registered Social Landlords (RSLs) and other stakeholders with the information they need to make informed decisions about where to search for land and property to deliver new affordable housing. It provides a summary of the affordable housing demand in Conwy and the strategic housing priorities for the next 12 months.

5.6 [Conwy Empty Homes Strategy 2019](#) sets out how the Council will address the level of empty homes in the County Borough, through returning them to use and therefore providing accommodation. Some are returned as affordable units.

5.7 The [Rapid Rehousing Transition Plan 2022](#) sets out how the Council will work towards achieving Welsh Government's vision to making homelessness 'rare, brief and unrepeatable'. The high level of 'ineffective properties', which includes second homes and short-term lets is raised as an issue. The need for a sufficient supply of affordable housing is one of the cornerstones of a rapid rehousing approach.

6 Affordable housing for local need

6.1 The LHMA (2022-37) identifies the level of affordable and market household need in the County Borough. It should be noted that the figure calculated in the LHMA does not simply provide a target for the RLDP. The [LHMA guidance](#) states:

"Whilst this estimate will inform the development plan, it is unlikely to directly equate to a housing requirement or the affordable housing target in a development plan".

6.2 It should also be noted that the RLDP is not the only source of affordable housing supply, and neither is it the only mechanism available to meet the identified household need in the LHMA. These are covered in more detail in Section 10 below.

6.3 Further work has been undertaken to identify the households that links with para 4.2.25 of PPW, which states that: "A community's need for affordable housing is a material planning consideration". A separate calculation has been prepared for households with a local connection only, linked to the RLDP time period and household projections identified as the preferred growth strategy (see BP 1 for more details).

6.4 This new LHMA applies the growth to the strategy areas used in the RLDP and includes the Eryri National Park planning authority mostly in the rural strategy area, with a small part falling in the West. Please see Section 12 on the approach to apportioning this need and the approach for shared settlements, where the boundary of the Park crosses through.

6.5 The Development Plans Manual requires the RLDP to “identify the total affordable housing need extrapolated over the Plan period, spatial implications and the predominant tenure mix required” (para 5.32). This section of the paper will identify the affordable housing for local community need over the Plan period and considers the tenure required, however, this could change over the timeframe of the RLDP. Policies will need to be flexible to accommodate any change. The spatial implications were considered at Preferred Strategy stage of the RLDP, and the affordable housing need for each strategy area was one of the considerations when apportioning the housing need.

6.6 When meeting this identified affordable need, the RLDP must also consider land availability and deliverability, financial viability of schemes and other relevant evidence base, including the household projections and overall dwelling requirements for the Plan period.

6.7 The figures quoted below for the number of households in need of affordable housing are different to the draft LHMA (2022-37) figure. This is to reflect the different time periods of the LHMA and RLDP. It also only includes households with a local connection. The figures link with the RLDP growth strategy, as detailed in BP 1.

6.8 The table below shows the number of households in need by the different tenures. This does not equate to a new housing requirement or affordable housing target for the RLDP. A total of 3,630 households are in need of affordable housing. The need can be met through a combination of new build, increasing churn in the existing affordable housing stock and using the private rental sector.

6.9 Note that the dwelling requirement for the whole Plan period is 3,600 (2018-33). The dwelling requirement of 2,400 in the table included below is for the timeframe 2023-33 only.

Table 1: total households in need by tenure for remaining Replacement LDP period (2023-33) compared with dwelling requirement

Strategy area	Social need	Intermediate need	Open market need	Total households (gross)	RLDP new build requirement
West	125	60	140	325	240
Creuddyn	890	500	380	1,765	720
Central	690	370	450	1,515	840
East	425	310	180	910	360
Rural*	160	95	140	390	240
Total	2,295	1,335	1,290	4,910	2,400

Source: Local Housing Market Assessment 2023 (draft) and BP1, CCBC

Note: rural area includes Eryri National Park planning authority area for the affordable housing need.

Totals may not add due to rounding.

6.10 The table below shows this need figure on an annual basis. It should be noted that the LHMA produces two figures. One for the first five years of the LHMA and a second for the remaining 10 years. The first figure is significantly higher as it includes the unmet need as at April 2023. The figures below have split this evenly. For more details, please see BP 09 LHMA 2022-37.

Table 2: average annual households in need by tenure for Replacement LDP period compared with dwelling requirement

Strategy area	Social need	Intermediate need	Open market need	Total households	RLDP dwelling requirement
West	13	6	14	33	24
Creuddyn	89	50	38	177	72
Central	69	37	45	152	84
East	43	31	18	91	36
Rural*	16	10	14	39	24
Total	230	134	129	491	240

Source: Local Housing Market Assessment 2023 (draft) and BP 1, CCBC

Note: rural area includes Eryri National Park planning authority area for the affordable housing need.

Totals may not add due to rounding.

- 6.11 There are limitations on the methodology used for preparing the LHMA. The LHMA guidance states: “All of the existing unmet need is allocated to affordable housing. It is noted this may overstate the affordable housing estimate and underestimate the market housing estimate”.
- 6.12 The LHMA methodology does make an allowance for churn in the existing affordable housing stock. This is based on past trends, however, the timeframe used was largely during the Covid-19 pandemic, which in combination with market changes, resulted in a lower than usual level of churn. This will be monitored in future, and the RLDP will need to ensure it takes a flexible approach to accommodate any changes in the identified need when the LHMA is updated.
- 6.13 The Development Plans Manual requires the need identified in the LHMA to be reflected in the growth strategy of the RLDP (para 5.32). The previous LHMA was used to inform the growth strategy at earlier stages of the Plan. The distribution of the affordable housing need is generally in-line with the RLDP spatial distribution strategy, reflecting relevant planning constraints and

other planning matters for each area. The need identified on the registers is not necessarily a true indication of need in each area. When choosing their area choices, households consider where affordable housing is available.

7 Financial viability of schemes

- 7.1 A key land use policy approach to delivering for affordable housing for local community need is through contributions from private/market led sites. The preference in national planning policy is for on-site delivery. The proportion sought must be based on robust evidence base.
- 7.2 Para 5.32 of the Development Plans Manual outlines that the LHMA sub-markets should be: "spatially reflected in subsequent viability testing". Links should also be made between the viability work, settlement hierarchy and affordable housing for local community need targets in the Plan. The viability testing reflects the spatial strategy areas in the RLDP, and the housing market areas set in the LHMA.
- 7.3 BP10 has been updated as part of work preparing for Deposit stage, and identifies that the following thresholds for affordable housing for local community need are considered financially viable.

Table 3: affordable housing requirement on development sites by strategy area

Strategy area	Settlements	AH requirement
West	Llanfairfechan, Penmaenmawr, Dwygyfylchi	30%
Creuddyn	Llandudno, Penrhyn Bay	40%
Creuddyn	Conwy, Deganwy, Llandudno Junction, Glan Conwy	35%
Central	Rhos on Sea, Mochdre, Colwyn Bay, Old Colwyn	30%
East	Llanddulas, Abergele	20%
East	Pensarn, Towyn, Kinmel Bay	0%
Rural	Llanrwst	40%

Source: BP10 (2024), CCBC

8 Maximising affordable housing delivery in the RLDP

8.1 Para 5.105 of the Development Plans Manual states that: "LPAs should maximise the delivery of affordable housing in their LDP, based on the viability evidence of allocations/sites in their plan". This aligns with goal 4 of the [Conwy Corporate Plan 2022-27](#): People in Conwy have access to affordable, appropriate, good quality accommodation that enhances the quality of their lives. Increasing the supply of affordable and accessible homes is a key part to delivering this.

8.2 Each element of affordable housing delivery, which can be secured through the RLDP has been considered. Elements that are considered to have robust evidence to demonstrate deliverability have been included below, and have been used to inform the affordable housing led target included in the RLDP (as required by para 4.2.28 in PPW).

Table 4: elements of affordable housing new build supply in the RLDP (04/2025)

Source of supply	Affordable housing supply	Market housing supply	Total housing supply
Completions to date	430	1,005	1,435
Commitments	515	310	825
RLDP allocations*	555	775	1,330
Windfall	135	570	705
Total	1,635	2,660	4,300

Source: Strategic Planning Policy, CCBC

* This could be increased should grant or other funding sources become available. See Section 9 below.

Note: totals may not sum due to rounding.

8.3 Windfall delivery has been calculated based on two elements; small windfall sites (<10 dwellings) and large windfall sites. Small windfall is simply calculated based on the past trend of housing completions on small sites and

projected forwards. This is not robust enough for large windfall sites however; this must be calculated differently to avoid double counting of commitments or allocations. Only completions for large sites that are considered ‘windfall’ are counted, i.e. sites that are within settlement boundaries or otherwise in accordance with LDP policy, excluding allocated sites.

8.4 The first 3 years of projected windfall delivery are disregarded for the purpose of large windfall calculation. This is assuming that any large windfall sites likely to come forward during this period already have permission, therefore are included in the Commitments figure.

8.5 **The figures above do not include affordable housing commuted sums which have also been sought and total £943,403 since 2018.**

8.6 The commitments and completions affordable housing figures included in the table above only consider those secured at the time of planning application. There was further delivery on some sites using grant funding.

8.7 The minimum affordable housing delivery anticipated through the RLDP is 1,635. It is anticipated that delivery will be higher over the remaining Plan period through an updated RLDP Affordable Housing Framework, including a potential increase in affordable housing on allocated sites through additional grant funding, Exception Sites, Affordable Housing led sites and development of public owned land. It was not possible to include them in the target, as the robust evidence needed is not available, and some measures fall outside of the scope of the land-use planning system and RLDP.

8.8 It is important to ensure that there is an appropriate supply of market housing delivered over the remaining RLDP timeframe. If there is an insufficient supply of market housing, there is a risk that it could lead to an increase in house prices (from a lack of supply). This could exacerbate the existing affordability issues in the County Borough, potentially adding to the number of households on the affordable housing register.

Allocated sites

8.9 Policy mechanisms are proposed for RLDP housing allocations, which promote increasing the level of affordable housing on the sites. This seeks to maximise affordable housing delivery through allocating for a minimum 50% on-site affordable housing delivery. The delivery highlighted in Table 4 above could be increased, should subsidy, such as Social Housing Grant, be secured. Due to the uncertainty over the amount of grant CCBC will receive in future years and its allocation to schemes, deliverability cannot be guaranteed. Caution is needed with including these figures in the RLDP affordable housing target, however, work is taking place to ensure priority of grant delivery to these sites. The table below shows the increased supply, should grants or other funding sources be available. The minimum affordable housing required column is based on sound evidence outlined in BP10: Affordable housing viability study.

8.10 The proportion for the Rural strategy area is based on the affordable housing for local community need policy requirement for Llanrwst, as the majority of supply will be delivered through allocations in the settlement. The final delivery for the rural area could be higher, as schemes in the smaller settlements will require a higher affordable housing for local community need proportion. Delivery of these is uncertain, however, and so a figure could not robustly be set.

Table 5: potential additional affordable housing supply from RLDP site allocations (04/2025)

Strategy area	Total dwellings on allocated sites	Minimum affordable housing provision	Potential grant funded additional affordable housing provision
West	200	55	29
Creuddyn	410	180	28
Central	380	170	60
East	290	110	N/A
Rural	100	40	10

Strategy area	Total dwellings on allocated sites	Minimum affordable housing provision	Potential grant funded additional affordable housing provision
Total	1,330	555	127

Source: Strategic Planning Policy, CCBC

Note: includes 3 sites at 100% affordable: Site 132 Dinerth Road, Site 206 Nant y Coed and Heol Dirion sites.

Sites with planning applications submitted have been based on the number of affordable housing as part of the application, and not RLDP policy requirements (Site 86 Penmaen Park, Site 210 Derwen Lane, Site 113 Tandderwen Farm and Site 41 Heol Dirion).

8.11 Should these be included in the RLDP affordable housing target, it would bring the total to 1,760 for the plan period.

Affordable housing led sites

8.12 The proposed policy approach is for all site allocations to be for 50% affordable housing, with grant required to fill the gap from the developer provision up to 50% (see para 8.9).

8.13 The Council has considered and prepared evidence to assess the possibility of allocating further affordable led housing sites in the RLDP. To facilitate this, a second Call for Sites took place in August 2022 for affordable housing sites only. New sites were submitted, and some existing candidate sites were re-submitted as affordable housing led sites.

8.14 CCBC are a landowner and has established an Affordable Housing and Homelessness Programme to progress Council owned land and assets to be used for new affordable housing development and temporary accommodation. This is a small list of sites. Some are allocated in the current adopted LDP and are being progressed for disposal and development ahead of adoption of the RLDP. Others are small scale and within settlement boundaries. These could come forward as windfall sites and, therefore, do not need allocating.

8.15 BP68: Affordable Housing Led Sites has been prepared. It shows that no area was financially viable at 50% affordable housing. In some areas, the viability was so low that even if there was no land cost, 50% affordable housing would still not be viable. Grant and/or RSL funding would, therefore, be required to ensure deliverability of these sites.

Public land for development

8.16 The current adopted LDP seeks a higher proportion of affordable housing for local community need on Council owned land and Government owned land, where it is deliverable and appropriate to the local community. The local community need for affordable housing and characteristics and current housing mix in the community will need careful consideration to ensure that developments contribute towards sustainable communities.

8.17 Limited sites were submitted through the Call for Sites exercise, which will be assessed and allocated through the candidate sites process. A policy approach will be included in the RLDP, which seeks a higher affordable housing contribution on public owned land than for private sites.

Adopted LDP allocations

8.18 Sites previously allocated in the adopted LDP, which have not yet come forward for development can be considered for inclusion as allocated sites in the RLDP. Careful justification, with a substantial change in circumstance with clear evidence of deliverability, and alignment with PPW is required. Where deliverability cannot be demonstrated, but sites are wanted to be retained for aspirational or regeneration purposes for example, they can be allocated as a 'bonus site'. These sites cannot be included in the housing supply as allocations or windfall due to this uncertainty over delivery.

8.19 Consideration has been given to whether any should be allocated in the RLDP as housing sites or as bonus sites as part of the site selection process (see BP06).

Employment growth led household projection

8.20 The RLDP Strategy encourages growth based on a clear understanding of the population and household changes over the Plan period and the need to promote a more balanced age structure, reduce out-commuting, provide for local requirements associated with the North Wales Growth Deal and increase affordable housing across the Plan area.

8.21 Since preparing the Preferred Strategy stage of the Plan, the need for affordable housing has increased significantly. The Strategy remains relevant and in-line with the Council's priorities for the area. Increasing the delivery of market housing, will in-turn lead to an increase in affordable provision, due to the proportion of developer led affordable housing secured on sites likely to result in higher affordable delivery.

Contingency allowance

8.22 The total dwelling requirement in the RLDP includes a 20% contingency. The adopted LDP had a contingency allowance of 10%, which was to be delivered through specifically allocated contingency sites. Even with this contingency, the LDP did not deliver sufficient housing numbers, which ultimately led to reviewing the LDP and work on the RLDP commencing. As a result, the RLDP includes an overall level of contingency, which is reflected across all site allocations, to provide for more flexibility in delivery.

8.23 The contingency allowance could be increased more to make provision for a greater number of houses, and therefore affordable housing, but there is a risk that this could mean an over-supply when compared to the dwelling requirement from the projections. This would mean that greenfield sites could be developed unnecessarily and could lead to other issues in the housing market, such as a higher level of empty homes. It is also likely to be considered unsound at Examination in Public stage of the Plan due to potential over-delivery compared with the overall strategy and dwelling target.

Affordable housing exception sites

8.24 It is important for the RLDP to direct growth towards sustainable places. This is also a requirement in national policy. For this reason, the Growth Strategy of

the RLDP allocates 90% of growth in urban areas. The remainder will be delivering in rural areas, with the majority expected to be delivered in the larger settlement of Llanrwst.

8.25 Sustainable levels of growth are required in rural areas, however, to enable these communities to thrive, sustain local facilities and the Welsh language and retain their local population. Second homes and holiday lets have recently added significant pressures in some of our rural areas. For this reason, the RLDP takes a positive approach to affordable housing, through the provision of an exception sites policy. Sites for this use should be located in close proximity, adjacent to rural settlements, to enable access to local facilities and services. A maximum threshold of 10 has been set.

8.26 The policy has also been amended to enable 100% affordable housing sites to come forward in all strategy areas, should local need evidence that delivery of the site is required to meet identified need. To allow significant delivery of housing on these sites would compromise the placemaking principles and other policies through potential location of sites in unsustainable locations. The use of this policy will be carefully applied and monitored, to ensure that the wider objectives of the RLDP and national policies are not undermined.

8.27 The current adopted LDP has an exception sites policy, but only for a maximum of five dwellings in rural areas. Delivery through this policy (and generally in rural areas) has been poor. This is the case across Wales as a whole, and is not unique to Conwy County Borough. No additional allowance for affordable housing provision through this policy has been allowed for, due to these concerns over deliverability. It is hoped, however, that increasing the site threshold in rural areas will assist with viability and future management of the scheme, which has been highlighted as a barrier.

8.28 Whilst this policy approach supports more affordable units being delivered, it is difficult to predict an exact amount, particularly given the previous low take up of affordable housing exception sites not just in Conwy County Borough, but also across Wales. The estimated windfall delivery reflects these past trends.

A pro-active approach to bring forward these sites in sustainable locations could increase the overall affordable housing delivery during the RLDP.

Shared accommodation / Houses in Multiple Occupation (HMO)

- 8.29 HMOs are an important part of the housing market. The latest housing need data (as in the LHMA) shows there is a significant number of single households in need and/or in temporary accommodation. Shared accommodation could be an appropriate housing choice for some of these households. They also provide accommodation that is low cost for a range of workers.
- 8.30 A new policy approach for HMOs has been prepared for the RLDP, which will allow them to come forward in a managed way, to ensure that any negative impacts from an over-concentration will not occur. See BP12 HMOs for more detail.
- 8.31 Shared accommodation and HMOs are unlikely to meet the definition of affordable housing for local community need, but can provide appropriate accommodation for some single households on the affordable housing registers. HMOs are a different use class (C4) compared to C3 dwelling houses, but are still counted in the dwelling supply and requirement from the household projections.

Town centres

- 8.32 Evidence base for the RLDP (BP18 Commercial Market Analysis) highlights that there is potentially a surplus of office space in the Plan area. In addition, a large proportion is older offices, built before 1970, which is unlikely to meet the needs of modern occupiers (see BP18 Employment Land Review for more details). Some of these offices are on the edges of town centres, and could be appropriate for conversion to residential. The new RLDP policy approach will support this for appropriate schemes in these areas.
- 8.33 Similarly, there are some retail areas that are in decline. Shopping boundaries were reviewed and reduced where applicable as part of the RLDP evidence

base (BP27 Primary and Secondary Retail Area and BP61 Town Centre First Study). Proposals to change use in these locations to residential will be supported, where there is no detrimental impact on the retail offer or town centre health. Changes of use of ground floor A use classes to residential in the designated retail areas will not be supported, as the loss of the A use class and shopping street frontage is likely to be permanent, and result in negative impacts on the vitality, viability and attractiveness of the shopping areas. Proposals for changes of use of upper floors or units without a frontage in these locations will be supported.

- 8.34 The potential housing supply as a result of this policy may not necessarily meet the planning definition of affordable housing for local community need, but has potential to provide smaller units, which are in high demand and could help meet the identified need. The windfall contribution makes an allowance for potential new homes developed as a result of this policy approach.
- 8.35 All the policy measures above are likely to increase the provision of affordable housing, but a figure cannot be included for the purpose of the RLDP for all. It would unlikely to be considered robust enough and some means fall outside of the control of the planning system.

Second homes and/or holiday lets

- 8.36 WG has introduced various powers to address the levels of second homes and / or holiday lets in some communities. New planning powers came into place on 20th October 2022. This included changes to the use classes order:
 - Class C3: Dwellinghouses used as sole or main residences
 - Class C5: Dwellinghouses, used otherwise than as sole or main residences
 - Class C6: Short-term lets
- 8.37 Local planning authorities can use Article 4 Directions on a specific area, where planning permission will be required to change use from a C3 to a C5 or C6 use. Changes from a C5 or C6 use to a C3 will be permitted without the

need for planning permission. This must be evidence based to justify the requirement for the Direction. For more details, see BP52 Second Homes and Holiday Lets.

8.38 Other powers that fall outside of the land-use planning system are relevant and are covered in Section 10 below.

9 Grant funding availability

Social housing grant (SHG)

9.1 The Council receives an annual SHG allocation from WG to fund the provision of new affordable housing. The amount varies per year. CCBC has received and spent the following SHG:

- 2018/19: £5,490,261
- 2019/20: £4,618,847
- 2020/21: £2,897,964
- 2021/22: £8,595,462
- 2022/23: £11,302,103
- 2023/24: £20,122,835 (received more than initially allocated)
- 2024/25: £12,516,409

9.2 The Council is responsible for ensuring that the full allocation of SHG is spent and CCBC is prepared to accept additional funding at the end of the year (if available).

Transitional accommodation capital programme (TACP)

9.3 The TACP is a Welsh Government scheme introduced in 2022/23 to provide grants to RSLs and local authorities to increase the levels of affordable housing and tackle homelessness. The following amounts have been spent previously on acquisitions and voids:

- 2022/23: £2,484,684
- 2023/24: £6,700,706
- 2024/25: £5,180,777

Recycled capital grant (RCG)

9.4 This is funding that was previously awarded to RSLs for provision of affordable housing. Should any be subsequently sold, the money received must be reallocated for further affordable housing provision in the County Borough.

The following amounts have been spent previously:

- 2018/19: £246,970
- 2019/20: £306,627
- 2020/21: £0
- 2021/22: £82,430
- 2022/23: £312,085
- 2023/24: £242,840
- 2024/25: £183,790

Planning contributions / commuted sums

9.5 When planning permission is granted for residential developments, a contribution towards the delivery of affordable housing is sought. The preference is for this to be provided on the development site. In some cases, for example, on a small scale scheme, a commuted sum is sought instead. This is secured via legal agreement to be used for providing affordable housing in the Plan area.

10 Other schemes delivering affordable need

10.1 It is possible to meet some of the affordable housing need of Conwy County Borough's residents through the existing housing stock. Further use of these schemes is being progressed by CCBC Housing Strategy and utilised to ease pressure on greenfield sites and meet the affordable housing need quickly and efficiently. Affordable housing for local community need delivered through these schemes has not been included in the target set for the RLDP, as they fall outside of the land-use planning system and the control of the RLDP. The new Local Housing Strategy will consider these matters and making best use of existing stock as a key priority.

RSL open market purchase

10.2 RSLs can apply to the Council for SHG and TACP to purchase existing properties on the open market. Some RSLs also have their own funding streams that they can access to purchase these. This has seen the following number of units delivered in the last 5 years:

- 2020/21: 14 units
- 2021/22: 8 units
- 2022/23: 22 units
- 2023/24: 22 units
- 2024/25: 28 units

Right sizing initiatives

10.3 Under occupancy, where people live in homes much larger than they need, has been found to be a problem in our County Borough. Others live in properties that are too small to meet their need. A North Wales Regional Rightsizing Group has been set up to help those living in properties that don't meet their needs to 'rightsize'. It is hoped that by ensuring residents are in the appropriate sized home, the number of households on the waiting list will be reduced. This work includes a new housing scheme that has been agreed for development in Colwyn Bay, which will be offered first to people who are under occupying social housing, in order to increase churn within the social housing stock.

Houses into Homes - Interest free loan

10.4 Funded by Welsh Government, Houses Into Homes provides interest free loans to support an owner with the cost of works necessary to bring a long term empty home back into use, or the cost of converting a non-residential property into residential accommodation. Loans of a maximum of £35,000 per property can be considered, up to a maximum of £150,000 per applicant. Houses Into Homes loans are interest free but must be repaid within specific timescales. Once the property has been brought up to standard, the owner has a choice either to sell it (and repay the loan within 2 years or on sale of

the property, whichever happens sooner), or to rent it, (and repay the loan by regular instalments, or in full at the end of the interest-free period of 5 years). Where an owner chooses to rent the property, this must be for full-time residential purposes, and uses such as Air BnB or holiday rentals are excluded. In addition, the scheme cannot be used where the owner intends to occupy the property themselves, or let it to close family members. Otherwise, however, the owner can choose their own tenants and charge a market rent for the property, if they wish. Under this scheme, the property does not have to be let by or through the Council.

- 10.5 This scheme does not contribute directly towards meeting the affordable housing need identified in the new LHMA, however, it does increase the supply of homes in the local area, which has a positive contribution towards the overall dwelling supply. A short trial has previously taken place, where it required the property to be available to the Council to be let as affordable housing for a 5 year period, while the loan was repaid. This had a detrimental effect on take up and so the decision was taken not to continue with this requirement. 30 loans have been issued in the period from 2018/19-2024/25. Once works are completed to all of the properties for which these loans have been issued, the scheme will have funded the creation of 12 new units of accommodation and the improvement of 21 existing units of accommodation.
- 10.6 In addition, two Town Centre Loans have been issued since 2018/2019, resulting in the creation of 2 new housing units and the improvement of 2 exiting units of accommodation.

Empty Property Landlord Grant

- 10.7 The purpose of the Empty Property Landlord Grant Scheme is to support owners of empty properties with the cost of work to bring them up to current standards. Under the scheme, we were able to offer a grant of 70% of the cost of the work necessary to bring the property up to the required standard (capped at £20,000 per property or unit of accommodation to be improved or created). The grant could not be used towards the purchase of the property

and, in addition, the property must have been unoccupied for a minimum of 6 months at the point of the application being made.

- 10.8 In return for the grant, the owner is required to make the property available to the Council to let as affordable housing for a 5 year period (during which time the property will be used to assist with the rehousing of households to whom a duty is owed under homelessness legislation). After the 5 year period, the property can return to use as an open market dwelling, should the owner wish, however, the option to retain the affordable use and resident household is promoted with the owner.
- 10.9 Owners have a choice either to offer nomination rights to the Council (whereby we identify tenants and provide a tenancy management service), or instead, the owner can ask for the Council to lease the property for the 5 year period. Under both options, the rent is determined using the relevant Local Housing Allowance for the property in question, and where the property is accepted onto the leasing scheme, the rent is guaranteed and is payable for periods when the property is vacant (for example, on change of tenant). In some limited situations, it may be possible for us to pay a rent above the Local Housing Allowance for the lease, but the rent must still be deemed affordable for the occupants.

Leasing Scheme Wales

- 10.10 Leasing Scheme Wales (LSW) is a leasing scheme supported by Welsh Government and managed by local authorities. The scheme provides property owners in the private rented sector (PRS) with the opportunity to lease their property to the local authority for a guaranteed monthly rental income and full property management service for between 5 and 20 years. Under LSW, the rent is fixed at the Local Housing Allowance, and therefore provides affordable housing for the term of the lease (minimum of 5 years). Where works are necessary in order to bring the property up to the required standard, Welsh Government grants are available (the maximum amount is dependent on how long the property has been empty and the length of the lease).

10.11 CCBC, in partnership with Denbighshire County Council, was one of three LAs who ran the pilot leasing scheme for WG from August 2020 to March 2022. This resulted in nine properties being leased in CCBC. LSW began nationwide in April 2022, and to date CCBC has leased 16 properties, with a target of 18 properties to be acquired during 25/26 and 37 in 2026/27. WG has identified target property acquisition numbers for each year up to March 2027, which total 95 properties for Conwy CBC.

10.12 When the period of the lease ends, the property can return to use as an open market dwelling. It is hoped that landlords will retain the current tenant and manage the contract directly. Due to the length of time the scheme has been in place, no lease periods have ended as yet. The first head leases from the trial will come to an end in late 2025. Discussions will take place at this time about the future use of the properties, which could include further assistance from the Council, such as a further leasing period. More information will be known at this time on future take up.

Temporary accommodation leasing scheme

10.13 The Council currently leases accommodation from private landlords as temporary accommodation to house homeless households. This leased accommodation provides households with self-contained temporary homes whilst a longer term solution is found. There are 96 properties currently on the scheme. The Council is seeking to increase this number to meet the demand due to the high levels of homelessness in the County Borough and lack of sufficient affordable accommodation, so that there is less reliance on bed and breakfast accommodation.

First time buyer grants

10.14 First Time Buyers in the National Park – under this scheme, grants were issued to five first time buyers of empty properties within the Eryri National Park area of the Conwy County. In order to qualify, the property had to have been empty for six months or longer, fall within Council Tax valuation bands A-C, and the applicant/s were required to demonstrate a local connection with

the National Park area of the county. This could be either through residence, employment or close family connections. Grants issued under this scheme were to support renovation / refurbishment costs and could not be used towards the purchase itself.

10.15 First time buyers of Housing Association in Rural Areas – using Council funding, grants were issued to three first time buyers of properties in rural areas which a Housing Association had identified as disposals. In order to be eligible, applicants were required to be Tai Teg eligible, demonstrate a local connection, and be able to obtain a mortgage for the purchase price. Once approved, the grant funding could be used towards renovation / refurbishment costs and a condition of the grant is that the applicant resides in the property for an agreed period of time (either 5 years for a full grant award, or 2 years for a partial grant award).

10.16 In total, eight first time buyer grants were awarded between 2018/2019 and 2022/2023. Five of these were for properties located in Eryri National Park.

11 Other schemes increasing housing supply

11.1 Increasing housing supply in general could have a positive impact on helping to meet the housing need, and enabling local residents to live locally. Some of these could be in affordable need. Similar to Section 10 above, their use could ease pressure on greenfield sites and meet the affordable housing need quickly and efficiently.

Empty homes and second homes council tax premium

11.2 Part 7, Section 139 of the Housing (Wales) Act 2014 gives authorities in Wales the discretion to charge Council Tax Premiums of up to 300% from April 2023, on long-term empty and second homes. For this purpose, a long-term empty dwelling is defined as a dwelling which is both unoccupied and substantially unfurnished for a continuous period of at least one year. A second home is defined as a dwelling which is not a person's sole or main home and is substantially furnished. The premiums can help to bring these

dwellings back into permanent use, increasing the stock available. Some have been brought back into use as affordable dwellings (see Section 9 above).

- 11.3 Conwy County Borough Council first introduced a 25% premium on both in April 2019. This has been reviewed each year since being introduced. From April 2025, the premium was set at 150% for second homes, 200% for long-term empty homes for a period of 5 years or less and 300% for those empty over 5 years. It was also resolved that from April 2026, an indicative premium of 200% be set on both categories, with a 300% premium on long-term empty properties that have been empty for four years or more. This indicative premium will be reviewed during 2025/26.

New short-term holiday lets requirements

- 11.4 In April 2023, the criteria for self-catering accommodation being liable for business rates and not council tax has increased to being available for let for at least 252 days, and actually let for at least 182 days in a 12-month period. Properties which cannot meet this criteria, will be considered a domestic property and placed on the council tax register. Those with planning conditions specifying they may only be used as holiday accommodation are liable for council tax at the standard rate and will not be required to pay any premium.
- 11.5 In January 2023, WG announced that they will be introducing a statutory licensing scheme for all visitor accommodation providers in Wales, as committed to in their Co-operation Agreement with Plaid Cymru. It will be introduced in three phases: registration, safety licensing and quality licensing phase.
- 11.6 It is hoped that these requirements will result in the return of some of these dwellings to permanent housing, easing pressures overall. A balance is needed, however, to ensure our local economy is supported.

Land transaction tax

- 11.7 WG is progressing a national framework, where local authorities will be able to request increased rates for Land Transaction Tax for second homes and

holiday lets in their area. This would need to be evidence based and directed towards areas that need support to manage the issues associated with concentrations of second homes and short-term holiday lets. A [public consultation](#) was held December 2023 to March 2024.

12 Eryri National Park and 'shared' settlements

- 12.1 National Park areas have their own planning authorities and LDPs. The Eryri National Park boundary cuts through the middle of some of our settlements. To ensure that a consistent approach is taken, without detrimental impact to the National Park, a joined approach is taken in these areas. These settlements are: Dwygyfylchi / Capelulo, Dolgarrog, Trefriw, Tal y Bont, Llanbedr y Cennin and Nebo (see BP03 - Hierarchy of Settlements and Shared Settlements for more details).
- 12.2 The LHMA (2022-37) applies the same strategy areas as the RLDP when assessing the housing need for an area. A joined approach is, therefore, also required when meeting the affordable housing need in the shared settlements. This builds on the joint working that takes place between CCBC Housing Strategy and the National Park planning team.
- 12.3 The figures quoted below are linked to the RLDP growth strategy. Eryri National Park has not endorsed this for their own LDP and so their strategy figures for future need may vary. This will be monitored and sites progressed according to the need evidence at the time.
- 12.4 It should be noted that it is difficult to get an accurate figure for affordable housing need in the rural areas. Rural Housing Enabler studies and open days have taken place to raise awareness locally about the affordable housing registers and the affordable housing options available to residents. Despite this, there was limited additional households added to the register. This is common in all rural areas, and not just Conwy County Borough. CCBC Housing Strategy are considering other options to increase awareness of the registers and housing options, so that robust evidence of housing need is available.

Dwygyfylchi / Capelulo

12.5 These settlements lie in the West RLDP strategy area and LHMA area. Table 1 above outlines an estimated total need for the RLDP period for 140 market and 185 affordable households in this area. This compares to a total dwelling requirement of 240. As at April 2023, there were 20 households on the affordable housing registers, who chose Dwygyfylchi as their first area choice. There were no households on the affordable housing registers, who chose Capelulo as their first area choice.

12.6 The Conwy RLDP approach for affordable housing within the settlement boundary of Dwygyfylchi will be to seek a minimum of 30% affordable housing provision on all development sites. The current adopted LDP seeks 20%. The majority of the settlement lies outside of the National Park boundary.

12.7 Current commitments include 23 units on the Bluen Goch site, including 3 affordable units.

12.8 Capelulo will be classed as a Hamlet in the Conwy RLDP. This is a change proposed in the Preferred Strategy and differs to the current adopted LDP where it is classed as a part of Dwygyfylchi. The Conwy RLDP policy will allow for small scale residential development in this area. The majority of the settlement lies within the National Park boundary. The Eryri LDP also allows for small scale residential development here.

12.9 It is anticipated that the majority of the housing need for Dwygyfylchi will be met within the Conwy RLDP Plan area through current committed sites, windfall sites and churn in the existing stock. Both planning policy approaches in the Conwy RLDP and Eryri LDP allow for small scale housing only in Capelulo. The wider strategy area includes Penmaenmawr, where sites could also come forward to meet the identified need for affordable housing in future if needed.

Dolgarrog

12.10 Dolgarrog lies in the Rural RLDP strategy area and LHMA area. Table 1 above outlines an estimated total need over the RLDP period for 140 market and 245 affordable households in this area. This compares to a total dwelling requirement of 240. It is anticipated that most of this need will be met in Llanrwst, with some small scale development in other rural settlements. As at April 2023, there were 5 households on the affordable housing registers, who chose Dolgarrog as their first area choice.

12.11 Potential residential development here is constrained by physical constraints, including topography and floodplains. Both the Conwy RLDP and Eryri LDP allow for small scale residential development. **Churn in the existing stock is anticipated to meet the localised need.**

Trefriw

12.12 Trefriw lies in the Rural RLDP strategy area and LHMA area. Table 1 above outlines an estimated total need over the RLDP period for 140 market and 245 affordable households in this area. This compares to a total dwelling requirement of 240. It is anticipated that most of this need will be met in Llanrwst, with some small scale development in other rural settlements. As at April 2023, there were 12 households on the affordable housing registers, who chose Trefriw as their first area choice.

12.13 Potential residential development here is constrained by physical constraints, including topography and floodplains. Both the Conwy RLDP and Eryri LDP allow for small scale residential development. The Eryri LDP allocates a small residential site here, but there has been no progress on developing it to date. There are no other committed sites here. The policy approach and Eryri LDP allocation, in combination with churn in the existing stock is anticipated to meet the localised need.

Tal y Bont

12.14 Tal y Bont lies in the Rural RLDP strategy area and LHMA area. Table 1 above outlines an estimated total need over the RLDP period for 140 market and 245 affordable households in this area. This compares to a total dwelling

requirement of 240. It is anticipated that most of this need will be met in Llanrwst, with some small scale development in other rural settlements. As at April 2023, there were 6 households on the affordable housing registers, who chose Tal y Bont as their first area choice.

12.15 Potential residential development here is constrained by flood risk in parts.

Both the Conwy RLDP and Eryri LDP allow for small scale residential development. There are no committed sites here. The policy approach, in combination with churn in the existing stock is anticipated to meet the localised need.

Llanbedr y Cennin

12.16 Llanbedr y Cennin lies in the Rural RLDP strategy area and LHMA area. Table 1 above outlines an estimated total need over the RLDP period for 140 market and 245 affordable households in this area. This compares to a total dwelling requirement of 240. It is anticipated that most of this need will be met in Llanrwst, with some small scale development in other rural settlements. As at April 2023, there were no households on the affordable housing registers, who chose Llanbedr y Cennin as their first area choice.

12.17 Potential residential development here is constrained by the local topography.

Both the Conwy RLDP and Eryri LDP allow for very small scale residential development. There are no committed sites here. The policy approach in combination with churn in the existing stock is anticipated to meet any newly arising localised need.

Nebo

12.18 Nebo lies in the Rural RLDP strategy area and LHMA area. Table 1 above outlines an estimated total need over the RLDP period for 140 market and 245 affordable households in this area. This compares to a total dwelling requirement of 240. It is anticipated that most of this need will be met in Llanrwst, with some small scale development in other rural settlements. As at April 2023, there were no households on the affordable housing registers, who chose Nebo as their first area choice.

12.19 Both the Conwy RLDP and Eryri LDP allow for very small scale residential development here. Planning permission has been granted for one dwelling. The policy approach in combination with churn in the existing stock is anticipated to meet any newly arising localised need.

Other settlements wholly in Eryri National Park

12.20 As at April 2023, there were 17 households on the affordable housing registers, who chose Betws y Coed as their first area choice, 4 households chose Dolwyddelan and 7 households chose Penmachno. CCBC Housing Strategy will work with the Eryri National Park Authority regarding this need.

13 RLDP policy requirements

13.1 The RLDP includes the following policy criteria to ensure the delivery of affordable housing for local community need in line with evidence base and national planning policy requirements:

- Set the overall housing requirement, including a breakdown for both affordable and market housing need. Show how this need will be delivered and delivery will be monitored.
- Site allocations, with detailed housing targets for individual sites for affordable and market housing.
- Detail how affordable housing for local community need is defined and the mechanism in place to secure in perpetuity.
- Detail that on site delivery of affordable housing for local community need is the preferred and expected option.
- Consider deliverability and viability in setting targets for affordable housing for local community need.
- Make provision for affordable housing led sites.
- Include a policy approach for affordable housing for local community need exception sites.
- Detail the mix and tenure of affordable housing for local community need to be provided on sites.
- Policy approach for public owned sites.

- For windfall sites, set a threshold where sites must contribute towards affordable housing for local community need, including that lower numbers to avoid triggering this threshold will not be permitted,
- Consider specific housing needs, such as older people and people with disabilities.

14 Conclusion

- 14.1 This paper has set out the Council's approach to delivering affordable housing for local community need in the RLDP. It will be updated once specific site allocations are known. Based on the information to date, it is anticipated that the RLDP can robustly demonstrate deliverability of 1,635 affordable housing for local community need units during the total Plan period. The target increases to 1,760 affordable housing units when grant funding is added.
- 14.2 Amended planning policy approaches set out in the Affordable Housing Framework are intended to help increase the delivery of affordable housing. It was not possible to include them in the target, as the robust evidence needed is not available, and some measures fall outside of the scope of the land-use planning system and RLDP. It is anticipated that the target in para 14.1 is therefore a minimum level that the RLDP can achieve.
- 14.3 The Affordable Housing Framework in the RLDP will not deliver the whole need identified in the LHMA, but neither is the LHMA figure a direct new build target. The remaining need will be delivered through a range of other mechanisms, which fall outside of the remit of the RLDP and land-use planning system.