



# Replacement Local Development Plan 2018-2033

## Topic Paper

August 2018

Topic Paper 1: Housing

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## **1. Introduction**

The Local Development Plan (LDP) is first and foremost a land use plan that identifies site specific development opportunities in response to the needs of the community for more housing, jobs, services and facilities. It also seeks to preserve, protect and enhance where appropriate, those aspects of the built and natural environment which are important in defining the quality and sensitivity of the places we value, enjoy, move through, and live in. The ultimate aim of the LDP will be to deliver sustainable development.

The LDP is a vehicle for the Council to define its key growth and development priorities and will provide the ongoing framework of policies to guide decisions on planning applications.

## **2. Purpose of this Topic Paper**

This is one of a series of topic papers which have been put together to inform the production of the Conwy Replacement Local Development Plan (RLDP). Their aim is to interpret the relevant evidence and guidance in relation to the specific topic and identify the key issues that the Plan will need to address as well as possible policy approaches to be incorporated in the Plan. Each topic paper has been compiled from detailed evidence originating from LDP Background Papers (technical documents that form the evidence base for the RLDP.) Topic papers are designed to cover key subject areas currently covered in the adopted LDP and summarise technical data contained within the Background Papers to make the presentation of data more accessible to readers. Topic papers establish a baseline position and identify the key issues facing the County Borough which the RLDP will need to address.

The Topic Papers are intended to provide an early opportunity for stakeholders and the public to have an input into the Plan. This topic paper covers key issues relating to Housing.

## **3. Key Changes to Legislation and Policy (since LDP adoption)**

### **3.1 National**

#### **The Well-being of Future Generations Act (2015)**

The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies to carry out sustainable development. This concept is not new but has been expanded under the Act and requires an improvement of all four aspects of well-being: economic, social, environmental and cultural well-being of Wales. It suggests public bodies such as Councils think more about the long-term, work better with other organisations and communities to prevent problems and take a more joined-up approach.

The Act highlights seven 'well-being goals' to help ensure that public bodies are all working towards the same vision of a sustainable Wales (see Figure 1 below). The

Act specifies five ways of working: long-term, integration, involvement, collaboration and prevention. Each of which will be incorporated into the RLDP process.

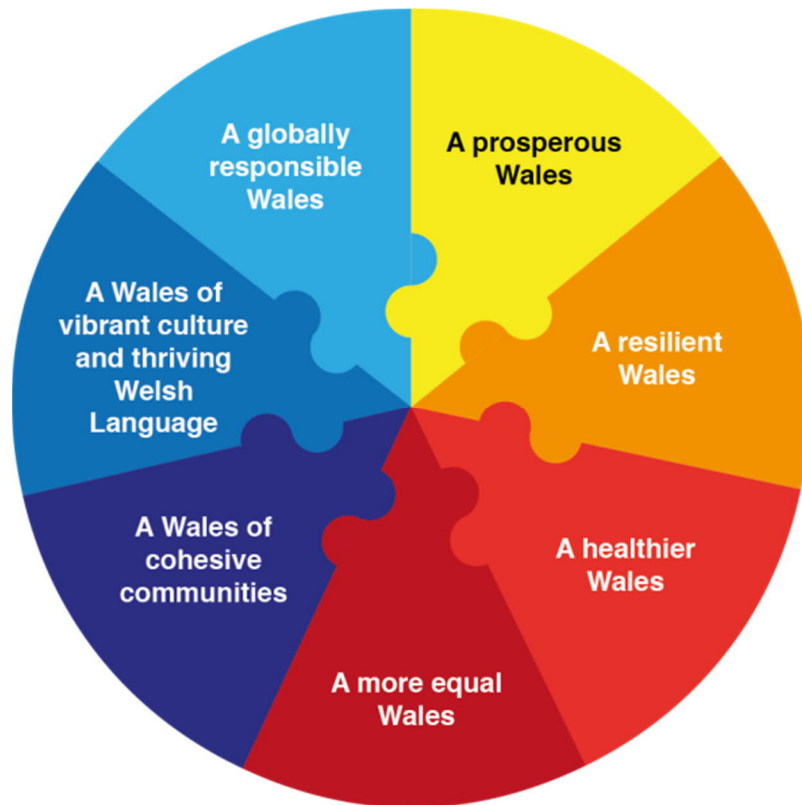


Figure 1: Well-being Goals (WG)

### **The Planning (Wales) Act (2015)**

The Planning (Wales) Act 2015 introduced a statutory purpose for the planning system, stating that any statutory body carrying out a planning function must exercise those functions in accordance with the principles of sustainable development as defined in the Well-being of Future Generations Act. The planning system is therefore necessary and central to achieving sustainable development in Wales. It provides the legislative and policy framework to manage the use and development of land in the public interest so that it contributes positively to the achievement of the well-being goals.

### **National Development Framework (NDF)**

The Planning (Wales) Act 2015 requires Welsh Government (WG) to produce and keep up-to-date the NDF. The NDF must cover a 20 year period accommodating Government priorities into a single, coherent direction, indicating the land use implications of key goals and objectives. The NDF will set out WG land use priorities and provide a national land use framework for SDPs and LDPs. The NDF concentrates on development and land use issues of national significance, indicating areas of major opportunities and change, helping to co-ordinate the delivery of WG policies to maximise positive outcomes. The NDF forms part of the statutory development plan and SDPs and LDPs must be in general conformity with the NDF.

## Planning Policy Wales (Edition's 9, 2016 & 10 - consultation draft, 2018)

Planning Policy Wales (PPW) sets out the land use planning policies of WG and provides the context for land use planning in Wales. It is supplemented by a series of Technical Advice Notes (TANs) and policy clarification letters. PPW, the TANs and policy clarification letters comprise national planning policy. National planning policy should be taken into account in the preparation of all tiers of development plans. PPW will sit alongside the National Development Framework (NDF) which will set out where nationally important growth and infrastructure is needed and how the planning system at a national, regional and local level can deliver it by providing direction for Strategic Development Plans (SDPs) and Local Development Plans (LDPs).

PPW 9 says that local authorities should adopt a corporate approach, involving housing and planning representatives in the public and private sectors, and their communities in preparing and co-ordinating development plans and local housing strategies. In preparing development plans it is important that the relevant local housing strategy and community strategy are given full consideration so that planning policies and decisions are compatible with the housing objectives.

In planning the provision for new housing, local planning authorities must work in collaboration with housing authorities, registered social landlords, house builders, developers, land owners and the community.

In PPW 10 the 'Active & Social' theme includes housing, retail, commercial centres, community facilities, recreational spaces and transport. This theme promotes the provision of a range of well-designed and located homes which are well connected to existing retail and commercial centres situated at the heart of our communities. It emphasises that when planning and managing future development planning authorities need to ensure that residents of existing and new communities have access to an appropriate range of community facilities including recreation, leisure, health and education. It promotes retail and commercial centres as hubs, for a range of activities, recognising their social, cultural and economic importance. It acknowledges the significance of community facilities and recreational spaces for our health, well-being and quality of life and specifically protects and promotes these uses in line with the overarching national sustainable placemaking outcomes.

PPW 10 states;

*'Planning authorities must understand all aspects of their housing system, which will include the requirement, supply and delivery of housing. This will allow planning authorities to develop evidence-based market and affordable housing policies in their development plans and make informed development management decisions that focus on the creation and enhancement of Sustainable Places. New housing development in both urban and rural areas should incorporate a mix and balance of market and affordable house types, tenures and sizes to cater for the range of identified housing needs and contribute to the development of sustainable and cohesive communities.'*

*In respect of housing the planning system must:*

- *Identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities across all tenures;*
- *Enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places; and*

- *Focus on the delivery of the identified housing requirement and supply.'*

Local Planning Authorities also need to understand the local housing market and the factors which influence housing requirements over the plan period. Development Plan requirements must be clearly set out and based on the latest population projections, employment growth levels and affordable housing requirements in conjunction with the Local Housing Market Assessment (LHMA) and other RLDP evidence as necessary.

### **Technical Advice Note 1: Joint Housing Land Availability Studies**

Technical Advice Note (TAN) 1 was revised in January 2015. This change made fundamental differences to site categorisation and housing land supply calculation; most notably removing the past completions method as a means to calculate housing land supply. This has also resulted in LPAs without a current adopted development plan being unable to demonstrate whether or not they have a 5-year supply. Conwy presently has less than a 5-year supply so arguably this would not have a great impact. Nevertheless this is one further reason why Conwy must progress the LDP Review quickly in line with the Delivery Agreement, to ensure the RLDP is adopted prior to expiry of the current LDP in 2022.

The focus on use of the residual method for calculating housing land supply in the present TAN1 fails to take into account the backlog of housing delivery prior to adoption of the LDP, and does not recognise the impact of the economic crisis on housing need in Conwy. This has been an issue raised by Conwy through various avenues including via WLGA and through Annual Monitoring Reports.

WG have recently undertaken a consultation on whether to dis-apply paragraph 6.2 of TAN1, which states:

*The housing land supply figure should also be treated as a material consideration in determining planning applications for housing. Where the current study shows a land supply below the 5-year requirement or where the local planning authority has been unable to undertake a study (see 8.2 below), the need to increase supply should be given considerable weight when dealing with planning applications provided that the development would otherwise comply with development plan and national planning policies.*

Conwy have responded to the consultation and the results of this are now awaited. In addition, WG announced that there will be a wide-ranging review of housing delivery. Further details on this are not yet available, so at this time it is not known what impact this may have on the RLDP and housing requirements.

Despite the importance associated with housing delivery and the 5-year supply, at the time of Examination of the Conwy LDP, LPAs were not required to demonstrate that they would have a 5-year supply at adoption. This has now changed, with TAN1 3.2 making it clear that the housing land supply is an important consideration at LDP Examination, so Conwy will have to ensure that allocated sites and other sources of housing identified in the RLDP are not only deliverable, but deliverable within the timescales required to ensure a 5-year supply. This can be particularly important with large sites where infrastructure requirements and lead-in times for sites can mean that significant completions may be difficult to achieve in the years immediately following LDP adoption. For this reason, the process of assessing and selecting allocations for the RLDP will be more thorough than has been undertaken previously,

with landowners being required to submit evidence to demonstrate deliverability of sites if they are to be allocated.

### **Longitudinal Viability Study of the Planning Process (WG 2017)**

Welsh Government aims to develop a shared understanding between the house building industry and local planning authorities of the importance of accurate assessments of site deliverability / viability at all stages of the planning process. The purpose of this research was to identify reasons why housing allocations or commitments that are assessed as deliverable during the Local Development Plan process are becoming stalled due to viability issues at later planning stages, and to make recommendations in respect of further changes to planning policy, processes and/or behaviours, which address the research findings. CCBC participated in the Study as a case study local planning authority with an adopted LDP.

The Study makes a number of recommendations including;

- More detailed site appraisals at candidate site submission
- Outline viability assessments prepared prior to allocation
- LPAs to make greater use of site de-allocation
- Develop deliverable disposal strategies for land in public ownership
- Early and effective involvement of statutory undertakers in LDP preparation
- Increased scrutiny of housing trajectory information during the LDP process
- Greater awareness of viability and training for stakeholders
- Viability assessments subject to greater transparency
- Developer contributions to be outlined at pre-application stages
- WG and local authorities to consider more innovative approaches to the provision of affordable housing
- Clear guidance on viability process

## **3.2 Regional**

### **Strategic Development Plan (SDP)**

The Planning (Wales) Act 2015 provides a legal framework for the preparation of SDPs. SDPs should be prepared on a regional basis and must reflect functional areas, to address issues such as regional housing markets, travel to work patterns and economic opportunity areas. SDPs must identify housing provision to be delivered through LDPs, including strategic allocations/areas of search for strategic employment sites, supporting transport infrastructure and strategic green infrastructure (including Green Belts). The preparation of an SDP allows opportunities and challenges to be considered and planned for in an integrated and comprehensive way, promoting the achievement of positive planning outcomes. SDPs must be in general conformity with the NDF.

### **Growth Vision for the Economy of North Wales (North Wales Economic Ambition Board – 2016)**

The aims of the Vision are;

- To improve the economic, social, environmental, and cultural well-being of North Wales;



- To support and retain young people in the region's communities;
- To address worklessness and inactivity across the region;
- To support and enable private sector investment in the region to boost economic productivity and to improve the economic and employment performance of North Wales.

In relation to housing the Vision seeks to address key barriers to housing delivery and ensure that a supply of adequate land for residential development is available to meet projected demand and need, especially re-use of brownfield sites. Also, to provide support to assist with costs associated with site remediation, the delivery of enabling infrastructure and the lack of funding caused by restricted access to banks and institutional funding will be available.

### **3.3 Local**

#### **Conwy Corporate Plan 2017-2022**

The purpose of the Corporate Plan is to present the Council's Priorities for the five years from 2017 to 2022. The priorities are the areas that the Council want to focus special attention in order to support the achievement of the citizen outcomes.

The outcomes are as follows:

- People are educated & skilled
- People are safe and feel safe
- People have access to affordable, appropriate, good quality accommodation that enhances the quality of their lives.
- People are healthy & active
- People live in a county that has a prosperous economy
- People value and look after the environment
- People live in a county where heritage, culture and the Welsh language thrive
- People in Conwy contribute to their community. They are informed, included and listened to.

Across all areas of work the Council is committed to ensuring that the needs of the present are met without compromising future generations, endeavouring to make the best decisions in light of financial restraints. In addition the Corporate Plan gives a commitment to consider the impact of policies on rural communities, those protected under Equalities legislation and people living in poverty. The Council will also promote the Welsh language, and build confidence to be progressive. Harnessing the potential of technology to improve performance, business processes and efficiencies is a strategic priority up until 2022.

#### **Population Growth**

The Council's Population Profile Research bulletin looks at key demographic information for Conwy, presenting the latest data, historical context and providing some commentary on what the data shows. It outlines some of the main findings in the 2016 mid-year estimates of population and migration and looks at the 2014-

based population projections which were produced by WG. The headlines from the bulletin are;

- The size of the resident population in Conwy County Borough at 30 June 2016 was estimated to be 116,550 people.
- Since 2006 the population of Conwy County Borough has increased by 3,350, which is 3.1% – an average of about 0.3% per year.
- Between mid-2015 and mid-2016 the change in population in Conwy County Borough was a result of:
  - negative natural change of -400 people (1,100 births and 1,500 deaths);
  - net migration gain of 700 people (about 5,100 people came to Conwy County Borough to live and about 4,400 people left).
- By 2036 it is predicted that:
  - if the 5 year migration trend continues Conwy County Borough will have a population of 118,500 – an increase of 1,950 (1.7%) from 2016 mid-year estimate levels.
  - if the 10 year migration trend continues Conwy County Borough will have a population of 118,600 – an increase of 2,050 (1.8%).
  - net increases in the population total will come from in-migration, as natural change alone (births and deaths) would lead to a fall in total.
  - population growth will be in the 65+ age group. The number of people of working age and the population aged under 18 will decline.

To inform the RLDP, Council's Corporate Research & Information Unit will be providing further evidence on population projections and employment and household growth options (Refer to the Background Paper).

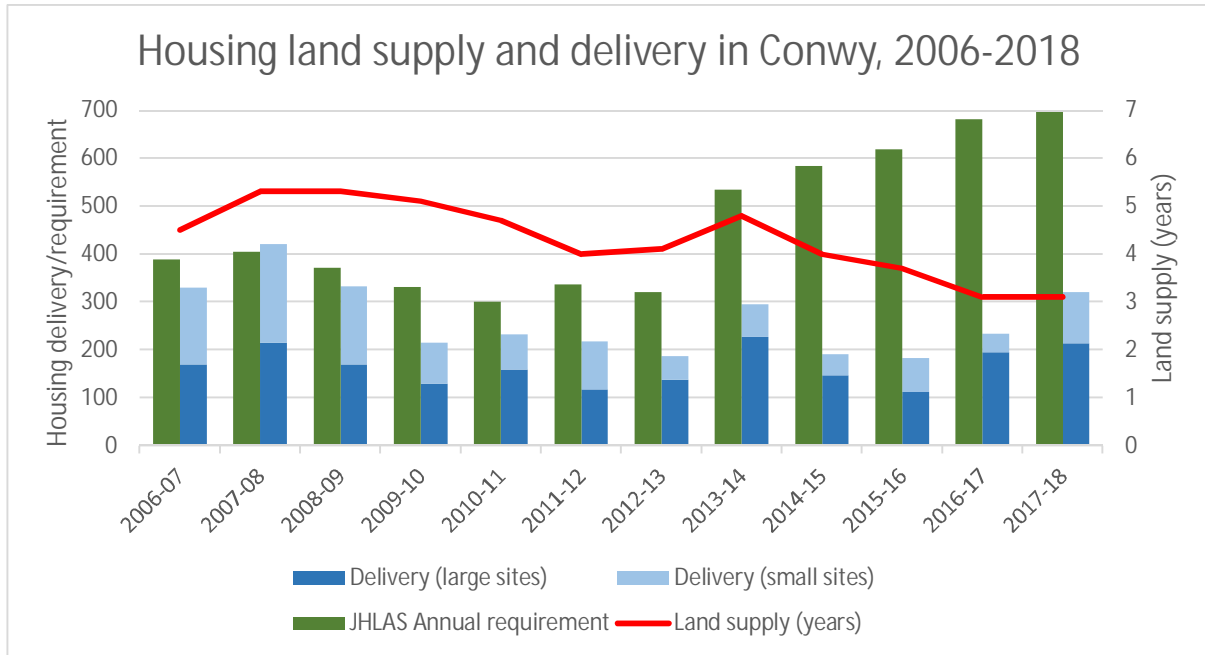
### **Local Housing Market Assessment 2016 - 2021**

The Local Housing Market Assessment (LHMA) provides robust evidence base to inform the Local Housing Strategy (LHS) and the Local Development Plan (LDP) in Conwy. The LHMA assesses current and future housing need within Conwy and sets out the need for additional affordable housing in Conwy over the next five years (2016-2021), it also informs the provision of market housing in terms of the size and type to ensure there is an appropriate mix of housing on offer.

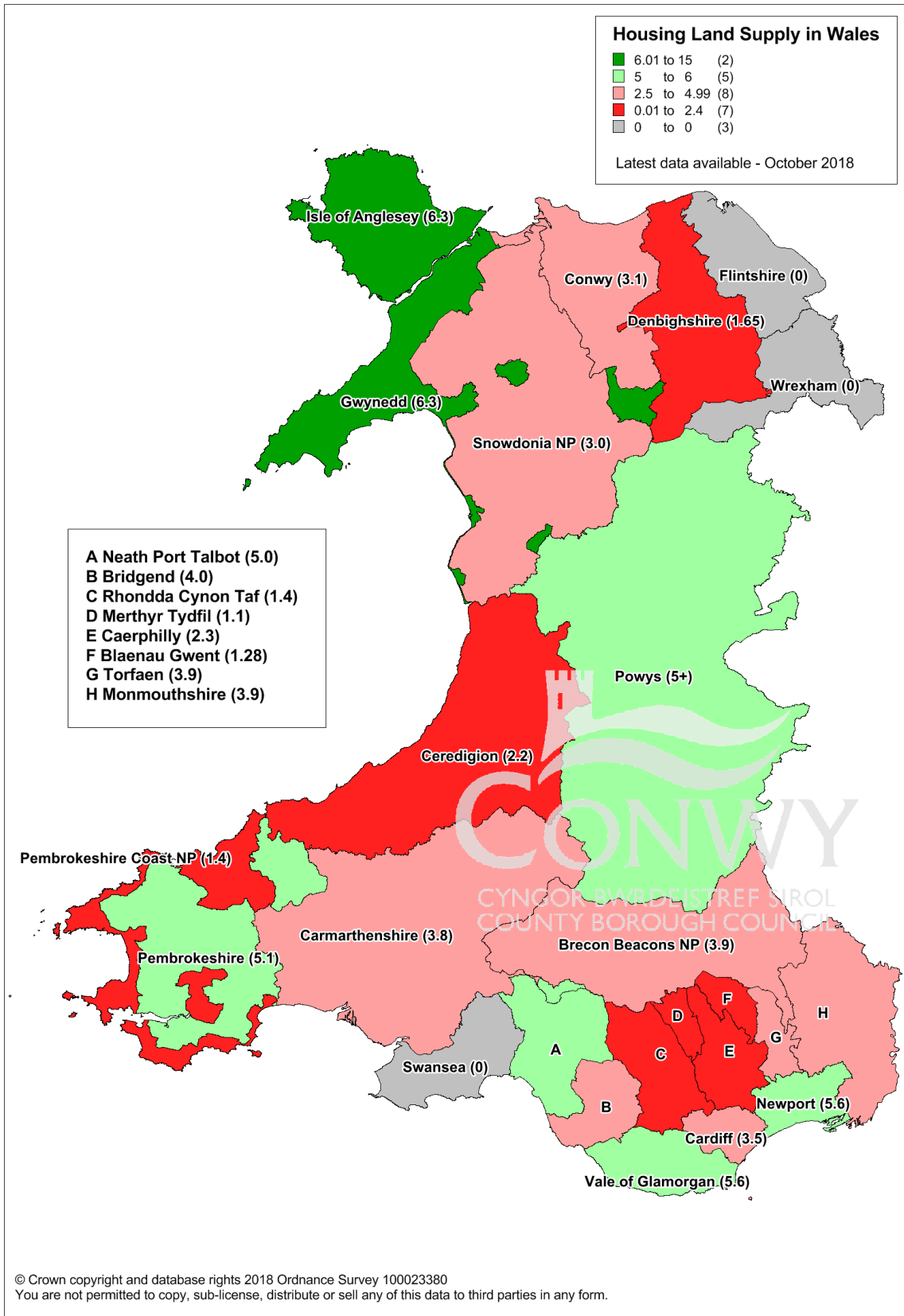
Population projections for Conwy indicate that the total population will grow marginally over the next five years. Changes in the population will create new housing need in addition to the backlog of housing need across Conwy which is still unmet. However, the additional housing need in Conwy will mainly come from the formation of new households within the existing population. This new housing need adds to the existing pressure on the housing market.

## Joint Housing Land Availability Study

The 2018 JHLAS has now been published, which demonstrates that Conwy again has a 3.1 years supply. This represents a shortfall of 1357 dwellings. Meeting the LDP housing target requires 699 dwellings to be built each year over the next 5 years. Whilst there has been an encouraging rise in housing completions in 2017-18, to a total of 320 (the highest since 2008-09) it is too early to be sure whether this is a short-term blip, or an upwards trend in housing delivery. What is clear however is that the likelihood of Conwy achieving a 5 year supply prior to adoption of the RLDP is extremely low. This is a trend experienced throughout Wales as the chart and map on the following pages demonstrate.



Source: CCBC SPPS



## **Gypsy & Traveller Accommodation Assessment (GTAA)**

Under the Housing (Wales) Act 2014 Local authorities are required to assess the accommodation needs of Gypsy and Traveller families and allocate sites to meet the identified need. Where a Gypsy and Traveller Accommodation Assessment (GTAA) identifies an unmet need, a planning authority should allocate sufficient sites in their development plan to ensure that the identified pitch requirements for residential and/or transit use can be met. Planning authorities will need to demonstrate that sites are suitable and deliverable in the identified timescales. In drawing up policies planning authorities should consult providers of social housing, representatives of Gypsies and Travellers and landowners in areas likely to be appropriate for Gypsy sites.

The Council have delivered a 4-pitch residential site on the outskirts of Conwy town which is fully occupied. The 2017 GTAA identified an additional transit site need for 7 pitches. A 'call for sites' has been carried out and the private and publicly owned sites submitted are being assessed with a view to delivering the transit site as soon as practicably possible. Subject to further agreement by Cabinet, the preferred location for a transit site will then be progressed via a formal planning application and/or the formal RLDP process.

## **Placemaking**

Placemaking now forms the core of PPW and must be embraced in both plan making and development management decisions to achieve the creation of sustainable places in line with the Well-being of Future Generations Act objectives. Placemaking is a multi-dimensional approach to planning, designing and managing an areas protection and enhancement. It is about responding to the surroundings by understanding the history and development of a place, its function and most importantly its residents and their relationship with the locality. It is then about delivering change that works towards meeting its environmental, economic and social goals. It uses a local community's assets and needs as inspiration for creating good, functional places that promote people's health, happiness and well-being.

The Abergele Placemaking Plan (APP) is currently being prepared. It will be owned and delivered by the local community and once finalised will set out the issues which need tackling in Abergele with an Implementation and Monitoring plan produced to address those issues. It will be the local reference document to achieving an improved and more sustainable community.

## **4. LDP Policy – Current position**

The LDP was adopted in October 2013 and has, to date, been through the Annual Monitoring Report (AMR) process four times. The next section of this Topic Paper addresses the key findings that have arisen from the AMR's. The current LDP policies on Housing can be found at Appendix 1 for reference.

## **5. LDP AMR findings and Review Report Conclusions**

There are a number of indicators relating to the Housing Strategy where targets have been missed. For the key indicators relating to housing delivery and land supply, this is primarily due to issues in the wider economy and housing market that have led to local problems. Whilst there are small ways in which LDP policies can be used to

assist in housing delivery, e.g. providing flexibility in planning obligation requirements, producing supplementary planning guidance, conducting site viability assessments, generally speaking the issues are outside the control of the LPA and therefore failure to meet the targets does not represent a fundamental problem in the implementation of the relevant LDP Policies.

Although the main issues affecting housebuilding remain the housing market and rates of development on housing sites, deliverability issues have hit some sites. Concerns were raised by developers during the JHLAS process about the timetable for release of CCBC owned sites, as a number of these form part of the housing land supply.

Delivery of affordable housing for local need (AHLN) has been below target although not as far below as the delivery of market housing; due in part to the delivery of large schemes via Housing Associations. Exception sites have also suffered with the target having been missed here, although a number of dwellings on Exception sites are in the pipeline. The applications granted on both allocated and windfall sites are contributing to the supply of market and affordable housing across the authority, with the type and scale of development being appropriate to local needs, in accordance with the LHMA and evidence from Housing Strategy. The Affordable Housing SPG was adopted in July 2017 and this should assist with the future delivery of AHLN.

Empty homes brought back into use has once again exceeded the target of 25 per annum. Two conversions of single dwellings to HMOs having been approved on appeal during the AMR period. The SPG on HMOs has been put on hold, pending the LDP review.

Full planning permission for a permanent residential Gypsy & Traveller site was granted in April 2015, work commenced on site in November/December 2015 and was completed in September 2016. The site is now occupied. The Council undertook a joint GTAA with Denbighshire County Council (DCC) which was approved by WG in March 2017. The GTAA identifies a Transit Site need in Conwy and the Council have carried out a call for sites and all new and existing sites will now be fully assessed.

Planning applications granted and development underway in Colwyn Bay support regeneration initiatives in these areas. Additionally, a new 'Abergele Placemaking Plan' is in production – intended to use money available from various sources including S106 contributions from applications on the strategic allocation to put in place the town centre regeneration and other improvements to the natural and built environment that local residents want to see. An extensive and well received public consultation has taken place, with project prioritisation by the Project Board being the next step.

Policy	Comment
HOU/1- Meeting the housing need	Policy is not delivering as intended and intervention is required.

HOU/2 – Affordable Housing for local need	Policy is generally delivering as intended, however appeal decisions have highlighted an issue in relation to AH requirements in the open countryside, related to policy HOU/12.
HOU/3 – Phasing housing development	Policy is not delivering as intended, but is delivering sufficiently that no intervention is required.
HOU/4 – Housing density	Policy is delivering as intended.
HOU/5 – Housing mix	Policy is delivering as intended.
HOU/6 – Exception sites for affordable housing for local need	Policy is not delivering as intended, but is delivering sufficiently that no intervention is required.
HOU/7 – Council and Government owned sites in the plan area	No conclusion can be drawn at this stage
HOU/8 – Register of landholdings	No conclusion can be drawn at this stage
HOU/9 – Meeting the site need for Gypsies & Travellers	Policy is not delivering as intended, but is delivering sufficiently that no intervention is required.
HOU/10 – Houses in multiple occupation and self contained flats	Policy is not delivering as intended and intervention is required.
HOU/11 – Residential care homes and extra care housing	Policy is delivering as intended.
HOU/12 – Re-use and adaptation of redundant rural buildings for residential use	Policy is generally delivering as intended, however there are some concerns over the conflict between economic and housing priorities, with AH provision linked to HOU/2 and the evidence required to be submitted with conversion applications.

Table 1: Housing Policies requiring review (source 2018 AMR)

Overall it is concluded that certain strategy elements of the LDP are being implemented effectively with no key triggers being met at present to expedite a review in those key areas. However, the Housing Strategy is now undermined, predominantly due to external influences outside of the Council's control. The impact of TAN1 changes and in applying the residual methodology of calculation, have resulted in a housing shortfall trend from 4.0 years in 2015 down to 3.1 years in 2018. The housing land supply shortfall is a significant concern, especially when having

regard to the current population and household projections. Furthermore, the slow progress of development on allocated land raises concerns against predicted phasing plans identified in the LDP. It is clear that an increasing shortfall in housing is a trend that can only be rectified via a review.

### **LDP Evidence Base**

The following new or updated evidence base will be required to inform the RLDP.

- Growth Level and Distribution Options Paper
- Local Housing Market Assessment (including housing mix)
- Joint Housing Land Availability Study
- Population and Household Projections
- Affordable Housing Viability Study
- Capacity of the house building industry
- LDP AMR and Review
- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Scoping
- Gypsy and Traveller Accommodation Assessment
- Site Deliverability Assessment

## **6. Key Issues**

### **1. Housing delivery**

Between April 2007 and March 2018 the average completion rate for new dwellings and conversions has been around 257 units per year, and was 320 in 2017/18.

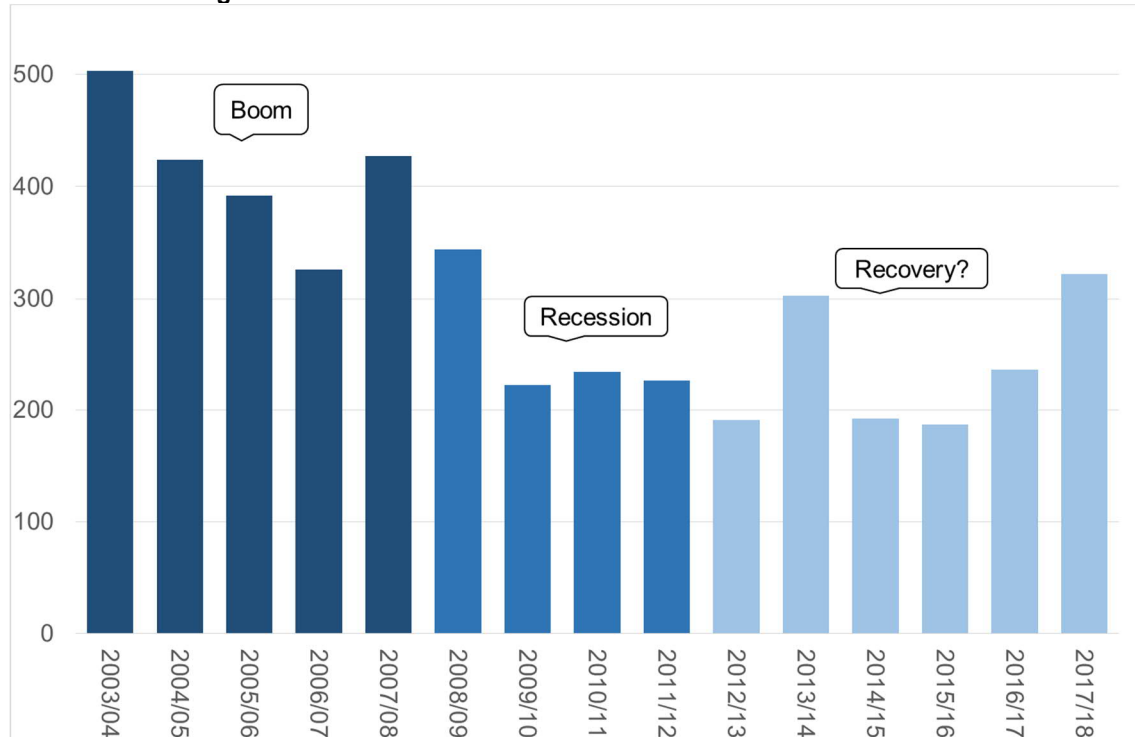
Since the economic downturn in 2007/08 there has been a general downward trend in the number of new dwellings which are built annually within the County Borough. In 2013/14 there was a significant rise in house-building activity, in part due to the completion of a number of large developments by registered social landlords. However, figures for most other years since 2008/09 were particularly low, and may not have kept pace with demand.

The number of units which are 'not yet started' has fallen significantly since 2010/11. This is due to a combination of fewer sites being submitted for planning permission, and sites with existing permissions expiring as they have not been built on during the 5 year period of their permission. Both of these reasons are by-products of the slow-down in the construction industry due to the economic down-turn.

For each year since April 2007 (the start date for the current LDP) the provision of new dwellings has fallen below the annual figure needed to reach the identified requirement of 6,800 additional dwellings by 2022. In the 11 years to April 2018 only 2,886 additional dwellings have been provided – if the requirement was shared equally across that period, that figure should be closer to 4,990. That is a shortfall of about -2,100 or -42% below target.



### New home building in CCBC



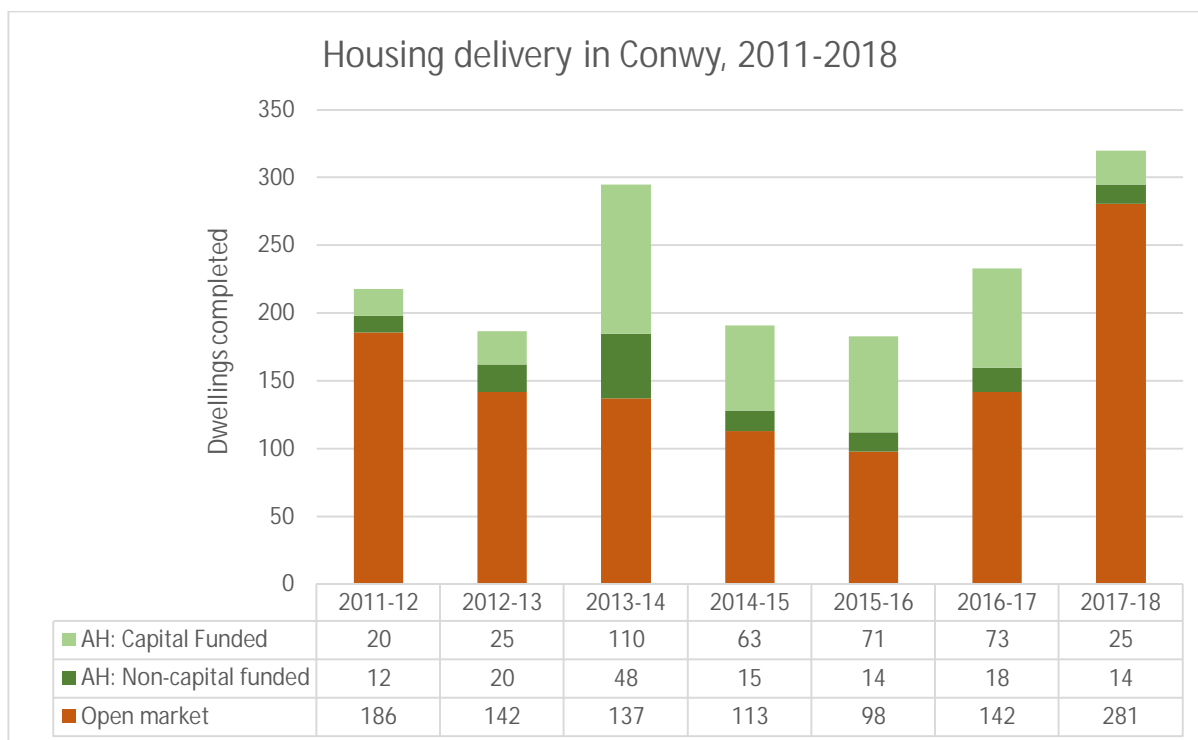
Source: CCBC JHLAS

When we compare the total housing completions, which include market housing as well as affordable, Conwy hasn't delivered on or above the current LHMA figure since before the 2008 economic crash, and certainly has never delivered the level of affordable units which are required by the LHMA. On average Conwy has delivered 78 affordable homes annually over the last 5 years, with a peak in 2013/14 due the availability of subsidy from WG to build extra care social housing.

## 2. Affordable Housing

Conwy's latest LHMA shows a need for 199 affordable housing units per year, this is due to a number of factors. Firstly the supply of affordable housing has not been sufficient to meet demands as shown below. Secondly the new SARTH social housing register has improved the level of data available in relation to social housing need, meaning that there is now a more accurate picture of current and future social housing need across Conwy.

The chart below provides a detailed breakdown of the affordable housing provision in Conwy over the last five years.



Source: CCBC SPPS

The affordable housing needs calculation looks at current and potential future affordable housing need, and calculates an annual estimate of how many households will require help to access affordable housing in addition to households who are already being helped.

It is important to note that the 'bottom line' affordable housing need figure isn't simply about the requirement to build new homes – it's about households in need. As well as providing new affordable housing, there are a variety of other ways of helping these households which don't require new building – for example through placement within existing social housing stock; the provision of supported purchase schemes such as that provided through the First Steps register; the conversion or adaptation of existing stock to better meet tenants' needs (from stock within both the social sector and the private sector) and through financial support to rent within the private sector (housing benefit). Though some households identified as being in need of help to access affordable housing will be currently without a home, most will have accommodation, albeit in inadequate housing. This does not negate the need to provide a significantly greater number of affordable housing options (particularly as housing costs continue to rise and those with lower incomes are squeezed out of market), but suggests that methods other than building new housing for social and intermediate tenure need to be employed to meet this need. This may include seeking to influence the type of housing that is built to make it more suitable to those who could potentially be housed in market housing if adequate and appropriate housing was available (for example, encouraging builders to provide more smaller dwellings or to apply 'homes for life' standards).

In line with PPW 10 recommendations planning authorities may look to identify sites for up to 100% affordable housing based on criteria reflecting local circumstances and viability 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 planning authority area, and in scale.

The housing register is a list of households who require housing. Each Local Authority has a register which is ordered in accordance with this policy. Households on the register are prioritised in bands according to need and local connection, and within bands by waiting time. Housing providers with a vacancy go to the register to see who in the greatest need has been waiting the longest. There are four priority bands each with a degree of housing need and two (Bands 1 & 2) with a local connection requirement. Eligible applicants with a local connection to the Council area to which they are applying, will be prioritised above those with no local connections. Further details can be found in CCBC's 'Common Housing Allocation Policy'. The Conwy Housing registers indicate that the vast majority of households fall within Bands 1 & 2 and the RLDP Preferred Strategy will reflect this requirement.

Any changes to Policy HOU/2 – 'Affordable Housing for Local Need' will be advised by the AH Viability Study and other new or updated evidence base informing the RLDP.

### 3. CCBC and Government owned land

LDP policy HOU/7 – 'Council and Government owned sites in the plan area' presently encourages higher levels of AHLN on Council and Government owned sites, subject to viability. Certain publicly owned sites may also be suitable for 100% AH in line with National guidance.

The disposal of local authority and other public owned land for market housing and AHLN can be subject to delays whilst moving through the political process. In order to prevent future delays such landowners will be expected to have at least an 'in principle' disposal agreement in place before the land is allocated in the LDP.

The level of AH on such sites will be informed by the AH Viability Study which in turn will dictate any changes to Policy HOU/7.

### 4. Viability

The LDP identifies that the success of its policy approach to deliver affordable housing requires not only flexibility from the LPA but also a greater awareness from landowners and developers when negotiating land purchase or option costs in the future. The LDP includes a policy assumption that land has been purchased at the right price and requires developers to complete a 'viability pro-forma' where there may be a need to deviate from policy requirements.

Recent changes to the Acceptable Cost Guidance (ACG) from WG will affect the viability and therefore delivery of affordable housing going forwards. The ACG has increased for all units, and has been split with a higher value for smaller sites of 10 and fewer dwellings than for larger sites.

This change should work to improve financial viability on sites, allowing private developers to build more affordable dwellings within housing sites, and encourage landowners to bring forward sites for affordable housing.

In contrast, changes to Building Regulations Part M have increased build costs, requiring all new dwellings, including conversions, to have fire sprinklers installed. Despite a report previously commissioned by WG which stated that sprinklers are not cost effective, the regulations have now been in force since 1st January 2016. At the time of LDP Examination, it was known that these changes to the building regulations would be taking place, but the full cost and regulatory impact of the proposals were not fully understood.

The above considerations are relevant to all developments nationally, however the impacts of these changes on viability and housing delivery will need to be considered at a local level. The Affordable Housing Viability Study is underway and will take account of these, and other relevant issues.

In order to overcome some of these issues, it is evident that there is a need for viability to be effectively incorporated into the very beginning of the plan process, in order to ensure that development plans are robust and to enable development to be delivered in line with the vision of the local authority and meet the predicted needs.

Policy HOU/2 – ‘Affordable Housing for Local Need’ amendments will be advised by the AH Viability Study and other new or updated evidence base relating to development viability.

#### 5. Houses in Multiple Occupation (HMO)

Dwellings which contain more than one household are known as houses in multiple occupation (HMOs), and cover a wide range of housing types mainly in the private rented sector, including bedsits and other types of accommodation with shared facilities. Policy HOU/10 – ‘Houses in multiple occupation and self-contained flats’ presently resists all changes of use to HMO’s. This policy evolved from amenity issues caused by poor quality and badly managed HMO accommodation in certain areas of the Authority.

The LHMA says that well managed and maintained HMOs are an important tenure choice for households on low incomes, in particular single persons under the age of 35 who typically are only eligible for housing benefit at the shared accommodation rate. Additional, mandatory licencing schemes for HMO owners have now been introduced.

In view of changes to the Town & Country Planning (Use Classes) Order 1987 (as amended), recent appeal decisions and the LHMA evidence, Policy HOU/10 requires review in consultation with Housing Strategy to fully assess the local need and control of this type of accommodation.

#### 6. Candidate site assessment

The WG LDP Manual (2015) states that;  
*‘at the plan-making stage, LPAs are not expected to be able to evidence every small site or minor issue nor will they be able to second guess major swings in the market. Nevertheless they must be able to show that schemes are likely to remain viable after applying all relevant plan policies such as affordable housing, open space, highway works etc as well as meeting other requirements... This will include checking the availability of relevant infrastructure and the implications for delivery, timetabling and site viability’*

The Manual goes on to state that, at candidate sites stage, LPAs will have *'sought information from the proponents about the site's availability, the basis on which it is being proposed and an indication that they (developers) are aware of, and have factored in, the costs of any mitigation requirements on development'*

As mentioned above viability is clearly an important consideration in all stages of the planning process, from LDP preparation through to development management. Evidencing viability and deliverability to the extent that it creates certainty is becoming more critical in order to deliver regeneration objectives, provide infrastructure and bring sites forward for development. At candidate site stage, site promoters are rarely required to provide information concerning viability, with the focus instead being on more generic deliverability issues such as land ownership or environmental / infrastructure constraints.

Achieving an allocation in the LDP results in the greatest increase in land value in the planning process and the asset value of the land substantially increases. Therefore, getting a site allocated can be the key driver for the site owner, rather than housing delivery itself, leading to reluctance to identify issues affecting viability at this early stage.

To address this, CCBC will require site promoters/landowners to submit viability appraisals based on methodology and requirements identified by the LPA as part of a phased candidate site assessment process of the RLDP. Background Paper (BP) 06 – 'Site Delivery Assessment' will undertake a full assessment of all 'candidate sites' submitted to identify the most suitable and deliverable sites for inclusion in the RLDP.

## 7. De-allocation

The Conwy LDP includes allocated sites for which there is uncertainty over when they may come forward, and in some instances whether they will be realistically able to be delivered during the Plan period. The reasons for this uncertainty are varied, and may include:

- Landowner intentions;
- Publicly owned land (including local authority and WG) for which there is no disposal strategy or for which disposal is likely to be outside of a five year period;
- Sites that have been 'rolled over' from Unitary Development Plans; and
- Sites that are included for their wider regenerative role, but which are likely to be complex and costly in terms of bringing forward

WG's 'Longitudinal Viability Study of the Planning Process' says that local planning authorities should make greater use of de-allocation as a means to restrict allocated sites to those likely to come forward for development within the Plan period. As part of the RLDP process the Authority should be prepared to remove long standing site allocations that are not realistically deliverable. Consideration will be given to the inclusion of a de-allocation policy in the RLDP.

## 8. Flood Risk and De-risking Development

Whilst the precautionary principle and approach to development in flood risk areas is still overriding, PPW 10 now includes flood risk in its definition of 'de-risking development' and there is further recognition of the role that naturalistic flood defence can play. Further policy strengthening of de-risking development would enable technically unconstrained, suitable sites to come forward providing regeneration benefits in areas that were previously sterilised and enabling natural growth of such communities.

To assist Growth Distribution Options, further evidence work is underway to assess flood risk and the potential to deliver innovative design solutions to accommodate housing growth to the East of the County Borough. This work will inform the Preferred Strategy which will be subject to community consultation in July 2019.

## 9. Speculative development

TAN 1 currently says that, where local planning authorities have a less than 5-year housing land supply, considerable weight should be given to the need to increase supply subject to compliance with other policies and guidance. Therefore, the Council, with a 3.1 year supply, is liable to receive speculative planning applications for housing and there have been a small number of controversial speculative applications received and determined since the TAN 1 changes. The Council produced a 'Speculative Housing Development Proposals' guidance note in 2015 in an attempt to control such applications.

However, to alleviate some of the immediate pressures on local planning authorities when dealing with speculative planning applications for housing and to allow them the capacity to focus on LDP preparation and review, WG have recently undertaken a consultation on whether to dis-apply paragraph 6.2 of TAN1 for the duration of a wide-ranging review of the delivery of housing through the planning system which WG propose to undertake this summer.

The Council have responded to the consultation in support of the dis-application and the results of this are now awaited. Further details of the WG housing delivery review are not yet available, so at this time it is not known what impact this may have on the RLDP and housing requirements. It is interesting to note that Conwy's speculative applications are showing as viable and this evidence will inform the Affordable Housing Viability Study work. A new policy to cover some of the points included in the Speculative Housing Development Proposals Guidance Note may be beneficial. This would allow the Council to better manage housing delivery in the future should the land supply again fall below 5 years after adoption of the RLDP.

## 10. Housing Mix

Policy HOU/5 says that development proposals should reflect the requirements for tenure, house types and sizes as set out in the LHMA and Conwy's AH registers, unless proven otherwise. The housing mix in the LHMA is identified by analysing the current and projected household sizes in Conwy and new residential developments should consider an appropriate mix of housing types in order to cater sustainably for current and future housing needs. Where a developer proposes an alternative mix of housing sizes a robust evidence base must support the need for the deviation. The affordable housing units on site must also contain an appropriate mix of unit sizes to be agreed with the Local Housing Authority. The Affordable Housing SPG also

highlights the need for new developments to provide an appropriate and well-integrated mix of housing types and tenures.

It is considered that Policy HOU/5, linked to the LHMA requirements, is working effectively.

## 11. Rural Housing

It is widely acknowledged that development in the countryside should be located within and adjoining established settlements to avoid unacceptable landscape, character and habitat impacts. In rural areas the majority of new developments should be located in those settlements which have relatively good accessibility by non-car modes and availability of services. Placemaking in rural areas is encouraged and such development should incorporate the placemaking outcomes.

The LDP Rural Development Strategy Area promotes a sustainable rural economy and aims to contribute to the provision of AHLN in the main villages, minor villages and hamlets. Policies HOU/1, HOU/2, HOU/6, HOU/12 all aim to assist with rural housing needs whilst at the same time conserving the natural and built character. Low market value areas and difficulties obtaining finance for affordable housing have been two of the issues restricting the delivery of rural housing. Further efforts will need to be made in consultation with Housing Strategy to identify whether the RLDP can better support delivery of Exception sites. This may, in turn, result in additional or revised RLDP policies.

## 7. Proposed amended and new policies

Taking into account the issues detailed above, it is proposed that the following policies will need amending as part of the LDP Review:

Policy	Comment
HOU/1- Meeting the housing need	Issues with the delivery and distribution of new housing will be addressed. This policy will be dependent on the preferred spatial strategy chosen.
HOU/2 – Affordable Housing for local need	Under-delivery of AH has mainly been due to stubbornly low rates of housing completions throughout the region, and not due to particular issues with the policy. Nevertheless, it will need to be revised, particularly in relation to AH delivery in the open countryside and to take into account of the results of the Viability Study.
HOU/6 – Exception sites for affordable housing for local need	Very few Affordable Housing Exception sites have come forward over the Plan Period. This is considered to be more due to issues in applicants gaining finance than with the policy, however efforts will need to be made in consultation with Housing Strategy to identify whether the RLDP can better support delivery of Exception sites.
HOU/9 – Meeting the site need for Gypsies & Travellers	The requirements of this policy are on-going in line with the findings of the Gypsy & Traveller Accommodation Assessment (GTAA). The policy is considered to be generally acceptable subject to some minor alterations.
HOU/10 – Houses in multiple occupation and self contained flats	Policy will need to be amended to take into account changes to the Use Classes Order and the need for small HMO units to meet some housing needs.
HOU/12 – Re-use and adaptation of redundant rural buildings for residential use	Recent appeal decisions have highlighted the need to review the criteria included in this policy, particularly in relation to the provision of AHLN in this policy. Consideration should also be given to merging policies EMP/6 and HOU/12 to provide a single set of criteria to all rural conversions.



In addition, new policies may be required to cover the following issues:

<b>Theme</b>	<b>Justification</b>
De-allocation of sites	To address the issue of allocated sites not coming forward, this policy could include a mechanism to de-allocate sites when it becomes clear that they are unlikely to contribute to the land supply during the Plan Period.
Housing land supply shortfall	To provide a clear approach to dealing with a shortfall in the housing land supply. This could include criteria against which applications for speculative development would be assessed.
Financial viability	To set out clearly how financial viability of sites will be addressed. It would set out the responsibilities of both developers and landowners if they wish to bring forward sites, and make it clear contributions will only be reduced in exceptional circumstances.
Sites for high level AH provision	One option for increasing AH delivery would be to allocate sites for high level AH based on proportionate land values in line with ACGs.

## **8. Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA)**

The Sustainability Appraisal Scoping Report outlines the proposed approach to the RLDP's Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), to ensure that it meets social, economic and environmental objectives. The SA/SEA is an important process in identifying areas of change and mitigation measures to ensure the RLDP is sustainable and in compliance with the Planning (Wales) Act and the Well-being of Future Generations Act.

In relation to housing the proposed SA objective is to;

*'Provide a sufficient quantum and range of good quality and affordable housing in sustainable locations to meet identified needs.'*

The SA Framework will include objectives relating to socio-economic issues including housing and adequate provision to meet identified needs, both in terms of the availability and quality of the housing stock. The RLDP will be of particular importance in determining the acceptability, including in environmental terms, of the proposed location, nature, size and operating conditions of all new development proposals.

## **9. Conclusion**

Delivery of housing, both market and affordable, has been the main issue since adoption of the LDP, as annual housebuilding has consistently fallen below targets. This has been highlighted in JHLAS reports and AMRs over several years and has been caused by a combination of factors including the national economy and local factors such as house building capacity and land disposal. Whilst not directly due to the LDP policies themselves, the site assessment process and site allocations selected for the RLDP will need to address this issue, to give certainty over delivery

of sites. In addition, CCBC should consider a range of ideas and more innovative approaches to the provision of affordable housing.

This Housing Topic Paper seeks to establish the key issues to be addressed and the evidence required early in the RLDP process but as the Plan will take at least three years before adoption new evidence and issues may arise. Based on the current evidence available it is considered that the proposed new and amended policies would provide a more robust approach to delivering CCBC's housing strategy. A key stakeholder group will regularly review the evidence base to identify key strategic changes to policy objectives and evidence and then recommend updates to the background papers.

## Appendix 1: Existing LDP Policies

### STRATEGIC POLICY HOU/1 – MEETING THE HOUSING NEED

1. Over the period 2007 to 2022 the Council will plan, monitor and manage the delivery of approximately 6,520 new dwellings (at an average annual rate of 478 new dwellings) inclusive of completions, commitments, windfall and new allocations and a contingency level of up to approximately 7,170 dwellings.

- a) Priority will be given to locating new development in line with Strategic Policy DP/1 – ‘Sustainable Development Principles’ and the settlement hierarchy set out in Policy DP/2 – ‘Overarching Strategic Approach’. Approximately 85% (5,542 dwellings) of the housing development will be located within the accessible **Urban Development Strategy Area** and distributed as set out below and in Table HOU1a:

#### Housing Allocations

##### URBAN DEVELOPMENT STRATEGY AREA

Settlement	Site	Housing Allocation
Abergele	Abergele Business Park	200 Dwellings
Abergele	Rhuddlan Road/Tandderwen Farm	600 Dwellings
Colwyn Bay	Lawson Road	35 Dwellings
Colwyn Bay	BT Exchange	70 Dwellings
Colwyn Bay	Glyn Farm	39 Dwellings
Old Colwyn	Ty Mawr	255 Dwellings
Old Colwyn	Ysgol y Graig	30 Dwellings
Rhos on Sea	Dinerth Road	65 Dwellings
Rhos on Sea	Dinerth Hall Farm	80 Dwellings
Llandudno		
Junction	Esgyryn	120 Dwellings
Llandudno		
Junction	Social Club/Youth Club	40 Dwellings
Llandudno		
Junction	Woodland	75 Dwellings
Llandudno	Plas yn Dre	40 Dwellings
Penrhyn Bay	Plas Penrhyn	30 Dwellings
Llanfairfechan	West Coast Building	10 Dwellings
Llanfairfechan	Adjacent to Glanafon	15 Dwellings
Llanfairfechan	Dexter Products	15 Dwellings
Llanrwst	Bryn Hyfryd/Ffordd Tan yr Ysgol	40 Dwellings
Llanrwst	Site A North of Llanrwst	50 Dwellings
Llanrwst	Site E adj to Bryn Hyfryd	50 Dwellings
Llanrwst	Site D East of Llanrwst	60 Dwellings

**Total UDSA Allocations****1919 Dwellings**

Outside the urban settlement boundaries, no further housing development will be permitted, except to meet AHLN on exception sites adjoining Llanrwst in line with Policies HOU/2 – ‘Affordable Housing for Local Need’ and HOU/6 – ‘Exception Sites for Affordable Housing for Local Need’. Development proposals within settlement boundaries on unallocated sites will be assessed against other policies in the Plan;

- b) In the Main Villages, the scale of proposed future development will reflect the settlement’s size and function and their physical and functional relationships with the urban areas. Over the Plan period, approximately 15% (978 dwellings) of the housing requirement will be accommodated mainly within the Tier 1 and Tier 2 Main Villages and distributed as follows:

**Housing Allocations****RURAL DEVELOPMENT STRATEGY AREA**

<b>Settlement</b>	<b>Site</b>	<b>Housing Allocation</b>
<b>Tier 1 Main Villages</b>		
Dwygyfylchi	Off Ysguborwen Road	15 Dwellings
Dwygyfylchi	North of Groesffordd	30 Dwellings
Glan Conwy	Top Llan Road	80 Dwellings
Llanddulas	South of the Mill	20 Dwellings
Llanddulas	Pencoed Road	20 Dwellings
Llysfaen	Adjacent to former rectory	30 Dwellings
Llysfaen	Adjoining Ysgol Cynfran	40 Dwellings
<b>Tier 2 Main Villages</b>		
Betws yn Rhos	Ffordd Llanelwy	10 Dwellings
Betws yn Rhos	Minafon	10 Dwellings
Cerrigydrudion	Land fronting B5105	20 Dwellings
Dolgarrog	Tan y Ffordd	15 Dwellings
Dolgarrog	Aluminium works	30 Dwellings
Eglwysbach	Off Heol Martin	10 Dwellings
Llanfair TH	The Smithy	25 Dwellings
Llangernyw	Coed Digain	25 Dwellings
Llansannan	North of Llansannan	25 Dwellings
<b>Total RDSA Allocations</b>		<b>405 dwellings</b>

The Tier 1 Main Villages will accommodate an element of market and AHLN and the Tier 2 Main Villages will seek to achieve 100% AHLN subject to viability. Outside the settlement boundaries only justified small-scale schemes (up to 5 dwellings) providing 100% AHLN on exception sites at the edge of the

settlements, or where it represents a Rural Enterprise Scheme or a Low Impact Development, will be permitted in line with Policies DP/6 – ‘National Planning Policy and Guidance’, HOU/2 – ‘Affordable Housing for Local Need’ and HOU/6 – ‘Exception Sites for Affordable Housing for Local Need’;

- c) In the Minor Villages, only limited development will be permitted to reflect viability, sustainability and the character of settlements. Over the Plan period, no housing allocations or settlement boundaries are required. Only small scale development seeking to achieve 100% AHLN proposals may be supported within the confinements of the settlement where it comprises redevelopment, conversion of existing buildings or where single or small groups of new dwelling estates (up to 5 dwellings) represent a form of infilling and relates physically and visually to the settlement. At the edge of minor settlements, only justified small-scale schemes (up to 3 dwellings) providing 100% AHLN, or where it represents a Rural Enterprise Scheme or a Low Impact Development, will be permitted in line with Policies DP/6, HOU/2 and HOU/6;
- d) In Hamlets and in the open countryside, housing development will only be permitted in exceptional circumstances. A single dwelling may be supported within, or at the edge of, the settlement or where this represents a conversion of a non-residential building in the open countryside, and where it is justified to meet AHLN or a Rural Enterprise and/or Low Impact Development on a case by case basis, in accordance with Policies DP/6, HOU/2 and HOU/6;
- e) The following sites are identified as contingency sites to be held in reserve but which can be released for development on a managed basis if the allocated housing sites in the Plan do not come forward for development as anticipated in the Plan:

### Contingency Sites

Settlement	Site	Dwellings
Abergele	Llanfair Road	100 Dwellings
Colwyn Bay	Glyn Farm	27 Dwellings
Old Colwyn	Llysfaen Road	20 Dwellings
Conwy	Henryd Road, Gyffin	10 Dwellings
Llandudno	Nant y Gamar Road	60 dwellings
Penrhyn Bay	Off Derwen Lane	175 Dwellings
Penmaenmawr	Conwy Road	15 Dwellings
Llanfairfechan	West of Penmaen Park	45 Dwellings
Llanrwst	Site C North East of Llanrwst	70 Dwellings
	<b>Contingency Total</b>	<b>522 Dwellings</b>

### Basis for release of Contingency Sites

If, following adoption of the LDP, the Joint Housing Land Availability Study (JHLAS) indicates that the Council is unable to achieve a five year housing land supply, the

Council will release a site (or sites) from the list of contingency sites, in order to increase the housing land supply. The release of contingency sites will be based on the following criteria:

- i) The location of the site within the Spatial Strategy, with priority being given to the release of a site in the same area where a shortfall in the land supply has been identified, and;
  - ii) The ranking of the site within BP/21, with priority being given to releasing the highest ranking contingency sites.
2. The Council will give priority to housing on previously developed land over the Plan period by phasing development in line with Policy HOU/3 – ‘Phasing Housing Development’, the Housing Delivery and Phasing Plan and table HOU/1b. Through the plan, monitor and manage approach, housing contingency sites will be released accordingly in line with the Monitoring Plan and the Annual Monitoring Report
  3. The Council will ensure that housing developments make the best and most efficient use of land by achieving a broad mix of housing types at an appropriate density which reflects the diverse needs of the residents in line with Policies HOU/4 – ‘Housing Density’ and HOU/5 – ‘Housing Mix’.
  4. The Council will address the need for gypsies and travellers in line with Policy HOU/9 – ‘Meeting the Site Need for Gypsies and Travellers’.
  5. The Council will control the development of self contained flats and Houses in Multiple Occupation to aid regeneration, improve housing quality and choice, and contribute to an enhanced environment in line with Policy HOU/10 – ‘Houses in Multiple Occupation and Self Contained Flats’.
  6. The Council will accommodate the housing needs for the elderly in line with Policy HOU/11 – ‘Residential Care Homes and Extra Care Housing’.
  7. The Council will control the conversion of rural buildings to residential in line with Policy HOU/12 – ‘Re-Use And Adaptation Of Redundant Rural Buildings For Residential Use’.

## **POLICY HOU/2 – AFFORDABLE HOUSING FOR LOCAL NEED**

1. The Council will require the provision of AHLN in new housing development as identified in The Local Housing Market Assessment and the Conwy Affordable Housing and First Steps Registers. The delivery of AHLN will be guided by Table HOU2a, the Housing Delivery and Phasing Plan and the following hierarchy:

- Giving AHLN provision a high priority through negotiating with developers to include AHLN on-site in all housing developments within the settlement boundaries of the Urban Development Strategy Area and Tier 1 Main Villages, according to the following distribution:
 

Llandudno and Penrhyn Bay, Rhos on Sea	35%
Conwy, Llandudno Junction, Glan Conwy, Llanrwst	30%
Llanfairfechan, Penmaenmawr, Colwyn Bay, Dwygyfylchi, Llanddulas & Llysfaen	20%
Abergele, Towyn and Kinmel Bay	10%
- A lower provision may be acceptable where it can be clearly demonstrated and supported by the submission of evidence including completion of a Viability Assessment Pro-Forma. Off-site provision or commuted payments will be acceptable for development proposals consisting of 3 or less dwellings, and may be acceptable for proposals consisting of 4 or more dwellings provided there is sufficient justification. It is expected that the AHLN units will be provided without subsidy.
- At the edges of the Urban Development Strategy Areas, development will not be permitted outside the settlement boundaries, apart from exception sites providing 100% AHLN adjoining Llanrwst.
- Windfall sites in Tier 1 Main Villages will reflect levels of need and consist of no more than 10 dwellings.
- Within the Tier 2 Main Villages, the Council will seek to achieve 100% AHLN on allocated and windfall sites within the settlement boundaries. Market dwellings may be permitted in exceptional circumstances on allocated and windfall sites where it is essential to assist the on-site delivery of affordable housing and where supported by the completion of a Viability Assessment Pro-Forma. Windfall sites will reflect levels of need and consist of no more than 10 dwellings.
- Outside Tier 1 and Tier 2 Main Village settlement boundaries, as an exception, small scale 100% AHLN will be acceptable on the edge of settlements up to 5 dwellings, giving first priority to Previously Developed Land, to encourage the creation of sustainable communities in line with Policies DP/2 – ‘Overarching Strategic Approach’, and HOU/6 – ‘Exception Sites for Affordable Housing for Local Need’.
- Within the Minor Villages, the Council will seek to achieve 100% AHLN only through single and small scale developments within the confinements of the settlement and where proposals represent a form of infilling and relate physically and visually to the settlement. Market dwellings may be permitted on such windfall

sites in exceptional circumstances where it is essential to assist the on-site delivery of affordable housing and where supported by the completion of a Viability Assessment Pro-Forma. Windfall sites will reflect levels of need and character of the settlement and consist of no more than 5 dwellings.

- At the edge of Minor Villages, only justified small-scale schemes (up to 3 dwelling) providing 100% AHLN, or where it represents a Rural Enterprise Scheme or a Low Impact Development, will be permitted in line with Policies DP/6 and HOU/6.
  - Within Hamlets, development will only be permitted in exceptional circumstances to provide an individual single justified AHLN dwelling in an acceptable and sustainable location in line with Policy HOU/6.
  - Within the open countryside, AHLN will be guided in line with Policy DP/6.
2. All developments will be required to achieve an appropriate mix in terms of housing types and house sizes of AHLN within a development, determined by local circumstances at the time of the submission of a development proposal in line with Policy HOU/4.
  3. AHLN units should be fully integrated within a development and indistinguishable from non-affordable housing in line with Policy DP/3.
  4. The Council will seek to achieve higher levels of AHLN on Council owned sites in line with Policy HOU/7.
  5. The Strategic Planning Policy Service will seek to establish a Plan Area-wide register of land holdings in public ownership for AHLN, in line with Policy HOU/8.

### **POLICY HOU/3 – PHASING HOUSING DEVELOPMENT**

Housing allocations will be released in line with the Phasing Plan as set out in the Implementation and Monitoring Framework.

### **POLICY HOU/4 – HOUSING DENSITY**

1. Residential developments should make the best use of land. The Council will seek a density of 30 dwellings per hectare on allocated sites and large windfall sites (10 dwellings and above).
2. Higher densities of up to 50 dwellings per hectare will be sought where it represents a sustainable use of land and buildings and does not result in an unacceptable impact. Higher density schemes which result in a negative residual value and lower affordable housing provision will be discouraged.



3. Lower densities below 30 dwellings per hectare may be acceptable in circumstances where natural and/or built environment and infrastructure constraints impact on site layout.

#### **POLICY HOU/5 – HOUSING MIX**

Development proposals should reflect the requirements for tenure, house types and sizes as set out in the Local Housing Market Assessment and the Conwy Affordable Housing and First Steps Registers, unless it can be demonstrated by evidence that the local circumstances of the particular settlement or location suggests a different mix of housing which would better meet the local needs. A proposed mix of dwellings which results in a negative residual value and lower affordable housing provision will be discouraged.

#### **POLICY HOU/6 – EXCEPTION SITES FOR AFFORDABLE HOUSING FOR LOCAL NEED**

Housing schemes providing 100% AHLN may be permitted as an exception to normal policy circumstances in line with Strategic Policy HOU/1 and Policy HOU/2 and providing the following criteria are met:

- a) The general local need for affordable dwellings has been proven;
- b) There are no allocated sites coming forward within the development boundaries or confinements of the settlement which could meet this need;
- c) The proposal adjoins and forms a logical extension to the development boundary or adjoins the existing settlement;
- d) Secure arrangements are provided to restrict the occupation of an affordable house/houses on first occupation and in perpetuity to those who can prove general local need for an affordable house;
- e) The number, size, type and tenure of the dwellings meet the justified local need as set out in the local housing needs survey in line with Policy HOU/5;
- f) The AHLN units are of high quality, built to the Welsh Government's Development Quality Requirements – Design Standards and Guidance 2005 in line with Policy HOU/2, Strategic Policy NTE/1 – 'The Natural Environment' and The Code for Sustainable Homes;
- g) The development proposal meets the requirements set out in the Development Principles and other related policies of the Plan.

#### **POLICY HOU/7 – COUNCIL AND GOVERNMENT OWNED SITES IN THE PLAN AREA**

The Council will seek to achieve higher levels of AHLN on Council and Government owned

sites greater than the standard for private sites, where viable, in line with Policy HOU/2 and as shown in Table HOU2b and the Housing Delivery and Phasing Plan.

### **POLICY HOU/8 – REGISTER OF LANDHOLDINGS**

The Strategic Planning Policy Service will seek to establish in partnership with the Conwy Housing Service, the Snowdonia National Park and other public agencies, a County Borough-wide register of landholdings in public ownership for AHLN.

### **POLICY HOU/9 – MEETING THE SITE NEED FOR GYPSIES AND TRAVELLERS**

1. Where a need is identified for a gypsy and traveller caravan site, proposals will be permitted provided all of the following criteria are met:
  - a) The site must be suitable for this type of use with a realistic likelihood that the site can be developed during the Plan period;
  - b) Previously developed land, or vacant land, on the edge of urban areas will be considered before sites in rural locations. Sites in rural or semi rural settings may also be acceptable provided they respect the scale of nearby communities and do not place an undue burden on local infrastructure;
  - c) A site allocated for other uses will only be released as an exception where a local housing needs assessment has established a need for a gypsy or traveller site, the need cannot be met in any other way and the scale of development does not exceed the level of need identified;
  - d) The site is accessible to shops, schools and health facilities by public transport, on foot or by cycle;
  - e) There is good access to the main transport network and the proposed development will not cause traffic congestion and highway safety problems;
  - f) The site is already appropriately screened or capable of being adequately screened and landscaped;
  - g) The site will have adequate on-site services for water supply, power, drainage, sewage disposal and waste disposal facilities;
  - h) The proposal would not be detrimental to the amenity of adjacent occupiers.
2. Based on the need identified in the Gypsy and Traveller Accommodation Needs Assessment (GTANA) the Council will identify and seek to obtain planning permission for suitable sites by September 2014.

### **POLICY HOU/10 – HOUSES IN MULTIPLE OCCUPATION AND SELF CONTAINED FLATS**

1. The Council will control the development of Houses in Multiple Occupation to aid regeneration, improve housing quality and choice, and contribute to an enhanced environment within the Plan Area. This will be achieved by resisting all proposals to create Houses in Multiple Occupation.

2. The sub-division of residential properties within the Urban Development Strategy Area to self contained flats will be permitted provided that:

- a) The scheme of conversion and change of use does not create a House in Multiple Occupation;
- b) Where appropriate, the development complies with the Development Principles, the Council's Parking Standards and all self contained flats are designed to a high quality in line with the Welsh Government's Development Quality Requirements – Design Standards and Guidance 2005 which includes space and Lifetime Home standards and the minimum standards to be met in relation to the Code for Sustainable Homes;
- c) The level of resident activity and traffic generated would not seriously impact upon the privacy and the amenity of occupants of neighbouring properties;
- d) The Development is supported by an identified need set out in the Local Housing Market Assessment (Phase 2).

#### **POLICY HOU/11 – RESIDENTIAL CARE HOMES AND EXTRA CARE HOUSING**

Within the Plan Area proposals for residential care homes or extra care homes will only be permitted where all the following criteria are satisfied:

- a) The new care accommodation is located either within the settlement boundaries identified in the Urban Development Strategy Area or a Tier 1 Main Village;
- b) On the advice of the Council's Social Service and/or Housing Strategy and taking into account the extent of existing private and local health authority establishments the proposal will not result in the over provision of care accommodation compared to the needs of the locality;
- c) The new care accommodation can be adequately serviced;
- d) It is located within reasonable walking distance of a town or village centre.

#### **POLICY HOU/12 – RE-USE AND ADAPTATION OF REDUNDANT RURAL BUILDINGS FOR RESIDENTIAL USE**

1. The conversion and re-use of suitably constructed buildings of merit in the rural area for permanent residential purposes will be supported provided that:-

- a) It can be demonstrated that there is no significant demand to accommodate business, tourism, sport and/or recreation uses to secure the retention of the building, and;
- b) The proposed development seeks to contribute to Affordable Housing for Local Need in line with Policy HOU/2, and;

- c) The existing building is structurally sound and suitable for conversion or is capable of being made so without substantial major external alteration or reconstruction, and;
  - d) The building is worthy of retention due its appearance, historic, architectural or landscape value, and that the scheme of conversion retains the identified important features, and;
  - e) Safe access for pedestrians and vehicles can be provided without prejudicing the character and appearance of the area, and;
  - f) The proposal represents a sustainable development in terms of the location and construction, and;
  - g) Any ancillary works associated with the conversion will not unacceptably adversely affect the rural character of the locality.
2. Development proposals for residential conversions which represent a subordinate part of a scheme for business re-use will be determined in line with Policy DP/6 – ‘National Planning Policy’.

## Appendix 2: Tables from Planning Policy Wales 9<sup>th</sup> Edition

Spatial policies that the RLDP may address:

Paragraph	Policy Issue
9.1.2	Housing in locations accessible to walking, cycling and public transport
9.2.3-9.2.5, 9.2.24	Settlement strategy and housing requirements
9.2.7	New settlements
9.2.8-9.2.9	Housing allocation search sequence
9.2.11	Housing on vacant urban land
9.2.21	Gypsy sites
9.2.22	Housing choice in rural areas, infilling

Topic based policies that the RLDP may address:

Paragraph	Policy Issue
9.2.13	Tandem development
9.2.22, 9.3.6	Housing in open countryside
9.3.1	Integration of new housing with existing settlement pattern
9.3.2-9.3.4	Infill development
9.3.2	Expansion of small towns and villages
9.3.2	Housing in the vicinity of industrial uses
9.3.5	Affordable housing as a material consideration
9.3.6-9.3.10	Rural enterprise dwellings
9.3.11-9.3.12	One planet development