

<p>HS7/AP3 – PCNPA to amend the reasoned justification of Policy 49: to explain the scale and type of affordable housing need in the NPA; how it will be met over the Plan period; add a reference to the emerging Affordable Housing SPG; outline the mechanisms for the management of commuted sums; and provide a cross reference Policy 53.</p>	<p>16th August 2019</p>	<p>MD</p>	
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Please see edits highlighted in green.

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New para: The requirement for affordable housing in that LHMA (2014) stated an annual need for 1450 affordable rented properties for the 5 years to 2019 and 289 affordable dwellings to purchase over the same period across Pembrokeshire. The need in the National Park area has been extrapolated to cover 5 years of plan period showing a total 5 year need of 1,850 affordable housing units as shown in Table 3 of the Local Development Plan.

New para: The majority of a affordable rented need identified in the Local Housing Market Assessment, and supported by regular reviews of the Combined Housing Register, is for one bedroom units (80%), with the remainder spread across two, three, four and five bedroom properties. This is because of a general lack of provision of one bedroom units across the county due to historical development. The provision of one bedroom units would therefore need to be the primary consideration on smaller sites. However it would not be appropriate to deliver this level of one bedroom units (80%) on larger affordable housing sites where a mixed community would be the aim. This is taken into consideration when new social housing developments are delivered by Registered Social Landlords.

New para: Affordable rented units account for over 83% of need identified in the LHMA, with the remainder showing a need for Low Cost Home Ownership (or similar scheme). The requirement for affordable homes to purchase needs to take into consideration the availability of support for the purchase of properties at affordable levels, through schemes such as Homebuy, Rent to Own and Shared Ownership.

4.291 The affordable housing target will not meet the need set out in the Local Housing Market Assessment. This is because the need forecast is greater than housing land supply can deliver. The approach to affordable housing delivery is to:

- Use market housing to cross-subsidise affordable housing delivery – see Policy 49.
- Prioritise the delivery of affordable housing over other land uses for example by not allowing new build self-catering in the countryside. Brownfield provision of self-catering is permitted in Centres and the countryside but only where there the site or building is unsuitable for market or affordable housing – see Policy 41. Also, when

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finding new uses for community facilities and employment sites that are no longer required uses beneficial to the community (including affordable housing delivery) are prioritised – see Policy 45 and Policy 53. Priority is also given to securing affordable housing through S106 agreement negotiations (see Policy 53).

- c) Use new or replacement conditions on rural enterprise dwellings which will mean some limited opportunities may become available for affordable housing.

New para: The Authority will prepare supplementary planning guidance on affordable housing provision

New Paragraph: A target of 250 affordable housing dwellings is identified for delivery over the Plan period taking account of the need for flexibility as per market housing provision and the need to negotiate proposals on a site by site basis. Policy 53 c) (note now separate policy) provides further advice on prioritising affordable housing when negotiating planning obligations.

Table 9 Percentage of Affordable Housing for Housing Submarket Areas

4.292 Affordable housing contributions are managed by Pembrokeshire County Council as the housing authority. The Authority's Supplementary Planning Guidance will prescribe the local area within which such funds should be spent. The contributions fund a variety of proposals. The County Council has prepared a framework for spending contributions.¹⁶⁴

4.293 In order for sites to be considered as exceptions sites a need for affordable housing must be shown and there must be a mechanism for making sure the properties remain affordable in perpetuity. In the case of Low Cost Home Ownership, experience has shown that no mortgage lender will lend without a mortgage in possession clause being included within a Section 106 legal agreement. As such a clause enables the re-sale of the property without restriction (in circumstances where the property is re-possessed), this does not guarantee that it will remain affordable in perpetuity. The Authority is keen to ensure that exception sites do not become market sites over time as a result of such clauses.

4.294 The Authority recognises that it will need to monitor changes in values and costs as they affect viability.

4.295 The Authority is committed to ensuring delivery of the most appropriate type of affordable housing to meet the needs of the community. The Pembrokeshire 2014 Local Housing Market Assessment indicated that the predominant need for affordable housing in all parts of Pembrokeshire is for social rented properties (83%). Pembrokeshire County Council also has evidence from monitoring work of Low Cost Home Ownership applicants encountering difficulties in gaining mortgages. Furthermore, the Council's experience of the re-sale of these properties has been that occupants who have benefited from the Low Cost Home Ownership property have often not fully understood the nature of the ties associated with the property and are discontent with the process involved. For all of these reasons, this Authority is keen to prioritise the delivery of rented affordable properties above Low Cost Home Ownership properties, where this is a requirement through a S 106 agreement on market sites. As a result, on market sites, where an onsite contribution or provision is necessary, the Authority will require the delivery of social and/or intermediate rented properties in preference to Low Cost Home Ownership properties.

4.296 The following policies and advice provide additional guidance on housing.