

### **Hearing Session 3: Affordable Housing Provision**

Representor Number 4144

#### **Question 2: Is the target for delivery of affordable housing through the planning system contained within policy SP17 satisfactory?**

- 1.1. It is considered that the Council has not had sufficient regard to the need for affordable housing within the overall housing requirement. The Local Housing Market Assessment for Caerphilly shows a need of 516 units per year for affordable housing and in this context, within paragraph 6.5.1 of Background Paper 6, the Council acknowledge that there is a need to maximise the provision for affordable housing.
- 1.2. In terms of affordable housing need, paragraph 6.6.2 of Background Paper 6 states that it would be unrealistic to project the shortfall of affordable units over the 15-year plan period, as house prices and incomes are likely to change in the future. However, no evidence is provided by the Council to assess the impact of these changes upon the supply of affordable housing. In addition, the update to the Local Housing Market Assessment (December 2008), states that affordable housing need has now increased to 706 units per annum.
- 1.3. When considering the level of affordable housing need, we believe it is important to consider the impact of the 2006 household projections which we consider will further exacerbate the need for affordable housing in the County Borough.
- 1.4. The need to consider affordable housing when deciding whether or not to adopt the WAG 2006 household projections is a clear requirement of National Guidance. Within the clarification letter released by the Welsh Assembly Government on 12th June 2009, paragraph 3 states that: "It is for local planning authorities to consider the appropriateness of the projections for their area, based upon all sources of local evidence, including the need for affordable housing identified by the Local Housing Market Assessment (LHMA)." However, we cannot find any evidence within background papers SB32 and ED.13, to explain how the need for affordable housing has been considered along with any decisions made with regard to the 2006 household projections. In light of the rising need for affordable housing in the County Borough and the requirements of National Guidance, we believe this needs further explanation by the Council.

#### **Question 3: Are the levels of affordable housing provision sought by Policy CW14 warranted and realistic?**

- 1.5. Whilst it is accepted that the LDP should secure appropriate contributions towards the provision of affordable housing, National Planning Policy Guidance requires that such provision should only be required where there is evidence of need and where site conditions allow. In this regard it is considered inappropriate to refer to a notional 25% target on housing sites in the Northern Connections Corridor. Policy CW14 should include a viability assessment within the policy criteria (rather than in the reasoned justification as the amended Policy CW14 suggests) so that sites are assessed on an individual basis, viability being based on the state of the market and the availability of grant, thereby retaining essential flexibility within the plan as required by test of soundness CE4.