

Pembrokeshire Affordable Housing Delivery Statement

**A Joint Statement by
Pembrokeshire County Council
and
Pembrokeshire Coast National Park Authority**

**Adopted by Pembrokeshire Coast National Park Authority
14th October 2009**

Adopted by Pembrokeshire County Council 22nd October 2009

Contents	Page
Executive Summary	4
Introduction	5
Section 1 – Assessing the need for housing	6
1.1 Evidence of need	6
1.1.1. Common Housing Register	6
1.1.2. Local Housing Market Assessment June 2007	7
1.1.3. Local Needs Surveys	8
1.2 Definitions of Affordability and Affordable Housing	8
1.3 Projected Housing Requirements 2007-2011	8
Section 2 - Meeting the Need for Affordable Housing	10
2.1 Delivery figure for affordable units	10
2.2 Delivery through the Affordable Housing Policies/Interim Policies	10
2.2.1 Contributions from existing sites	10
2.2.2 Contributions from new sites	10
2.2.3 Approach to developer contributions	11
2.2.4 Local Sites thresholds and quotas	11
2.2.5 Changing Requirements for Affordable Housing Outside Pembrokeshire Coast National Park in Pembrokeshire County Council's Planning Area	11
2.2.6 Changing Requirements for Affordable Housing inside the Pembrokeshire Coast National Park	13
2.2.7 Rural exception sites	14
2.2.8 Tenure and Type	14

Section 3 - Securing Affordable Housing	15
3.1 Housing strategy and housing partnerships for delivery	15
3.2 Mechanisms for securing affordable housing	15
3.3 Scope and use of Section 106 Agreement	15
3.4 Use of Development Appraisal Toolkits	16
3.4.1 Development Appraisal Toolkits	16
3.5 Other Approaches	16
3.5.1 Social Housing Grant	16
3.5.2 Empty Homes	16
3.5.3 Role of the Rural Housing Enabler	17
3.5.4 Community Land Trusts	17
3.6 Disposal of local authority land	17
Section 4 Monitoring of delivery	18
4.1 Risk Assessment	18
Appendix 1 Affordable Housing Delivery Statement Summary	19
Appendix 2 Allocations Policy Banding	21
Appendix 3 Contacts	23

Executive Summary

Pembrokeshire County Council and Pembrokeshire Coast National Park Authority have to produce Affordable Housing Delivery Statements to show how they will deliver affordable housing from 2007 to 2011 and include a target for delivery over that period. The Authorities have produced a Joint Statement. There are three key components to the statement.

They are:

1. Assessing the need for affordable housing;
2. Providing options for improving the delivery of affordable housing
3. Setting a target for Affordable housing;

The Authorities have identified:

- A need for nearly 3000 affordable homes
- A target for delivering 325 affordable homes over the life of the statement between 2007-2011, based on current funding levels and using existing planning policies.

Planning policies in the Joint Unitary Development Plan for Pembrokeshire (JUDP) have not increased the delivery of affordable housing much beyond what is already provided by Registered Social Landlords, because very little has been secured through planning gain (section 106 agreements). This is because planning policies were only adopted three years ago and the thresholds for requiring affordable housing in the County Council's Planning area were relatively high. Most housing sites permitted, and developed, since the Plan was adopted fall below the current thresholds. This reflects a tradition in Pembrokeshire of housing development being on small sites (under 5 homes) and often on single plots.

This document sets out different ways of increasing the delivery of affordable housing. It includes the introduction of interim planning policies on affordable housing.

Pembrokeshire Coast National Park Authority has adopted its draft Local Development Plan Policy (Policy 33) in advance of the Local Development Plan being adopted. Pembrokeshire County Council has adopted an interim planning policy (section 2.2.5) which will remain in force until it is replaced by policies in the Local Development Plans.

Introduction

The Welsh Assembly Government has committed to delivering an extra 6500 affordable homes across Wales between 2007 and 2011. This Affordable Housing Delivery Statement is an interim measure, ahead of Pembrokeshire County Council and Pembrokeshire Coast National Park Authority adopting their Local Development Plans, setting out the Authorities' contribution to meeting that target. This statement effectively replaces policies on affordable housing set out in the Joint Unitary Development Plan for Pembrokeshire and carries significant weight in deciding planning applications for housing. The existing Joint Unitary Development Plan has different affordable housing policies for the two planning areas.

This Affordable Housing Delivery Statement is a joint document produced by Pembrokeshire County Council and Pembrokeshire Coast National Park Authority. Following a six week public consultation period, this statement was adopted by Pembrokeshire Coast National Park Authority on 14th October 2009 and Pembrokeshire County Council on 22nd October 2009. A report of consultations is available on request.

Section 1 – Assessing the need for housing

1.1 Evidence of need

The need to increase the supply of affordable housing in the County is clear from the following evidence:

- ❖ The Common Housing Register
- ❖ The Local Housing Market Assessment
- ❖ Housing Needs Surveys carried out by the Rural Housing Enabler

The different sources are described below along with the level of need they identify. The Authorities are concerned with the robustness of the Local Housing Market Assessment methodology as set out in Welsh Assembly Government guidance, and therefore believe the most reliable source of evidence of need is the raw data in the common housing register.

1.1.1. Common Housing Register

The Common Housing Register is a list of all the people who have applied for social housing in Pembrokeshire shared between all Registered Social Landlords in the county. Applicants on the Register are categorised (or banded) according to need. There are three bands: gold, silver and bronze. Applicants in the gold and silver bands are those which Pembrokeshire County Council has a legal requirement to house or are trying to prevent becoming homeless.

Table 1 shows the number of applicants in gold and silver bands on the Common Housing Register, currently living in Pembrokeshire, waiting for different sizes of accommodation as at 30th July 2008. The table shows the overall figures for housing need for Pembrokeshire and also separates the need in the 'National Park Planning Area' and in the 'County Council Planning Area'. The figures take into account those towns and villages that fall in both planning areas by splitting the need equally between them. The table does not take account of future need.

Table 1 Common Housing Register Net Need

Net housing need Area	Number of bedrooms					Totals
	1	2	3	4	5	
County Council Planning Area	947	1086	349	69	7	2427
National Park Planning Area	172	187	75	20	1	426

Totals for Pembrokeshire	1119	1273	424	89	8	2913
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As mentioned above the Authorities believe the Common Housing Register to be the most accurate assessment. This identifies a net¹ need of 2913 affordable dwellings.

1.1.2. Local Housing Market Assessment June 2007

The Local Housing Market Assessment provides affordable housing need figures for Pembrokeshire. The figures primarily took account of household growth of approximately 446 a year² (2005 to 2015) for the County as a whole and data contained in the Common Housing Register. Residential completions averaged 556 per annum in Pembrokeshire between 2001 and 2006, 468 per annum outside the National Park and 89 per annum within, a ratio of 84:16.³

If the figures of need identified in the Local Housing Market Assessment⁴ are shared using this ratio the number of affordable housing that would need to be built is shown in Table 2 below. Whether the current backlog of need is addressed in 2 or 20 years, depending on the quota used, the provision of affordable housing is more than double the current completion rate of all residential property.

Table 2 Number of dwellings per annum needed to address existing backlog of need over 2 to 20 years plus newly arising need

Quota to reduce current backlog (% per annum)	Number of Years to address existing need	Number of dwellings to be provided per annum	Number of dwellings per annum in the National Park at 16%	Number of dwellings per annum Outside the National Park	As a % of total completions
5	20	1406	225	1181	253%
10	10	1539	246	1293	277%
15	6.6	1672	268	1404	301%
20	5	1806	289	1517	325%
25	4	1939	310	1629	349%
30	3.3	2072	332	1740	372%
35	2.8	2205	353	1852	396%
40	2.5	2338	374	1964	420%
50	2	2605	417	2188	468%

The Local Housing Market Assessment shows a very high level of need which does not in anyway compare with development levels experienced in the County (1406 affordable homes needed per year over 20 years to meet the identified need when on

¹ Excludes those already in social rented housing and wishing to transfer

² Local Housing Market Assessment, Pembrokeshire County Council, page 72 – 73.

³ As above, page 41.

⁴ As above Figure 66, page 86.

average 556 homes are constructed each year). The Authorities have concerns over the robustness of the methodology.⁵

1.1.3. Local Needs Surveys

The Rural Housing Enabler for Pembrokeshire has so far carried out local housing needs surveys in 38 community council areas. The surveys have identified a minimum need of 408 units of affordable housing in rural areas. There are no follow up interviews to validate the level of need in the way that there are for applicants for the Common Housing Register. Nevertheless these surveys along with the housing register give a good indication of how much affordable housing is needed in rural areas.

1.2 Definitions of Affordability and Affordable Housing

Affordable housing meets a specific local housing need which cannot be met by housing on the open market. A household is in housing need if they are in unsuitable accommodation.⁶ The method for assessing whether a household can afford to meet their needs on the open market is described in the Supplementary Planning Guidance on affordable housing jointly prepared by both Authorities.⁷

1.3 Projected Housing Requirements 2007-2011

The Joint Unitary Development Plan (JUDP) for Pembrokeshire sets a housing requirement of 9000 dwellings (outside the National Park) for the period 2001 to 2016, an average of 600 dwellings per year, or 2400 over the life of the AHDS.⁸ This was based on past completions of around 470 per year outside the National Park and an additional aspirational element to facilitate inward investment and deliver improved economic growth which in itself requires the provision of additional housing. Recent completions outside the National Park in 2005, 2006 and 2008 have exceeded the JUDP annual requirement (Table 3).

⁵ Please see commentary in the Housing Background Paper prepared for the National Park Deposit Local Development Plan: <http://www.pcnpa.org.uk/website/default.asp?SID=1243&SkinID=5> starting at page 16.

⁶ Unsuitable housing is defined, based on WAG Local Housing Needs Assessment table 8.1, in Appendix 2 of Supplementary Planning Guidance Affordable Housing in Pembrokeshire

⁷ Weblink to the Affordable Housing Supplementary Planning Guidance. Please see Appendix 2 and 3. <http://www.pcnpa.org.uk/website/default.asp?SID=234&SkinID=5>

⁸ Any housing which is built within the National Park will count against the overall County provision.

Table 3 Completions outside the National Park 1998 to 2008

Annual Completions Report	County Council Planning Area	National Park Planning Area
01/07/1998 to 01/04/2008		
1998/1999	267	117
1999/2000	556	84
2000/2001	473	117
2001/2002	214	105
2002/2003	436	93
2003/2004	232	50
2004/2005	704	109
2005/2006	720	87
2006/2007	522	52
2007/2008	666	105
Total	4790	919

These completion rates pre-date the current recession and housing market slump so we can expect, in the short term at least, those completion rates to fall which may mean that the Affordable Housing Delivery Statement dwelling requirement is not reached.

Within the National Park completion rates have not varied significantly over recent times. In the period 1997 to 2007 the average completion rate was 87 per annum and between 2003 and 2008 it averaged 81 per annum. During the lifetime of this statement, and given the current economic climate, it is unlikely to exceed 87 per annum.

Section 2 - Meeting the Need for Affordable Housing

2.1 Delivery figure for affordable units

The likely delivery on an annual basis for the period 2007 to 2011 is set out in Appendix 1. The figures are based on JUDP policies (3 or more units and 20% in the National Park and outside the National Park 20% on sites of 0.75ha and over and 1.5 ha and over in the rural and urban areas respectively) and on forecasts of housing delivery set out in the Joint Housing Land Availability Study (JHLAS) for 2007⁹. The total projected delivery for the County would be around 325 units averaging 80 a year. Most of this, 207 units, is delivered by Social Housing Grant (Appendix 1). It is also expected that many of the remaining units will also involve Registered Social Landlords and Social Housing Grant. They have not been included in the Social Housing Grant figure for Pembrokeshire County Council because they have outline planning permission and developers have not yet approached the Registered Social Landlords to see whether they would be willing to purchase the completed units. They are therefore currently included in the s106 non Social Housing Grant category.

To meet the identified need in the waiting list (2913 homes) with the rate of delivery enabled by the JUDP planning policies would take around 36 years. In order to deliver more affordable housing the Authorities propose to increase the amount delivered through the planning system but deliverability will be entirely dependent on what is viable for developers to provide. This in turn is dependent on a variety of other factors, not least in the current economic climate how much Registered Social Landlords can contribute to that delivery either from their own funds or using Social Housing Grant.

2.2 Delivery through the Affordable Housing Policies/Interim Policies

2.2.1 Contributions from existing sites

The contributions from existing sites will be around 325 units unless the thresholds are changed and/or the percentage required increased.

2.2.2 Contributions from new sites

The only new sites that are likely to come forward up to 2011 will be windfall (non allocated housing sites) and rural exception sites. To date only two small exception sites have been permitted, although we anticipate additional exception sites being developed by 2011. Since the Joint Unitary Development Plan was adopted in July 2006, in the County Council area there were only 7 windfall sites that were above the threshold for negotiating affordable housing. One site will be developed by

⁹ JHLAS are prepared annually in Partnership with the WAG, Home Builders Federation and RSLs to assess five year housing supply.

Pembrokeshire Housing Association for 100% affordable housing and 2 sites have a condition requiring 20% affordable housing. The other four sites were either very close to the threshold or involved less than 10 units, including one barn conversion, and no affordable housing was secured on them. This is out of a total of 1064 planning permissions for housing. Clearly the contribution to affordable housing from windfall sites would have been insignificant unless the threshold for requiring affordable housing was changed.

2.2.3 Approach to developer contributions

There will be instances when the viability of a proposal is questionable. Developers are then likely to seek reductions in the amount of planning obligations required. Both planning authorities are keen to ensure that planning obligations do not act to stifle or prevent development. When it can be proven that a proposal is not financially viable in terms of all the policy requirements, priority will be given to the delivery of affordable housing in any further negotiations. The Three Dragons Development Appraisal Toolkit can assist in initial site appraisal but it will be necessary for developers to provide an 'open book approach' for their proposals if they want to negotiate to reduce planning obligation requirements.

2.2.4 Local Sites thresholds and quotas

Up to the base date of the Affordable Housing Delivery Statement (AHDS) (2007) most affordable housing was provided by Registered Social Landlords using Social Housing Grant providing around 75 homes a year, way below the 120 a year JUDP target. Appendix 1 projections suggest that around 325 additional affordable housing units will be provided up to 2011. Although the JUDP will be replaced before 2016 it is clear that the 1800 target would not have been met based on applying JUDP policies. A significant issue for both Authorities was that the ability to negotiate affordable housing was impaired as weight could not be attached to the affordable housing policies of the JUDP until it was adopted in 2006. Also the housing need is far greater than when the JUDP was being prepared. At that time (2001), excluding transfers, the waiting list held around 1025 applicants. It has nearly trebled over the intervening years to 2913 in 2008.

2.2.5 Changing Requirements for Affordable Housing Outside Pembrokeshire Coast National Park in Pembrokeshire County Council's Planning Area

Tests using the 3 Dragons Development Appraisal Toolkit carried out in May 2009 and again in September 2009 on sites outside the National Park indicate that, taking account of house price falls of around by 10% from their 2007 peak, it is viable for developers to provide:

- Affordable housing on developments well below the JUDP thresholds;
- Around 40% affordable housing where social housing grant is available

- Around 20% affordable housing without Social Housing Grant

Over the last 10 years, completions on sites of 3 or more dwellings have averaged around 73% of total completions. Lowering the threshold would make many more sites eligible to contribute towards affordable housing.

Although we are two years into the AHDS period, and most of the housing likely to be built over the remaining two years, to 2011, is already permitted (and therefore opportunities to secure more affordable housing are limited), changing the threshold for requiring affordable housing on site could, in theory, deliver extra units.

The Interim planning policy for affordable housing outside the National Park is set out below:

“Developers will be required to provide affordable housing:

- on housing sites with a net gain of 10 dwellings in the main towns of Fishguard, Haverfordwest, Milford Haven, Pembroke, Pembroke Dock, Neyland and Narberth;
- in all other locations where there is a net gain of 5 or more dwellings.”

Where social housing grant is available 40% of dwellings on the site should be for affordable housing. On sites where no social housing grant is available 20% of dwellings should be affordable. “

Affordable housing is one of a number of requirements placed on developers in addition to costs directly required to bring a site forward. Pembrokeshire County Council has published supplementary planning guidance on planning obligations setting out these other requirements, some of which will be phased in over the life of this interim planning policy on affordable housing. The Council have made it clear, in the SPG on planning obligations and in the Affordable Housing Delivery Statement, that affordable housing is the priority for the Authority. Therefore, if it is not viable to require all planning obligations to be met by a particular proposal affordable housing will take precedence. The Council has tested the viability of its policy requirements and is satisfied that they can be met. If a developer believes that it is not viable to meet those requirements the Council will expect the developer to demonstrate why they cannot meet them when negotiating any change to those requirements.

Clearly particular site circumstances will vary and the Authorities will factor in any extraordinary costs when negotiating on individual sites, the 20% and 40% should therefore be treated as a guide rather than an absolute requirement.

The affordable housing target will remain at the level predicted under the JUDP policies, the Authorities will carefully monitor any additional provision resulting from the changes and report on them to the Assembly so that they can be factored in to any assessment of progress towards meeting the One Wales target of 6500 additional units.

2.2.6 Changing Requirements for Affordable Housing inside the Pembrokeshire Coast National Park

In the National Park, given the scarcity of opportunities to deliver affordable housing, the opportunity to negotiate an element of affordable housing on smaller sites was provided for by the Joint Unitary Development Plan. There was no minimum threshold for negotiating affordable housing. As a working practice affordable housing was negotiated on sites for 3 or more dwellings under the Joint Supplementary Planning Guidance on Affordable Housing 2006.

Guidance¹⁰ on the preparation of Affordable Housing Delivery Statements advises that the evidence used to prepare Affordable Housing Delivery Statements and the policies to be included in Local Development Plans should be substantially the same (paragraph 1.12).

The National Park Authority has recently consulted upon its Deposit Version Local Development Plan. The background to the policy approach is set out in the Plan itself and in its Housing Background Paper.¹¹

The thresholds and quotas contained in the policy for affordable housing provision (Policy 33 of the Local Development Plan – Deposit Plan) replace those used for the National Park in the Joint Unitary Development Plan and associated Supplementary Planning Guidance on Affordable Housing in Pembrokeshire.

The Authority will seek to negotiate on sites for 2 or more residential units 50% affordable housing with the following exceptions where a higher percentage will be negotiated: Tenby (60%), Newport (70%), Saundersfoot (60%), Dale (80%), Dinas Cross (75%) and New Hedges (60%). One site at Crymych (the Depot site) is allocated for 100% affordable housing.

Within Pembrokeshire generally where a planning application is received for a site below the affordable housing threshold but which is part of a larger site which is above the threshold then the Authorities will expect affordable housing to be provided. This is to ensure that large sites are not broken up into smaller portions and phases which would avoid the requirement for affordable housing.

¹⁰ Paragraph 1.12, Affordable Housing Delivery Statements, 2007-2011, Final Guidance February 2009.

¹¹ Weblink for the Deposit Local Development Plan and Background Papers
<http://www.pcnpa.org.uk/website/default.asp?SID=1336&SkinID=5>

Affordable housing will be made available for those who are unable to resolve their need for housing without assistance. The terms 'affordable housing need' and 'affordable housing' are defined in the Joint Supplementary Planning Guidance (SPG) on affordable housing. The term 'local person' is also defined in the SPG.

2.2.7 Rural exception sites

Policy 51 of the Joint Unitary Development Plan – Exception Sites for Affordable Housing allows for affordable housing to be developed on sites not allocated or available for general needs housing but within or adjoining a settlement and where there is a proven local need for affordable housing. This policy will continue to operate in both planning areas across Pembrokeshire.

'Exception sites' are specifically to provide for local people who are in need in rural areas. Exception sites are generally on land which would not otherwise be permitted for housing and because of its lower value should enable housing to be built, and rented or sold, at an affordable price. Local Housing Needs surveys should provide the evidence of a need for such housing and will continue to be co-ordinated by the Pembrokeshire Rural Housing Enabler. To date two exception sites have been permitted and are nearing completion. The low number of exceptions sites coming forward is for a variety of reasons including local opposition; difficulty in RSLs and landowners agreeing a price for the land; and landowners holding out in the hope that their site will be included in the Local Development Plans. Nevertheless a planning application has been submitted for an additional exception site and we expect others to follow through the life of the AHDS. Local Housing Needs Surveys carried out by the RHE have been also been used as evidence when securing affordable housing on market housing sites.

2.2.8 Tenure and Type

Negotiations will depend on the level of need for rented or low cost home ownership at the time of application by reference to the Common Housing Register.

Section 3 - Securing Affordable Housing

3.1 Housing strategy and housing partnerships for delivery

The Local Housing Strategy 2007-12 for Pembrokeshire focuses on the need for affordable housing in Pembrokeshire and the mechanisms by which it can be delivered which are outlined in the sections below.

In Pembrokeshire the housing partnerships involved in the delivery of affordable housing are:

- The Affordable Housing Working Group
- The County Council working with the Welsh Assembly Government on the Social Housing Programme
- The Housing Forum
- Pembrokeshire County Council working with Registered Social Landlords

3.2 Mechanisms for securing affordable housing

Pembrokeshire County Council and Pembrokeshire Coast National Park Authority jointly adopted Supplementary Planning Guidance on Affordable Housing in 2006. The SPG deals with mechanisms for securing affordable housing, definitions of local and in need and the use of section 106 agreements and planning conditions. The Authorities do not intend that this Affordable Housing Delivery Statement will replace the Supplementary Planning Guidance but that it will operate in tandem with it. This statement effectively replaces policy 50 in the Joint Unitary Development Plan for Pembrokeshire which the SPG supplements. Therefore, the sections of the SPG that refer to policy 50 will need to be updated in an erratum but the rest of the SPG will remain the same. In addition to affordable housing, the Authorities have joint supplementary planning guidance on planning obligations. That document reiterates that affordable housing takes precedent over other planning obligations.

3.3 Scope and use of Section 106 Agreement

The Joint Supplementary Planning Guidance on affordable housing explains the use of section 106 agreements and defines housing need and who is eligible for affordable housing. It also explains what can be done if there are problems re-selling a property.

3.4 Use of Development Appraisal Toolkits

3.4.1 Development Appraisal Toolkits

Whilst Local Planning Authorities are able to seek affordable housing on suitable development sites, policy guidance requires Local Planning Authorities to have regard to the economics of development and the costs of bringing sites to the market. It is also necessary to be aware of the level of public and or private subsidy which is required to develop a variety of affordable housing products and its availability. Where an applicant advises that the cost of providing affordable housing means that the site will not be viable to develop they will be expected to prove this by describing the costs and value of the development fully.

The 3 Dragons Development Appraisal Toolkit will be used by the Local Planning Authorities to assist in discussions. Independent advice from Development Consultants may also be sought.

3.5 Other Approaches

In addition to using the planning process to secure affordable housing, there are other options available to increase the supply in the county. These include:

3.5.1 Social Housing Grant

Social Housing Grant (SHG) is a capital grant used by the Welsh Assembly Government to assist Registered Social Landlords (RSLs) to provide affordable housing. The grant paid is equivalent to 58% of the development cost.

The total amount of SHG available to RSLs to spend in Pembrokeshire for 2009/10 is £3.348m, which is consistent with previous allocations to the county. Currently the Welsh Assembly Government approves more schemes than can be delivered in one financial year to ensure maximum spend of the available SHG allowing for any slippage or delays in development.

On average the RSLs have delivered 75 new affordable homes per year in Pembrokeshire over the last 3 years. As SHG has remained fairly static for a number of years, with no indication from the Welsh Assembly Government that it is likely to increase, it is fair to assume that this is a reasonable estimate for future delivery. Clearly, an increase in SHG allocation to Pembrokeshire would improve the delivery of affordable housing

3.5.2 Empty Homes

The Housing Act 2004 increased powers for Local Authorities to bring empty properties back into use to increase the availability of housing. The Council will be undertaking a survey to record all the properties in Pembrokeshire that have been empty for more than six months. The Council will then develop an Empty Homes

Strategy based on the results of this survey. This will include looking at the options available to the Council to bring empty properties back into use. Until the survey has been completed it is unclear how many empty properties can be brought back into use in Pembrokeshire. So far no empty properties have been brought back into use for affordable housing in the county.

3.5.3 Role of the Rural Housing Enabler

Pembrokeshire appointed a Rural Housing Enabler (RHE) in 2005 as a pilot funded jointly by Pembrokeshire County Council (Planning and Housing), Pembrokeshire Coast National Park Authority, Pembrokeshire Housing and Cymdeithas Tai Cantref. The work of the RHE has focussed on:

- Undertaking Housing Needs Surveys in conjunction with Community Councils.
 - Since 2005, 38 local surveys have been completed at the request of Community Councils.
 - The surveys conducted comply with the all-Wales model approved by the Local Government Data Unit to ensure consistency and appropriateness for planning purposes.
- Analysis of surveys and presenting findings to Community Councils. All the surveys have identified the need for additional affordable housing in the individual communities.
- Working with the Community Councils to identify potential development sites.
- Liaison with planning to deliver schemes.

To date, two exception sites have been permitted and are nearing completion as a result of the RHE work. An application on a further site is being considered and other proposals are expected to be submitted for planning permission before 2011.

3.5.4 Community Land Trusts

Where a number of self builders are interested in providing affordable housing, a way forward may be to support self build within the context of Community Land Trusts. Community Land Trusts own land for the benefit of the community, and the people living and working there. The purpose of these trusts is to create common wealth, in the form of, e.g., affordable land for housing. These resources are more accessible to the community, stewarded by it, and retained in community control.

3.6 Disposal of local authority land

Pembrokeshire County Council and Pembrokeshire Coast National Park Authority have in the past sold land for Affordable Housing to RSLs and will continue to consider this in the future.

Section 4 Monitoring of delivery

An annual summary statement is required to be submitted to the Welsh Assembly Government showing how targets are being met as part of the monitoring process for Affordable Housing Delivery Statements. A standard assessment has been proposed including completions and anticipated affordable housing contributions.

Local planning authorities are also required to monitor the provision of market housing, and affordable housing through Development Plan Annual Monitoring Reports and Joint Housing Land Availability Studies (JHLAS). JHLAS are co-ordinated by the Welsh Assembly Government in partnership with PCNPA, PCC, the Home Builders Federation and Pembrokeshire Housing and Cymdeithas Tai Cantref. The studies now include an assessment of completions and anticipated affordable housing contributions over the five years following the base date of each study (1st April each year).

If annual monitoring reports suggest that targets are not being met the Authorities will need to consider how to increase delivery. There may be some scope for increasing delivery by the methods suggested in Section 3 e.g. encouraging more empty homes to deliver affordable private rented accommodation. However neither planning authorities can influence when private housing development occurs and so cannot influence the timing of delivery of affordable housing by section 106 agreements.

4.1 Risk Assessment

There are many risks attached to the delivery of affordable housing particularly related to the current economic crisis and its impact on the housing market. Some of these are identified on guidance on AHDS, a few of which are listed below:

- Continued reduction in land values reduces the capacity for developers to cross subsidise affordable housing from market housing.
- Lower house prices reduce the viability of housing schemes and developers either halt development or challenge affordable housing and other s106 requirements
- Lack of mortgage availability reduces buyers so developers delay building
- Costly infrastructure requirements or a lack of investment by providers delays development.
- Landowners land banking through the recession (a common occurrence in Pembrokeshire)
- Land owners awaiting the outcome of the two Local Development Plan Examinations
- Local opposition to development

Appendix 1 Affordable Housing Delivery Statement Summary

Action	2007/8	2007/8	2007/8	2008/9	2008/9	2008/9	2009/10	2009/2010	2009/10	2010/11	2010/11	2010/11	All Pembrokeshire 4 year Total
	Completed - All Pembrokeshire	Completed Pembrokeshire County Council	Completed National Park	Projected - All Pembrokeshire	Projected Pembrokeshire County Council	Projected - National Park	Projected - All Pembrokeshire	Projected Pembrokeshire County Council	Projected - National Park	Projected - All Pembrokeshire	Projected Pembrokeshire County Council	Projected - National Park	
SHG (subject to WAG allocation)													
General Needs inc Homebuy	41	34	7	13	0	13	35	26	9	26	3	23	115
Vulnerable Households & extra care	0	0	0	0	0	0	48	48	0	0	0	0	48
Mortgage Rescue (not included above)	0	0	0	2	2	0	3	2	1	2	2	0	7
Rural Exception sites (not included above)	0	0	0	0	0	0	0	0	0	12	10	2	12
Empty Homes (not included above)	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Capital Investment Fund (SCIF)	0	0	0	7	7	0	6	6	0	12	12		25

Action	2007/8	2007/8	2007/8	2008/9	2008/9	2008/9	2009/10	2009/2010	2009/10	2010/11	2010/11	2010/11	All Pembrokeshire 4 year Total
	Completed - All Pembrokeshire	Completed Pembrokeshire County Council	Completed National Park	Projected - All Pembrokeshire	Projected Pembrokeshire County Council	Projected - National Park	Projected - All Pembrokeshire	Projected Pembrokeshire County Council	Projected - National Park	Projected - All Pembrokeshire	Projected Pembrokeshire County Council	Projected - National Park	

Non-SHG funded

Section 106/Condition													
New build units (committed)	5	5	0	6	6	0	33	32	1	60	47	13	104
Section 106/Condition													
New build units (windfall)	0	0	0	1	0	1	0		0	12		12	13
Rural exceptions policy inc CLTs	0	0	0	0	0	0	1		1	0			1
Empty Homes initiatives	0	0	0	0	0	0	0		0	0			0
Other measures (Homebuy)	0	0	0	0	0	0			0	0			
Totals/target delivery figure	46	39	7	29	15	14	126	114	12	124	74	50	325
Variance													

Appendix 2 Allocations Policy Banding

Gold Band (high priority) – People who have difficulty managing within their home, unintentional homeless people who are not in priority need and people with several different types of housing need amounting to moderate problems in the home.

- Customers who are in need of a significantly adapted property (major adaptations which could not be achieved in their own home) and who are supported by an occupational therapist recommendation
- People who have been determined to be unintentionally homeless
- Customers who require at least 2 additional bedrooms for the permanent household (not including access children)
- Customers that are unable to succeed to a Pembrokeshire County Council or Housing Association tenancy following the death of the tenant and who have been resident at the property for at least 12 months prior to the death of the tenant
- Existing Pembrokeshire County Council or Housing Association tenants who are under-occupying a property by at least 2 bedrooms and who wish to move to smaller accommodation
- Households with children and who are living in private rented sector accommodation and sharing amenities with other households not related to the customer
- Private sector tenants in accommodation that is confirmed as unfit by an environmental health officer, e.g. in substantial disrepair and/or lacking basic amenities where statutory enforcement action is being taken
- Owner occupiers who live in accommodation which has been confirmed as unfit by an environmental health officer and do not have the financial means to carry out improvements or secure alternative accommodation through the sale of the property
- Customers experiencing severe harassment or threats of violence confirmed by a professional agency and where rehousing is the best option. The Council will seek, in the first instance, to address the problem behaviour of the perpetrator
- Customers suffering from a chronic or serious medical illness (supported by medical evidence) where re-housing is essential and would significantly improve their quality of life
- Customers suffering from a chronic or serious medical illness (supported by medical evidence) where re-housing to a specific area in Pembrokeshire, to either receive support or medical care, would significantly improve their quality of life and prevent hardship
- Customers who meet five or more criteria in the Silver band

Silver Band (medium priority) – People who have some need but who can generally manage well in their own homes. It is not essential that they move, but more suitable accommodation would ease their situation or make it more comfortable.

- Customers with a need for social housing in a specific area of Pembrokeshire due to a medical or welfare reason as defined within s167(2) of the Housing Act 1996 (as amended)
- Customers who require one additional bedroom for the permanent household (not including access children)
- Existing Pembrokeshire Council or Housing Association tenants underoccupying a property by 1 bedroom and who wish to move to smaller accommodation
- Customers sharing accommodation with family or friends who are not to be rehoused with them
- People who do not own any residential property and are living in the private rented sector on an assured short-hold tenancy
- People who are intentionally homeless
- Owners of property with a social or medical need, which cannot be resolved through the sale or adaptation of their property. Customers living in properties suffering from disrepair that have been confirmed by an environmental health officer and statutory enforcement action is in progress
- Customers with a medical condition (supported by medical evidence), where re-housing would assist in alleviating the condition (see section 6)

Bronze Band (Low priority)

- Any applicant for social housing not meeting any of the above requirements.

Appendix 3

Contacts

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