

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

### LDP Document: 55 SPG - Affordable Housing

RefPoint: 55.

#### 78 Home Builders Federation Ltd

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P1		08/08/2018	<input type="checkbox"/>	E	S		M		Summary: Response to question AH1

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Document:SPG - Affordable Housing Definitions and types

#### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH1 - Do you agree that the affordable housing definitions and types as set out are relevant to the Powys LDP area? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P2		08/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH2

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Document:SPG - Affordable Housing Data sources and calculating affordability level

#### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH2 - Do you agree with the data sources and calculations used to work out the affordability level for Powys? If not, please explain why.

The HBF have no objection to the data sources used.

The HBF notes that the Authority has a very wide range of housing types including many very expensive homes, for this reason we question whether or not this average across all housed types does generate a fair representation of the affordable level. The HBF suggests that a calculation that does not include some of the most expensive housing (properties that would not be suitable as affordable housing due to price, size and location) would be more appropriate.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P3		08/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH4

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Document:SPG - Affordable Housing Alternatives to on-site provision

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P3		08/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH4

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### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH4 - Do you agree with the examples given of circumstances where alternative provision to on-site provision may be considered? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P4		08/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH5

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Document:SPG - Affordable Housing Arrangements for off-site provision

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH5 - Do you agree with the approach used to determine whether off-site provision would be appropriate? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P5		08/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH6

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Document:SPG - Affordable Housing Calculating financial contribution

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH6 - Do you agree with the method and formulae for calculating the required financial contribution? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P6		08/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH7

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## AH SPG - Reps by Representor

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P6		08/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH7

Document:SPG - Affordable Housing Spending financial contributions

### Question Representation Texts

#### Question: Details

Representation Text: . AH7 - Do you agree with the examples given as to how the Council may spend financial contributions and with the cascade to be applied? If not, please explain why.

The need to specify a time period for using contributions – I would suggest that a cross reference to the details in Planning Obligations SPG the might be helpful. I also think that 10 years is far too long with regard to affordable housing. The Council produce lots of evidence to show the need and demand for affordable housing yet aren't willing to commit to bringing any forward using the resources they collect in a reasonable time period I think specifying 5 years would be a positive statement from the Council (The HBF will make this comment separately in response to the consultation on the Planning Obligations SPG).

If the Council can accept a cascade method for spending of commuted sums it should be applied fairly across all types of provision. It would still result in affordable housing being provided and there is a need for affordable housing across the whole borough.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P7		08/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH8

Document:SPG - Affordable Housing Evidence of local housing need

### Question Representation Texts

#### Question: Details

Representation Text: . AH8 - Do you agree with the sources of evidence to be used by the Council to determine local housing need? If not, please explain why.

Although the HBF accepts that the LHMA is the latest available evidence source it is already four years out of date. HBF would suggest that para 6.6.5 is clearer in stating that the updated 2018 evidence will be used as soon as it is available and state the time period in which it will next be updated as the plan runs until 2026.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
78.P8		08/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH9

Document:SPG - Affordable Housing Assessing financial viability

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
78.P8		08/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH9

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**Question**                      **Representation Texts**

**Question:**                      **Details**

*Representation Text:* . AH9 - Do you agree with the arrangements and information requirements for assessing the financial viability of a specific development and proposals for reviewing viability? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
78.P9		08/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH16

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Document:SPG - Affordable Housing Other comments

**Question**                      **Representation Texts**

**Question:**                      **Details**

*Representation Text:* . AH16 – If you have any other comments you want to make which are not covered by the above questions please include them here:

Time limited permissions – I'm aware that a shorter time limit for commencement can be attached to a planning permission but I've only seen it in relation to unallocated sites being allowed in view of the old para 6.2 of TAN1 five year land argument. I guess you're trying to link it to sites becoming more viable over time but in reality there is just as much chance they will become less viable, recent work on the Swansea LDP suggested that cost of building had increased three times as much as values had increased over the same period, you also have to consider policy changes which may result in additional cost (fire sprinklers being brought in would be an example). I have looked at the WG guidance you refer to (which I must admit I wasn't aware of) I note it was written in 2009 and was a reaction to the deep recession the house building industry was in at the time. The guidance does say 'Being assured that the scheme is development-ready and will proceed once viability issues have been addressed (which will tend to mean that the mechanism is not suitable for schemes with outline permission). It may be at least worth cross referencing this guidance if this is the justification for including it in the SPG.

With regard to review mechanisms the WG guidance you quote does state 'A variant on the 'shortlife' permission (but which is only really relevant to larger sites) is to review the level of obligations at defined stages in the scheme's development.' I note your amended wording which does as you say provide some more flexibility.

It may also be worth noting in the document that WG are currently reviewing Affordable Housing so things may/probably will be changing in the next few years.

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### 516 Mochdre Community Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P1		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH1

Document:SPG - Affordable Housing Definitions and types

#### Question Representation Texts

##### Question: Details

Representation Text: . AH1 - Do you agree that the affordable housing definitions and types as set out are relevant to the Powys LDP area? If not, please explain why.

Yes.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P2		20/08/2018	<input type="checkbox"/>		O		M		Summary: Response to question AH2

Document:SPG - Affordable Housing Data sources and calculating affordability level

#### Question Representation Texts

##### Question: Details

Representation Text: . AH2 - Do you agree with the data sources and calculations used to work out the affordability level for Powys? If not, please explain why.

NO – The Council queries the average wage stated for a full-time worker in Powys i.e. £24,884. As employment in the County is primarily of an agricultural or light industry nature, with remuneration based on National Minimum Wage Rates (from April 2018 £7.83 for those 25 and over and less for those under 25), generally an annual salary is more likely to be around the £16,286 mark.

This also thus causes the Council to obviously question the gross disposable household income per head figure quoted as £16,303.

The Council also queries the gross disposable household income per household figure being based on an average household having 2 persons who are working. Whilst it accepts that there are some households lucky enough to have 2 people in them who are working full-time, there are a lot of single parent families out there or families with only one person in full-time employment!

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P3		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH3

Document:SPG - Affordable Housing Specialist market housing developments

## AH SPG - Reps by Representor

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
516.P3		20/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH3

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**Question**                      **Representation Texts**

**Question:**                      **Details**

Representation Text: . AH3 - Do you agree with the approach towards seeking affordable housing contributions from specialist market housing developments? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
516.P4		20/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH4

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Document:SPG - Affordable Housing Alternatives to on-site provision

**Question**                      **Representation Texts**

**Question:**                      **Details**

Representation Text: . AH4 - Do you agree with the examples given of circumstances where alternative provision to on-site provision may be considered? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
516.P5		20/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH5

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Document:SPG - Affordable Housing Arrangements for off-site provision

**Question**                      **Representation Texts**

**Question:**                      **Details**

Representation Text: . AH5 - Do you agree with the approach used to determine whether off-site provision would be appropriate? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
516.P6		20/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH6

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P6		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH6

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Document:SPG - Affordable Housing Calculating financial contribution

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH6 - Do you agree with the method and formulae for calculating the required financial contribution? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P7		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH7

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Document:SPG - Affordable Housing Spending financial contributions

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH7 - Do you agree with the examples given as to how the Council may spend financial contributions and with the cascade to be applied? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P8		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH8

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Document:SPG - Affordable Housing Evidence of local housing need

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH8 - Do you agree with the sources of evidence to be used by the Council to determine local housing need? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
516.P9		20/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH9

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Document:SPG - Affordable Housing Assessing financial viability

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH9 - Do you agree with the arrangements and information requirements for assessing the financial viability of a specific development and proposals for reviewing viability? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
516.P10		20/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH10

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Document:SPG - Affordable Housing Exception sites: Towns and Large Villages

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH10 - Do you agree with the guidance on assessing the appropriateness of the location, scale and type of affordable housing on exception sites in Towns and Large Villages? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
516.P11		20/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH11

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Document:SPG - Affordable Housing Exception sites: Small Villages

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH11 - Do you agree with the guidance on determining whether a site should be viewed as infill or as a logical extension in Small Villages? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P12		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH12

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Document:SPG - Affordable Housing Exception sites: Rural Settlements

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH12 - Do you agree with the guidance on the tests to be used to determine whether a proposal is located within a Rural Settlement? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P13		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH13

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Document:SPG - Affordable Housing Affordable Housing Schemes

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH13 - Do you agree with the guidance and principles to be used in assessing Affordable Housing Schemes? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P14		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH14

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Document:SPG - Affordable Housing Assessing local housing need

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH14 - Do you agree with the process for assessing the local housing need of proposed occupiers? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
516.P15		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH15

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21/09/2018

## AH SPG - Reps by Representor

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
516.P15		20/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH15

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Document:SPG - Affordable Housing Ensuring provision, affordability, availability

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<i>Question</i>	<i>Representation Texts</i>
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<b>Question:</b>	<b>Details</b>
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*Representation Text:* . AH15 - Do you agree with the approach towards ensuring the provision, affordability and availability of affordable housing at each stage of the planning process? If not, please explain why.

Yes.

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## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

### 517 Montgomery Town Council

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
517.P1		10/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH7

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Document:SPG - Affordable Housing Spending financial contributions

#### **Question**                      **Representation Texts**

##### **Question:**                      **Details**

*Representation Text:* . AH7 - Do you agree with the examples given as to how the Council may spend financial contributions and with the cascade to be applied? If not, please explain why.

The Town Council agrees with how financial contributions in lieu of build may be used but feel that spend should be strictly limited to the immediate locality rather than potentially cascaded out across the whole of Powys and BBNP. As the Housing Topic Paper for the LDP indicates, there is a rationale behind the approach to Affordable Homes and contributions have been determined on this basis. It is difficult to see that a financial contribution could not be applied within a locality particularly given the requirements for social and sheltered housing provision; the potential for upgrading existing or derelict stock, and the Council's welcome commitment to building Council houses.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
517.P2		10/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH8

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Document:SPG - Affordable Housing Evidence of local housing need

#### **Question**                      **Representation Texts**

##### **Question:**                      **Details**

*Representation Text:* . AH8 - Do you agree with the sources of evidence to be used by the Council to determine local housing need? If not, please explain why.

The Town Council are pleased to see that the LHMA is in the process of being updated and will be used to review need. From local knowledge some of the data may be inaccurate.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
517.P3		10/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH9

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Document:SPG - Affordable Housing Assessing financial viability

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
517.P3		10/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH9

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### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH9 - Do you agree with the arrangements and information requirements for assessing the financial viability of a specific development and proposals for reviewing viability? If not, please explain why.

The Town Council would particularly endorse the LPA's more rigorous approach to ensuring affordable homes are constructed as required by the S.106. We agree that affordable and market housing should be built concurrently and open market homes not completed first. If the developer considers this renders the development unviable then the application should be withdrawn rather than a compromise sought

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
517.P4		10/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH10

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Document:SPG - Affordable Housing Exception sites: Towns and Large Villages

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### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH10 - Do you agree with the guidance on assessing the appropriateness of the location, scale and type of affordable housing on exception sites in Towns and Large Villages? If not, please explain why.

The Town Council would broadly agree with the assessment guidance for exception sites with the proviso that the existing infrastructure can accept such developments and that 'logical extensions' to settlements of up to 5 houses should also be assessed in terms of impact on the integrity of the settlement, the transport / highways infrastructure, landscape/heritage site impacts and potential adverse impact on the amenity of existing dwellings.

There may also be a case for exception sites in rural locations which needs to be considered. It may prove difficult for a dwelling to be built on farmland for family members. This could preclude younger farmers remaining on the land; obviously a highly undesirable outcome.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
517.P5		10/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH14

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Document:SPG - Affordable Housing Assessing local housing need

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## AH SPG - Reps by Representor

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
517.P5		10/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH14

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH14 - Do you agree with the process for assessing the local housing need of proposed occupiers? If not, please explain why.

The Town Council would support this and welcomes the strengthening of guidance to ensure local housing need is met and that occupancy restriction is subsequently maintained unless it can be incontrovertibly proved it is no longer required.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
517.P6		10/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH15

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Document:SPG - Affordable Housing Ensuring provision, affordability, availability

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH15 - Do you agree with the approach towards ensuring the provision, affordability and availability of affordable housing at each stage of the planning process? If not, please explain why.

The Town Council broadly supports the process being put in place to ensure and review provision of affordable housing availability in the short, medium and longer term. We would question a possible divergence from the LDP where it states that affordable / local needs homes can be a home for life. The planning process will need to reflect this when considering any future applications to modify the unit albeit keeping within the defined surface area parameters. The potential conflict requires resolution through this SPG.

We welcome the withdrawal of permitted development rights on affordable homes which has been instrumental in reducing the affordable housing stock in the past. We also welcome the ability to refuse the application on grounds of deliberate underdevelopment / phased development of sites to avoid planning obligation. We trust this, and the requirement for simultaneous build of affordable and open market elements, will be effectively and rigorously enforced. It would be helpful to include detail of monitoring arrangements that will be in place to ensure compliance.

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## AH SPG - Reps by Representor

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### 525 Presteigne & Norton Town Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P1		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH1

Document:SPG - Affordable Housing Definitions and types

#### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH1 - Do you agree that the affordable housing definitions and types as set out are relevant to the Powys LDP area? If not, please explain why.

Yes.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P2		27/07/2018	<input type="checkbox"/>		O		M		Summary: Response to question AH2

Document:SPG - Affordable Housing Data sources and calculating affordability level

#### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH2 - Do you agree with the data sources and calculations used to work out the affordability level for Powys? If not, please explain why.

No. We believe the average income, certainly for Presteigne and Norton, if not all Powys is unrealistic and that the average income stated is not only too high but also that it is unlikely that a family unit looking to buy a property would both be earning the stated wage. Therefore the stated 'affordable' house price is too high and the gap between that figure and the average house price is much greater than stated.

In addition the number of persons stated as being in affordable housing need in East Radnor is far too low. The Town Councils own housing survey in 2011 identified 80 people within Presteigne and Norton stating they would need an affordable 2/3 bedroom home within three years. Just 11 have been provided in the PNTC area since that time. In 2011 PCCs own housing register had 158 on its housing register (only six of which had completed the PNTC survey so 152 extra).

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P3		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH3

Document:SPG - Affordable Housing Specialist market housing developments

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P3		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH3

### Question Representation Texts

#### Question: Details

Representation Text: . AH3 - Do you agree with the approach towards seeking affordable housing contributions from specialist market housing developments? If not, please explain why.

Yes.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P4		27/07/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH4

Document:SPG - Affordable Housing Alternatives to on-site provision

### Question Representation Texts

#### Question: Details

Representation Text: . Yes providing the monies received are spent within the same community as the original site.

The TC supports the prevention of subdivision/phasing of development sites to avoid Affordable Housing contributions and in defining the density of sites to avoid 4 homes being provided rather than five on a 0.25 hectare site.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P5		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH5

Document:SPG - Affordable Housing Arrangements for off-site provision

### Question Representation Texts

#### Question: Details

Representation Text: . AH5 - Do you agree with the approach used to determine whether off-site provision would be appropriate? If not, please explain why.

Yes.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P6		27/07/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH6

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P6		27/07/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH6

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Document:SPG - Affordable Housing Calculating financial contribution

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH6 - Do you agree with the method and formulae for calculating the required financial contribution? If not, please explain why.

Agree with the principle but affordable housing need figures not felt to be even close to correct. See AH2.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P7		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH7

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Document:SPG - Affordable Housing Spending financial contributions

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH7 - Do you agree with the examples given as to how the Council may spend financial contributions and with the cascade to be applied? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P8		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH8

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Document:SPG - Affordable Housing Evidence of local housing need

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH8 - Do you agree with the sources of evidence to be used by the Council to determine local housing need? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
525.P9		27/07/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH9

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Document:SPG - Affordable Housing Assessing financial viability

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH9 - Do you agree with the arrangements and information requirements for assessing the financial viability of a specific development and proposals for reviewing viability? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
525.P10		27/07/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH10

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Document:SPG - Affordable Housing Exception sites: Towns and Large Villages

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH10 - Do you agree with the guidance on assessing the appropriateness of the location, scale and type of affordable housing on exception sites in Towns and Large Villages? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
525.P11		27/07/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH11

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Document:SPG - Affordable Housing Exception sites: Small Villages

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH11 - Do you agree with the guidance on determining whether a site should be viewed as infill or as a logical extension in Small Villages? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P12		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH12

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Document:SPG - Affordable Housing Exception sites: Rural Settlements

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH12 - Do you agree with the guidance on the tests to be used to determine whether a proposal is located within a Rural Settlement? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P13		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH13

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Document:SPG - Affordable Housing Affordable Housing Schemes

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH13 - Do you agree with the guidance and principles to be used in assessing Affordable Housing Schemes? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P14		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH14

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Document:SPG - Affordable Housing Assessing local housing need

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH14 - Do you agree with the process for assessing the local housing need of proposed occupiers? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P15		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH15

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## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
<b>525.P15</b>		27/07/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH15

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Document:SPG - Affordable Housing Ensuring provision, affordability, availability

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<i>Question</i>	<i>Representation Texts</i>
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<b>Question:</b>	<b>Details</b>
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*Representation Text:* . AH15 - Do you agree with the approach towards ensuring the provision, affordability and availability of affordable housing at each stage of the planning process? If not, please explain why.

Yes.

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## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

### 542 Abermule (with) Llandyssil Community Council

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
542.P1		21/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH2

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Document:SPG - Affordable Housing Data sources and calculating affordability level

#### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH2 - Do you agree with the data sources and calculations used to work out the affordability level for Powys? If not, please explain why.

To quote your figures at 4.2.1, two people in a household earning average wage of £24,884.00 each with a total disposable income of £32,606.00 presumes both partners are working full time, it can be no surprise the size of households are decreasing, as they can't afford to have a family.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
542.P2		21/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH14

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Document:SPG - Affordable Housing Assessing local housing need

#### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH14 - Do you agree with the process for assessing the local housing need of proposed occupiers? If not, please explain why.

The majority of recent developments are two or three bed, often the third bed/box room inadequate for a growing family. The Council have identified a need for provision of family accommodation. The SPG does nothing to encourage provision of sustainable homes to retain families in the village.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
542.P3		21/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH15

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Document:SPG - Affordable Housing Ensuring provision, affordability, availability

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
542.P3		21/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH15

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### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH15 - Do you agree with the approach towards ensuring the provision, affordability and availability of affordable housing at each stage of the planning process? If not, please explain why.

The introduction of a cap on the re-sale price at 72% of open market value would have a detrimental effect. Creating a huge disadvantage, as first time buyers inevitably pay a higher rate for their mortgage and once in a position to move up the ladder, would be faced with a huge differential between selling at 72% and purchasing at full market value, thus deterring them from moving on and releasing the affordable dwelling back onto the market.

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## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

### 1552 Douglas Hughes Architects Ltd

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P1		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH1

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Document:SPG - Affordable Housing Definitions and types

#### *Question*                      *Representation Texts*

##### **Question:**                      **Details**

*Representation Text:* . AH1 - Do you agree that the affordable housing definitions and types as set out are relevant to the Powys LDP area? If not, please explain why.

Yes, although it is not clear from these definitions as to whether and in what circumstances self-build might be included in the definition of affordable housing. There are references to self-build in other sections of the document but it would be helpful to make mention here.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P2		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH2

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Document:SPG - Affordable Housing Data sources and calculating affordability level

#### *Question*                      *Representation Texts*

##### **Question:**                      **Details**

*Representation Text:* . AH2 - Do you agree with the data sources and calculations used to work out the affordability level for Powys? If not, please explain why.

Broadly. However the calculations do not take account of local variations in prices and salaries and which could vary considerably. Moreover the calculations appear to take no account of build costs (affordability to build as well as affordable to rent or purchase). This begs the question whether it is possible to provide anything but the smallest, most basic "affordable by design" properties without subsidy. This would in turn suggest that only the RSLs/SHA are capable of financing affordable housing and what this is likely to mean in terms of viability for those schemes where an affordable housing contribution is required but where it is not possible to secure the involvement of either an RSL or the Council.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P3		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH3

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Document:SPG - Affordable Housing Specialist market housing developments

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P3		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH3

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH3 - Do you agree with the approach towards seeking affordable housing contributions from specialist market housing developments? If not, please explain why.

We broadly support this approach. However there are more likely to be viability issues having regard to the additional design features required of certain specialist provision.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P4		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH4

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Document:SPG - Affordable Housing Alternatives to on-site provision

### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH4 - Do you agree with the examples given of circumstances where alternative provision to on-site provision may be considered? If not, please explain why.

Yes. However we would appreciate more information as who will be required to provide evidence (and in what form) that a contribution towards affordable housing in a different location would have a greater contribution towards meeting the local affordable housing need. How. In the last example box at paragraph 6.3.4 it may be worth emphasising the potential role of RSLs as they are increasingly involved in market development.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P5		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH5

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Document:SPG - Affordable Housing Arrangements for off-site provision

### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH5 - Do you agree with the approach used to determine whether off-site provision would be appropriate? If not, please explain why.

Generally speaking. It is not clear how this arrangement would work if, for example, an alternative site is not in the same ownership as the one on which it is deemed less suitable to develop. Is this something that can be accommodated within a traditional section 106 arrangement and does it imply an additional level of legal and financial negotiation and agreement?

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## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P6		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH6

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Document:SPG - Affordable Housing Calculating financial contribution

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH6 - Do you agree with the method and formulae for calculating the required financial contribution? If not, please explain why.

Yes, although there may be a risk that, where it is possible for them to do so, developers will seek sites in areas where there is less requirement for affordable housing.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P7		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH7

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Document:SPG - Affordable Housing Spending financial contributions

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH7 - Do you agree with the examples given as to how the Council may spend financial contributions and with the cascade to be applied? If not, please explain why.

We note that BBNPA is at the bottom of the list in terms of the cascade. While acknowledging that this is a different Local Planning Authority, the Powys communities in the BBNPA forms part of the same Strategic Housing Authority as the rest of County. Where such a community forms an adjoining settlement to the one in which the contribution has been obtained then perhaps this would represent better deployment of that contribution to meeting local need. There could perhaps be a reciprocal arrangement with the National Park LPA in this respect.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P8		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH8

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Document:SPG - Affordable Housing Evidence of local housing need

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P8		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH8

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH8 - Do you agree with the sources of evidence to be used by the Council to determine local housing need? If not, please explain why.

Yes, subject to:

- An overhaul of the Common Housing Register which would give all parties more confidence in the housing needs information provided;
- Developing and promoting the affordable housing register so that it provides a reliable source of data at a local level;
- A transparent and timely mechanism for conducting local housing needs surveys where such information is required to meet any gaps in information held by the Strategic Housing Authority (e.g. in communities where there is little or no social rented housing or where there is a paucity of information about the need for affordable housing).

It also needs to be recognised that, however often it is reviewed and updated, Local Housing Market Assessments are very broad snap-shots in time and cannot drill down to any meaningful level to inform site specific applications.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P9		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH9

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Document:SPG - Affordable Housing Assessing financial viability

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH9 - Do you agree with the arrangements and information requirements for assessing the financial viability of a specific development and proposals for reviewing viability? If not, please explain why.

We would require reassurance that the Council has sufficient capacity and expertise in order to undertake this function in a timely manner. Perhaps this is something the Strategic Housing Service, rather than the beleaguered Planning Service might take a lead on as Housing seems less vulnerable to pressures on budgets and staffing.

We are not sure that we follow the argument in respect of reducing the timescales for development in cases where affordable housing requirements are relaxed or dropped unless the purpose in reducing or removing the requirement to provide affordable housing is specifically to ensure that development can be achieved within policy timeframes and not for any other reason (e.g. financial viability).

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P10		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH10

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Document:SPG - Affordable Housing Exception sites: Towns and Large Villages

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## AH SPG - Reps by Representor

## Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P10		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH10

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH10 - Do you agree with the guidance on assessing the appropriateness of the location, scale and type of affordable housing on exception sites in Towns and Large Villages? If not, please explain why.

Yes. The wording of paragraph 7.4 which states that housing development which would harm the character and appearance of the surrounding landscape would not be looked on favourably. One would suggest (indeed hope) that the Local Planning Authority would apply a similar policy to any development proposals irrespective of whether or not it was affordable housing to be located on an exception site.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P11		14/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH11

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Document:SPG - Affordable Housing Exception sites: Small Villages

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH11 - Do you agree with the guidance on determining whether a site should be viewed as infill or as a logical extension in Small Villages? If not, please explain why.

Yes. Interesting that the affordable housing requirement is inverted here so that only developments of less than the usual "trigger" of 5 units / 0.25 ha will be considered. However we consider this to be sensible in view of the likely needs and infrastructure of most small villages.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P12		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH12

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Document:SPG - Affordable Housing Exception sites: Rural Settlements

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### **Question**                      **Representation Texts**

#### **Question:**                      **Details**

*Representation Text:* . AH12 - Do you agree with the guidance on the tests to be used to determine whether a proposal is located within a Rural Settlement? If not, please explain why.

We are reasonably content with this guidance. However we would again emphasise the importance of ensuring that robust and reliable local affordable housing register information is available for the purpose of determining whether or not it is appropriate to provide affordable housing in such areas.

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## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P13		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH13

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Document:SPG - Affordable Housing Affordable Housing Schemes

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH13 - Do you agree with the guidance and principles to be used in assessing Affordable Housing Schemes? If not, please explain why.

We are reasonably content with the guidance and principles although perhaps there needs to be a little more clarity in respect of self-build or specialised accommodation. Also we would ask the Council to consider instances where larger accommodation may be available e.g. for a larger, extended households (e.g. where there are dependent older or disabled relatives or where there are cultural issues). In such instances would the Council consider reviewing the maximum size of property or is another arrangement possible e.g. building a pair of semi-detached properties, not exceeding the maximum permissible area, to be allocated as a single unit but capable of being converted back to separate accommodation as and when no longer required for this purpose.

Also it would be useful to receive ACG information in respect of flatted accommodation in light of the demand for this type of housing prompted by changes to household demographics and pressures on housing benefits.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P14		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH14

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Document:SPG - Affordable Housing Assessing local housing need

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH14 - Do you agree with the process for assessing the local housing need of proposed occupiers? If not, please explain why.

See response to AH13.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P15		14/08/2018	<input type="checkbox"/>		C		M		Summary: Response to question AH15

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Document:SPG - Affordable Housing Ensuring provision, affordability, availability

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P15		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH15

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### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH15 - Do you agree with the approach towards ensuring the provision, affordability and availability of affordable housing at each stage of the planning process? If not, please explain why.

Subject to there being sufficient capacity within the system. We wish to clarify whether or not this is part of the Section 106 Officer's role and whether s/he has the capacity to deal with this work as well as the range of other planning obligations Powys-wide.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
1552.P16		14/08/2018	<input type="checkbox"/>		C		M			Summary: Response to question AH16

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Document:SPG - Affordable Housing Other comments

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### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH16 – If you have any other comments you want to make which are not covered by the above questions please include them here:

By and large we consider this draft SPG to be a sensible and workable document. There is, though, an issue more fundamental than process and that is deliverability, key to which is viability in an area where too many sites with planning permissions attached are not being built out because they do not stack up commercially. A robust SHG in a slow market area is likely to place even more reliance on registered social landlords, the Council, and the ongoing availability of generous Welsh Government funding for affordable housing in what are uncertain political and financial times. Notwithstanding the recent announcement by Welsh Government of its intention to provide assistance to local developers in order to take forward smaller stalled sites the Council and its strategic partners need to consider what further options are available to stimulate development within the 5-year land supply; identify and bring forward other suitable sites that may become available during the LDP period and what means are available to ensuring the reality of housing delivery meets fulfils Powys' strategic objectives.

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## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

### 4628 Mid Wales Housing Association

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P1		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH1

Document:SPG - Affordable Housing Definitions and types

#### Question Representation Texts

##### Question: Details

Representation Text: . AH1 - Do you agree that the affordable housing definitions and types as set out are relevant to the Powys LDP area? If not, please explain why.

Yes.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P2		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH2

Document:SPG - Affordable Housing Data sources and calculating affordability level

#### Question Representation Texts

##### Question: Details

Representation Text: . AH2 - Do you agree with the data sources and calculations used to work out the affordability level for Powys? If not, please explain why.

Yes.

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P3		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH3

Document:SPG - Affordable Housing Specialist market housing developments

#### Question Representation Texts

##### Question: Details

Representation Text: . AH3 - Do you agree with the approach towards seeking affordable housing contributions from specialist market housing developments? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status</i>	<i>Modified</i>	<i>Summary</i>
4628.P4		21/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH4

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Document:SPG - Affordable Housing Alternatives to on-site provision

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH4 - Do you agree with the examples given of circumstances where alternative provision to on-site provision may be considered? If not, please explain why.

Yes.

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status</i>	<i>Modified</i>	<i>Summary</i>
4628.P5		21/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH5

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Document:SPG - Affordable Housing Arrangements for off-site provision

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH5 - Do you agree with the approach used to determine whether off-site provision would be appropriate? If not, please explain why.

Yes.

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status</i>	<i>Modified</i>	<i>Summary</i>
4628.P6		21/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH7

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Document:SPG - Affordable Housing Spending financial contributions

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH7 - Do you agree with the examples given as to how the Council may spend financial contributions and with the cascade to be applied? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P7		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH8

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Document:SPG - Affordable Housing Evidence of local housing need

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH8 - Do you agree with the sources of evidence to be used by the Council to determine local housing need? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P8		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH9

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Document:SPG - Affordable Housing Assessing financial viability

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH9 - Do you agree with the arrangements and information requirements for assessing the financial viability of a specific development and proposals for reviewing viability? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P9		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH10

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Document:SPG - Affordable Housing Exception sites: Towns and Large Villages

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH10 - Do you agree with the guidance on assessing the appropriateness of the location, scale and type of affordable housing on exception sites in Towns and Large Villages? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
4628.P10		21/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH11

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Document:SPG - Affordable Housing Exception sites: Small Villages

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH11 - Do you agree with the guidance on determining whether a site should be viewed as infill or as a logical extension in Small Villages? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
4628.P11		21/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH12

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Document:SPG - Affordable Housing Exception sites: Rural Settlements

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH12 - Do you agree with the guidance on the tests to be used to determine whether a proposal is located within a Rural Settlement? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status	Modified	Summary
4628.P12		21/08/2018	<input type="checkbox"/>		S		M			Summary: Response to question AH13

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Document:SPG - Affordable Housing Affordable Housing Schemes

### *Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . AH13 - Do you agree with the guidance and principles to be used in assessing Affordable Housing Schemes? If not, please explain why.

Yes.

## AH SPG - Reps by Representor

by: Representation No

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P13		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH14

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Document:SPG - Affordable Housing Assessing local housing need

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH14 - Do you agree with the process for assessing the local housing need of proposed occupiers? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P14		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH15

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Document:SPG - Affordable Housing Ensuring provision, affordability, availability

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH15 - Do you agree with the approach towards ensuring the provision, affordability and availability of affordable housing at each stage of the planning process? If not, please explain why.

Yes.

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Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4628.P15		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH16

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Document:SPG - Affordable Housing Other comments

### *Question*                      *Representation Texts*

#### **Question:**                      **Details**

*Representation Text:* . AH16 – If you have any other comments you want to make which are not covered by the above questions please include them here:

It would be useful if the SPG clarified how planning applications for 100% affordable housing provide by an RSL is processed and conditioned at the planning application stage. Mid-Wales Housing Association has experiences inconsistency on this matter in recent years and, without better clarification in the SPG, there is concern that this inconsistency will continue.

The following permissions highlight the varying approaches used by Development Management in recent permissions:

## AH SPG - Reps by Representor

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
<b>4628.P15</b>		21/08/2018	<input type="checkbox"/>		S		M		Summary: Response to question AH16
<hr/>									
<p>P2016 1167 - Canal Road, Newtown (approved March 2017) – MWA was the named applicant on the application for 30 units and no requirement for affordable housing was imposed on the permission (no conditions or S106). All 30 units have recently been completed as affordable (social rented) housing.</p>									
<p>P/2017/1076 - Orchard Close, Churchstoke (approved March 2018) – MWA was the named applicant on the application for 28 units and the new 'model' condition detailed in the draft SPG was imposed on the permission requiring details of tenure/mix etc. to be submitted and approved by the LPA. However, the condition required that 100% of the units (all 28) are affordable even though the majority of the site is within the settlement development boundary. This appears to be at odds with the guidance in the SPG.</p>									
<p>P2013 0891 – Glan y Dwr, Newtown (approved 2014) – Private developer was the named applicant but land was transferred and developed by RSL. The S106 imposed on the permission required 20% affordable housing but this requirement fell away if the site is transferred to an RSL.</p>									
<p>Paragraph 6.1.2 and 8.22 of the draft SPG seems to suggest that the affordable housing requirement/restrictions do not apply to development proposals for 100% affordable housing. This would support the approach adopted above at Canal Road and Glan Y Dwr above. This would be the Association's preferred method because it would not affect the Association's ability to securitise (borrow funds against) the properties, which in turn enables the Association to build further affordable housing.</p>									
<p>As touched upon in the paragraph 8.22 of the SPG, there are mechanisms in place (through the Welsh Government SHG programme) to ensure that that RSLs do not circumvent their duty to rent/sell the properties at an affordable level.</p>									

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## AH SPG - Reps by Representor

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### 5704 Glandwr Cymru - Canal & River Trust in Wales

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
5704.P8		17/08/2018	<input type="checkbox"/>		S		M		Summary: Response to consultation confirming no comments

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Document:SPG - Affordable Housing Other comments

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*Question*                      *Representation Texts*

**Question:**                      **Details**

*Representation Text:* . Please note we have no comments to make on the affordable housing SPG.

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**AH SPG - Reps by Representor**

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document= SPG - Affordable Housing

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