

**Eryri Local Development Plan Examination:**  
**Action Points deriving from Hearing Session 1**

**Action Point 1: Further work to identify historic trends in respect of large windfall sites and whether an allowance should be included in the overall housing provision**

The Authority has undertaken further work to identify the historic trends in respect of large windfall sites within Snowdonia National Park.

The Authority has looked at all the planning applications that have been permitted in the National Park in the last 10 years between 2008 and 2018. The table below provides information on the large windfall development site, its location, the type of development and the number of units permitted.

**Large windfall sites permitted 2008 - 2018**

	Site	Location	Settlement hierarchy	Type	Units
2008	Youth Hostel	Llanbedr	Secondary Settlement	Redevelopment	9
2009	Abbey Arms	Llan Ffestiniog	Secondary Settlement	Redevelopment	13
2009	Golden Lion Yard	Dolgellau	Local Service Centre	Redevelopment	7
2012	Plas yn Dre Car Park	Bala	Local Service Centre	New build	12
2013	Pant yr Eithin	Harlech	Service Settlement	Redevelopment	13
2014	Chapel Conversion	Harlech	Service Settlement	Conversion	5
2018	Natwest Bank	Bala	Local Service Centre	Redevelopment	5
TOTAL					64

The above table identifies a total of 7 developments permitted on large windfall sites between 2008 and 2018 ranging from a 5 unit site to a 13 unit site. The table above gives a total of 64 units over a ten year period which equates to 6.4 unit per annum. In order to identify an allowance in the Eryri LDP it is important to consider the likelihood of this trend continuing over the plan period. The deposit Eryri LDP housing development boundaries have not changed significantly since the adopted Eryri LDP and therefore it is reasonable to assume that large windfall opportunities will decrease within the revised deposit Eryri LDP housing development boundaries. The Authority therefore consider that it would be reasonable to include an allowance of 5 units per annum within the overall housing provision. This would equate to a total of 75 units over the Plan period (2016 – 2031). This would result in an overall housing provision of 885 units (810 + 75 units). The increase in housing provision would result in increasing the flexibility of the plan from 5% to 15%. These changes would ensure that the Plan is more accurate and the changes will not affect the soundness of the Plan.

The Authority has also looked at the distribution of these historic large windfall sites within each settlement tier. The table below demonstrates the distribution of large windfall sites that have come forward within each settlement tier along with a % proportion in order to calculate the large windfall site allowance for each settlement tier over the Plan period.

Settlement tier	No of units	%	% rounded up
Local Service Centre	24	38%	40
Service Settlement	18	28%	30
Secondary Settlement	22	34%	30

The above proportions reflect the nature of the settlements within the National Park (2 local service centres, 5 service settlements and 38 secondary settlements with some of these secondary settlements e.g. Llan Ffestiniog somewhat larger than others). The Authority considers that distributing the large windfall allowance based on the historical distribution trend identified above is the appropriate way forward and has rounded up the proportions accordingly.

**Changes required to the revised Eryri LDP to take into account the inclusion of large windfall site allowance on the overall housing provision have been included in MAC 4.**

**Action Point 2: Further work to justify the proposed thresholds and any viability considerations.**

The thresholds for affordable housing delivery set out in the revised Eryri LDP are realistic and founded on a credible assessment of viability. The Affordable Housing Viability Study concludes that the key driver of viability will always be location rather than scale of development. The thresholds of 5, 3 and 2 within the Local Service Centres, Service Settlements and Secondary Settlements respectively are therefore considered viable in terms of the Affordable Housing Viability Study.

The thresholds of 5, 3 and 2 also reflect the type and size of developments coming forward in the National Park. The Local Service Centres of Bala and Dolgellau have a threshold of 5 to reflect their status as the largest settlements in the National Park, the size of sites coming forward and their ability to accommodate new development and change. The housing needs of Bala and Dolgellau will be met by a mix of open market housing and sites are allocated in both settlements for 100% affordable housing to meet local needs. A threshold of 3 within the Service Settlements and a threshold of 2 within Secondary Settlement again reflect their status, the size of sites coming forward and their ability to accommodate new development and change.

The Authority has also taken into account localised factors and considered previous Annual Monitoring Reports and what has been delivered on the ground. All the relevant evidence has been considered to set site thresholds for residential development above which a proportion of affordable housing will be sought. Further information is contained in the *Further Evidence Background Paper: Affordable Housing Percentages and Thresholds* (April 2018).

The Plan seeks to maximise the number of affordable houses that will be built on windfall sites while taking into consideration:

- The overriding purposes of the National Park to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- An element of identified affordable need
- The need to retain culturally distinctive communities
- Viability constraints

- The need to stimulate some market housing for smaller sites to increase choice and overall completion rate as well as supporting small builders and the local economy.
- Flexibility of policy on site viability

The Authority considers that increasing the thresholds in the revised Eryri LDP and allocating other appropriate sites for 100% affordable housing is the most appropriate way forward to ensure delivery. This approach would balance the need to deliver affordable housing to meet local needs and would enable the release of more open market housing to stimulate the local housing market, increase the overall completion rate and support small builders and the local economy within the context of a designated landscape. The thresholds of 5, 3 and 2 will make sites more attractive to local house builders active within the National Park and will result in a mix of open market and affordable housing completions to meet the needs of the local communities.

In terms of affordable housing contribution, the Authority would not be seeking affordable housing contributions below the thresholds. Any units proposed below these thresholds will be open market units which will not have any viability implications. Small, local house builders do not necessarily have the cash towards the payment of commuted sums on these smaller sites (below the threshold) which could stagnate housing delivery in the National Park. The Authority is keen to ensure housing needs are met on site to meet the needs of the local community. Commuted sums would not necessarily guarantee delivery of Affordable Housing on site.

Having looked at the Affordable Housing Viability Study and all the local evidence the thresholds proposed in the revised Eryri LDP are considered viable, reasonable and deliverable per settlement tier.

**Action Point 3: Further work to explain how the different tenures assessed in the Affordable Housing Viability Study have influenced the affordable housing % targets and explain which route best reflects the type of housing that is most likely to be achieved in practice in the National Park.**

### **Affordable Housing Viability Study 2016**

The Affordable Housing element has been tested by considering two different tenure approaches in the Affordable Housing Viability Study. The first by reference to local household income which assumes that the Affordable Housing product will be focused on local needs and towards home ownership (an intermediate affordable housing approach). The second approach, assumes that housing associations will purchase Affordable units on a tenure neutral basis at 42% of ACG (Acceptable Cost Guidance). ACGs are published by Welsh Government and are indicative costs for providing Affordable Housing.

The type of affordable housing that is most likely to be achieved in practice (and which has been achieved in previous years) within Snowdonia National Park is the intermediate Section 106 route which is focused on local needs and towards home ownership. This is the approach taken by self-build projects and by small builders active within the National Park. Due to the above factors, **the 2016 AHVS intermediate route was the tenure approach used as the starting point for determining the % affordable housing targets in the Plan.**

The testing under the ACG approach assumes that housing associations will purchase affordable units on private sites at 42% of ACG. This approach is more relevant for larger sites outside of the National Park. The only large allocated site within the Plan which this approach might be relevant to is the site behind Red Lion, Bala.

**The 2018 AHVS update findings:**

The Authority updated the Affordable Housing Viability Study in 2018 to ensure that the most up-to-date figures were presented to the Inspector at the Examination Hearing Sessions. The updated AHVS demonstrated that viability has improved in some areas compared to 2016 study in particular relating to the intermediate tenure route. The findings further support the targets set in the Plan. The 2018 AHVS AGC route also supports the 20% target within Bala.

In addition, within the National Park, past trends and continuous discussions with housing associations demonstrate that housing associations prefer and are delivering 100% affordable housing on their own sites rather than purchasing affordable units on a private site. This approach is also reflected in the Affordable Housing Policy in the Plan.

In addition to the Affordable Housing Viability Studies (2016 & 2018), the Authority has also provided evidence to outline past delivery rates and identify localised factors. These are discussed in more detail in Examination Document 007: Further Evidence Paper – affordable housing percentages and thresholds (April 2018)

**Action Point 4: Provide an update on progress with Gwynedd LHMA**

The Authority is in a unique position in that it does not produce a LHMA specific to the National Park Authority boundary; it is reliant on the evidence of neighbouring authorities. Gwynedd Council's most recent LHMA continues to be the 2013-2018 LHMA Study. The findings of the 2013-2018 LHMA has provided evidence of need as part of the Eryri LDP revision process, but unfortunately the LHMA has not been updated in time to inform the hearing sessions.

The Authority are in regular contact with Gwynedd Council's Housing Department and the Joint Planning Policy Team to keep updated with the progress and to emphasise the importance of an up-to-date assessment of the full range of housing requirements. The Authority attended a meeting on 12<sup>th</sup> April to discuss the importance of an up-to-date LHMA and to agree a timetable. Work has since started on the 2018-2023 Gwynedd LHMA. The Authority attended a meeting on June 19<sup>th</sup> and Gwynedd Council's housing department reported that they have been working closely with the Council's research team on the housing market profiles and key statistics to identify the main matters and issues facing the area. Work has also progressed on the annual affordable housing requirement calculation. Gwynedd Housing Options Team (who manage the Council's social housing register) have provided data to feed into the social housing need calculation and Tai Teg are looking to provide data to feed into the Intermediate housing needs calculation.

The Authority will continue to work closely with Gwynedd Council to progress the work on the LHMA and will be in a position to report on the findings and progress in the Annual Monitoring Report. Monitoring the affordable housing need figure through the LHMA is already one of the indicators included in the Eryri LDP monitoring framework.

**Action point 5: Further work on Development Policy 13 following publication of WGC 005/2018: Planning for Gypsy, Traveller and Showpeople sites**

Further Work has been undertaken on Development Policy 13 following the publication of Welsh Government Circular 005/2018 and this further work has resulted in changes to Development Policy 13. These changes can be seen in MAC 8 and have been agreed with the Welsh Government.

**Action Point 6:**

**Cross check for any subsequent knock on of the MACs.**

As a result of the changes proposed to Development Policy 13 and the assessment of these changes through the SA/SEA to ensure that sufficient consideration is given to the Welsh Language when determining planning applications the definition of Windfalls within Appendix 1 Glossary needs to be amended. This amendment is shown as MAC 8

As a result of the change to the housing provision figure (due to the inclusion of the large windfall allowance) amendments have been made to the various sections of the text in the housing chapter and these can be seen in MAC 4.