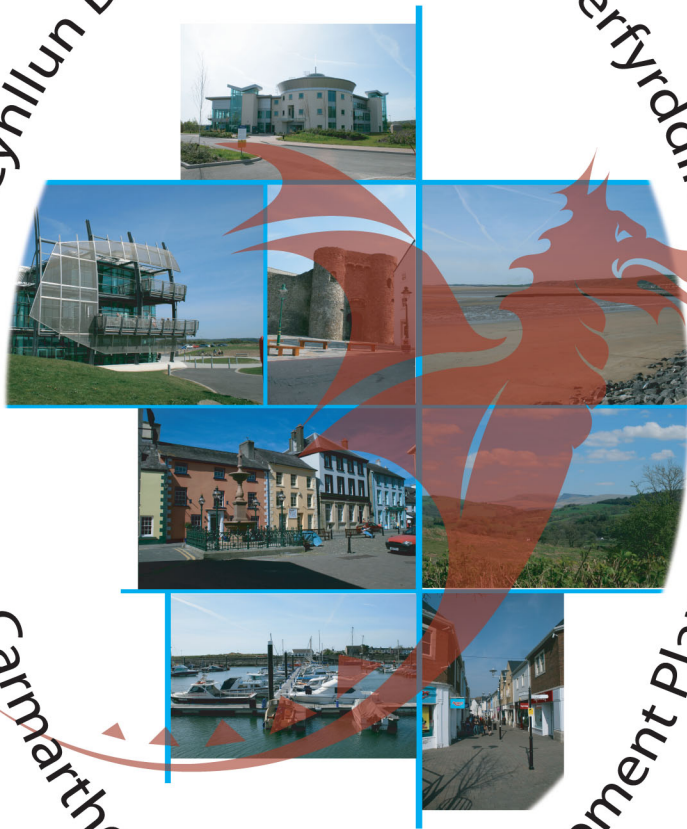


Affordable Housing - Topic Paper 4

Cynllun Datblygu Lleol Sir Gaerfyrddin



Carmarthenshire Local Development Plan

June 2011

1. Introduction

- 1.1 Carmarthenshire County Council (CCC) is in the process of preparing a Local Development Plan for its area (excluding that part contained within the Brecon Beacons National Park). The aim of the new Local Development Plan (LDP) is to make the Development Plan system more relevant, inclusive and engaging to local communities.
- 1.2 The LDP will set out the Local Planning Authority's proposals and policies for the future development and use of land within its administrative area. Upon adoption, the LDP will supersede the existing Unitary Development Plan (UDP) with decisions on planning permissions primarily based on its content. A Development Plan provides a measure of certainty about what kind of development will, and will not, be permitted during the Plan period.
- 1.3 Carmarthenshire County Council aims to ensure that everyone in the county has access to a good quality home that meets their housing requirements. The Council therefore has an important strategic and enabling role in aiming to provide an increasing supply of affordable housing through different mechanisms.

Purpose of this Paper

- 1.4 The overall aim and purpose of the study is to
 - Identify the most ambitious yet achievable viable target(s) and threshold(s) for affordable housing which fully reflect the availability of a range of finance towards affordable housing and reflects priority infrastructure needs;
 - To assess the impact of the profile of sites within the CCC area on housing viability;
 - Advise on a robust policy position with respect to the setting of thresholds which do not adversely impact on the delivery of housing in the County.
- 1.5 Carmarthenshire County Council appointed Three Dragons consultants to prepare a Viability Assessment compliant with the requirements of the Welsh Assembly Government's TAN2 – Planning and Affordable Housing (2006).
- 1.6 This Topic Paper should be read in conjunction with the Three Dragons Viability Report, which is utilised as the key evidence document for affordable housing policy within the LDP.

2. Policy Context

2.1 The term affordable housing for the purpose of the land use planning system is defined in *Technical Advice Note 2: Planning and Affordable Housing* as “housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers.” (TAN 2, 2006, paragraph 5.1).

2.2 There are two main types of affordable housing as defined by TAN 2:

Social Rented Housing – provided by local authorities and Registered Social Landlords where rent levels have regard to the Assembly Government’s guideline rents and benchmark rents.

Intermediate Housing – where prices or rents are above those of social rented housing but below market housing prices and rents. This includes Low Cost Home Ownership models such as shared equity or assisted purchase schemes.

2.3 All other housing is classified as ‘market’ housing, which includes private rent or sale in the open market, where no occupancy restrictions are in place.

2.4 Particular reference is given to Paragraph 9.2.14 of Planning Policy Wales - Edition 4 which states that ‘A community’s need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies. Paragraph 9.2.16 goes on and states ‘development plans must include an authority-wide target for affordable housing (expressed as numbers of homes) based on the LHMA and identify the expected contributions that the policy approaches identified in the development plan (for example, site thresholds, site specific targets, commuted sums and affordable housing exception sites) will make to meeting this target. The target should take account of the anticipated levels of finance available for affordable housing, including public subsidy, and the level of developer contribution that can be realistically sought.

3. Local Housing Market Assessment

3.1 In 2005, Carmarthenshire’s Local Housing Market Assessment was undertaken by DTZ to enable a better understanding of the local housing market, the key drivers of local housing demand and supply, and the level of affordable housing need within the County. The Assessment is now in its fourth annual review. It forms a key part of the robust evidence base to identify the need for, and setting a target for the level of affordable housing for the LDP, in relation to the context of what the planning system can reasonably be expected to deliver. The

LHMA has been prepared in accordance with the Welsh Assembly Government Local Housing Market Assessment Guide (2006).

- 3.2 The LHMA (2009 review) provides a quantitative assessment of the current housing needs which provides a figure of additional affordable homes required above the UDP commitment, and carried forward during the period of the Local Development Plan.
- 3.3 The LHMA identifies a need for alternative accommodation (excluding available stock to offset need) of 4,310, and along with other various calculations defines an overall annual shortfall of 743 affordable units. This need for alternative accommodation is derived from the housing choice register. There is a recognition within the LHMA that the shortfall may represent an underestimate, and a recognition (in the short to medium term at least) that the fall in completion numbers has encumbered the ability of the planning system to deliver new affordable housing.
- 3.4 The shortfall of 743 affordable dwellings per year which the 2009 LHMA indicates is a second successive annual fall, and a notable fall from 2007's figure of 1,332 dwellings per year. This fall can be partly attributed to the fall in house prices in some parts of Carmarthenshire during the last few years which has allowed prices to become more affordable relative to household income, and home ownership has therefore become more accessible.
- 3.5 In identifying this shortfall or requirement in terms of affordable housing, the LHMA defines the extent of need across the County and also at a sub area level based on the six Community Areas (CNA). It is clear that the shortfall cannot be provided through the planning system alone and reference is made to other avenues for delivery in subsequent stages of this paper.
- 3.6 To further this point, the analysis within the LHMA provides an assessment for a five year period, and based on this evidence, this affordable need would equate to a requirement of 3,715 affordable dwellings to be built within the next 5 years to satisfy the shortfall.
- 3.7 The Population and Household Projections topic paper, envisages that there is a requirement of 15,197 dwellings to be developed through the planning system during the LDP period. This equates to 1,013 dwellings per year.
- 3.8 When compared to the overall housing requirement of 1,013 dwellings per annum identified during the Plan period, the LHMA would require that 73% of all constructed dwellings would need to be affordable. It is not expected that the planning system alone will, or should provide for this shortfall. Further details on the consequences of this breakdown are discussed in the summary and conclusions.

- 3.9 To further clarify the differences between the need and potential provision through the LDP, the Housing Land Availability Study conducted for the period 1st April 2008 to 30th March 2009 concluded that 263 dwellings were completed and 175 dwellings were under construction. Table 1 shows the number of completed dwellings during the last 10 years and it is evident that to provide the level of affordable housing in conjunction with the LHMA, it would be higher than the development levels experienced in the county, further indicating anomalies between the LHMA need and what is deliverable through the planning system. This should however be viewed in the context of the LDP through its level of housing provision, the need to closely monitor provision particularly in light of market conditions, and its implications in relation to that need.

	2009 (1/4/08 – 30/3/09)		2008 (1/4/07- 30/3/08)		2007 (1/7/05– 31/3/07)		2005 (1/7/03– 30/6/05)		2003 (1/7/01– 30/6/03)		2001 (1/7/99– 30/6/01)	
	Cp	U/C	Cp	U/C	Cp	U/C	Cp	U/C	Cp	U/C	Cp	U/C
Carmarthen	36	65	192	54	326	98	313	118	207	117	180	37
Dinefwr	120	31	109	35	227	54	215	73	130	42	108	24
Llanelli	107	79	346	81	622	218	737	268	238	115	234	30
TOTAL	263	175	647	170	1,175	370	1,265	459	575	274	522	91

Table 1: Past Completions

Cp = units completed

U/C = units under construction

4. Carmarthenshire Affordable Housing Delivery Statement 2008-2011

- 4.1 In line with WAG guidance, Carmarthenshire's Affordable Housing Delivery Statement set out the factors influencing demand for affordable housing within the County and the mechanisms for enabling supply. It looks to accommodate need whilst recognising the difficulties in forecasting, particularly from an affordable housing perspective. In identifying need in relation to affordability it sets a series of commitments over a 3 year period (575 units).

The Affordable Housing Delivery Statement sets out the following table in relation to deliverable affordable housing commitments.

Action	2008/9 (actual)	2009/10	2010/11	3 year Total
To Rent				
Social Housing Grant & Recycled Capital Grant (subject to WAG allocation)	10	50	80	140
To Buy				
Section 106	16	10	10	36
Rural exceptions policy	0	0	24	24
Affordable housing project on council land (including an element of rental and shared ownership)	29	25	150	204

Social lettings agency	15	35	50	100
Empty homes initiatives	0	15	15	30
Strategic Capital Investment Fund	1	20	20	41
Totals	71	155	349	575

Table 2- Affordable Housing Commitments

4.2 Having identified shortfall across the County, its distribution provides a measure of need across the six CNA's as set out below:

Area	Number requesting housing (expressing one choice only)	As a % of total	Expressed as numbers of affordable housing required
Aman	735	14%	100
Gwendraeth	1326	24%	181
Llanelli	2125	39%	290
Taf	953	18%	130
Teifi	178	3%	24
Tywi	124	2%	17
	5441	100%	743

Table 3- Need across the six CNA's

- 4.3 The LDP in providing for a flexible level of overall housing growth makes a provision which contributes to the meeting of the need identified within the LHMA, in a manner which is consistent with the spatial pattern of demonstrated demand.
- 4.4 It should be noted that the LHMA, in calculating the potential for need to be accommodated through offset stock, has not taken account of unused stock in the private sector. The identified shortfall and the calculation of need takes into account existing households falling into need. This includes owner occupiers and private tenants. Whilst the need amongst these households for more affordable housing is recognised there is a potential for freeing up existing stock should they change accommodation.
- 4.5 In considering the role of planning in meeting the shortfall (or need) identified within the LHMA there are a number of other contributors. In this respect, the Affordable Housing Delivery Statement identifies a number of ways in which the Council can enable the delivery of affordable housing supply. This statement demonstrates the role of the development plan (Unitary Development Plan) as only part of the solution to meeting need. Reference should be had to the Affordable Housing Delivery Statement in this regard.

5. Viability Study - High Level Testing

- 5.1 Carmarthenshire County Council appointed Three Dragons to prepare a Viability Assessment which involved undertaking high level testing to consider viability for mixed tenure residential development for a number of different proportions and types of affordable housing. The analysis was based upon a notional one hectare site, undertaken in seven sub market areas within Carmarthenshire. The submarket areas are identified by Table 3.1 of Three Dragons' Viability Report.
- 5.2 The analysis relates to scheme residual which would be expected to be achieved across a range of sites including brownfield and green field situations.
- 5.3 The analysis applies as at January 2011. Further assumptions and variables are noted within the Viability Report.

Results

- 5.4 The affordable housing viability study undertook 40 different testing assumptions, which included development mixes at 20, 30, 40 and 50 dwellings per hectares, and used different affordable unit targets within the assessment. The results of which, are found at Figures 3.1, 3.2, 3.3, and 3.4 of the Three Dragons Study.
- 5.5 The residual value at 20 dph within the sub market areas vary significantly with a broadly three way split in viability. First, Llandovery, Llandeilo and North East Carmarthenshire along with St Clears and Rural Hinterland; second, Newcastle Emlyn and Northern Rural Area along with Carmarthen and Rural; and third, the sub markets comprising Kidwelly, Burry Port, Llanelli, Ammanford and Cross Hands.
- 5.6 At 20% affordable housing, residual values are £0.49 million per hectare at the top of the market (Llandovery, Llandeilo and North East Carmarthenshire) and -£0.19 million per hectare at the bottom, demonstrating the range of viability.
- 5.7 The scenario at 30 dph generates a similar pattern of residual values as at 20 dph with the same broad, three way divisions appearing.
- 5.8 In comparing a 20 dph and a 30 dph scheme, we see (see also Appendix 3) higher residual values in the higher value areas (most notably the four higher value areas); and lower residuals in the lower value areas. At the lower end of the market, negative residuals are compounded by higher density. The mix adopted at 30 dph offsets this although it should be stated that a different mix (at 30 dph) may provide a higher residual value.

- 5.9 Increasing density to 40 dph (from 30 dph) increases residual value significantly; in particular in the higher value areas; however in the lower submarket areas the residual value is still negative.
- 5.10 In Kidwelly and Burry Port, a 40 dph scheme should generate a modest affordable housing contribution, although delivery will be, as elsewhere, dependent on the relationship between residual value and existing use value.
- 5.11 Residual values are increased from 30 dph to 40 dph on account of a similar development mix being assumed. As previously stated, the residual values achieved are sensitive to development mix and increasing or decreasing density may or may not enhance viability. At 40 dph a relatively higher density is being achieved but with a relatively low proportion of flats (5%) which tend to make development in a locations such as Carmarthenshire less viable.
- 5.12 At 50 dph the main impact on the assumptions here is to decrease viability. This occurs in all instances except one (Llandovery, Llandeilo and North East Carmarthenshire at 10% affordable) when comparing the 40 dph and 50 dph scenarios (see also Appendix 3).
- 5.13 Residual values are still however robust in the middle and higher value areas. Residual value is £200,000 per hectare at 40% affordable housing in Llandovery, Llandeilo and North East Carmarthenshire. In Carmarthen and Rural residual value is around the same level (£200,000 per hectare) at 20% affordable housing.

Analysis

- 5.14 From the Three Dragons Affordable Housing Viability Assessment, the analysis indicates significant challenges in delivering sites with affordable housing in the lower value sub markets. The residual values are negative even at very low proportions of affordable housing. From a policy position this means that it is unrealistic to request affordable housing on development schemes. Even assuming significant increases in house prices over the Plan period would allow anything other than a modest affordable housing requirement.
- 5.15 Whilst the evidence suggests that in certain areas there should be a nil target applied this would be the wrong policy option, as market forces change. This conclusion is borne from Three Dragons' study and secondly the local authority is committed to provide an element of affordable housing through the planning system.
- 5.16 The analysis of the AVHA shows the significant variation in residual values achieved across the County area and in particular the viability divide between the three main areas. Three Dragons draw upon two

different options for the targets for affordable housing which is set out below.

- A single target for the Carmarthenshire area. This could reasonably be set at 20% but recognising that this would be challenging in the weaker sub markets and probably not challenging enough in the higher value areas;
- A target of 30% in Llandovery, Llandeilo and North East Carmarthenshire and St Clears and Rural Hinterland; a target of 20% in Carmarthen and Rural and Newcastle Emlyn and Northern Rural; and a target of 10% in Kidwelly, Burry Port, Pembrey and Lower Gwendraeth Valley as well as in Llanelli and Ammanford, Cross Hands and Amman Valley.

5.17 The second option provides a more 'precise' steer for the Council in that it reflects targets at the more local or sub market level. In this respect, the second option should allow for smoother site specific negotiations since targets are more bespoke. However the split target approach provides only a very modest requirement in the lower value areas which in turn could have serious implications on the numbers of affordable units provided, as identified above. Where there are large sites in lower value areas which are above average in terms of house prices, opportunities may be missed and hence a more general, county wide target is then appropriate.

Formatted: Font: Arial

- 5.18 By undertaking a county wide target of 20%, it is evident that the areas which could accommodate viability at 30% will not maximise the amount of affordable housing they can acquire. For higher viable sub market areas the number of LDP housing allocations within their areas equates to roughly 7.5-10% of total LDP housing allocations. In turn, this would reduce the potential amount of affordable housing that could be achieved from these areas. This would equate to approximately 130 dwellings.
- 5.19 For submarket areas which showed limited or no existing viability, a rigid target of 10% would set an extremely low affordable housing target. The number of new houses allocated in the lower sub-market areas equates to approximately 60% of the overall housing allocations in the LDP and at 10% viability only approximately 900 houses would be affordable, however with a flexible 20% viability target, the number of dwellings could be as much as 1,800 affordable dwellings.
- 5.20 The Three Dragons study acknowledges that the County wide target is appropriate to deal with the eventualities of hot spot areas, and also allows the flexibility should market conditions change and where residual values increase. It is this approach which the Local Planning Authority will seek within the LDP and will be for the following reasons.
- 5.21 On balance, it is the view of the Local Planning Authority that creating a starting point of 20% county wide with the ability to negotiate outweighs

the merits of creating three different viability targets. It is recognised that the ability to negotiate will work in both directions, and the authority where applicable could request a higher affordable percentage target on sites with a higher residual value.

5.22 In order to follow this approach a flexible mechanism will need to be employed to reach this target. There will be site-specific circumstances where achievement of the affordable housing proportions set out above may not be possible or where development exceeds the proposed targets. This should not detract from the robustness of the overall targets but the Authority will take into account specific site viability concerns when these are justified.

5.23 If there is any doubt about viability on a particular site, it will be the responsibility of the developer to make a case that applying the Authority's affordable housing requirement for their scheme makes the scheme not viable. Where the Authority is satisfied that this is the case, the Authority has a number of options open to it (including changing the mix of the affordable housing and supporting a bid for grant funding from the WAG / or using their own funds) before needing to consider whether a lower level of affordable housing is appropriate. In individual scheme negotiations, the Authority will also need to consider the balance between seeking affordable housing and its other planning obligation requirements.

Deleted: 33

6. Options for Site Size Thresholds

6.1 Chapter 4 of the Three Dragons AHVA study reviews the policy context and options for identifying the contributions which small sites can make to securing affordable housing. Where the supply of housing sites is dominated by very large sites, then a low threshold will not be significant, but the Authority has a number of settlements where they rely heavily on smaller housing sites, and therefore they can play a vital role in providing affordable housing. The threshold level at which affordable housing is set will have a major bearing on how much affordable housing is made available.

6.2 TAN2 does not provide any national guidance on appropriate thresholds and leaves this to LPAs to identify. TAN 2 does comment that

'When setting site-capacity thresholds and site specific targets, local planning authorities should balance the need for affordable housing against site viability'. (TAN2 para 10.4)

6.3 The study through the table below identified the relationship between the number of dwellings granted planning permissions and the site size.

Table 4: Permissions – all Carmarthenshire (April 2008-December 2010)

Site Size	No of Dwellings	% of Total
1 to 4	766	37.83
5 to 9	151	7.46
10 to 14	74	3.65
15 to 24	118	5.83
25 to 49	136	6.72
50 to 100	332	16.40
> 100	448	22.12
	2025	100

Source: Carmarthenshire CC

- 6.4 The analysis indicates that for the county as a whole almost 38% of permissions are for sites of 1-4 no. dwellings which represents a significant amount of dwellings falling below the threshold for affordable housing contributions (These thresholds are identified within Carmarthenshire County Council's – Affordable housing policy).
- 6.5 Further analysis by Three Dragons suggests that within larger settlements it has a relatively lower reliance on small sites compared with the County as a whole. However, it is noted that almost one in four dwellings across the three growth areas will be built on very small sites (1-4 dwellings). This is shown in Table 5.

Table 5: Permissions – major settlements

Ammanford, Carmarthen & Llanelli		
Site Size	No of Dwellings	% of Total
1 to 4	88	23.72
5 to 9	31	8.36
10 to 14	12	3.23
15 to 24		
25 to 49	35	9.43
50 to 100		
> 100	205	55.26
	371	100

Source: Carmarthenshire CC

Table 6: Permissions – Tier 2, 3 and 4 settlements

Rural Settlements		
Site Size	No of Dwellings	% of Total
1 to 4	678	40.99
5 to 9	120	7.255
10 to 14	62	3.748
15 to 24	118	7.134
25 to 49	101	6.106
50 to 100	332	20.07
> 100	243	14.691
	1654	100

Source: Carmarthenshire CC

6.6 Table 6 shows the pattern of permissions across all lower tiers settlements. The table shows a heavy reliance on site sizes of 1-4 dwellings with almost 41% of permissions being on small sites. The remaining 59% of permitted dwellings are largely on sites with more than 50 dwellings with a low and equal spread across the other 5+ no. dwelling categories.

Formatted: Font: Arial

- 6.7 Under the current Affordable Housing Delivery Statement thresholds, the threshold of 10 no. dwellings in urban areas would capture 67.92% of dwellings with planning permissions. If the site size threshold was reduced to 5no dwellings, this would capture 76.28% of dwellings with planning permission. It is noted that of the 141 allocated sites within the LDP, only 33 of those have indicative dwellings numbers fall between 5 and 10 dwellings. Some of these are under construction without affordable housing contributions, therefore a minimal increase in on-site affordable housing contributions would be had by changing the current threshold. Furthermore, the residual values experience in the growth areas, particularly in Ammanford and Llanelli is low, therefore maintaining a 10 + dwelling threshold would aid in the delivery of these sites.
- 6.8 The threshold of 5 no. dwellings in rural areas (Tier 2 and below) would capture 59% of dwellings with planning permissions. This table shows a heavy reliance on small sites which fall below this threshold.
- 6.9 Table 5 and Table 6 indicate that 32.08% and 40.99% respectively of permitted dwellings falling below the thresholds for on-site contributions within their tiers. The Local Planning Authority believes that the consideration given to commuted sums can be explored due to the fact that the capture of affordable housing through on-site contributions is low. The analysis by Three Dragons identifies that the level of setting a threshold is at the expediency of the Council. In Three Dragons'

experience there is no significant relationship between viability and site size.

- 6.10 Given that the analysis above has identified a large number of sites not contributing towards the affordable housing requirements of the Authority, in Carmarthenshire's case it is therefore prudent to accept commuted sums to be used to increase the range and availability of affordable housing throughout the county's settlements.

7. Commuted Sums

- 7.1 In exceptional circumstances where on-site provision is not considered appropriate and off-site units cannot be delivered because an alternative site is not available, the Council will consider whether a commuted payment in lieu of on-site affordable housing provision would be appropriate.
- 7.2 The commuted sum should be of equivalent value to the developer contribution if the affordable housing was provided on the site.
- 7.3 Where the contributions secured would fund less than a whole dwelling, contributions can be pooled until sufficient funding has been secured for the provision of one or more dwellings. Should no suitable options for the provision of affordable housing be available within a specific settlement, provision should be made within the same sub-market area. If neither of the options are achievable within an appropriate timeframe, the Local Authority retain the right to spend the money elsewhere in the County.
- 7.4 There is current uncertainty regarding the relationship between affordable housing obligations and the use of the Community Infrastructure Levy (CIL) particularly in consideration of where contributions will be pooled. Further elaboration on the role of commuted sums will be made available within the Affordable Housing Supplementary Planning Guidance. SPG will also address how contributions will be calculated and secured, and the criteria for disbursement of pooled funds including the time period within which monies will be spent and the prioritisation of locations for local housing provision.

8 Exception Sites

- 8.1 The Deposit LDP sets out a policy context on proposals for 100% affordable housing development on sites immediately adjacent to the development limits of defined settlements. Support will be given to schemes where there is an identified need for affordable dwellings, in conjunction with the submission of evidence where no schemes on

allocated sites are projected to commence within a reasonable time. Further elaboration will be identified within the SPG.

9. Potential Provision from the LDP

9.1 The table below documents the number of affordable units which could be provided from the LDP housing allocations and other various key delivery schemes.

Delivery Mechanisms	Dwellings per year	Total Number of dwellings for LDP period
LDP Housing Allocations (at 20%)		2196 dwellings
Housing Association Schemes on site		44 dwellings
Average housing association new build per year (not using S106)	50	500 dwellings(2012-2022)
Affordable Houses Delivered (2007-2011)		184 dwellings
Rural Exceptions		30 dwellings
	Total	2,954 dwellings

9.2 The figure given from the LDP allocations consists of a 20% affordable target on proposed housing developments alongside those granted planning permission with S106 contributions for affordable housing. The base date for development is taken as April 2007 for all LDP housing allocations. The total number of affordable houses from this source equates to 2,196 dwellings. This figure also takes into account threshold levels.

9.3 The housing association commitment schemes currently on site equate to 44 dwellings. This information is supplied by the Housing Section of the Authority.

9.4 The average housing association schemes on allocated sites equate to roughly 50 dwellings a year. Over the course of the remainder of the LDP this can equate to 500 dwellings.

9.5 It is acknowledged that through various delivery mechanisms, 184 dwellings have been delivered between 2007-2011.

9.6 Figures for rural exception sites indicate low numbers of dwellings coming forward and being granted planning permission. Recent permissions suggest approximately 6-10 dwellings within the last 5 years. Although the LDP policy is in place to cater for these exception sites in certain circumstances, it is envisaged that this current trend will

continue. The Local Authority has placed a notional figure of 30 dwellings to cater for this need.

10 Summary and Conclusions

- 10.1 The market values of dwellings vary across the seven submarket areas identified within this study which reflect in significant variations in the residual values calculated to specify an affordable housing target.
- 10.2 The residual values in lower submarket areas indicate that affordable housing viability is low, however the Authority recognises that this would be a wrong policy response as there will be hotspots within these lower value areas where affordable housing contributions could be made.
- 10.3 The Authority's approach will be to create a county wide benchmark target for affordable housing contributions (20%), however the policy would allow negotiations on a site by site basis to reflect any abnormal costs which could affect viability.
- 10.4 The LHMA identifies a need for 743 affordable dwellings a year to be built to overcome the existing shortfall. It is recognised that the LDP cannot provide, or should not provide for this entire shortfall. Based on a 20% affordable target, it would mean that 3,715 dwellings a year would need to be built to make up this shortfall. This equates to 18,575 dwellings to be developed within 5 years. The household requirements for the life of the LDP is only 15,197 dwellings, therefore it is recognised that the LDP can only provide a certain amount of this shortfall. There are other key delivery mechanisms in place outside of the LDP which can cater for the supply, including Homebuy, Mortgage Rescue, Social Letting Agencies and refurbishments.
- 10.5 The thresholds of 10 units in the Growth Areas and 5 units in all other settlements will capture a significant proportion of development in Carmarthenshire and provide a diverse mix of housing for its residents.
- 10.6 The role of commuted sums is to be used to make available contributions on the large percentage of dwellings which are built on sites that fall below the thresholds.