

HOUSING NEED & AFFORDABLE HOUSING STATEMENT

Proposed erection of 10 no. affordable dwellings and associated
development
at
Former Ysgol Babanod Coed Mawr, Bangor, Gwynedd, LL57 4TW

Prepared on behalf of
Cyngor Gwynedd Council



OWEN DEVENPORT CYF
LTD

Cynllunwyr Tref Siartredig • Chartered Town Planners

Agents Ref: - 1607/11/23



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HOUSING NEED & AFFORDABLE HOUSING STATEMENT

FORMER YSGOL BABANOD COED MAWR, BANGOR, GWYNEDD, LL57 4TW: PROPOSED ERECTION OF 10 NO. AFFORDABLE DWELLINGS AND ASSOCIATED DEVELOPMENT

1.0 INTRODUCTION

- 1.1 The purpose of this statement is to examine the proposal against detail on housing need in the area, in order to demonstrate that it is an appropriate response to data on need and the relevant policy concerning the same.
- 1.2 It will also provide detail on the approach to affordable housing within the scheme, and how the mix and tenure has been arrived at.
- 1.3 This proposal follows an earlier application which was approved on the 13/04/2023 under permission ref:- C22/0525/11/LL. The scheme has been subject to design changes to address drainage requirements, with the layout of the development changed as a result. Therefore, the Applicant must, of course, apply for a new permission for the development as it materially differs from that previously approved. However, the overall number of properties is unchanged as is the tenure of the proposed dwellings.
- 1.4 This assessment is required to meet the requirements of policy TAI8 of the Anglesey & Gwynedd Joint Local Development Plan (JLDP) which requires justification of the proposed housing mix on schemes. It is also needed as the level of development in Bangor has exceeded the indicative growth level set in policy TAI1, and as such further provision must be justified based on evidence of particular unmet need.
- 1.5 It is noted that the site is located within the ward/electoral division of Dewi. However, this scheme is set within the larger settlement of Bangor and will serve a wider community need, and so the ward is not a good fit for assessing Welsh Language use in the much larger settlement. In this case data from the Middle Super Output Areas W02000010 & W02000011 and their constituent LSOA more closely reflect the bounds of the Bangor community (see maps at figures 1 and 2), and so data has been drawn from those areas (where possible).

Figure 1 - Map of Dewi Ward/electoral division

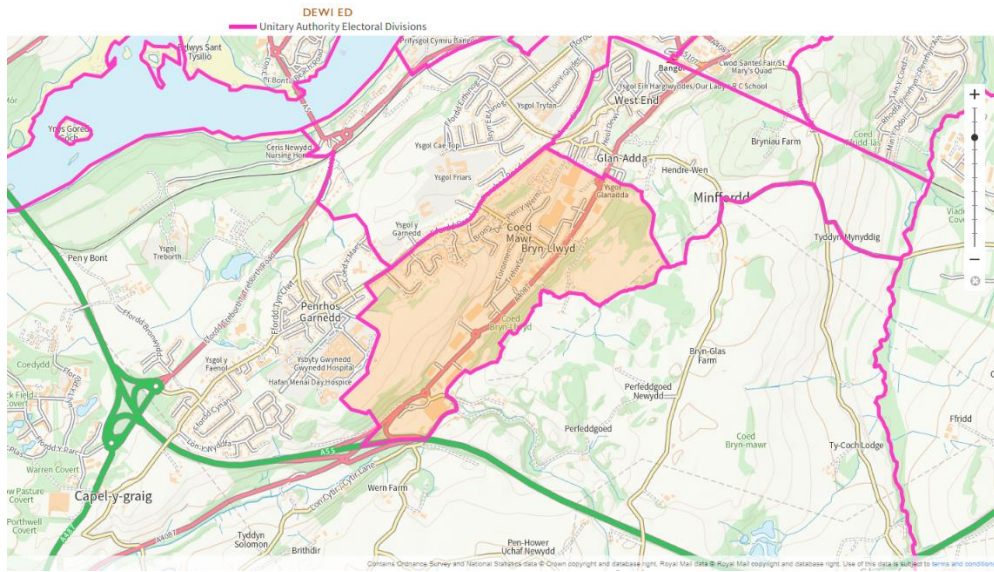
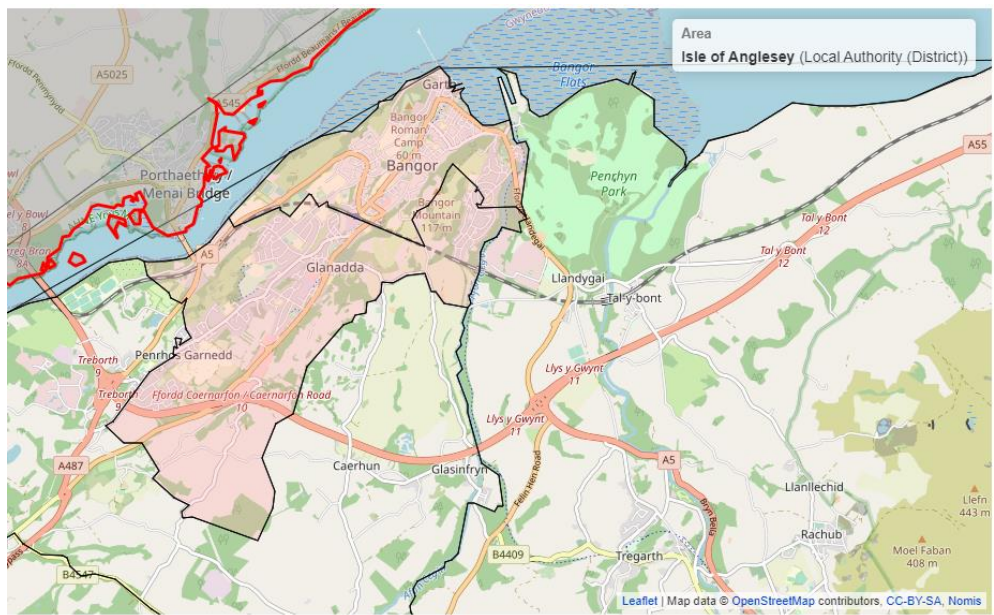


Figure 2 - Map of Lower Super Output Areas - W02000010 & W02000011 (shaded pink)



2.0 THE DEVELOPMENT

- 2.1 The proposal is a full application for the erection of 10 affordable dwellings and associated development on the application site. The following mix is proposed:-

Table 1 - Proposed mix detail

<i>Unit type</i>	<i>No.</i>	<i>Type of dwelling</i>	<i>Total Bedroom no.</i>	<i>Tenure</i>
4-person 2 bed house (4P2B)	4	Semi-detached two-storey house	8	Shared equity intermediate affordable
5-person 3 bed house (5P3B)	6	Terraced two-storey house	18	Shared equity intermediate affordable
<i>Total no. dwellings</i>	10	<i>Total bed spaces</i>	26	

- 2.2 The proposal seeks consent for intermediate affordable dwellings, which are being developed by Gwynedd Council through their Ty Gwynedd arm in order to meet an identified gap in this form of provision within the plan area. This approach has been adopted by the Authority through project 3a of the Housing Strategy. The types of affordable properties being provided at present mainly comprise of social rented units (provided by housing associations) or a smaller amount of discounted/intermediate affordable housing provided by developers. This has left a gap for those requiring a shared ownership arrangement that the Applicant is well placed to fill. If approved, the houses would be made available on a shared ownership basis, with qualifying occupiers able to purchase the majority of the value of the dwelling (setting their mortgage at a substantial discount from open market value and thus ensuring that it is affordable), with the remaining value held by the Authority. This would ensure their long-term affordability for the occupiers, and the retained equity for Authority would guarantee that they provide a resource for the community for decades to come.

3.0 POLICY ON HOUSING MIX

- 3.1 The Local Authority has various policies and documents that set out detail of how they wish housing mix to change in the area.
- 3.2 Within the development plan policy TAI 8 specifically address the question of housing mix and seeks to ensure that developments contribute to creating suitable mixed communities by “2. contributing to redress an identified imbalance in a local housing market”, and “3. ensuring the correct mix of housing unit types and tenures to meet the needs of the Plan area’s current and future communities”, and “5. making provision, as appropriate, for specific housing needs such as student accommodation, homes for the elderly, Gypsy & Travellers, supported accommodation, nursing, residential and extra care homes, needs of people with disabilities;”
- 3.3 Policy TAI 15 also sets out requirements for varying levels of affordable housing across different parts of the plan area, and in this area sets a target of 20% affordable housing provision from all schemes of 2 or more dwellings. It also requires at section 3. i. that “i. All developments will be required to achieve an appropriate mix in terms of tenure, types and sizes of local need affordable housing, determined by the local housing market assessment or any alternative Council or partner assessment”, and at viii. that “dwellings are of a size, scale and design compatible with an affordable dwelling”.
- 3.4 The Supplementary Planning Guidance (SPG) on Housing Mix (2018) provides a great deal of information on housing need and demand across Anglesey & Gwynedd, as well as guidance on how to approach assessment of this issue. It also requires that a Housing Statement is provided for schemes of 5 or more dwellings, with this document addressing that requirement.
- 3.5 The objectives at section 6 are of most relevant here as they set out key goals for achieving a more balanced housing market, which are as follows:-
1. Providing more smaller homes;
 2. Providing homes for older people;
 3. Providing Self-build plots;
 4. Improving tenure mix;
 5. Providing Sustainable homes.
- 3.6 The latest Gwynedd Local Housing Market Assessment (2018) also sets out objectives for housing delivery across the County, as well as general data on the circumstances of local market and population. Key points from it are:-
1. Private rented sector has grown significantly in Gwynedd over the last decade;
 2. Private rental levels are unaffordable for many low-income households;
 3. Demand for social housing remains high across the area;
 4. Demand for social housing with 1 bedroom is not met by current available stock;

5. Number of households is forecast to increase, and their size to decrease over the next decade;
6. Long term empty properties and stalled development sites can potentially provide additional supply for the market;
7. Based on population projections, 303 new households will be established annually in Gwynedd over the next 5 years;
8. 707 Additional social housing units is required each year for 5 years to meet the current and anticipated demand;
9. 104 Additional intermediate housing is required each year for 5 years to meet the current and anticipated demand;
10. The Assessment recommends that the mix of all new developments should be 40% 1 or 2-bedroom properties, 30% 3 bed and 30% 4+ bed roomed properties;
11. There is a shortfall of £4,781 between median household incomes and the income needed to purchase lower quartile homes in Gwynedd;
12. There is a shortfall of £17,067 between median household income and the income needed to purchase median homes in Gwynedd;
13. Affordability based on income is a challenge for many households, with 59% priced out of the market in Gwynedd compared to 56% across Wales;
14. Based on income and within the wellbeing areas of Llyn 69% of households are priced out of the market, 63% in Dolgellau, 61% in Porthmadog and Tywyn at 61%. The Blaenau area is most affordable with 48% of households priced out of the market;
15. It is projected that an average of 303 new households will be formed each year in Gwynedd from 2018-23;
16. Approx. 1900 applicants have registered for Social Housing in Gwynedd;
17. There is housing need across all tenures, especially smaller property types and social housing;
18. 71% on Social housing register requested 1 or 2 bedroom properties, however there is a shortage of 24% in social housing stock;
19. Over 80's population is expected to grow and increase the need for suitable and accessible housing options;
20. Less than 10% of social housing stock has some form of adaptation, this does not represent fully accessible accommodation;
21. Number of households expected to increase by 8% up to 2035;
22. Increase of 18% of 1 person households; and 13% of 5+ person households by 2035;

23. Increase in housing need for smaller dwellings with one or two bedrooms due to increase of smaller households between 2018-35 (caused by ageing population and smaller households);
24. Similarly, an increase in need for larger dwellings (5+ person) is expected due to greater number of larger households between 2018 - 2035;
25. Recommended housing mix will be 40% for 1-2 beds, 30% each for 3 or 4+ beds for new developments;
26. Supply of new housing being built at current levels will not meet the demand for affordable housing in Gwynedd;
27. Almost 1400 units have received planning consent but have not begun construction;
28. Long term empty properties are key resource to improve supply of housing within Gwynedd;
29. Total annual social and intermediate housing need is 707 units (including committed supply).

3.7 The current Housing Strategy for Gwynedd (2019-2024) summarises the substantial challenge of affordability and other housing issues across the County, and sets out the following high level goals:-

1. That everyone's home in Gwynedd is affordable to them;
2. A social house is available to all who require one;
3. No one is homeless in Gwynedd;
4. Various housing options for a wide range of needs and age;
5. Plenty of homes available to enable the people of Gwynedd to stay and play a full role within communities;
6. Investment in the housing field contributes to a thriving economy and contributes towards freeing people from poverty;
7. Gwynedd housing are environmentally friendly;
8. Homes have a positive contribution to the health and well-being of the people of Gwynedd.

3.8 Various strategies and objectives are then set out to achieve those goals.

3.9 Clearly then there are various policy objectives and goals that seek to intervene in the mix of sizes, types, & tenures of dwellings proposed for development across the plan area.

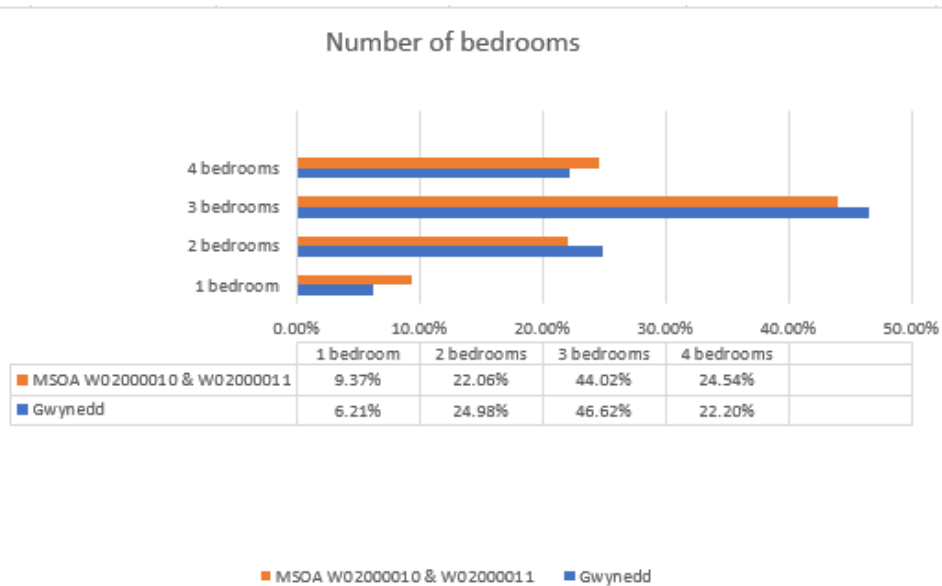
4.0 EXISTING PROPERTY & HOUSEHOLD MIX IN THE COMMUNITY

4.1 There are a variety of data available from the 2021 census that sets out detail on housing mix and household sizes in the local community. Key data is examined below:-

Dwelling sizes

4.2 The following data is available on the size of properties within the local area and in the county.

Chart 1 - Number of bedrooms



Source: RM059 - Household composition by number of bedrooms from 2021 Census

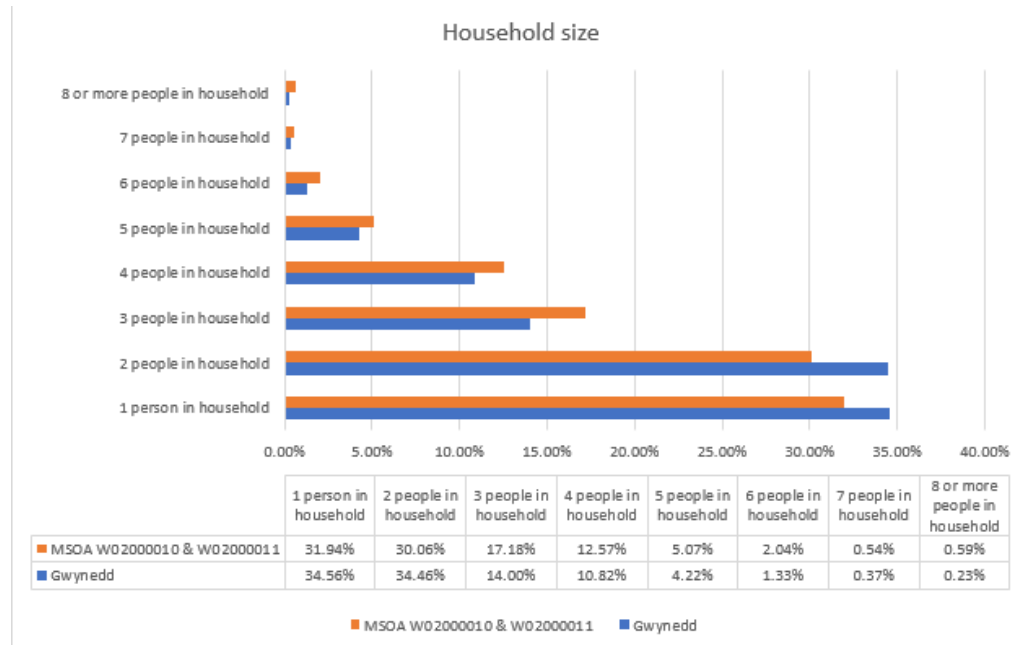
4.3 This shows that Bangor has a higher proportion of 1 and 4-or-more bedroom properties than the County level, and lower levels of 2 and 3-bedroom properties. 3-bedroom properties predominate as the most common dwelling type both locally and at the County level, with 4-bedroom or larger properties the second most common type.

4.4 Whilst not necessarily a problem in itself this must be compared to actual household sizes to see if there is a mismatch.

Household sizes

4.5 The following data is available on the size of households within the local area and in the county.

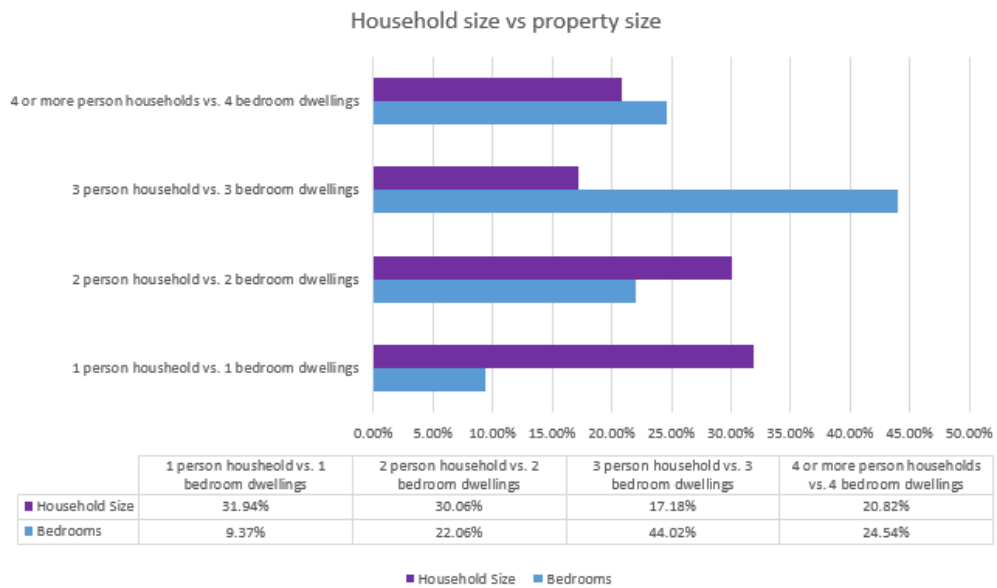
Chart 2 - Household size



Source: TS017 - Household size from 2021 Census

- 4.6 This shows that 1 and 2-person households form a smaller proportion of the population in Bangor than in Gwynedd as a whole, with 3, 4, and 5-person households forming a larger proportion than is seen in the rest of the county. Indeed, all larger household types are more common in Bangor than in Gwynedd, albeit that they represent a small proportion of the total.
- 4.7 Some of this will of course be accounted for by the higher levels of student housing in the city.
- 4.8 However, the most common household types at a County and local level are both 1 and 2-person households, with 3 and 4 being the next most common type.
- 4.9 It is considered to be useful to compare household size to dwelling size. Although this is only a crude comparison and there is never an exact match between the size of properties and the households in an area it is helpful in giving an idea of any mismatch between them.

Chart 3 - Household size vs property size



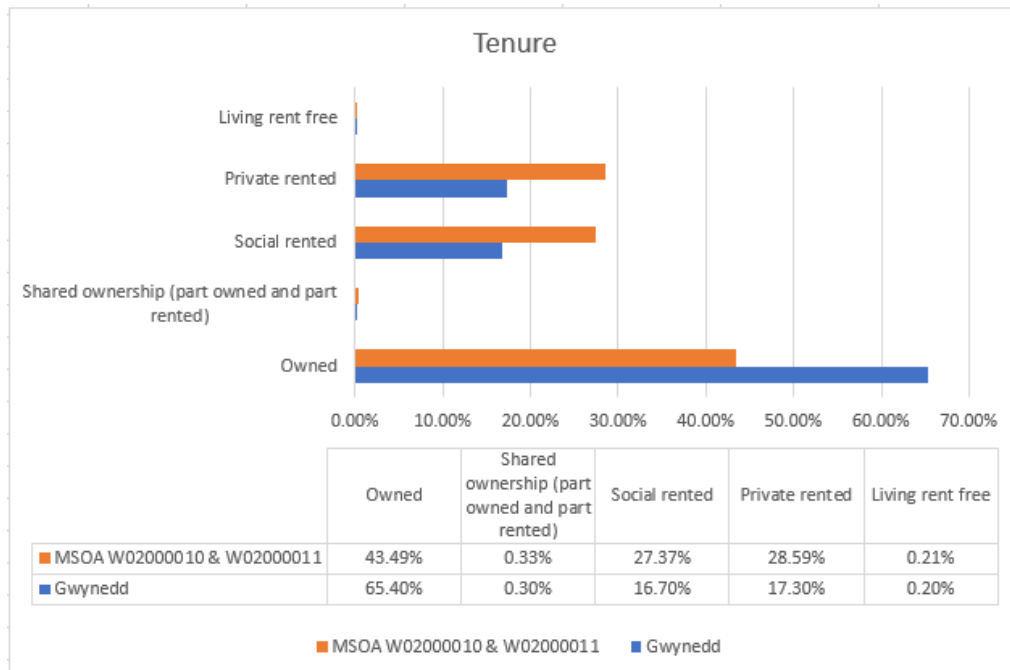
Source: RM059 - Household composition by number of bedrooms from 2021 Census & TS017 - Household size from 2021 Census

- 4.10 This shows that there is a considerable mismatch between the number of 1 person households and 1-bedroom properties and for 3-person household vs 3-bedroom properties. 2-bedroom properties are also below the level of 2-person households.
- 4.11 The 1-person household mismatch is likely to represent situations where separate household are required to share, such as within HMO’s and other forms of shared accommodation.
- 4.12 For the 2-person household segment this is a known issue where housing for this segment is under provided regionally, with such households requiring a mix of 1 and 2-bedroom properties to meet the needs of differing living arrangements.
- 4.13 For the 3-bedroom dwelling type this will likely represent a mix of households under occupying properties, as many households seek larger accommodation to accommodate future need or allow for visitors. In addition, 3-bedroom dwelling types will also serve many 4-person and some 5-person households.
- 4.14 Overall, the comparison suggests that smaller households are under provided for with smaller accommodation (1 and 2 bedroom), and that there is an over representation of 3-bedroom house stock as a house type - but this is likely mitigated by the fact that it meets the needs of 3-5 person households and there is a strong desire among many households to have a 3-bedroom or larger property to provide flexibility.

Housing tenures

4.15 The following data is available on the tenure properties within the local area and in the county.

Chart 4 - Housing tenures



Source: TS054 - Tenure - 2021 census

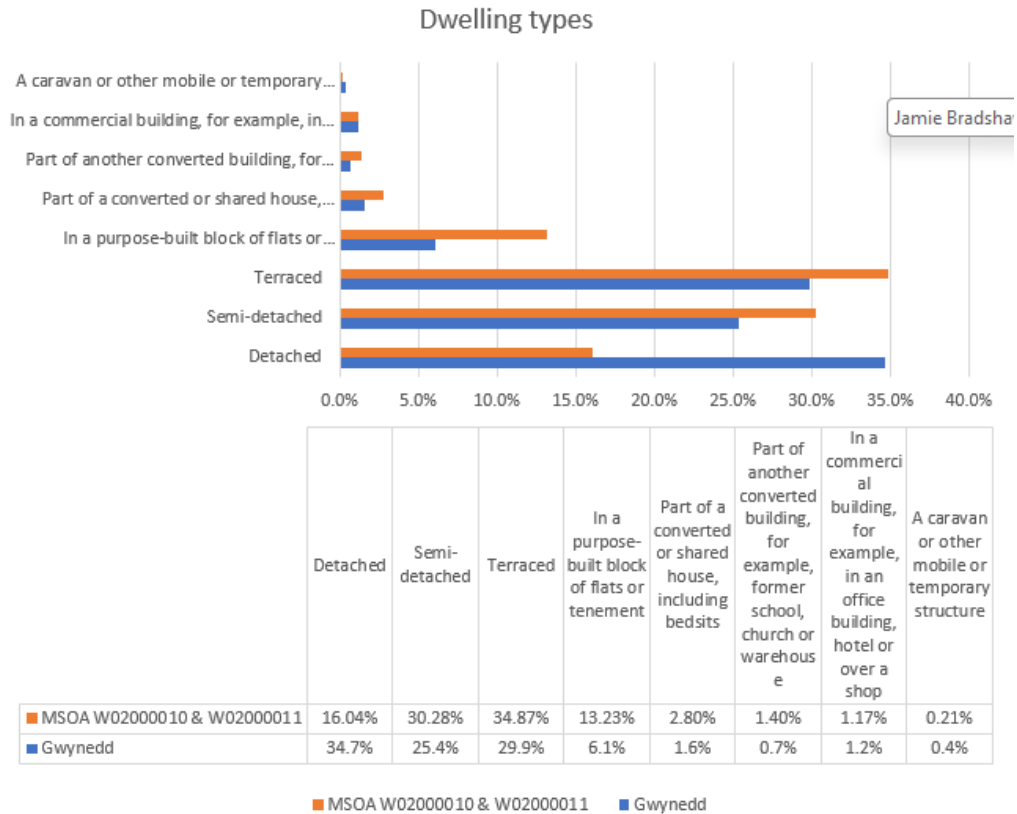
4.16 This shows that there is a considerably lower level of owned property as a tenure type within Bangor compared to Gwynedd as a whole, with the difference made up of much higher levels of private rented and social rented properties in the city. Some of this difference would be accounted for by student accommodation, but there is also a higher level of social rented property.

4.17 It is also clear that shared ownership accounts for a very small proportion of tenures both locally and in the county, which represents a gap in provision.

Dwelling types

4.18 The following data is available on dwelling types within the local area and in the county.

Chart 5 - Dwelling types



Source: TS044 - Accommodation type - 2021 census

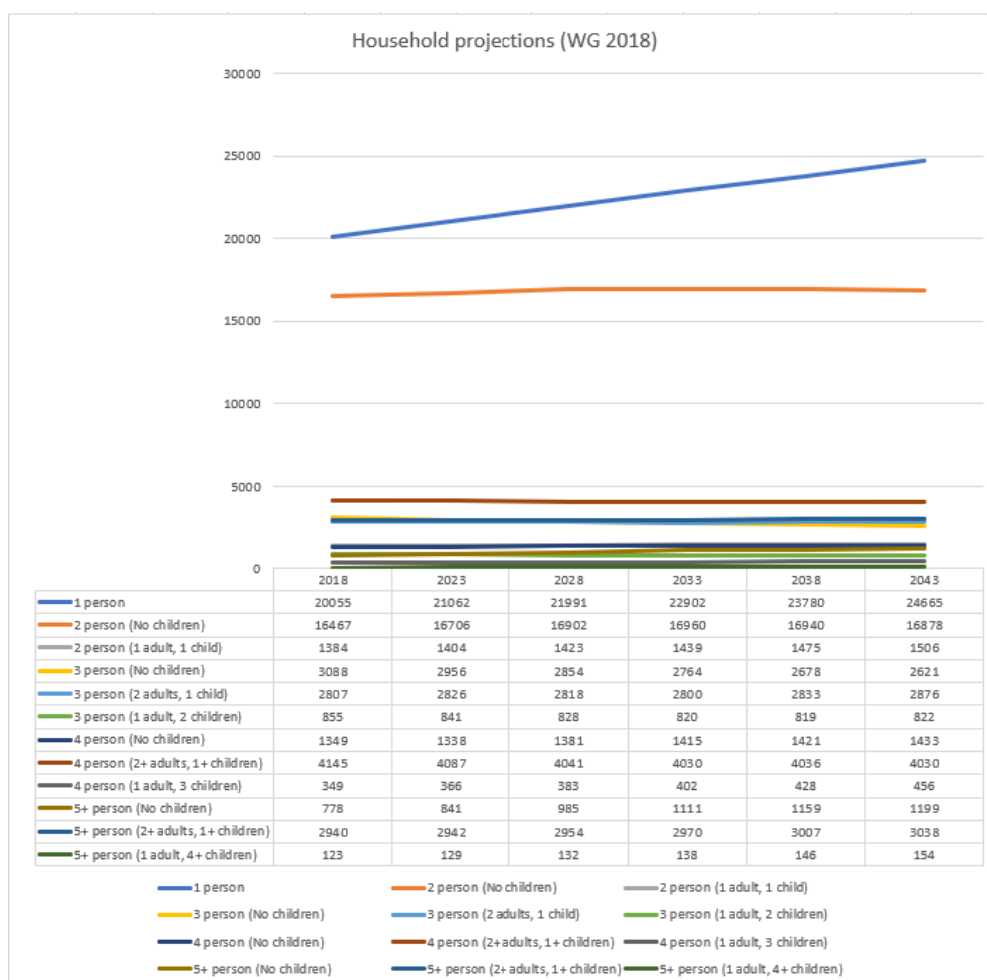
4.19 The data shows that detached properties form a much lower proportion of overall house types in Bangor than in Gwynedd as a whole (though this perhaps not surprising as it is an urban area with denser development than is typical for the County as a whole, and detached properties are a ‘land greedy’ form of development). Instead, terraced and semi-detached properties form a much larger share of the housing mix, which is to be expected for an urban area, and indeed these together form the majority of house types in the city.

4.20 Flats also form a much larger share of the house types than is typical in the county average (again not unexpected for an urban area), with purpose built being the main category in this type.

5.0 PROJECTIONS OF HOUSEHOLD SIZE

5.1 The Welsh Government provides regularly updated household projections at national & a county level, and so the latest (2018) projections¹ for Gwynedd are examined below:-

Chart 6: Household projections (2018)



Source: Household projections by local authority, household type and year (2018) - Welsh Government (StatsWales)

5.2 The projections show a substantial growth in the number and proportion of 1-person households within the County, along with a more modest growth in the number of 2-person (no children) households. These far outstrip the other household sizes as a proportion of the overall number.

5.3 Changes in other cohorts are much smaller with 2-person (1 adult 1 child), 4-person (no children), 5-person (no children) and 5-person (2+ adults 1+ children) households seeing modest growth. There are also modest declines projected for 3-person (no children) & 4-person (2+ adults, 1+ children) households. Other household types are projected to change by a much more modest amount so the extent where they essentially hold steady.

¹ Data has been shown at 5 year intervals to reduce the complexity of the chart and table whilst allowing the overall trend to still be observed. Smaller area data is, sadly, not available.

- 5.4** The overall trend though is of smaller household sizes, which reflects the changing nature of how people live. This is seen in the average household size, which declines from 2.21 person in 2018 to 2.14 in 2043.

6.0 DWELLING PRICES, INCOMES, & AFFORDABILITY

- 6.1 Turning to the question of average dwelling prices versus income and resulting affordability, there are a variety of data sources to draw upon.
- 6.2 However, a quick reference to available data from the Land Registry shows that house prices are as follows in Gwynedd² over the last 10 years³:-

Table 2 - Dwelling prices in Gwynedd

<u>Date</u>	<u>All property types</u>	<u>Detached houses</u>	<u>Semi-detached houses</u>	<u>Terraced houses</u>	<u>Flats and maisonettes</u>
Dec 2013	£131,517	£188,556	£132,656	£102,766	£87,196
Dec 2023	£208,873	£305,923	£213,495	£162,131	£123,010
Percentage change	59%	62%	61%	58%	41%

Source - UK House Price Index - Land Registry

- 6.3 These show substantial increases in values across all property types in the County, with these being particular marked for detached and semi-detached houses.
- 6.4 On a more local level, Zoopla and Rightmove record the following figures for the last 12 months of sales in Bangor:-

Table 3 - Sold prices in Bangor in the last 12 months

<u>Date</u>	<u>All property types</u>	<u>Detached houses</u>	<u>Semi-detached houses</u>	<u>Terraced houses</u>	<u>Flats and maisonettes</u>
Rightmove	£241,720	£426,468	£235,566	£161,098	No data
Zoopla	£186,700	£358,222	£233,348	£158,052	£94,071
Average	£214,210	£392,345	£234,457	£159,575	£94,071

Source - Sold prices - Zoopla & Right Move

- 6.5 These figures show higher values than the county figures for all types except terraced houses and flats, which are lower in value in Bangor.
- 6.6 Turning to the question of local incomes, available data from the annual survey of hours and earnings shows the following income levels for Gwynedd⁴:-

Table 4 - Average Full-Time Earnings in Gwynedd 2013 & 2023

<u>Year</u>	<u>Average individual income</u>
2013	£23,700
2023	£30,847

Source - Annual survey of hours and earnings - Nomis

² Again, the smallest area from which data is available for this source.

³ A 2023 date has been chosen to allow comparison to average incomes as the latest data on this is from 2023.

⁴ Again, the smallest area from which data is available for this source.

- 6.7 When the multiple of between income to dwelling prices is compared it is clear that prices outstrip income by a considerable degree:-

Table 5 - Dwelling prices against earnings in Gwynedd 2012 & 2022

	<u>All property types</u>	<u>Detached houses</u>	<u>Semi-detached houses</u>	<u>Terraced houses</u>	<u>Flats and maisonettes</u>
Dec 2013	£131,517	£188,556	£132,656	£102,766	£87,196
Multiple of individual income	5.55	7.96	5.60	4.34	3.68
Dec 2023	£208,873	£305,923	£213,495	£162,131	£123,010
Multiple of individual income	6.77	9.92	6.92	5.26	3.99

Source - Annual survey of hours and earnings - Nomis, & UK House Price Index - Land Registry

- 6.8 Indeed, it is clear that affordability has reduced across all house types, and most starkly for detached and semi-detached houses. Bearing in mind that an affordable value is considered to be 3.5 times annual gross household income for a single earner household and 2.9 times that for dual income households the issue is clearly stark for all property types.
- 6.9 However, the above perhaps overstates the affordability issue as it only compares individual rather than household income to prices.
- 6.10 In its Affordable Housing SPG the Authority provides detail from 2020 CACI pay check data which confirms average household income across the plan area. The Lower Super Output areas making up Bangor are shown below, with the income figures averaged to provide a city wide average income:-

Table 6 - Household income Bangor 2020

LSOA	Income
W01000092 : Gwynedd 001E	£23,186.00
W01000062 : Gwynedd 001A	£20,476.00
W01000076 : Gwynedd 001B	£25,947.00
W01000077 : Gwynedd 001C	£20,325.00
W01000091 : Gwynedd 001D	£19,430.00
W01000072 : Gwynedd 002B	£30,091.00
W01000064 : Gwynedd 002A	£30,984.00
W01000102 : Gwynedd 002E	£36,733.00
W01000075 : Gwynedd 002C	£21,752.00
W01000090 : Gwynedd 002D	£18,332.00
Average household income	£24,725.60

Source - SPG Appendix 4 / CACI Paycheck data

- 6.11 When this is compared to 2023 property values the following affordability levels can be seen:-

Table 7 - Dwelling prices against earnings in Gwynedd 2023/2020

	<u>All property types</u>	<u>Detached houses</u>	<u>Semi-detached houses</u>	<u>Terraced houses</u>	<u>Flats and maisonettes</u>
Dec 2023	£208,873	£305,923	£213,495	£162,131	£123,010
Multiple of household income 2020	8.45	12.37	8.63	6.56	4.98

Source - SPG Appendix 4 / CACI Paycheck data & UK House Price Index - Land Registry

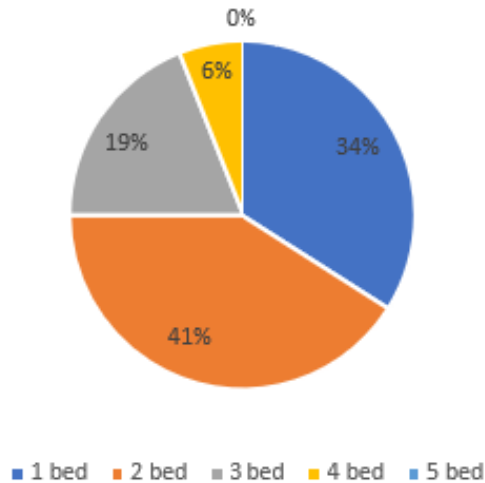
- 6.12 Whilst the CACI data is from 2020 so is not up to date the comparison is still useful as it shows a similar picture to the previous table and underlines the severe affordability issue in this locality.

7.0 HOUSING NEED DATA

7.1 There is a variety of data available at a local level that sets out known housing need in this area. As this proposal is concerned solely with affordable housing information the demand for open market/private housing is not examined.

Chart 7: Gwynedd Social Housing Register (Bangor)

Gwynedd Housing Register (Bangor)

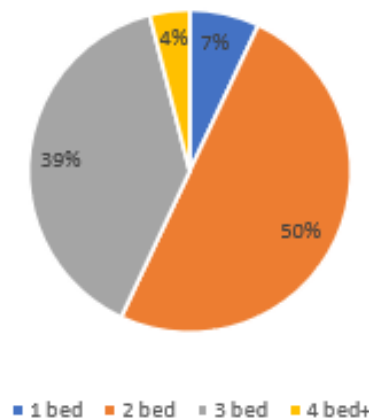


Source - Gwynedd Council

7.2 There are 925 entries on this register, which records those seeking social rented accommodation. It is clear that 2-bedroom properties are particularly in demand making up the largest share of need, closely followed by 1-bedroom houses. This is not surprising as this reflects the mix of household sizes in the population, and may also represents lower levels of income amongst smaller households. Those seeking larger properties (3 and 4 bedrooms) make up a much smaller proportion (25%) with 3-bedroom houses being most in demand in that group.

Chart 8: Gwynedd Tai Teg Housing Register (Bangor)

Tai Teg register (Bangor) - All



Source - Gwynedd Council

- 7.3** The current Tai Teg register has 653 entries for Bangor, which is a substantial increase from the register of April 2022 presented in the original application which had 192 entries. This shows a considerable increase in need. The register presented above relates to those seeking affordable properties for both rent and purchase (shared ownership, discounted etc.). The mix of properties sought by those on this register is substantially different from the social rent register, with 2-bedroom dwellings being most in demand and forming the majority of recorded need, closely followed by 3-bedroom properties. Notably, 1 and 4-bedroom dwellings form a very small fraction of recorded need.
- 7.4** Turning to the split between demand for homes for rent and purchase on the register we are advised that the split is as follows:-

Table 8 - Tai Teg Reister for Bangor showing breakdown between demand for rented vs purchased properties

<i>Size</i>	<i>Overall Percentage</i>	<i>% rent</i>	<i>% purchase</i>
1 bed	7%	6%	1%
2 bed	50%	33%	17%
3 bed	39%	20%	19%
4 bed+	4%	2%	2%

Source - Gwynedd Council

- 7.5** As can be seen in both cases 2 and 3 bedrooms form the majority of need, with 2-bedrooms being a higher proportion of rental properties, versus 3-bedroom properties for those seeking homes for purchase.

8.0 COMPARISON OF PROPOSED MIX TO AVAILABLE DATA

8.1 The proposed mix has been designed to address a particular need for affordable houses for purchase in the area, with the scheme concept being to provide shared equity homes to local residents seeking to purchase in their community but unable to meet house prices. It is the Applicant's position that this need is poorly provided for locally, with Housing Associations typically providing social rented properties, and developers either passing their affordable housing provision to HAs or providing discounted intermediate affordable housing. A shared equity tenure provides a different option for households who cannot access either of those models, and the Applicant is well placed to meet that need.

Need

8.2 There can be no dispute that there is a housing affordability problem in the city (and indeed nationwide) so the provision of a 100% affordable housing development is to be welcomed, particularly one that seeks to bring forward a different type of affordable dwelling specifically targeting the intermediate market that is currently not catered for.

8.3 More specifically, there is a substantial level of recorded un-met need for affordable homes for purchase in the Tai Teg register, and this proposal would assist in meeting that need. The number of people that have recently registered with Tai Teg has increased from 192 to 653 between the two applications, and this could be a result of the planning process that was recently undertaken for the Coed Mawr development and also the formal launch of Ty Gwynedd. The proposed mix compares as follows to recorded need:-

Table 9 - Comparison of proposed house type mix to Tai Teg register

	<u><i>Tai Teg register</i></u>	<u><i>Proposal</i></u>	
<i>Size</i>	<i>Percentage</i>	<i>Percentage</i>	<i>Difference</i>
1 bed	7%	0%	-7%
2 bed	50%	40%	-10%
3 bed	39%	60%	21%
4 bed +	4%	0%	-4%

8.4 In comparison to the Tai Teg register the proposal over provides by a small margin for 3-bedroom, and under provides for 2-bedroom by a small amount. There is also a slight under provision of 1-bedroom and 4-bedroom units.

8.5 It is considered that this approach is acceptable here as there is a very high level of unmet need so there would not be an actual overprovision of 3-bedroom units. The scheme and setting are also particularly suited to providing family properties as the area is defined by houses of that type.

8.6 It is accepted that the proposal does not compare well to the Social Housing Register, but this is justified as the proposal does not seek to provide that form of affordable housing. Instead, it is targeted at meeting a currently unmet need, as identified by the Tai Teg register, for 2 and 3 bedroomed properties which are to be offered as shared-equity intermediate affordable housing, which would be a pro-active step to improve the options available

(in terms of tenure mix) in order to increase the opportunities for local people to compete in the current housing market.

Tenure

- 8.7 Turning to the tenure it is clear that shared equity housing forms a very small share of tenures within Bangor and Gwynedd as a whole. The addition of properties of this type of the housing market would be valuable in increasing the choice of affordable properties for local residents, and achieving a more balanced mix of tenures in the city.

Property types

- 8.8 The proposal is mainly comprised of terraced houses at 60%, with the semi-detached houses making up 40%. This is considered to be a reasonable mix of property types for this urban setting, and certainly not out of keeping with its context.
- 8.9 No bungalows are proposed as part of this scheme as there has been little specific interest for this type of unit shown by those who have registered for an intermediate affordable dwelling to purchase. Therefore, there is little evidence for bungalows and a strong demand for shared-ownership properties of this type in this location and at this time. It is acknowledged that the Social Housing Register shows an unmet need for bungalows but this development is specifically targeted at the proven need for affordable intermediate dwellings to purchase rather than bringing forward social housing through a Registered Social Landlord.
- 8.10 Furthermore, flats are not proposed as there is a lower level of recorded need for 1-bedroom properties for purchase, and the constraints of the site would make it hard to accommodate the required level of parking for larger flats and/or a denser form of development. Other sites are better suited to meeting this need within the city, or indeed through change of use of the under-used upper floors within the city centre.
- 8.11 As such, it is considered that the proposed mix is ideally suited to the site, and would complement and respect the form of development seen around the site.

Policy/guidance documents

- 8.12 Turning to policy/guidance the mix is considered appropriate against the following documents for the following reasons: -
- 8.13 **SPG - Housing Mix** - themes:-
1. More smaller homes - The proposal does provide smaller homes as it includes 2 and 3-bedroom houses, with no larger properties. Whilst no 1-bedroom properties are proposed this is for sound reasons as set out above;
 2. Providing homes for older people - In this case the scheme is not specifically targeted at the older age bracket, though it could meet some households needs. However, it is considered appropriate in this case due to the nature of the site and area which is better suited to family housing, and the need to provide older age housing is specifically targeted developments on a case-by-case basis;

3. Providing Self-build plots - Again, this is a very specific form of provision which must be sought on a site-by-site basis and it not considered suitable here;
 4. Improving tenure mix - The proposal will provide a very under represented tenures in the area and thus will assist in improving tenure mix locally;
 5. Providing Sustainable homes - The proposed homes will be highly sustainable.
- 8.14 LHMA** - While the model mix provided in the LHMA is 40% for 1 & 2 beds, 30% each for 3 or 4+ bed for new developments, this is for open-market development which is not what is proposed here. The mix seeks to address specific affordable need, and it is considered that it does this well.

9.0 AFFORDABLE HOUSING STATEMENT

- 9.1 As per the preceding sections, the proposal seeks consent for shared-equity intermediate affordable dwellings. This approach has been adopted by the Local Authority as the Applicant as they have identified a gap in provision of affordable homes, with properties being provided at present comprising mainly social rented units (provided by Housing Associations) or a smaller amount of discounted/intermediate affordable housing provided by developers. This has left a gap for those requiring a shared ownership arrangement that the Applicant is well placed to fill.
- 9.2 It is submitted that the preceding sections have clearly demonstrated the need for a development of this type and have justified the mix of properties proposed, and therefore it is not proposed to repeat those arguments here.
- 9.3 Turning to the question of **energy use and built sustainability** the proposed dwellings will be designed to reduce their energy consumption through high levels of insulation, and the specification of energy efficient technology and fittings, as well as appliances and fittings that would reduce the use of water. As such, the environmental impacts of the proposal will be minimised as will the on-going running costs for its occupiers.
- 9.4 Turning to **accessibility and adaptability**, the scheme has been laid out to provide suitable clear access routes within the site to allow for movement within it by all potential users. Turning to the dwellings themselves, the floor plans demonstrate that the buildings will be reasonably accessible subject to minor adaptations to allow use by particular users, such as the installation of a stair lift or full lift, either of which would be achievable within the proposed designs.

10.0 CONCLUSIONS

10.1 The following conclusions can be drawn from the sections above:-

- ☑ The proposed mix would meet identified local housing needs and is targeted at a large unmet need for intermediate affordable housing. Similarly, the level of development is appropriate bearing in mind the need for affordable dwellings for purchase in Bangor;
- ☑ The proposed tenure is suitable and will assist in addressing a particular need for affordable homes to purchase, and will increase the level of shared equity homes in the area which are very under-represented as a tenure type;
- ☑ The proposed mix is appropriate as it will assist in addressing need for homes of this type/tenure, makes best use of the site, and respects the locality;
- ☑ As such a further exceedance of the indicative growth level for Bangor is justified in this case as the scheme would clearly meet a particular local need.

10.2 To conclude, there is a sound and reasoned basis for approving this scheme and further exceeding the indicative growth level set in the plan. The proposed mix has been carefully chosen to meet recorded need, and the single tenure shared equity intermediate affordable housing approach is entirely appropriate bearing in mind the high recorded need for affordable homes for purchase and the very low levels of this tenure in the area.

10.3 An entirely affordable housing scheme should also be welcomed bearing in mind the high recorded levels of need and low affordability of housing in the area.

10.4 As such, there can be no basis for refusing this proposal based on the proposed housing mix.

10.5 Indeed, there would appear to be a basis for releasing other land in and around the settlement to meet the registered affordable housing need, but this falls outside the scope of this submission and document.

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