

# Rural housing delivery in Wales: How effective is rural exception site policy?

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# INTRODUCTION

In many rural areas of Wales there are particular issues facing local communities in seeking to increase the supply of affordable housing, as well as in terms of housing's role in supporting the longer-term sustainability of smaller rural settlements.

Local planning policies are critical in this respect, but so is an understanding of issues around the economics of housing on rural exception sites and

assessing development viability. **Planning Policy Wales identifies affordable housing exception sites as a 'special provision' (para 9.2.23) that can help to ensure the viability of local communities.** Welsh Government policy identifies that such sites are usually small, are located within or adjoining existing settlements, and provide affordable housing to meet local needs. Sites are those which would not otherwise be allocated in a development plan. It is for this reason that such sites are considered as exceptions to general housing provision. They sit alongside other exceptions, such as One Planet Developments and rural enterprise dwellings.



# POLICY CONTEXT

Wales has a more detailed national policy framework on affordable housing exception sites than in England or Scotland.

Welsh Government planning policy offers a range of tools to support the delivery of affordable housing in rural areas, in addition to rural exception sites. These include: market housing developments contributing to affordable housing delivery; the ability to identify sites for 100% affordable housing in the development plan, among others. **Most local planning authorities in Wales include an affordable housing exceptions site policy in their Local Development Plan.** Development plan policies on affordable housing exception sites are one of several 'policy approaches' recognised in the Welsh Government's (2006) Technical Advice Note 2: Planning and Affordable Housing for the delivery of affordable housing. This technical advice states that a local planning authority's development plan must indicate the amount of housing which will be delivered by the policy approaches set out in the plan (para 10.1). Planning Policy Wales at paragraph 9.2.24 states that **development plans should identify 'any areas where exception sites will be considered'**. This may also form

part of a local planning authority's identification of a settlement strategy.

The approach set out in Planning Policy Wales is clearly echoed in the policies contained in Local Development Plans (LDPs). There are nevertheless some important variations on key aspects of rural exception site policy at local level. **Variations in the application of policy include: the scale of housing or number of units envisaged on exception sites; the definition of local need and the ways in which connections to the locality are assessed; the number and extent of criteria by which applications for rural exception sites are to be assessed.** LDP policies vary in how they identify where the relevant rural exceptions policy applies to. Some apply across the area covered by the LDP and to all settlements, while others identify a list of settlements that the policy applies to. In some cases, the policy applies differently in different areas of the local planning authority (e.g north and south). **LDP policies address connections to the locality in subtly different ways.** Some require a connection to a specific settlement, while others refer to a community council area or a housing sub-market area. Many refer to generalised 'family connections', while others are more specific about working or living in the identified area. An isolated example referred to retirements from tied accommodation.

Policies generally imply that **rural exceptions policies are 'a mechanism of last resort'**, only to be approved if



other means of delivering affordable housing in rural areas are not timely or successful (e.g. allocated sites, sites within development boundaries). Chapter 9 of Planning Policy Wales appears to be silent on the development management aspects of affordable housing exceptions sites and focuses only on the policy dimensions of such sites. A key issue is whether policies nationally and in development plans are supportive of landowners and developers bringing forward appropriate proposals for rural exceptions sites, and whether those policies are helpful in assessing proposals for such sites. **The policy, as an exception and a 'special provision', is expressed in strict terms in national planning policy, rather than something that is to be applied flexibly.** Such an approach risks overlooking the scope for non-allocated sites outside of development boundaries to deliver land at lower cost.

LDP policies typically refer to rural exception sites as being 'outside and (immediately) adjacent to' settlement boundaries, and in some cases unallocated sites within settlement boundaries. Some policies apply a looser phrasing of being outside of settlement boundaries without reference to being (immediately) adjacent to those boundaries. One policy seemed to identify an even looser relationship of requiring 'a distinct visual or physical relationship' with the settlement. **The scale or number of affordable housing units also varies between policies in Local Development Plans.** Many policies refer to such sites being 'small'. This is

typically qualified as being either up to 5 or 10 units, although in one case a policy restricted this to single dwellings in smaller settlements. A small number of policies refer to area alongside the number of units, such as 0.5 hectares. The largest number of units envisaged in any rural exceptions policy is 30, although this is significantly more than most other policies.

**Policies vary in which mechanisms and organisations they refer to for the delivery of affordable housing on rural exceptions sites.** Some envision and restrict provision to that by Registered Social Landlords (RSLs). A smaller number envision a wider range of delivery organisations and mechanisms, including council provision, private or estate provision, community land trusts, and self-build. Some policies specifically exclude self-build as part of their rural exception site policy. **Wales also has a more restrictive policy framework than in England in requiring that exception sites are used exclusively for affordable housing.** National planning policy in England identifies the role of market housing in enabling cross-subsidy of affordable housing provision on rural exception sites. In addition, recent changes to national planning policy in England extend the principle of exceptions policy to 'entry-level exceptions sites'.

# LOCAL PLANNING AUTHORITY PERSPECTIVES

## Introduction

This section discusses Local Planning Authorities' perspectives on rural exception site policy. All Local Planning Authorities (LPAs) in Wales (25) were invited to complete a detailed online survey. There were **17 responses received**, comprised of 14 Local Authorities, 2 National Park Authorities, and 1 joint planning policy response from the Local Authorities of Anglesey and Gwynedd. Only one response per LPA was received. The survey was open for 17 days and mostly completed by planning or senior planning policy officers, but in some cases managers, team leaders, and chief officers completed the survey. The survey was constructed around **six key themes; National Planning Policy, Local Planning Policy, Eligibility and Definition of Need, Partnership Working, Implementation, and Improving Effectiveness and Delivery.**

## National Planning Policy

Planning Policy Wales identifies five characteristics of affordable housing exception sites. Of the five, **participants unanimously agreed the need for sites to be within or adjoining existing settlements as the most important consideration**, followed by

the requirement that they should provide affordable housing to meet local needs, and that they should do so in perpetuity. While a majority still agreed, there was a small minority which did not consider whether sites need to be small housing sites or that they would not otherwise be allocated in the development plan as particularly important. Overall however participants broadly see the five key characteristics in Planning Policy Wales as important in deciding on the suitability of affordable housing exception sites, with a connection to existing settlements being the most important factor.

By their nature affordable housing exception sites are an exception to standard guidelines. To explore this dimension participants were asked to comment on Technical Advice Note (TAN) 2 which states that 'Affordable housing exception sites must meet all the other criteria against which a housing development would be judged' and whether there are any typical housing development criteria that they believe should be relaxed when considering the appropriateness of an affordable housing exception site. Six criteria were noted, with 'form part of a mixed use community' (63.6%) and 'mixed tenure' (54.5%) being selected the most, followed by 'construction of housing with low environment impact' (27.3%), 'barrier free housing development' (18.2%), 'accessible' (9.15%) and 'the most efficient use of land' (9.15%). **The majority of participants note the need for flexibility in terms of tenure mix and broader mixed land use when**

## assessing the suitability of exception sites.

TAN 2 also notes the importance of local planning authorities, housing authorities, registered social landlords (RSLs) and private developers to work together to deliver rural exception sites. Participants were asked to comment on how well these groups worked together in identifying sites. Generally, participants noted the limited number of exception sites being brought forward, with some suggesting this may be because the various partners are not working well together. There was a sense among participants representing the more built-up LPAs that **RSLs are not particularly familiar with the process of bringing forward rural exception sites.** Rather it was suggested in some cases private developers tend to begin the process and then bring on RSLs at a later stage. Participants also noted that LPAs are sometimes engaged late in the identification stage to the detriment of the scheme and that there can be a tension between the objectives of the LPAs and the RSLs. Other LPAs commented that **it is hard to attract private developers and landowners to affordable housing schemes in the first instance.** As might be expected, the more rural LPAs have seen more established, but still limited, successful partnerships - with some highlighting **the importance of a proactive approach between all partners to move sites forward and the role of the Rural Housing Enablers (RHLs).**

## Local Planning Policy

The Local Development Plans (LDPs) of survey participants were at various stages of adoption. Of the 17 LPA respondents, only Cardiff and Bridgend's LDPs do not include a policy on rural affordable housing exception sites. **The majority of respondents with a rural affordable housing exception policy noted that no issues were raised during the examination stage of their LDP.** Where issues were raised, they tended to be around the criteria used to demonstrate local need as well as questions around viability and where they should be permitted. Powys originally included two policies in respect of rural exception sites based on the type of settlement it was being located in but were subsequently merged at the Inspector's request and clarity was added on the size of developments in small villages. **In a few cases there were discussions about the percentage of affordable housing required and that a mix of private housing might be necessary to ensure viability.** Anglesey and Gwynedd identified the impact of hope value being potentially attributed to sites thereby making development unviable. To address this they sought to include a policy designed to allow a limited amount of market housing on site if the applicant was a RSL who could demonstrate viability issues however this was not approved at inspection. Swansea made specific reference to the inclusion of a 'Local Needs Housing Exception Sites' policy in their LDP (adoption anticipated January 2019) devised to address identified local need in rural areas that required a mix

of majority affordable and minority private housing on identified sites. This policy sought to address tenure mix, house types, and lifetime homes standards outside of the specific 'rural exception site' policy and as such requires a robust evidence base at a localised scale to justify the policy.

**Respondents broadly agreed that LDP policies for exception sites are most effective when they apply across the entire local planning authority area, though a minority suggested they are best applied specifically to identified and named settlements or other identified areas.** There was general agreement on the relationship of a rural exception site to a nearby settlement, with most respondents agreeing **sites should be immediately adjacent to settlement boundaries or close to but not immediately adjacent to a settlement boundary**. One respondent suggested there was a need for clarity in the guidance regarding the distinction between the edge of an existing settlement and the settlement boundary of a settlement in an LDP. **LPAs draw on a wide range of evidence to support the identification or determination of affordable housing.** While most utilise Local Housing Market Assessments, several noted the use of housing sub-market assessments, local surveys at ward level, local surveys at settlement level as well as local waiting lists for affordable housing and community consultation. Partnership approaches were also evident with some drawing on surveys and waiting lists by Rural Housing Enablers and Tai Teg.

## Eligibility and Definition of Need

Responses varied from respondents on the appropriate maximum number of units for rural exception site proposals. While half identified 6-10 units, responses varied between a single unit while others more than 10 units.

**Comments from numerous respondents suggested that ultimately it depends on the size of the settlement and local need, with some using different maximums depending on the type of settlement (rural, village, etc.).** Many however suggested that there should be no more than a maximum of 10 units in line with TAN1 guidance but also because **as the number of units increases it creates difficulties around maintaining mixed tenure and local connections criteria.**

There was an even split amongst respondents regarding allowing self-build on rural exception sites. Those that did not allow them generally had **concerns around ensuring the property remains affordable in perpetuity** while others allow them if this can be secured as they argue it can be a useful way to meet local need and maintain a connection to the area. A genuine connection to an area was seen as the key means to identify persons in local need for the provision of rural exception sites. Respondents suggested **genuine connection could be demonstrated in a variety of ways but that need, not desire, must be proven** often case-by-case and subject to a minimum number of years for that connection to have existed.



A number of restrictions were noted as important to be placed on rural exception sites. The most common restrictions from respondents were **the need to not create fragmented development (94.1%), a genuine local need for affordable housing (82.4%), and occupied in perpetuity by those in need of affordable housing (76.5%)**. Less commonly selected restrictions included restrictions on tenure type (29.4%), that it does not exceed overall growth limits of the area (29.4%), and that there should be a limit on the land area used (17.6%). 70.6% of respondents noted that it was important for there to be a restriction for the site to be solely for affordable housing.

## Partnership Working

LPA respondents highlight the fairly good working relationship between themselves and RSLs. In most cases there is a **very good partnership between all the various stakeholders**, but one respondent noted that landowners are not necessarily well integrated into the process and are often negotiated with directly by the RSLs. For others the identification and development of sites is reactive but when sites are brought forward there is a good working relationship to try to get them delivered.

Of the potential delivery partners **all respondents identified RSLs as the key group to provide affordable housing on rural exception sites**, followed by Local Council (88.2%) and Community Land Trusts (82.4%). Private sector and

self-build were identified as groups that should be able to provide affordable housing by 11 respondents (64.7%). **More respondents selected that self-build should be allowed (11) than do actually allow (8) in their LPA**. One respondent noted that there are concerns with private sector delivery leading to speculation and that this should be managed carefully. In order to improve these partnerships further **respondents identified the need for more detailed understandings of housing need**, through things like local needs assessments and more engagement with town and community councils, as well as a need to identify more sites and further working with RSLs to explain rural exception site policy.

## Implementation

**A range of opinions exist about the contribution that rural exception sites make to local housing need**, with 41.2% either strongly agreeing or agreeing that they do compared to 35.3% who strongly disagree or disagree, with the remainder neither agreeing or disagreeing. Respondents broadly agreed however that the **mechanisms designed to ensure that affordable housing built on rural exception sites meets the needs of local people in perpetuity were effective**. LPAs also noted various ways that they control occupancy, through planning obligations, delivery via a RSL, and signing of S106 agreements.

LPAs were asked about the appropriateness of market housing on

affordable housing exception sites in order to enable and cross-subsidise affordable housing as is done in England. **There was a mixed view as to whether Planning Policy Wales should be changed** to allow this, with 29.4% of respondents agreeing, 35.3% disagreeing, and 35.3% unsure.

Respondents noted the advantages of such an approach included improved mixed tenure and more cohesive communities, it assists viability and incentivises bringing sites forward, and in doing so assists in meeting local need. Many noted that should such a change be introduced it would be **important to ensure that the amount of private market housing was kept as low as possible**, had absolute minimum thresholds for affordable units to be delivered as well as percentage maximums for market housing so as to ensure private developers did not see such sites as alternatives to allocated sites. One respondent suggested that market housing ownership could be restricted to meet specific local issues while another noted that market housing should only be allowed if done by a Housing Association or Community Land Trust while another suggested cross-subsidy should only be allowed in more sustainable locations rather than remote rural settlements. Sustainable sites were raised by another respondent who argued **allowing market housing goes against the principle of a plan-led system in allocating the most sustainable sites**.

Key disadvantages focused on how such an approach would **potentially increase hope/residual value leading to increased speculation** and that it negates the idea of a site being an exception given market housing is already allocated to appropriate areas and levels in the plan. This may lead to developers not developing housing on formally allocated sites, particularly brownfield sites. If market housing was to be allowed the majority of respondents (52.9%) note that **the level should be no more than 25% market housing allowed** while 35.3% of respondents suggested that no market housing should be permitted at all.

Planning Policy Wales notes that LPAs can identify sites in a LDP for 100% affordable housing. Respondents were asked if they thought such **sites could be identified in rural areas and settlements as a plan-led alternative to rural exception sites, with 62.5% saying yes, 25% saying no, and 12.5% unsure**. Respondents highlighted that such an approach could create more certainty, would be easier to justify and approve at planning application stage, allows full scrutiny of sites at LDP stage, and ensures the most sustainable sites are allocated. Respondents identified that there would have to be a clear identified need to allocate such sites and mechanisms to ensure it was affordable in perpetuity. A key concern raised around such an approach was that **land values in allocated areas may increase as a result leading to landowners holding onto the land in the hope that they**

**might change to market housing in the future.** Others suggested such an approach does not provide flexibility for case-by-case sites that might come along, with one respondent noting that they have allocated sites as 60% affordable housing in their LDP but still like the added flexibility of rural site exception policy. Another respondent suggested Welsh Government was resistant to 100% affordable housing allocations and that such an approach would be seen as eroding the planning system as being market driven.

## Improving Effectiveness and Delivery

Respondents were asked to identify the principal barriers to delivering more affordable housing on rural exception sites. The **key barrier most commonly identified was the lack of landowners willing to come forward,** their expectations of future increases in their land values, and hope of getting their land allocated for market housing. Other barriers include a recognition that RSLs tend to focus on larger, already allocated sites and are often unfamiliar with the exception site criteria as well as broader issues of viability, lack of housing needs information, grant funding, and community concerns. One respondent also noted that RSLs and Councils are nervous about development outside the settlement boundary as it is seen as risky.

In order to overcome these barriers respondents provided a number of suggestions. In terms of ways LPAs can address the issues, **suggestions included allocating 100% affordable housing in LDP, utilising compulsory purchase, and ensuring no future sites in rural settlements are released in order to remove hope value.** Other suggestions focused on funding and training, particularly for RSLs with specific investments in guiding them on how to bring forward exception sites and the need for them to have quick access to financing for when sites become available as well as greater assistance for Community Land Trusts to allow them to lead on proposals. More generally funding for rural housing need surveys was noted as well financial incentives for landowners to release land and the need for increased affordable housing grants. Policy changes included a suggestion to allow cross-subsidy with market housing as well as reduce infrastructure commitments for sites. One respondent noted that Welsh Government also had a role in trying to convince mortgage companies to provide a mortgage for affordable housing obtained through Section 106 agreements.

# STAKEHOLDER PERSPECTIVES

## Introduction

In order to provide a deeper understanding of the key challenges related to rural exception sites **9 semi-structured interviews were undertaken**. These were comprised of housing delivery agents (two housing associations and two rural housing enablers), government officers (housing policy officer, Welsh Government, and planning inspector), and professional representative bodies (Master Builders Federation and Royal Town Planning Institute Cymru).

## Challenges

Interviews generally suggested that it was still an open question as to whether rural exception sites were working. Affordable housing on rural exception sites has not been significant in numbers terms, but it has been significant in rural locations where otherwise affordable housing might not have been provided. It is seen by interviewees as one tool in a variety of tools. Multiple interviewees noted that there is a particular **need to consider the impact of the policy on land values, landowner expectations, and hope value**. Some expressed a concern that expectations of the value of exception sites were being raised unrealistically by local estate agents leading to landowners being reluctant to bring sites forward as they want to obtain the best price for their

land. Many interviewees suggested that **exceptions site policy works best where the development plan framework is mature and robust** as this helps to 'drive out hope value' for unallocated sites through a plan-led system where it is clear that some sites will not secure housing other than exception sites for affordable housing. Others argued that **exception sites, as unidentified sites, provide flexibility by not allocating a site as this does not inflate landowner expectations of its value**. There was general agreement that landowner expectations of what they can get on a site – now or in the future – are critical. Viability for rural exception sites is typically impacted on by dealing with waste, utilities instalment and costs of planning and building approvals, increased technology in housing requiring specialist installation teams to visit remote rural locations. As a result it is argued that **the system disadvantages smaller-scale housebuilders that would often be the ones to bring housing forward in rural areas**. RSLs raised concerns that smaller sites experience less cost-efficient maintenance if the RSL stock is distributed around in small pockets in villages in rural areas. Local planners are seen to be rightly concerned to ensure that housing provided on exception sites remains affordable in perpetuity though this can create problems in terms of lenders willing to lend against the value of the asset.

## Cross-subsidy through market housing

Agricultural and rural landowners take a long-term view of their land assets, often over generations. As a result the

sale of land at affordable housing land values may not be sufficient or immediate enough an incentive to make land available. **Market housing on exception sites was seen as a way to possibility address this by some interviewees through creation of an incentive for landowners to bring forward and sell sites.** A number of factors were seen to impact upon viability of schemes on exception sites. For instance, there are often **insufficient levels of social housing grant** and housing associations may face abnormal costs outside development boundaries. If there was an element of market housing allowed this might give greater flexibility to enable cross-subsidy of affordable housing. Disadvantages include that **it is meant to be a specific policy to meet local need and may bring in non-locals to the community too.** Market housing on exception sites could be useful if the barrier or hurdle is land not being brought forward. There is **a need to identify the positives and negatives in England** in relation to their use of cross-subsidy.

There was general agreement that any cross-subsidy changes would **need to have robust guidelines and be based on evidence and independent valuation or viability assessment** as it may otherwise simply drive up hope value and inhibit delivery. If there were to be market housing on exception sites some interviewees suggested thresholds should be determined locally based on viability. Some suggested more work needs to be done to identify and understand what the implications of this are for landowner expectations on value. It was noted that **there is no evidence**

**as yet that enabling market housing on exception sites does lead to an increase in supply of affordable housing.** Welsh Government was seen to be open to considering evidence that market housing on exception sites leads to increased delivery, but they have yet to receive this.

## Self-build

Rise of volume housebuilders has created difficulties for the development of self-build, and more broadly smaller sites as might be identified in rural exception sites. There are particular financing challenges in borrowing smaller amounts for what are seen as riskier projects as well as lack of skilled tradespeople in construction, increasing materials costs, and underperforming utility companies were all identified as making housebuilding in rural areas less attractive. The very nature of exception sites is itself seen as a hurdle by interviewees, with additional risks and legal costs in managing and delivering these. **A key concern was mortgageability.** The planning system was also seen as difficult for small house builders to navigate. There were also concerns that self-build is more difficult to obtain affordability in perpetuity, but some interviewees noted it can be done, such as through Section 106 agreements requiring sale at a percentage of market value. This could however been seen as blurring local need with housing for locals leading to suspicions about whether it is then a loophole.



## Plan-led identification

National policy discourages the identification of 100% affordable housing sites but interviews suggest LPAs are trying to find ways to do this.

There was fairly **broad support amongst interviewees to allow 100% affordable housing to be identified through a plan-led system**. Also, closely linked to this is an increased appetite for compulsory purchase of sites if not brought forward for development once allocated. Such an approach is used by Monmouthshire where there are allocated sites (not exceptions) within the LDP for rural affordable housing. This is an alternative and more strategic approach to rural affordability (allocated sites) in all the main villages across Monmouthshire, rather than relying on exception sites.

**If the sites are not brought forward then they are taken out of the plan.**

Regardless it was noted there is still a need for rural allocations policy to prioritise applicants according to local connection.

## Partnerships

Interviewees noted that **local organisations are generally working effectively to try and address local need for affordable housing**. There is a recognised need for openness and transparency while ensuring people are not given false hope. It was argued that local councillors (county and community) need to be given a better understanding of what needs to be done not only to address affordable housing need but also to create local sustainable communities.

**RHEs are important, but interviewees acknowledged that support and coverage has declined**. Rural housing enablers were widely viewed as doing good work. The RHE raised the profile of affordable housing in rural areas, such as Pembrokeshire, undertaking local needs work, developing local interactions, etc. and began to change perceptions of affordable housing. The **benefits of RHE posts were seen by some to be “slow burners”**.

Only after certain posts were removed are some of the schemes championed by them coming to fruition. It was noted that some community councils are keen to work with RHEs while others are less so, though being able to show successful exception site developments can help convince others. The RHEs were seen as an area that Welsh Government could potentially have a role in resurrecting.

More broadly, **LPAs like working with RSLs as they are seen as an easy and familiar mechanism for ensuring affordability in perpetuity and controlling occupancy**. Interviewees argued that there is a need to recognise that it can take a long time (after surveys) to bring forward schemes on exception sites. There is now more emphasis on community consultation (rather than measuring local housing need), which can lead to increased levels of expressed housing need on the housing register. RHEs have also been involved in consultations on the design of schemes.

## Changes needed

Exceptions are, by definition, exceptions and as such they are a bonus rather than a principal

mechanism for delivering affordable housing and this must be acknowledged in any policy. Currently rural exception sites must meet all other housing criteria. The key question noted by some interviewees is **what is 'exceptional' if a site meets all the general housing criteria?** This may prevent delivery as intended and it was suggested that it needs clarification. Another area that was **noted for clarification is in relation to references to rural exception sites and affordable housing exception sites.** It was argued that the Technical Advice Note needs to clarify whether they are the same or distinctly different. Some interviewees also noted that there is an increased role for Planning Policy Wales or a Technical Advice Note to set out parameters for eligibility for local need through additional national guidance or criteria that can then be tested and modified locally.



# CASE STUDIES

## /// Pembrokeshire

### Introduction

Pembrokeshire is selected as a case study as a largely rural authority which **experiences significant housing pressure**, and where the ratio of average local income to average house prices indicates considerable difficulties with affordability of housing. In addition, national data indicates modest delivery of affordable housing units on rural exception sites. The area is also one that is **experiencing an ageing population profile, and affordable housing for younger generations in rural settlements is a key issue**. The need for affordable housing in the county is recognised as 'acute'. Local documents also identify an increasing backlog of affordable housing need due to past under-supply of affordable housing.

### The Local Development Plan

Pembrokeshire County Council adopted its Local Development Plan in 2013 and commenced a review of the plan in 2017. The Plan includes a series of policies linked to affordable housing. **The Plan defines a settlement hierarchy**, including a category of 'Small Local Villages' in which all residential development is to be local needs affordable housing. These developments are identified as up to 5 units. The Plan is clear that **such sites**

**are to be 100% affordable housing and that this cannot be negotiated downwards on viability grounds**. This is complemented by a policy on 'Exception sites for local need affordable housing', with such sites being permitted in 'exceptional circumstances'. The policy defines criteria for assessing proposals and when they will be permitted, including with reference to the settlement boundary, an identification of local need for affordable housing, and homes remaining affordable.

The Plan also **adopts a positive approach to self-build low cost home ownership in defined Small Local Villages**. This does however refer to low cost home ownership rather than affordable housing.

The Council also produced in 2015 a document providing supplementary planning guidance on affordable housing. This highlighted a **restriction of exception sites to social rent or intermediate rent properties as the preferred means of ensuring affordability in perpetuity**. The document noted difficulties with low cost home ownership schemes due to the conditions required by mortgage providers when lending on such homes.

The Council in 2017 commenced a review of its Local Development Plan. The review documentation to date identifies that the policy on **'Exception sites for local need affordable housing'**

**has been 'effective'**. The policy is identified as requiring only limited change to respond to issues raised by stakeholders. The proposals for the revised Local Development Plan do, however, remove the distinction between large and smaller local villages on which the identification of only affordable housing in the latter depends.

## Implementation

The Local Development Plan (2013) established a monitoring framework. This includes an **indicator or target of 40 affordable homes permitted on exception sites by 2021**. The Annual Monitoring Report for 2017-18 states that implementation **has exceeded this target**, with 151 units granted planning permission on rural exception sites at the point of plan review in 2017. The number of units in two separate years exceeded the target for the period to 2021. The number of units on affordable housing exception sites appears to have exceeded by a considerable margin the level anticipated at the point of plan adoption.

**The number of units recorded in any one year remains highly variable** – ranging from zero to 64 units. The number of units approved for planning applications in the period 2012-17 range from two to 30. Ten planning applications for rural exceptions sites were approved in the period 2012-2017. Data on planning applications shows a rough pattern of smaller sites of up to 6 units, and larger sites of between 25 and 30 units on exception sites. The patterns suggest activity by Registered Social Landlords with

medium-sized developments in rural areas. Approximately 25% to 45% of RSL units securing planning permission in any one year are on rural exceptions sites.

## Key lessons

The key lessons derived from the case study of Pembrokeshire are:

- Local needs affordable housing in rural areas can be an important factor in **managing the needs of particular groups, including younger people**. The policy can therefore play a part in managing demographic change.
- The exception site policy appears to have been successful in that the Plan has at an early stage already exceeded its target for the number of affordable housing units granted planning permission on exception sites. An average of two planning applications per year have been approved for exception sites, at an **average rate of around 30 units per year for the period 2012-17**.
- **Social and intermediate rent are the preferred forms of affordable housing for delivery on exception sites**. This is to ensure that homes remain affordable in perpetuity.

# /// Gwynedd

## Introduction

Gwynedd is selected as a case study due to it being a **predominantly rural and sparsely populated authority** in the North of Wales which has sought to include a more flexible interpretation of rural exception sites in their joint local plan. National data also suggests that **over a ten-year period it has delivered the considerable affordable housing units on rural exception sites**. The North West Wales Regional Rural Housing Enabler Service operates in rural Gwynedd. While house prices are not high in relation to other areas, lower incomes and higher new build costs in Gwynedd have resulted in housing being unaffordable for many, with **young people identified as particularly in need**. The use of 'Right to Buy' and increased purchase of second/holiday homes has reduced housing supply and created additional affordable housing pressures for local residents.

## The Local Development Plan

Anglesey and Gwynedd have produced a Joint Local Development Plan for the period 2011 – 2026 which was adopted in 2017. The Plan includes a specific section on affordable housing which includes a settlement hierarchy with **'Local Villages' and 'Rural / Coastal Villages' identified just for local affordable housing need**. Developments in these areas greater than a single unit must

provide a contribution to affordable housing based on variable rates depending on house price area, up to a maximum of 30%. **The Plan includes an 'Exception Sites' policy** for use where it can be demonstrated that there is a proven local need for affordable housing that cannot be met by market housing within a reasonable timescale. Exception sites are to be considered for all settlements identified within the plan and must be of an appropriate scale. The Plan provides a concession for this if justification is provided as to how a proposal serves a wider area than the settlement itself, such as a 'lack of opportunities in other settlements within the same area'.

Prior to examination, **the Plan had a different 'exception sites' policy wording which was amended at the request of the Inspector**. Originally the Plan drew on TAN6 policy that stated 'Planning authorities should employ all available policy approaches, in an innovative way, to maximise the supply of affordable housing as defined in TAN2' in order to **argue for the inclusion of market housing within exception sites**. The original wording in the draft LDP noted:

*In exceptional circumstances, subject to evidence that it is not viable to provide a 100% affordable housing to meet a proven local need for affordable housing on sites immediately adjacent to the development boundary, proposals for an enabled exception site will be granted provided that all the following criteria are satisfied:*



1. Only a minimum number of open market housing dwellings are included to make the proposal viable;
2. The development is by or in partnership with a Registered Social Landlord and/or a Community Land Trust and/or the Strategic Housing Authority;
3. The open market provision does not exceed the growth level anticipated within the Plan's settlement strategy.

A number of **additional restrictions were noted**, including evidence that the proposal would not be viable without an open market component, that the number of open market units should be the least amount required, and that the affordable housing component is completed concurrently with the market housing.

During the inspection hearing session representatives of local registered social landlords noted the difficulties in financing site schemes but it was **ultimately determined that the inclusion of market housing on rural exception sites conflicted with national policy** as it would unduly influence the value of land through the generation of hope value and the proposals were removed.

## Implementation

The Joint Local Development Plan (2017) established a monitoring framework **with a target of an increase in the number of affordable housing exception sites compared to the average during 2015/16-2016/17**. The

number of affordable housing **exception sites granted permission and delivered varies depending on data source**. Based on Topic Paper 3A 'Population and Housing' (2016) produced for the Anglesey and Gwynedd Joint Local Development Plan, Gwynedd granted permission to 4 sites in 2011-12, 2 sites in 2012-13, 0 sites in 2013-14, and 2 sites in 2014-15. This compares to StatsWales data which notes differences in permissions granted for 2011-12 at 13 sites and 2014-15 at 0 sites. Similarly delivered rural exception site units varies, with the Population and Housing paper noting Gwynedd delivered 17 sites in 2011-12, 2 sites in 2012-13, 2 sites in 2013-14, and 3 sites in 2014-15 compared to StatWales which notes differences in 2011-12 at 21 sites and in 2014-15 at 0 sites.

The North West Wales Regional Rural Housing Enabler Service operates in rural Gwynedd. Draft supplementary planning guidance on affordable housing notes the **importance of the role of the Rural Housing Enabler** to raise awareness of the shortage of affordable housing for local people, collect data on local affordable housing need, empower and assist communities, work with communities to register the housing needs of local people, and support partnerships between different groups in the provision of affordable housing. The Population and Housing paper notes that the Rural Housing Enabler **was not aware of any exception site that had been developed without the inclusion of a housing association** due to it not

being viable without a social housing grant.

## Key lessons

The key lessons derived from the case study of Gwynedd are:

- The inclusion of **market housing on rural exception sites conflicts with national planning policy** and is likely to not be accepted at examination due to the potential impact on hope value.
- Data on the number of affordable housing units granted and delivered on rural exception sites differs depending on the data source. There is a **need for more consistent data to track the number of exceptions granted and delivered**.
- **Rural Housing Enablers play a key role in identifying local affordable housing need** and bringing various partners together to bring forward rural exception sites.
- The **development of an exception site is most often undertaken by a housing association** due to the need for a social housing grant to make it viable.



# /// Brecon Beacons National Park Authority

## Introduction

As one of Wales' three national parks, Brecon Beacons provides a useful example of a local planning authority that must manage a **range of housing pressures across multiple unitary authority boundaries**. National data on rural exception sites suggests that Brecon Beacons utilised the policy extensively between 2007-2014 to deliver large numbers of affordable housing units but since 2015 has not delivered any additional sites. The National Park Authority develops, implements, and monitors affordable housing policies however it is the responsibility of the constituent Unitary Authorities to deliver it. **Portions of the national park are within the commuting area of the Cardiff Capital Region, placing particular pressures on housing affordability while at the same time potentially improving the viability of schemes**. Planning restrictions related to national park designation may create additional challenges for the delivery of affordable housing.

## The Local Development Plan

The 2007-2022 Local Development Plan was adopted by the Brecon Beacons National Park Authority on 17<sup>th</sup> December 2013 and with formal review of the plan beginning on 17<sup>th</sup> December 2017. The Plan **includes**

### **a specific policy on enabling affordable housing exception sites.**

Typical criteria are set in relation to provision only on adjoining sites that form a logical extension of a settlement, meet a proven housing need, and where local need has been established. This is followed by requirements that include planning conditions or legal agreement to ensure occupancy in perpetuity for those in affordable housing need. The Plan includes no mention of self-build as a means of low-cost or affordable home ownership.

### **Supplementary guidance on affordable housing was endorsed in September 2014 but only exists in relation to affordable housing contributions.**

Separate supplementary guidance related to rural exception sites does not exist. In June 2018 an affordable housing strategy was adopted by the National Park Authority which identifies areas of affordable housing need, however there is no mention of rural exception sites as a mechanism for delivery. Rural exception sites are noted as a key measure to be monitored in annual monitoring reports.

In April 2018 a review of the Local Development Plan was undertaken.

**The review notes that no rural exception sites have been granted permission between December 2013 and April 2017.** No potential changes are noted in relation to the rural exception site policy in the review to date.

## Implementation

The December 2013 Local Development Plan includes a monitoring framework with a rural exception site **indicator of granting permission for 4 affordable homes on exception sites annually.** Since 2013 **no affordable housing rural exception sites have been granted permission, however this is due to no sites being brought forward by landowners.** The various annual monitoring reports include suggestions to stop monitoring this indicator in the future given it relates to 'exceptional development'.

More broadly the annual monitoring report highlights variable levels of affordable housing completions, however **over the long-term affordable housing targets are being met.** House prices have increased within the National Park Authority helping to improve viability, however this has also increased the need for affordable housing. The National Park Authority has **commissioned a report to examine additional viability testing with a view to modifying the affordable housing contribution targets** (if appropriate) during the review of the local development plan.

## Key lessons

The key lessons derived from the case study of Brecon Beacons National Park Authority are:

- Rural exception sites may **not always be as necessary if affordable housing targets are being met.**

- Increases in house prices place particular pressure on areas to provide affordable housing, however at the same time this **can improve viability allowing long-term affordable housing targets to be met**. As a result, affordable housing contribution targets can potentially be increased.
- Rural exception site policy requires that landowners bring forward land. **A proactive approach to engagement with landowners may be necessary** to facilitate this.

## /// Cornwall, England

### Introduction

Cornwall is selected as a case study of a local planning authority in England. It has been selected due to its track record in delivery of affordable housing on rural exception sites. Cornwall Council **accounts for around 40% of all affordable housing on rural exception sites in England**, and far exceeds any other local planning authority in England in delivery of affordable homes on such sites. Cornwall Council identifies that **rural exceptions sites have been a consistent source of affordable homes**, complementary to the delivery of affordable housing on allocated sites.

Cornwall Council also operates within the English policy context, where national planning policies support the

provision of a proportion of **market housing on rural exception sites**.

Government data for England identifies that no affordable housing is granted planning permission or delivered on rural exception sites for many local planning authority areas. Rural exception sites are **therefore a tool used selectively by local planning authorities in England**.

### The Local Plan

The Cornwall Local Plan was adopted in 2016 and includes a specific policy for Rural Exceptions Sites. Some of the notable features of the policy include:

- The **policy applies to 'smaller towns, villages and hamlets'** and the primary purpose of rural exception sites is 'to provide affordable housing to meet local needs'.
- Sites are **defined as 'outside of but adjacent to the existing built up area'** of smaller towns, villages and hamlets. The physical relationship of sites is defined as 'well related to the physical form of the settlement and appropriate in scale, character and appearance'.
- The policy does not prescribe the number, type, size and tenure of affordable dwellings for rural exception sites. These **should instead reflect local needs as identified through the housing register and local surveys**.
- The policy accepts the provision of market housing on rural exception sites 'where the Council is satisfied it is essential for the successful delivery of the

development'. This requires detailed financial appraisal. **There is a cap on market housing of no more than 50% of the homes and 50% of the land take.**

The policy is a relatively simple and flexible one and has a limited number of principles or criteria. The policy sets out a mechanism whereby the extent of market housing on any site is **linked to what is essential for delivery**. The responsibility is on the applicant to demonstrate whether any market housing, and if so what extent of market housing, is essential for delivery of the development. The Council is clear in its **expectation that proposals for rural exception sites will normally be for dwellings restricted in perpetuity for local needs affordable housing**. The purpose of enabling some market housing on rural exception sites is to address an environment of **limited public subsidy** for affordable housing. The Local Plan identifies that the policy may remove the need for all or significant levels of public subsidy. A secondary justification is to provide a wider range of homes in some communities.

The Local Plan's monitoring framework sets out a **target of 150 affordable homes per year to be provided on rural exceptions sites**. Government data for 2016-17 identifies 400 units, indicating that the provision exceeds targets.

The Planning Inspector's report on the examination of the Local Plan (2016)

notes that changes were made to the Council's originally proposed policy. The Inspector required the Councils' policy on 'affordable housing led schemes' to be **properly expressed as a rural exceptions site policy as set out in national planning policy**. The Inspector also required that local need should only apply to the affordable housing element of a rural exceptions site. The Inspector also found that the criterion that there should be local support for such sites was not justified and was deleted from the policy. The Inspector additionally expressed **some reservations about whether the rural exceptions policy could deliver the 2,700 dwellings anticipated** by the Council over the plan period. The Inspector did not have any evidence to substitute an alternative figure.

## Supplementary Planning Document

Cornwall Council has very recently closed a consultation on a draft Housing Supplementary Planning Document. The document is designed to support various plan policies related to affordable housing, including that for rural exceptions sites. Several of the principles of the rural exceptions sites policy are reiterated, although additional information is provided on the following:

- The draft document refers to **a nationally-recognised land value for rural exception sites** (a value of £10,000 per plot or no more than ten times agricultural land value, whichever is the lower). The draft document



proposes that decision notices for approved schemes will **cap land value 'at exception site prices'**. Key variables for appraisal, including capping land values, are also to be included in the s.106 agreement.

- The value of **pre-application advice** on sites and their suitability as rural exceptions sites
- The preference for **full rather than outline planning applications for rural exceptions sites**, designed to enable a proper assessment of financial viability. Applications made in outline will be considered to be 100% affordable housing and only scaled back from this when viability can be properly assessed at reserved matters stage.

## Implementation

Cornwall Council provides a range of guidance and support for the delivery of local needs affordable housing. It provides a 'Rural Toolkit Handbook: advice, guidance and practical help in delivering local needs affordable housing'. This includes **help to find and select suitable sites, as well as managing hope value** for affordable housing sites through encouraging competition between alternative sites.

Cornwall Council also maintains a **record of interest in custom-build and self-build**, including for affordable housing. This helps to build evidence of local demand and need for such forms of housing. Self- and custom-

build is therefore positively identified as helping to contribute to affordable housing supply.

These supportive mechanisms and initiatives are important in facilitating the delivery of local needs affordable housing, and complement the existence of planning policies in the Local Plan.

## Understanding Cornwall's Approach – A Background Interview

*Robert Lacey, Strategic Policy, Cornwall County Council*

Cornwall Council and its pre-unitary predecessors, especially Restormel District Council, have a long history of using market housing to enable affordable housing on rural exception sites. This was a response to a decline in previously substantial grants for affordable housing. As grant funding declined, 100% affordable housing sites were not being brought forward. Even where exception sites had been granted planning permission, they were then not being delivered. Carrick District Council ultimately included it as a policy to enable cross-subsidy from market housing. The 2016 Local Plan then adapted the policy.

There have been concerns from some stakeholders about allowing market housing in less sustainable locations. There is also some concern about the size of sites in dispersed rural locations which inevitably means looking at smaller sites now as rural exception sites, including through Registered Social Landlords.

Delivering affordable housing is now almost entirely through market housing cross-subsidy with practically no public subsidy provided. Elected members exhibit strong political will and pressure to deliver affordable housing and support its delivery.

Initially housing waiting lists and housing need surveys showed declining need in rural areas, but this turned out to be an underplaying of need. As little housing was ever built it was considered that there was little hope in going on the list as nothing came forward. As units did come forward, more people felt it was worth going onto the list. Cornwall County Council tried hard to address the perception that affordable housing was only ever an issue in urban areas.

There is a view that cross-subsidy of sites has increased the supply of affordable housing, as previously sites granted planning permission for rural exceptions units were not then being delivered. Now, the Council is typically achieving 60-70% affordable housing units on sites delivered as rural exception sites. Some agents, however, have interpreted no less than 50% affordable housing as simply meaning 50% market housing. Council planners were promoting a 'majority' of affordable housing and councilors pressed for the 50% in the policy. The key issue is very tightly-drawn settlement boundaries as this helps to deliver where it was not possible previously.

The Rural Housing Enablers team was important in speaking with landowners, especially in raising awareness of the existence and role of exception sites. There has been a decline in their capacity however.

There is limited interest in self-build within Cornwall. Self-build affordable housing is a challenge due to mortgage provisions. Most self-build in Cornwall is also quite expensive housing, rather than affordable. The Council tried to get a 5% self-build requirement into the Local Plan, but this was not supported at examination on the grounds that it may undermine affordable housing. Cornwall Council is however looking again at facilitating self-build.

## Key lessons

The key lessons derived from the case study of Cornwall are:

- Cornwall Council demonstrates that **rural exception sites can be an important tool for the consistent delivery** of local needs affordable housing.
- Rural exception sites policies in development plans can be **expressed in a relatively simple and straightforward form**, and can apply across a range of different scales of settlement and types of affordable housing.
- Mechanisms can be designed to enable, but carefully limit the extent of, **market housing on rural exception sites, based on assessment of financial viability**.
- Evidence of local affordable housing need is an important factor in identifying what is a suitable extent and form of development within specific settlements.
- It is important to **manage landowner and developer expectations of land value for rural exceptions sites**, and that

this can be managed through decision notices and planning obligations.

- Successful delivery depends on a series of initiatives and activities that promote the delivery of affordable housing, including on rural exceptions sites. **Proactive management and delivery** is as important as ensuring that the plan includes a well-designed policy.



# Recommendations

*Recommendations were informed by the preceding research as well as a workshop undertaken near the end of the research. The workshop took place in Wrexham, Wales and included roundtable discussions on the research outcomes with 17 participants from the public, private, and non-profit planning and housing sectors.*

## Clarify Guidance and Improve Data:

- Welsh Government regularly collects data on affordable housing exception site planning permission and delivery from Local Planning Authorities. Discrepancies between Annual Monitoring Reports and StatsWales data were identified during the course of this research. These discrepancies were also anecdotally noted by research participants. It is **recommended data and definitions are clarified between Welsh Government and Local Planning Authorities** to ensure the reporting of permissions and delivery of affordable housing rural exception site units are consistent and accurate.
- Participants noted the requirement for improved housing needs data, particularly at the community scale, in order to appropriately identify and project demand for future local housing need. In areas where they are still active, **Rural Housing Enabler surveys offer a particularly useful means of identifying current and future community housing need.** It is

recommended these continue to be supported where they exist and expanded where possible.

- Currently rural exception sites must meet all other housing criteria. There were queries around what is 'exceptional' if a site meets all the general housing criteria. This may prevent delivery as intended and should be clarified. Survey results suggest **the requirement that rural exception sites form part of a mixed use and mixed tenure community should be relaxed** as criteria.
- There is a **need to clarify references to rural exception sites and affordable housing exception sites which are often used interchangeably** in Welsh Government and local policy. It is recommended that TAN2 should be updated to clarify whether they are the same or distinctly different.
- Currently guidance on rural exception sites **does not provide much advice on the development management aspects of rural exception sites**, how they are best operationalised, and used. It is recommended further guidance on this is provided to help support Local Planning Authorities.

## Expand Local Flexibility:

- No evidence was found to limit the type of provider of affordable housing on rural exception sites. While many Local Planning Authorities restrict provision of housing on sites to Registered Social Landlords in order to maintain affordability in perpetuity, this unnecessarily limits potential provision. Local Planning Authorities that allow any provider to build are able to maintain affordability in



perpetuity through a range of legal mechanisms. **It is suggested, where they exist, that Local Planning Authorities consider removing restrictions on the type of provider.**

- Many Local Planning Authorities include specific, often low, caps on the number of units that can be provided on a rural exception site. As the provision of affordable housing on these sites is designed to provide for local housing need Local Planning Authorities should **consider removing caps on the number of units to ensure they are not unnecessarily restricting potential supply of affordable housing** where a local demand exists, as all other rural exception site criteria are designed to ensure an unnecessary or excessive number of units are not built.
- In partnership with Welsh Government, Local Planning Authorities should explore opportunities to remove the residential restriction on rural exception sites to **allow for mixed-use non-profit employment schemes** to balance affordable housing provision with increased employment opportunities.

## Increase Support for Delivery:

- Private-sector and self-build on rural exception sites has been limited by the availability of mortgage lending criteria that can ensure affordability in perpetuity. **It is recommended that Welsh Government explore the potential role of the Development Bank of Wales** in providing mortgages for affordable housing that allow for affordability in perpetuity.

- Rural Housing Enablers provide vital services in identifying need, appropriate rural exception sites, and in engaging the range of partners necessary to progress rural affordable housing sites. The Rural Housing Enablers also play a key role in encouraging applicants to register need as they are often reluctant to do so if they do not think there is a suitable property available. **It is recommended that funding for Rural Housing Enablers be increased** to expand the number and activities of enablers across Wales.
- Particularly in areas where Rural Housing Enablers do not exist, Registered Social Landlords tend to be less likely to bring forward developments on rural exception sites. This was attributed in part to a lack of local guidance on the process and impression of risk. **It is recommended that a rural affordable housing toolkit be developed** that explains not only rural exception site processes, who to engage with, and how, but also identifies and discusses the wider range of affordable housing provision options available within a Local Planning Authority in a proactive manner. There may also be a **need to review social housing grants for housing associations to make sites viable.**
- The lack of landowners bringing rural exception sites forward was identified as a key concern due to lack of financial incentive and potential hope value. Up to date development plans are seen as key to the removal of hope value. Other **financial incentives should also be considered, including potential tax benefits for landowners who bring forward land**



for affordable housing in areas of identified need.

## Further Explore the Impact of Market-housing:

- There is no overwhelming opposition towards market-housing being used to cross-subsidise affordable housing on rural exception sites. However, **no compelling evidence has been identified through this research that suggests cross-subsidy of market-housing delivers more affordable housing**. It is however recognised that viability is a key barrier to the provision of affordable housing on rural exception sites and the role of market-housing in enabling viability should be kept under review. This may be particularly necessary if subsidies for affordable housing provision are reduced.
  - If market-housing cross subsidies are introduced, this research suggests that the most prudent approach would be a **presumption in favour of 100% affordable**, with an inclusion of market housing only to the extent necessary to make a scheme viable. As in the case of Cornwall, this would require open and transparent engagement
- between the Local Planning Authority and the developer.
  - This research also suggests that a **maximum cap of 25% market-housing be set**, that restrictions be included on the maximum land area of a site that can be used for market-housing, that a minimum absolute number of affordable housing units be set, and that affordable housing be developed concurrently with market housing.
  - The case of Gwynedd noted that the inclusion of market-housing would 'undermine the principle of the exception sites approach which seeks to limit the influence that an identified development potential has on the value of land'. **Wider research on the potential impact of such 'hope' value is necessary.**
  - Ultimately the inclusion of market-housing to cross-subsidise affordable housing on rural exception sites **may require a different, specific policy framework** or may be approached differently through a plan-led approach to the identification of exceptional affordable housing sites.



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Local Planning Authorities that completed the survey were: Anglesey and Gwynedd Joint Planning Policy Unit, Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Carmarthenshire, Ceredigion, Denbighshire, Flintshire, Monmouthshire, Neath Port Talbot, Newport, Pembrokeshire Coast National Park, Powys, Rhondda Cynon Taf, Snowdonia National Park, and Swansea.

Interviewees included representatives from: Ateb Group, Cornwall County Council, Cartrefi Cymru, Federation of Master Builders, Monmouthshire County Council, Rural Housing Enabler Service, Planning Inspectorate, Royal Town Planning Institute Cymru, and Welsh Government.

Workshop participants in Wrexham included multiple representatives from: Denbighshire County Council, Ceredigion County Council, Snowdonia National Park Authority, Huw Evans Planning, RTPI Cymru, Rural Housing Enabler Service, Flintshire County Council, Cadnant Planning, and retired former planners.

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This research was completed in accordance with the ethical approval processes of Cardiff University.