

SHS 07

Ymgynghoriad ar y cyflenwad o dai cymdeithasol

Consultation on social housing supply

Ymateb gan: Castell Group

Response from: Castell Group

Castell Group are an SME social house builder based in Swansea currently delivering residential development schemes for Registered Social Landlords and Local Authorities across South Wales. A key goal of the company is to increase the supply of social housing, and by working closely with RSLs, we feel as though we are well positioned to comment on the key issues that affect social housing supply in Wales.

The planning system in Wales faces a number of challenges and issues that significantly impact the delivery of social housing.

- The system has become increasingly complex with different departments within Local Authority having their own aims and objectives which do not necessarily correlate to the delivery of planning permissions which in turn would deliver social housing. A significant number of costly surveys and reports are required to progress with a planning application, however, despite carrying out these works, this does not necessarily mean that a planning application will be received favourably by a Local Authority. Pre-application advice can be sought, however we have found that this can not be relied upon through the planning process, as different planning officers may have different views, with planning policy being implemented subjectively. There is a host of 'grey areas' which can make a planning application seem more like a guessing game rather than being able to feel confident when a planning application is submitted.
- We deliver a number of schemes on Brownfield sites, however there is no presumption in favour of social housing. Re-developing brownfield sites for social housing should be looked upon favourably in planning, however these sites face the usual hurdles, if not more, considering the opposition from local communities when we seek to develop sites.
- NIMBYs – As mentioned above, opposition on social housing sites are common with a stigma attached to the residents who will benefit from living in social housing. Even when planning applications are put forward for 100% affordable housing, there are objections to these sites from local communities, councillors and beyond. Therein lies a deeper issue that despite the pressing need, a small minority would rather object to a site, and it is difficult to obtain support from the silent majority who are in desperate need of housing
- Not enough weight is given in planning to address the housing crisis in Wales
- The plan led system in Wales and the lack of emerging LDPs and the lack of small allocations. In Bridgend there were no allocations under 100 homes, and therefore only lend themselves to PLC delivering the sites on the open market and providing S106 plots, which they will try and reduce where possible to ensure they maintain their profit margin.
- The timescales in obtaining planning consent are also prohibiting the delivery of social housing, with it on average taking our company 21 months from submitting a pre-app to being able to start on site following the discharge of planning conditions
- There are currently circa 90,000 on the waiting list needing a home in Wales, which shows the target above is nowhere near ambitious enough to help the number of families requiring somewhere to call home.
- Remove PAC for sites above 10 / increase the threshold to 50
- Streamline S106 for smaller sites with agreed template including Mortgagee in Possession clauses
- Highways & SAB adoption policies need to be clearer

- Ecology biodiversity calculations need to be clear so developers can work out if sites can comply without chancing it at planning
- Increase the planning application fee and ring fence the money to increase resource in departments
- Give planning officers more authority to make decisions if consultees do not respond as this is where the significant amount of delays occur
- Reduce the amount of pre commencement conditions that are still being imposed
- Planning committee have personal influence in our opinion and it's a risk
- Introduce more permitted development rights for existing buildings
- Seek frequent feedback from the private sector as to what's working or not

There are a number of challenges facing social landlords with several outlined below:

- Lack of contractors to deliver social housing schemes
- Skills shortages within the construction sector
- New, unknown technologies being installed into properties with little regard given to the long term maintenance and management of these technologies
- Individuals within the Local Authority determine whether social housing grant support can be provided to sites, however there does not seem to be a basis for whether there will be support. In RCT for example there are several thousand waiting for a 1 bed dwelling, however, support may not be given to a development of a 1 bed apartments in a sustainable area
- Lack of land supply – plan led system and delay in the delivery of plans has meant that there are a lack of opportunities in the area of highest need and demand.