

Position Statement: Planning Contributions and Specialist Supported Housing

This statement sets out the justification for excluding the proposed Specialist Supported Housing (SSH) scheme from planning contributions, having regard to Planning Policy Wales (Edition 12) and associated national guidance.

The proposed development provides accommodation for adults with complex needs, including learning disabilities, autism, mental health conditions and physical disabilities. The scheme qualifies as affordable housing within the meaning of paragraph 4.2.29 of Planning Policy Wales (PPW), which defines affordable housing as including social rented housing and intermediate housing where "the subsidy element is essential to affordability." SSH developments fall squarely within this definition, as they are delivered in partnership with a Registered Social Landlord (RSL), include a long-term lease arrangement, and are occupied by individuals who would not otherwise be able to access suitable housing through the open market.

Furthermore, the Welsh Government's Delivery of Affordable Housing Using Section 106 Agreements (2019) guidance recognises that not all affordable housing schemes are subject to contributions, particularly where public subsidy is in place, or where the scheme would be rendered unviable through additional obligations. SSH schemes typically require enhanced design, accessibility, and long-term care arrangements. These factors result in significantly higher development and operational costs, which are not recoverable through tenant rental income. In this case, the viability is finely balanced to deliver bespoke, lifelong homes for highly vulnerable individuals.

Overall, in light of the above, it is submitted that the SSH scheme should be exempt from standard planning contributions. This reflects both its affordable housing status and its critical role in meeting the needs of an underserved, high-needs population in a sustainable and socially responsible manner.