

## **Matter 7: Provision of Sustainable Housing Sites (inc housing requirement)**

Key Issue:

Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?

a) Is the housing requirement, based as it is on economic and job aspirations, realistic and deliverable within the plan period? How does the amount of housing proposed relate to the most recent Welsh Government household projections? Has the UDP under-delivery been accounted for in the LDP housing requirement figure? If not, should it be?

**HBF supports the Councils approach to basing its housing requirement on economic growth, a position which we believe has been justified by the status given to the area in the recently published National Plan and Welsh Government funding for the Northern Gateway site in Deeside.[ [link to details of funding award](#) ]**

**The HBF notes that the 2015 JHLAS study produced by the council identified a shortfall of 2012 units between the UDP housing requirement and the number of units delivered. It is clear from the Councils BP10A that they have and do not intend to include any additional requirement to take account of this.**

b) Although neighbouring counties each provide for their own housing needs, does the differential in prices, particularly between England and Wales, lead to any cross-border demand for housing? If so, has this been accounted for?

**HBF notes that this issue is identified in the National Plan where it says the following about the relationship between these areas:**

***'The region should work together to consider the connections with Mid Wales, Ireland, Cheshire West and Chester and the North West of England. Promoting accessibility and inter-linkages between these areas, based on an understanding of their roles and functions, will ensure these areas operate as a cohesive whole, and do not compete against each other or take strategic decisions in isolation.'***

**HBF notes the issue is touched upon in document LDP-EBD-HP3 Local Housing Market Assessment Update - January 201 where it states at para. 3.42:**

***'The analysis indicates a strong connection with the neighbouring areas of Wrexham and Cheshire West and Chester. Flintshire is part of the wider functional economic area including Wrexham and Cheshire West and Chester but experiences a moderate degree of self-containment.'***

**It goes on to say:**

***'Therefore, Flintshire County can be described as a self-contained housing market both in terms of migration and travel to work. The County is considered to be an appropriate Housing Market Area for the purposes of Local Plan policy making.'***

**This suggests that little consideration has been given to this issue by the Council.**

**HBF considers it should be given greater consideration particularly based on current trends which are showing people to move away from larger cities and look for or semi-rural locations as a result of greater home working.**

c) The 14.4% flexibility allowance is slightly greater than average. On what basis has that percentage been selected?

**Although the Development Plan Manual 3 indicates that a 10% flexibility allowance should be the starting point. There are LDP's in Wales which are higher and lower, the HBF suggests that the appropriate rate should be set based on the local circumstances. Due to the Councils heavy reliance on two main strategic sites [47% of allocation on two sites] one of which is not yet been sold to a developer HBF considers that a greater level of flexibility should be allowed for in the plan to increase the chance of meeting the proposed trajectory of the plan.**

d) Is the housing requirement over reliant on the provision of dwellings on windfall and small sites?

**Although the Council do appear in their explanation to have explained how they have taken measures to avoid an overreliance on windfall sites particularly compared to historical data. It is noted that there are several factors which can affect the delivery of windfall sites, the previous higher levels are likely in part to be as a result of there not having been an adopted plan in place. Further windfall sites are limited in number as a result of the type of site they are likely to be to past high delivery is likely to mean less windfall sites will be available in the future.**

**Various submitted documents refer to the windfall allowance as being 600 on large sites and 720 on small sites, a total of 1320. However, in Table 4A BP10A Jan 21 it has reduced to 1080, as a percentage of the allocated sites this is 13%.**

**The guidance in DPM3 is clear that a plan should avoid being over reliant on windfall sites.**

**Due to the short time period of the plan remaining and the levels of delivery required concern still remains that that plan includes a level of windfall sites which by its nature is unknow.**

e) Do rates of housing delivery over recent years indicate that the housing requirement firstly, could, or secondly, should, be increased?

**HBF considers that the number of planning applications submitted for new homes in the area on recent years is an indicator of a strong demand for housing, however delivery has been delayed by the inability to gain planning permission in part as the result of not having an adopted plan. Although this has led to a number of appeals many of which have been successful this has meant that delivery has delayed by one to two years as a result of the time it takes to navigate the planning and appeal process. Further the lack of an adopted plan and the need to use the appeal system will have put off developers and therefore generated a hidden build up of demand.**

f) Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?

**Although the HBF does not object to this suggestion in principle, if the Council are minded too do so then it is important that they show that the sites have been thoroughly checked in terms of their viability and deliverability. Many sites benefit from older planning consents which may be renewed several times or kept alive by implementation of works, these need to be considered carefully in terms of whether or not they will ever come forward, particularly taking account of the short plan period.**

g) Is it likely that all the committed sites identified as contributing to the housing requirement (LDP Appendix 1), and allocations which are carried over as such from the UDP, will be delivered during the plan period? What is the evidence?

**Historic consents are often not delivered for good reason, generally across Wales we have seen levels of housing delivery increasing over the last few years in terms of units per year on sites. As required by the DPM3 it is for the Council to show that they have carried out the necessary checks to ensure sites are viable and deliverable and not just 'roll them over' into the new plan.**

**The delivery of sites is affected by several factors many of which are outside of the control of the Council. However, one area of the delivery process that the Council is able to influence is the time it takes to provide developers with implementable planning permissions including the discharge of planning conditions and signing of S106 agreements.**

h) How does the LDP avoid the issue of double counting in respect of large windfall sites?

**HBF notes that the council identify that they have taken steps to avoid double counting of large windfall sites in the first two years of the plan (Appendix 4A) and also notes at para 2.6.8 that they have avoided double counting of committed and sites which have gained planning consent since.**

i) What will be the implications for the delivery of the housing requirement of the comparatively short plan period remaining at adoption?

**HBF does not consider that the short plan period will have a direct impact on delivery. However, in practise an allocation is the first step to delivery, the determination of an implementable planning permission and the discharge of the planning conditions is what determines a start on site. On larger strategic sites delays can often be caused by the requirement for detailed design briefs and time taken to resolve S106 agreements. The Council will need to work closely with developers to ensure that the resources are available to ensure the timely determination of applications for new housing, particularly on the larger more complex strategic sites which the plan is heavily reliant on.**

j) Is the wording of Policy STR11 appropriate, particularly the use of the word 'expected' and the inclusion of the final paragraph?

**HBF considers the use of the word 'expected' to be inappropriate and notes that only one other policy in the plan [HN3: Affordable Housing] uses this terminology. HBF suggests that the word 'encouraged' is more appropriate and should be used instead. The HBF considers the final paragraph is not necessary and is not a policy requirement more a statement by the Council, which if still required, could be included in the supporting text, although HBF does not consider this necessary.**