

## Flintshire Local Development Plan Examination in Public Scheduled Hearing 14 May 2021: Matter 13

### Affordable Housing Rural Exception Schemes: Policy HN4 - D

#### Objection by Huw Evans Planning

##### 1.0 Reasons for the Objection

1.1 The need for affordable housing in the rural areas is strongly supported but this objection is made on the basis that the policy is unsound as it is not deliverable.

##### 2.0 Evidence

- 2.1 The sentiment of the rural exceptions policy is well meaning, however, it is not fit for purpose. The policy is fatally flawed as it has provided no meaningful affordable housing contribution in the rural areas. Attempts have been made to elicit a response from the local planning authority as to how many rural exception dwellings have been provided in Flintshire since its introduction over 15 years ago. These have included Freedom of Information requests but no evidence has been produced regarding the numbers, if any, of exceptional site dwellings that have been either approved or built.
- 2.2 The only such development is the Maes Y Goron site at Lixwm. This 25 unit site was granted in 2007 and, although the cooperation and negotiation between the developer and the planning authority was well intentioned, it has been fraught with difficulty ever since. It represented the first and only attempt to bring forward a rural exception site in the county. The lessons learned have demonstrated that the exceptions Policy HSG11 of the UDP is an ineffective mechanism to bring forward local needs housing in the rural area. In light of this experience it is surprising and disappointing that the planning authority reproduces exactly the same policy in the clear knowledge of its failure. In response to an enquiry on a different site it was stated that, "The policy has worked well in terms of preventing market dwellings in these settlements but has perhaps worked less well in terms of the numbers of affordable houses it has delivered". This is a clear admission of its failure.
- 2.3 Implementation Statement 3 of the current UDP (Monitoring the Plan), states that "The Council will continuously monitor the effectiveness of policies and proposals in the Plan and will respond to changing economic, social, environmental and legislative circumstances in order to review and update the Plan". Paragraph 20.13 of the explanatory text emphasises how important this is in terms of measuring the effectiveness of its policies and proposals. "It is important that the policies and proposals in the UDP are regularly monitored and reviewed in order to gauge their effectiveness as they are implemented. Regular monitoring will indicate whether or not the Plan's aims are being met and will ensure that it remains the most appropriate and locally accepted response to current issues of environmental, social and economic importance". LDP Manual paragraph

5.2.2.2 advises that existing planning policies should be reviewed to assess their effectiveness and reiterates this later by saying that useful sources of existing information include the appraisal and monitoring of previous/extant Development Plans. The planning authority clearly have not done so in relation to the effectiveness and intent of this policy.

- 2.4 The Council's response to the objection recognises that the need for affordable housing in rural areas is particularly important. It states that the aim of the policy is to protect the open countryside from inappropriate residential development, but to enable small scale affordable housing development where required. The council refers to paragraph 4.2.34 of PPW (10) which states "Affordable housing exception sites are not appropriate for market housing." and relies on this to exclude market housing on exception sites. PPW (11) is unchanged in this respect which is both disappointing and surprising following RTPi sponsored research published in January 2019 which highlighted the failure of this policy nationally. It is known that senior Welsh Government officials acknowledged the failure of the policy and it was expected that a review would follow with subsequent changes to PPW.

### **3.0 Conclusion**

- 3.1 If there is serious intent to provide affordable housing in the rural area, then it must re-think its policy. Unless there is meaningful change there is no prospect of helping the rural community provide the type of housing that it needs within this plan period. Allowing an element of open market housing to cross subsidise affordable housing would be subject to negotiation through the development management process taking account of other relevant policies and guidance. This should be well within the capabilities of experienced planning officers to ensure that development is both proportionate to need and has no unacceptable impact on the character of the area.

*Huw Evans Planning*

26 April 2021