

## Flintshire Local Development Plan Examination

### Notes on behalf of Redrow Homes Ltd (1148956) in relation to the Inspector's Schedule of Matters, Issues and Questions.

#### Issue 13 – Affordable Housing and HMO's.

- a) *Is the required level of affordable housing need based on robust evidence? Is the Local Housing Market Assessment (LHMA) sufficiently robust to inform the Plan's housing strategy?*

It is not considered that the assessment of need has been adequately assessed. The assessment of 'need' should, in the first instance be a 'policy off' assessment. It would appear that the LPA have an assessment of need for the period to 2023 within the latest LHMA of 238 dpa, but it does not appear that there is any assessment for the period thereafter which is the greater part of the remaining Plan period.

Instead, what the LPA have done is to calculate the number of affordable dwellings that they expect it to be possible to deliver from the allocated housing sites and used this to generate a figure that is "deliverable" (see Council's response to Inspector's Preliminary Questions, no 20). Aside from criticism of the ability of individual sites to deliver the number of affordable houses for reasons of viability etc, it is recognised that this is a reasonable assessment of what the Plan might deliver, but it has no regard to need and, therefore, it is not possible to assess the extent to which it can be considered to be an appropriate strategy.

What is clear, however, is that the LHMA identifies a need for 238 affordable homes per annum until 2023, but that the LPA's strategy seeks to achieve just 134 affordable homes per year through the Plan period. There is a stark difference between the two that does not appear to be addressed or justified, need might well fall, or increase, beyond 2023, but a reduction of some 44% seems extreme and would require particular justification.

Therefore, it does not appear that need has adequately been addressed as a basis for preparing an appropriate affordable housing policy. Whilst the present target may well relate to the level of affordable housing that the Council consider can be delivered from the

proposed housing sites, it is very clearly the case that, were the overall housing requirement to be increased, then so the delivery of affordable housing would also be increased. It is noted that at para 3.4 of Background Paper 7 it is stated that:

**...it would require an unsustainable level of housing growth to enable the development of enough affordable housing to meet the requirement within the LHMA for 238 units per annum.**

That may be so, but there are frequent cases where the need for affordable housing has provided justification for at least some increase in the overall housing target and this factor, together with those assessed in the context of Matter 7, surely provides justification for an increase in the housing requirement within Flintshire.

- b) *Will the affordable housing target meet the local housing need? If not, what other mechanisms are available?*

For the reasons set out in relation to 'a' above, we do not believe that it is possible to answer this question with certainty because 'need' beyond 2023 has not been assessed, however, the disparity between need up to 2023 and the average rate of affordable housing proposed strongly suggest that it will not be met.

Whilst the Council refer to their 'SHARP' programme as a source of additional affordable homes, it is noted that their response to q.21 in the Inspector's Preliminary Questions only refers to projected delivery up until 2021, there is no reference to potential sites upon which further affordable housing might be provided through to the end of the Plan period and, as para 5.1 of Background Paper 7 makes clear, such projects are dependent on Social Housing Grant which cannot be guaranteed into the future.

- c) *Does the Plan clearly identify all components of affordable housing supply?*

This would appear to be a matter for the Council to respond to in terms of detail, but apart from the SHARP potential, the Plan does not appear to identify any other source of supply.

- d) *Are the required affordable housing contributions and thresholds in Policy HN3 founded on a credible assessment of viability?*

Please see attached Savills technical appendix dealing with this particular question.

- e) *Are the requirements of Policy HN3 clear and consistent with National policy?*

Please see attached Savills technical appendix dealing with this question.

- f) *Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?*

Whilst detailed sub-area analysis is, unfortunately, somewhat limited in the 2018 LHMA, it would appear logical that affordable housing need is spread across the County, indeed, in the more rural locations, where house prices are likely to be higher, it is likely that need, as a proportion of overall population, is likely to be greater.

As noted in relation to Matters 3 and 12, the Plan is reliant on housing delivery, and consequently affordable housing delivery, from a relatively small number of sites and it is inevitable, therefore, that the spatial distribution of affordable housing is similarly limited. Whilst the spatial distribution of need does not appear to have been addressed in any detail, it seems likely that the Plan will fail to meet need where it arises.

- g) *How will off-site or commuted sum contributions for affordable housing be secured and managed? What mechanisms are in place to ensure that the level of contributions sought are appropriate?*

This is a question for the Council to answer.

- h) *Do affordable housing exception sites have to be immediately adjoining settlement limits?*

According to part 'c' of Policy HN4-D, they do, alongside other criteria.

- i) *Why are exception sites not allowed adjoining Tier 1 settlements? How does this reflect the spatial distribution of need for affordable housing?*

Beyond the fact that we do not consider that the spatial distribution of affordable housing need has been adequately assessed in the first place, this is a question for the Council to address.

- j) *What is the basis for restricting management of exception schemes in Policy HN4-D(e)?*

We see no basis for restricting management, greater flexibility surely increases the likelihood of increasing delivery, so long as the management option proposed can deliver the required dwellings and manage them appropriately. We are aware of several housebuilding companies who have delivered and managed affordable housing schemes within their developments and see no reason why this type of arrangement, for example, should not be considered on its merits.

- k) *Should the LDP specify the criteria that will be applied to determine who will qualify for an exception?*

It seems illogical to specify the criteria relating to HN4-D, when those criteria are not specified in relation to HN3.

- l) *How will the affordable housing target be delivered and reviewed?*

Please see attached Savills technical appendix dealing with this particular question.

- m) *Will the affordable housing policies ensure a balanced mix of house types, tenures and sizes, and is the required density level appropriate?*

This appears to be a matter for the Council to comment on.

### Conclusions

The proposed strategy looks to achieve a level of affordable housing provision that is little more than half the level of need assessed up until 2023, given the importance attached to addressing

affordable housing needs, this consideration provides strong justification for increasing the level of overall housing provision in its own right. Whilst it might justifiably be argued that meeting the affordable housing requirement in full from new housing development over the remainder of the Plan period is an unachievable goal, it should be possible for a Council, committed to growth, to move significantly in this direction and in this respect the proposed increase in the annual requirement of 150 dpa (615 per annum in total) put forward by Redrow would seem logical, deliverable and a significant policy change in relation to meeting affordable housing need.

The approach adopted by the Council in relation to viability is flawed and, therefore, reaches conclusions that cannot be justified. In particular, the proposed approach that seeks 40% affordable housing contribution from sites in certain areas would result in the proposed developments being unviable and, far from maximising affordable housing provision, such an approach would actually reduce the amount of both affordable and market housing provided.

Therefore, in order to address affordable housing need appropriately within the Plan, there is a need to increase the overall number of dwellings provided, thereby increasing the affordable housing element, but at the same time, to do this in a manner that can be demonstrated to be viable so that the housing can actually be delivered.