

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M13

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

Matter 13 – Affordable Housing

Key Issue: Will the housing proposed meet the needs of those in the County who have special requirements? Are the assessments for specialist housing based on robust and credible evidence? Is it deliverable? Are the policies for affordable housing, annexe accommodation and for houses in multiple occupation clear, reasonable and appropriate?

- 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?***

Bloor Homes agree with the robustness of the LHMA in determining affordable housing needs however the proposed housing requirement would only maintain a shortfall in affordable housing over the plan period rather than seeking to positively address this key requirement. Bloor has significant concerns regarding the delivery of allocated sites as envisaged by the Council (see responses to Matters 3 and 7) and without these sites coming forward without any delay, the affordable housing requirement will not be met.

The Council have failed to account for the accrued shortfall of 2,012 homes which remained undelivered over the UDP plan period. Bloor Homes have made comments on how this should be accounted for within the LDP housing requirement as these needs remain within the Borough. Moreover, the Council's failure on housing delivery over the UDP will have inevitably resulted in suppressed household formation rates across the Borough, with fewer homes being built to accommodate new households. The identified housing need under the LHMA is therefore operating from a lower baseline which will inevitably downplay the level of actual needs within the Borough.

Policy HSG10 of the Flintshire UDP explicitly states that the North East Wales Housing Market Assessment (2008) which underpinned the UDP evidence base, *'recommended that 480 new homes be built within Flintshire every year up to the year 2021'* with 38% of all new housing built in Flintshire dedicated to affordable provision. The Council took a far more conservative position on policy requirements in order to reflect economic uncertainties and promote development within the Borough – arriving at a 30% requirement which would secure 1,000 affordable homes over the plan period.

The Council accepted that this figure *'is significantly less than the recommendations contained within the Housing Needs Survey undertaken in 2005'*¹ which were further reinforced by the conclusions of the 2008 assessment. Despite working towards a suppressed affordable housing target the Council failed to meet these needs over the UDP plan period and even to 3 years after the UDP expired (see Table 1 below²):

¹ Flintshire UDP (2011) Para. 11.75

² Figures based on Table 5.4 of Flintshire Local Housing Market Assessment Addendum (2020)

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M13

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

Year	Affordable Housing Completions
2008-09	74
2009-10	24
2010-11	115
2011-12	71
2012-13	57
2013-14	138
2014-15	96
2015-16	43
2016-17	84
2017-18	249
Total	951
10 Year Average	95

Noting that the UDP set an affordable housing target of 30% provision across sites of 25+ dwellings (equating to 1,000 homes) it took until 2019, four years after the plan period, to meet this significantly reduced target. This emphasises the extent to which the Council have failed to meet their affordable housing targets in the past, and the extent to which actual needs have been unaccounted for in the LDP housing requirement.

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

Based on the above Bloor Homes have concerns that the affordable housing target continues to be suppressed from the UDP period and from the Council's failure to not only deliver housing as expected but account for these unmet needs rolling forward to the LDP.

It is also unclear to what extent the methodology for calculating the housing requirement has fully considered the need for affordable housing within the County and the impact this could have upon housing requirement for the Plan Period.

The Local Housing Market Assessment found that there is an annual shortfall of 238 affordable dwellings across Flintshire. The Council have set an annual requirement of 530 dwellings, 238 as a percentage of this is 45%, therefore, if it was the case that the annual requirement of affordable homes was to be met each year, nearly half of the homes being built would need to be affordable.

It cannot be disputed that this percentage of affordable homes will not be achieved based upon the current level of housing growth. Therefore, a more prudent approach to the delivery of affordable homes in the County would be to increase the overall housing requirement, which in turn would increase the provision of affordable homes as a proportion of schemes.

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M13

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

Taking the annual affordable housing need identified through the LHMA over the Plan Period would equate to 3,570 dwellings. The Council states however in Background Paper 7, that this would require an *'unsustainable level of housing growth to enable the development of enough affordable housing to meet the requirement within the LHMA'*³. The Council have therefore already taken a position of accepting that the LDP will not be capable of meeting the identified housing needs for the Borough. This is despite being based upon a target that is already suppressed from previous lack of delivery. The proposed affordable housing target of 134 dwellings per annum only aspires to deliver 56% of the Borough's identified need. Noticeably the Council have not presented any evidence or alternative options to demonstrate how the LDP could deliver on these needs.

To disregard the need for affordable homes within the County, despite there being clear evidence of the number required is perverse and will only result in the Council needing to address a backlog in the future.

Alternative strategies such as directing a proportion of additional housing towards sustainable, higher order settlements such as Broughton will therefore ensure the delivery of much needed affordable housing will be secured particularly in the early years of the Plan Period. Moreover, the identification and development of smaller sites will help to ensure that affordable homes are delivered sooner in order to meet local needs.

c) Does the plan clearly identify all components of affordable housing supply?

The LDP sets out the definitions for social rented and intermediate tenures in line with that within TAN2. The LHMA has also now been updated to distinguish tenure types as part of the identified affordable needs. The tenure split required is 30% social rented, 30% intermediate rented and 40% low-cost home ownership.

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

Bloor Homes have no comments in relation to this question.

e) Are the requirements of Policy HN3 clear, and consistent with national policy?

Bloor Homes accepts that a degree of flexibility has been incorporated into the policy which allows for affordable housing to be delivered off-site or as a commuted sum in lieu of on-site provision, albeit in exceptional circumstances

Affordable housing requirements should not be referred to as a starting point for negotiations as this provides no certainty to developers on the level of affordable housing required in a policy compliant position.

³ Background Paper 7 – Affordable Housing (2020) Page.3

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M13

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

The policy should be revised to state affordable housing percentages as a target, acknowledging there are instances where a lower affordable housing provision is entirely justified and reasonable.

It is important that the affordable housing policy HN3 acknowledges that viability can vary on a site-by-site basis, regardless of which sub-market area the development site is located within.

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

The proposed affordable housing thresholds appear to broadly reflect the spatial distribution of local needs, for example by directing a higher affordable housing requirement for new development in the Connah's Quay, Queensferry & Broughton sub-market area. In this sub-market area there is an annual need of 186 dwellings per annum, circa 78% of the Borough's annual affordable housing need. This similarly aligns with the growth ambitions set out under the National Development Framework which identifies areas such as Broughton within a national growth area. In order to deliver on the North Wales Growth Deal it is vital that new residential development is promoted under the LDP. This includes not only open market but affordable housing provision.

Bloor Homes therefore strongly recommend that given the uncertainty over the deliverability of the Warren Hall strategic site, located on the periphery of Broughton, it is important that suitable alternative sites come forward in the locality such as at Bretton Road, in order to meet this significant housing need.

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?

The supporting text to Policy HN3 states that specific guidance on the scale, tenure and nature of affordable housing and what information will be required to accompany viability assessments will be set out in any emerging affordable housing SPG, which to date has not been published. The policy text suggest this will follow post adoption of the plan and therefore it is unclear at this time what mechanisms are in place in relation to offsite or commuted sum contributions. This provides no certainty to developers when considering viability.

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

This approach to exception sites is supported and aligns to the principles of delivering sustainable development. Moreover, this is required under PPW11 which states that '*where such policies are considered appropriate it should be made clear that the release of housing sites within or adjoining existing settlements for the provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision*'⁴.

⁴ Planning Policy Wales 11th Ed. (2021) Para. 4.2.34

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M13

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

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

Bloor have no comments in relation to this question.

j) What is the basis for restricting management of exceptions schemes in Policy HN4-D (e)? – Will this deliver smaller schemes in rural areas?

Bloor Homes have no significant comments in relation to this question but would highlight that for smaller residential schemes resulting in a lesser affordable provision (e.g. <5 dwellings), there may be less of a demand from registered providers, housing associations or equivalent management organisations to take on this requirement. This emphasises the need for greater certainty on housing allocations being capable of delivering their affordable housing requirements and less of a reliance on smaller windfall sites.

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

Bloor Homes have no comments in relation to this question.

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

The affordable housing target of 2008 dwellings over the LDP period is broken down as follows in the Background Paper 7 – Affordable Housing (BP7):

- Allocations – 902 dwellings
- Windfalls – 398 dwellings
- Committed Sites – 709 dwellings

It is however unclear how this target will be delivered and reviewed as it is absent from the current Housing Trajectory. PPW11⁵ explicitly requires that the Trajectory sets out the anticipated delivery of affordable dwellings as well as open market housing. This is a key absence of evidence and does not enable the Council to review the deliverability of their affordable housing target over the LDP period.

Moreover, it is assumed that 100% of committed sites will be delivered, something which the DPM⁶ recognises as a 'high risk strategy'. The number of commitments set out under BP7 equates to a high proportion of the overall affordable target (35%) and thus it is important to have certainty on delivery in order to meet what is an already suppressed target (see response to Question 13a)).

⁵ Planning Policy Wales 11th Ed. (2021) Para. 4.2.10

⁶ Development Plans Manual (2020) Table 18

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M13

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

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

The LHMA proposes a tenure split of 30% social and 30% intermediate rental and 40 affordable ownership. Bloor considers that the Council should consider a more favourable split (i.e. 50/50), with flexibility applied on a site specific basis to reflect local housing needs and market requirement.

Policy HN3 states that detailed guidance on the scale, tenure and nature of affordable housing to be sought will be set out in the Affordable Housing SPG, however it is not clear how this will be delivered or when the SPG will be prepared. Imposing requirements particularly on the tenure of affordable housing can impact significantly on viability and Bloor Homes are concerned that if this comes forward through an SPG, the fully implications of the requirements may not be considered robustly and with appropriate evidence. This detail should be provided upfront and robustly assessed through the local plan process.

n) How will housing for people/groups with special needs, such as the elderly, be provided? Should there be a separate policy and/or allocations for such housing?

Bloor Homes have no comments in relation to this question.

o) Are criteria a), b) and c) of Policy HN4-B reasonable and necessary, taking account of the Plan's approach to employment provision and the costs associated with conversion?

Bloor Homes have no comments in relation to this question.

p) Is the restriction on infill development to meet a proven local housing need unduly onerous? To what extent will this contribute to the provision of affordable housing in the County? Annex Accommodation a) Are criteria i) and iii) of Policy HN6 necessary in order to prevent the creation of self-contained dwellings?

Bloor Homes have no comments in relation to this question.

HMOs

a) In Policy HN7, what is meant by 'over concentration'; can the policy be implemented without a definition of this term? Is it necessary to include the second part of the sentence in criterion e (...to the detriment of etc)?

Bloor Homes have no comments in relation to this question.