

Hearing Statement – Matter 13

Flintshire Local Development Plan

On behalf of Pochin Goodman (Northern
Gateway) Ltd (PGNGL)

April 2021



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Pochin Goodman (Northern Gateway) Ltd (PGNGL) in respect of:
- Matter 13: Affordable Housing and HMO's
- I.2. PGNGL has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.3. PGNGL control the former Corus Garden City site, which forms part of the strategic Northern Gateway site. This scheme is an important part of the national, regional and local growth agenda and can positively contribute towards the economic and housing growth for the area.
- I.4. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with PGNGL comments upon the submission version of the Flintshire Local Development Plan, September 2019, as submitted in November 2019.
- I.5. As indicated in earlier communication, this is a written statement and PGNGL do not wish to attend Matter 13 of the Examination in Public.

2. Matter 13: Affordable Housing and HMO's

Q13	<p>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?</p>
	<p>Are the policies for affordable housing, annexe accommodation and for houses in multiple occupation clear, reasonable and appropriate?</p>
d)	<p>Are the required affordable housing contributions and thresholds in Policy HN3 founded on a credible assessment of viability?</p>
e)	<p>Are the requirements of Policy HN3 clear, and consistent with national policy?</p>

- 2.1. PGNGL **supports** the provision of affordable housing however PGNGL is concerned that the policy requirements for affordable housing are high. The September 2019 viability study indicates for Garden City that the majority of typologies became viable at 15% rather than 20% where three of the five typologies are marginal or unviable.
- 2.2. The viability study has been set up to determine the viability requirements for affordable housing provision, however it is unclear what regard has been given to any other policy requirements established within the Local Development Plan. This includes but is not limited to Policy STR4 requirements for all development to be accessible, and adaptable to climate change and changing needs, and on site renewable energy generation, Policy PC3 requirements for high quality materials, Policy PC4 requirements for resilient and adaptable developments, and Policy PC6 requirements for cycle storage at new developments. The consideration of

the impact of policy requirements when assessing viability is required by PPW¹, and as a minimum we would expect to see some sensitivity testing including higher costs to reflect the requirements. In the absence of testing these potential additional requirements it is not possible to consider the associated impact on viability and affordable housing targets.

2.3. Furthermore, it is not clear what abnormal costs have been considered for the site specific testing. Indeed, Background Paper LDP07 Affordable Housing, confirms that the *“viability assessment was a high level appraisal and didn’t involve the assessment of individual allocations within the LDP, site specific viability assessments may need to be carried out at the planning application stage, where developers feel there are abnormal costs that may impeded the delivery of affordable housing on site”*. Furthermore, with specific regard to developments within Garden City the background paper notes that the planning applications for 280 dwellings at Northern Gateway was granted permission with 10% affordable housing on site. Thus, it is considered that the requirement is set at a level that is likely to necessitate site specific viability assessments and protracted negotiations at Planning Application Stage.

2.4. PGNGL is concerned that with all the policy requirements detailed within the Local Development Plan that the affordable housing requirement could serve to undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. This would be contrary to the principles established within PPW. The Council must be aware of the impact that viability assessments and subsequent negotiation of obligations can have on the delivery timescales for development.

2.5. The Council should be mindful that it is unrealistic to negotiate every site on a one by one basis, because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. Therefore, site by site negotiations should occur occasionally rather than routinely. PGNGL recognise that there may still be occasions where prevailing market conditions, or site specific circumstances, necessitate site specific viability assessments and support the use of review mechanisms where appropriate.

2.6. PGNGL do not consider that the required affordable housing contributions and thresholds in Policy HN3 are founded on a credible assessment of viability, and as such the requirements of Policy HN3 are not consistent with national policy. PGNGL do not consider that the

¹ PPW paragraph 4.2.19

requirements in Policy HN3 are effective or appropriate. The Plan in its present form could fail to deliver sustainable development in accordance with the policy in PPW.

- 2.7. PGNGL consider that with a reduction in the affordable housing requirement, following additional viability and sensitivity testing in respect of the Garden City Area, the Local Development Plan can be found sound.

Proposed Change

- 2.8. To overcome the objection and address soundness matters, the Council should:
- Review the viability evidence to ensure that it reflects the requirements of the Plan as a whole and the abnormal costs likely to be present on sites, including Northern Gateway (Policy STR3A).
 - Amend the affordable housing requirement for the Garden City Area accordingly.