

WELSH GOVERNMENT
Examination Hearing
Statement

Flintshire County Council
Local Development Plan

Matter 7
Provision of Sustainable Housing Sites

20 April 2021

Matter 7: Provision of Sustainable Housing Sites (Inc. housing requirement)

It is not appropriate for the Welsh Government to have a view on the suitability or otherwise of individual site allocations. It will be for the LPA to explain the selection/appropriateness of individual sites/allocations and the delivery and timing of them, which is not the role of Welsh Government. However, in terms of the overall growth levels, the housing/job requirement, and the delivery of such levels, the Welsh Government makes comments within this statement in the context of the requirements of the National Development Framework (NDF) : Future Wales, Planning Policy Wales (PPW) Edition 11 and the Development Plans Manual (DPM) Edition 3.

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?

Housing Requirement

The Welsh Government considers the housing requirement (6,950 homes) is realistic, appropriate and is founded on robust and credible evidence. It is also the Government's view that the overall growth levels in the plan have been sufficiently informed by, and are broadly consistent with, the relevant policy requirements in PPW (4.2.3 – 4.2.8) and guidance in the DPM (5.25-5.57). As stated in previous hearing statements, the Welsh Government has raised no concerns with the focus of housing/job growth at Deeside, a key driver for growth levels in the plan which is in 'general conformity' with the NDF-Future Wales.

The Government considers that the relevant projections (2014-based at Deposit) have been adequately taken into account by the Council, along with other relevant policy considerations set out in PPW, in arriving at the chosen growth option / housing requirement. The Council will need to explain the impacts of the 2018-based household projections at the examination sessions (PPW 4.2.6)

The Council has explained through its evidence base that to plan for the 2014-based projections (Deposit figures) would result in 'planning for decline' with significant negative demographic outcomes, based on negative and recessionary trends. The 2014-based and 2018-based principal household dwelling requirement would result in a need for around 260dph to 230dph respectively (WG non-statistical analysis). These rates would also result in completions rates significantly below what has been delivered historically.

In arriving at its view, the Government has placed great emphasis on ensuring the proposed growth levels and housing requirement proposed in the plan can be delivered. PPW (4.2.10 – 11) and the DPM (5.58 -5.74) places great emphasis on development plans being deliverable, including the delivery of housing via robust components of housing supply, articulated through a trajectory.

The Council has identified that their economic growth strategy and job target is ambitious in order to reflect Flintshire's role and strategic location as a sub-regional economic hub and contribution towards the North Wales Economic Ambition Board (NWEAB) Growth Vision of creating, amongst other things, 120,000 new jobs. The majority of the jobs in Flintshire are expected to come forward on the strategic sites at Northern Gateway and Warren Hall. Both of these sites have been identified for significant new growth and job opportunities as part of the Mersey Dee Alliance and Growth Deal bid. The Welsh Government does not object to the plans growth strategy. This approach is also in 'generally conformity with the NDF – Future Wales'. See also our statement regarding employment (Matter 6).

The merits or otherwise of individual sites, their timing phasing and delivery will be a matter for the LPA to justify not Welsh Government. See also previous statements and answers in the remaining parts of this statement.

UDP under delivery – implications for the plan

The principle of taking into account any under or over delivery in a previous plan into a new plan period and its housing requirement **is not appropriate**. This LDP covers this plan period only. This plan is based on up-to-date demographic/economic and housing need (LHMA) that covers the full plan period 2015-2030. The plan is also based on a consideration of past delivery rates.

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?

This is a matter for the LPA to explain in the context of PPW.

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

This is a matter for the LPA to explain the context of PPW 4.2.10 and the DPM 5.59. The Welsh Government notes that the flexibility allowance is now 18% (FCC002).

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

No. The Welsh Government has no objection to the approach to windfall development in the plan. The windfall allowance is based on detailed urban capacity work as advocated in the DPM (5.63 and Table 18.). A 50% discount on past 18 year rates has been applied, resulting in 120 dwellings per annum on large and small sites in this plan period.

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

This is a matter for the LPA.

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

No. DPM 5.62 'definition of components' states that allocations and commitments should be separated to ensure clarity to plan users of what is 'new' and aid effective monitoring of the plan. However, where the plans strategy is reliant on a strategic housing allocation(s) the total extent of the strategic site should be identified as an allocation, which may include permissions within the total extent, due to the scale of the site. This is because they are integral to the plan and have special status. Other commitments that may or may not lapse over the plan period would be within a settlement boundary where there would be a presumption in favour of permission in any case, providing all relevant planning considerations both national and local are taken into account.

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?

This is a matter for the LPA and other parties to comment on. PPW and the DPM is clear that the 'rolling forward' of allocations from previous plans requires special justification in respect of their delivery (PPW, 4.2.17 and DPM, Table 18).

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

The publication of updated FCC002: Housing Land Supply and Delivery Background Paper 10A (January 2021) is welcomed as this reflects the most up-to-date housing position. Our statement to Matter 1(e) explains in some detail how the work the Council has undertaken in Doc. FCC002 aligns fully with the requirements of the DPM (5.73) in this case the discounting of 2 years large windfall sites has been applied to the remaining supply (FCC 002, Appendix 4A – Row I). The Welsh Government is of the view there are no issues in this respect.

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

Based on the updated supply and trajectory work within FCC002 i.e. completions to date, historic completion trends, remaining supply in relation to flexibility allowance, the Council appears to be well on track on deliver the housing requirement in the remaining plan period.

The average required annual build rate is 463 dwellings per annum. The Council has completed 2,609 units at the 2020 base date, above the 2,315 units required over the same period. Proposed delivery rates in the remaining plan period (FCC002, Appendix 4A, Row L) are considered realistic and deliverable in light of past build rates. Appendix 5A of FCC002 also demonstrates that with an increased housing provision of 8210, there is sufficient flexibility in the plan to deliver on these rates in the remaining plan period.

As a final point, past build rates should and do provide an important context when considering future development (DPM, 5.55-5.57). The Council has considered past rates and how they relate to the growth level chosen in the context of the current strategy, sustainability principles and infrastructure provision. The levels proposed in the LDP (465 p/a) are below the 10 year average, but above recent 5 year completion rates. This will be a matter for the LPA to explain in detail.

The justification of the timing and phasing of individual sites comprising the housing provision/trajectory is a matter for the LPA and other parties to comment on, not Welsh Government.

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

The removal of the word 'expected' would not detract from the delivery of policy STR11.

The final paragraph of policy STR11 may be better located in the reasoned justification, as it appears to be more by explanation, than policy based. If this were to be the case it would not detract from the effectiveness of the policy.

* * * * *