

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.

Matter 7 – Provision of Sustainable Housing Sites.

- 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?*

As noted in relation to Matter 3, relating the housing requirement to economic growth aspirations is an approach that, in principle, is supported and the ability of the Plan to deliver the proposed requirement of 463 dpa is not questioned - as Table 5A of Background Paper 10A confirms in recording an average rate of completions of 522 dpa over the past five years.

However, it is the proposal that housing need should be set at 463 dpa that is questioned. Putting aside the detailed modelling of household demand, it would be expected that a housing strategy that looked to support economic growth would be one that, first of all, sought to establish the level of basic need in relation to household growth, net migration etc within a relatively buoyant period (because to look at any other period is to plan for decline/recession) and then increased this level by an appropriate number of additional dwellings so as to allow for the planned influx of additional employees – if there are no houses for them, then that is a disincentive to relocate to Flintshire.

Some of the above information was available at the time when decisions were taken regarding the proposed housing figure:

The average completion rate in the period 2015 – 2018 was 568 dpa.

However, the LPA document 'Employment and Housing Advice' (B E Group) advises that, at least in the period between 2015 and 2017, employment actually fell by approximately 1000

persons in Flintshire.

Therefore, there is evidence that within a period when there was a reasonable housing market (albeit a period that was not without its economic issues) housebuilders were satisfying a level of market demand that was significantly above that now proposed, and it is clear that it was not supporting economic growth because the Council's own consultants actually advise that during this period employment was declining in Flintshire.

There is, therefore a fundamental problem with the LPA's housing proposal because the available data does not support 463 dpa as a level of housing growth that will meet basic housing need, let alone an economic growth strategy.

The baseline requirement should, therefore, be at least 568 dpa, reflecting past rates without economic growth, and then this figure should be increased by an appropriate amount to provide for an appropriately calculated incentive for economic growth, however, in this latter respect we note the comments in paragraphs 2.24 to 2.26 of Lichfield's Technical Note where concern is raised regarding the LPA's assumptions in relation to the relationship between job growth and housing and in relation to commuting. The presently proposed figure is one that, far from encouraging economic growth would appear to actually constrain basic market need.

We further note that during the UDP period, 2000 – 2015, there was a shortfall in provision of 2012 dwellings (equivalent to 134 dpa) in relation to the Policy requirement for the provision of 7400 dwellings (Policy STR 4), such a significant scale of under-provision will have an impact on figures relating to average household size, household generation rates and net migration which will in turn impact on the modelling of future housing requirements such that they will be reduced from the levels that might, otherwise, have been calculated. However, more fundamentally, we have seen no evidence that the assessment of housing need has considered past under-provision and considered the extent to which this needs to be addressed in the Plan period; it seems inevitable that this is a factor that must provide further justification for increasing the overall requirement.

- 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?*

Redrow Homes are very aware of the cross-border demand for housing from their marketing of developments in Flintshire to which significant numbers of residents from, in particular, Cheshire West and Chester are attracted. It is appropriate that this demand is accounted for because it cannot be avoided.

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

The calculation of the flexibility allowance is dependent on the decision taken relative to the overall level of housing provision that is required (see 'a' above). However, there is, unfortunately, a history of sites not being delivered in Flintshire if one compares the list of sites within the current UDP with those in the Deposit Plan, in such circumstances, although it is to be hoped that the Plan will provide sites that can genuinely be delivered, an increased flexibility allowance is justified.

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

There has been a housing land shortfall in Flintshire for many years, as a consequence of which the delivery of housing sites has been very heavily reliant on windfall sites, frequently brought forward without the cooperation of the LPA. In Background Paper 10A the LPA have acknowledged the above and discounted past rates, on large sites in particular, by 50%, this appears to be a random approach. Whilst acknowledging that it may not be easy to assess the extent to which this is justifiable, there does not appear to be any attempt to support the approach adopted, but, with the Plan relying on 600 dwellings from this source over the remainder of its life, it is clearly a significant contributor. Consequently, it is considered that the assumed figure is still overly optimistic and that a more cautious approach is justified – if, ultimately, the LPA are proved right then the over-provision by this means would not be problematical, but assuming too many dwellings from this source would be more

problematical because of the emphasis placed on plans being able to deliver.

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

Yes, see 'a' above.

Furthermore, the BE Group 'Employment and Housing Advice' document in 2019 examined past build rates and concluded that: "*The 2015-2018 average of 568 dwelling completions is above the target level and represents a strong start to the actual growth for the planning period Para 4.3). It also suggests that such growth targets are supportable in Flintshire*".

With a better range of appropriate sites, we say that dwelling completions in excess of 568 per annum are achievable.

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

The LPA's response is awaited. However, if the committed sites permissions lapsed, then this would be indicative of significant problems associated with their delivery and allocating them would not address the problem; in such circumstances, alternative, deliverable, sites would be the preferred option.

- g) *Is it likely that all the committed sites identified as contributing to the housing requirement and allocations which are carried over as such from the UDP, will be delivered during the Plan period?*

See our representations in relation to Matter 3 in respect of Warren Hall and the Northern Gateway and in relation to Matter 12 in relation to other sites. It is anticipated that there will be a shortfall on delivery as compared to the LPA's trajectory.

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

Whilst we note that the LPA have now accepted the potential for double counting and

excluded contributions from large sites in the first two years following the grant of planning permission in accordance, they say, with Edition 3 of the Development Plans Manual. However, the Manual indicates that the 2 year discount is a “recommendation” (para 5.73), para 5.64 indicates that: “...a thorough understanding of the overall timing of development from pre-application discussions, obtaining a planning permission, surveys required, discharge of conditions and on-site phasing is essential when considering the delivery of housing”. It is not clear what the basis of the WG recommendation is as it is not consistent with the findings of several inspectors elsewhere where longer periods (often 3 years) have been found to be appropriate, nor is it based on any detailed investigation of sites in Flintshire which would be a means of testing whether local circumstances support the WG recommendation.

In the circumstances we maintain our view that three years should be discounted.

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

Assuming the Plan is adopted, the short Plan period only emphasises the uncertainty associated with delivery because there is very little time to overcome any unforeseen difficulty or delay without impacting on the proposed delivery of housing. This is especially the case given the comments at ‘g’ and ‘h’ above. The allocation of an increased number of appropriate, deliverable sites would increase the chances of this not being an issue in terms of the delivery of the housing requirement.

- j) *Is the wording of Policy STR11 appropriate, particularly the use of the word ‘expected’ and the inclusion of the final paragraph?*

The word ‘expected’ is unclear in terms of its weight relative to the requirements of the Policy, but if this was replaced by, for example, ‘required’ then the Policy would be equally problematical because not all sites can reasonably be required to meet all of the criteria set out. It may be that the better approach is to ‘require’ the criteria to be met ‘where it can reasonably be justified in relation to the development and the needs of the locality’.

So far as the final paragraph is concerned, monitoring does nothing to address a housing land shortfall other than identifying it in the first place. Nor is it considered that a commitment to allocating additional sites provides a realistic means of addressing a shortfall, this Plan has been many years in the making and it is still not at the stage of being adopted. The only practical means of maximising the prospects of delivery in accordance with the Plan requirements is for the Policy to recognise the potential for other appropriate sites to be brought forward when either an existing or emerging shortfall is identified. It is proposed, therefore, that, at the very least, the Plan includes a range of suitable contingency sites that could be brought forward to address such problems.