

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M12

Date: 26 April 2021

From: NJL Consulting (Consultee ID 21232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

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, annexed 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) deliverable? Is the proposed strategy?

LPC 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. LPC has

Policy HSG10 of the Flintshire UDP explicitly states that the North East Wales Housing Market Assessment (NEHMA) recommends that 48,000 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 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.

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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 H N3 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 reflect the spatial distribution of local needs, for example by directing a higher proportion of affordable provision to the Connah Quay, Queensferry & Broughton sub-market area.

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Tier 1 settlements are defined under the LDP as the main locations for new housing development which reinforces and contributes to sustainable settlements ⁵. Further to being the most sustainable locations within the spatial strategy,

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The affordable housing target of 2008 dwellings over the LDP period is broken down as follows in the Background Paper 7 2 Affordable Housing (BP7):

Allocations 2 902 dwellings

Windfalls 2 398 dwellings

Committed Sites 2 709 dwellings

It is however unclear how this target will be delivered and reviewed as it is absent from the current Housing Trajectory. PPW11 7 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.

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p) Is the restriction on in-fill 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?

LPC have no comments in relation to this question.

HMOs

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without a definition of this term? Is it necessary to include the second part of the sentence in
FULWHULRQ H «·WR WKH GHWULPHQW RI HWF "

LPC have no comments in relation to this question.