

Flintshire Local Development Plan Examination

Notes on behalf of Redrow Homes Ltd (1148956) in relation to the

Issue 13 of the Flintshire Local Development Plan (LDP) 2018-2033

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a) Is the required level of affordable housing need based on robust evidence? Is the Local

Development Plan (LDP) 2018-2033

It appears that the LPA have an assessment of need for the period to 2023 within the latest LHMA of 238 dpa, but it does not appear that there is any assessment for the period thereafter which is the greater part of the remaining Plan period.

Instead, what the LPA have done is to calculate the number of affordable dwellings that they expect it to be possible to deliver from the allocated housing sites and to generate a figure of 100 affordable dwellings per annum (AWU) for the period 2023-2033.

proposed housing sites, it is very clearly the case that, were the overall housing requirement to be increased, the delivery of affordable housing would also be increased. It is noted that at para 3.4 of Background Paper 7 it is stated that:

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That may be so, but there are frequent cases where the need for affordable housing has provided justification for at least some increase in the overall housing target and this factor, together with those assessed in the context of Matter 7, surely provides justification for an increase in the housing requirement within Flintshire.

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

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

Please see attached Savills technical appendix dealing with this particular question.

- e) Are the requirements of Policy HN3 clear and consistent with National policy?

Please see attached Savills technical appendix dealing with this question.

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

Whilst detailed sub-area analysis is, unfortunately, somewhat limited in the 2018 LHMA, it would appear logical that affordable housing need is spread across the County, indeed, in the more rural locations, where house prices are likely to be higher, it is likely that need, as a proportion of overall population, is likely to be greater.

As noted in relation to Matters 3 and 12, the Plan is reliant on housing delivery, and consequently affordable housing delivery, from a relatively small number of sites and it is inevitable, therefore, that the spatial distribution of affordable housing is similarly limited. Whilst the spatial distribution of need does not appear to have been addressed in any detail, it seems likely that the Plan will fail to meet need where it arises.

- g) How will offsite 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?

This is a question for the Council to answer.

- h) y166rn Q arises.

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

Beyond the fact that we do not consider that the spatial distribution of affordable housing need has been adequately assessed in the first place, this is a question for the Council to address.

- j) What is the basis for restricting management of exception schemes in Policy (e) 14

We see no basis for restricting management, greater flexibility surely increases the likelihood of increasing delivery, so long as the management option proposed can deliver the required dwellings and manage them appropriately. We are aware of several housebuilding companies who have delivered and managed affordable housing schemes within their developments and see no reason why this type of arrangement for example, should not be considered on its merits.

- k)

affordable housing needs, this consideration provides strong justification for increasing the level of overall housing provision in its own right. Whilst it might justifiably be argued that meeting the affordable housing requirement in full from new housing development over the remainder of the Plan period is an achievable goal, it should be possible for a Council committed to growth to move significantly in this direction and in this respect the proposed increase in the annual requirement of 150 dpa (615 per annum in total) put forward by Redrow would seem logical, deliverable and a significant policy change in relation to meeting affordable housing need.

The approach adopted by the Council in relation to viability is flawed and, therefore, reaches conclusions that cannot be justified. In particular, the proposed approach that seeks 40% affordable housing contribution from sites in certain areas would be in the proposed developments being unviable and, far from maximising affordable housing provision, such an approach would actually