

# Rebuttal Statement

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DFURVV )OLQWVKLUH† SUHSDUHG Taylor Winkley HOGV R  
and Redrow, to support objections to the Flintshire Deposit LDP

FLINTSHIRE COUNTY COUNCIL  
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the growth options considered for the Plan, the time to have commented on these





included in the Infrastructure Plan in the Strategy). There will also be a need for further allocation of land for housing as the Local Development Plans are renewed from 2021 onwards. This gives us the opportunity to ensure that the land use planning process is closely integrated and aligned with our economic growth strategy.

3.5 This emphasizes the point above that it is the other Authorities who were earlier adopters of LDPs than Wrexham and Flintshire, that need to consider through their impending plan reviews how they can match the contributions being made by Flintshire and Wrexham towards the Growth Vision of the region, rather than it being for Flintshire alone to make a disproportionate contribution as implied by Lichfields. To illustrate the relative levels of LDP housing delivery, table 2 compares planned growth in respective adopted or emerging LDPs to the actual delivery rates experienced during the respective plan periods. Flintshire has provided the highest rate of growth via its LDP, and is the only Authority where provision is in line with planned growth.

Table 2. North Wales Planned and Actual housing delivery rates (within plan periods)

LPA	Planned Housing Growth Rate (LDP) (Requirement + flexibility)(dpa)	Actual Housing Completion Rate (dpa)	Differential/Shortfall
Flintshire	530	536	+6
Wrexham	517	260	-257
Denbighshire	500	194	-306

Conwy

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what that higher requirement would be, D Q G Q R U G R W K H \ H [ S O D L Q I U R F perspectives how mainstream housing developers are either willing or able to provide high levels of social/affordable housing at up to 51% of market development sites. Indeed, Redrow amongst others have objected to the affordable housing policy in the LDP and in particular the proposal to require up to 40% affordable housing on sites in some sub-market areas. It is therefore difficult to see how, even if more sites were added to the plan as advocated by Lichfields, it would be acceptable or viable to their clients to deliver these sites at 51% affordable?

5. Previous Delivery

- 5.1 Lichfields criticize the & R X Q F L O ¶ V H Y L G H Q F H E D V H I R I d r y E n H L Q J R X relation to the background documents relating to Employment Land Review (2015) and the supplementary document μ ) O L Q W V K L U H ) X U W K H U ( P S O R \ P H Q W Assessment which were produced in 2017, but they also refer to the later Employment and Housing Advice document produced in 2019 which the Council feels is as up to date as was possible prior to Deposit. This is also not the primary source for housing completion data referred to by Lichfields as this is derived from the annual land availability studies, which have continued to be produced to the TAN1 methodology, in the form of Housing Land Monitoring Statements, despite the inability of the Council to publish a formal study. Lichfields refer to the housing delivery in the first three years of the plan which averaged 568 dpa which Lichfields point out is above the average planned growth for the entire plan period (463 dpa) and where they also selectively highlight that in two of the early plan period years completions exceeded 600 dpa. They use this to make the point that as delivery O H Y H O V D U H <sup>3</sup> H D V L O \ D g r e q u i r e m e n t s o u l d b e h i g h e r K R X V L Q
- 5.2 The Council do not consider that just because a delivery level is achievable in the short term, this should result in the housing requirement being increased as this does not appear to be a sustainable, sound or evidenced approach to setting the LDP housing requirement. It also relies on the shortest of trends (just 3 years) to project over the 15 year plan period, but with no evidence to support the ability of the market and industry to sustain such high delivery rates. In fact, the Council has now produced its 2019 land availability statement which shows that in the fourth year of the plan period delivery rates dropped to 421 which is below the LDP planned average, and where in 2017 the LDP level was also not achieved (454).
- 5.3 The average delivery rate has therefore dropped significantly to 536 dpa from the 568 dpa referenced by Lichfields in just 12 months, which also illustrates the significant variability in the annual levels of delivery in a period with a rising housing market and where Flintshire clearly has committed land available to meet the requirements of the Plan. Whilst the Plan requires the delivery of 463 dpa, it has provided the ability to deliver 7,950 homes at 530 dpa which is almost identical to



the present four year delivery average. This clearly shows that the plan is on track as far as delivery is concerned and has pitched the requirement and flexibility at the right levels (see figure 1).

Figure 1. Flintshire Housing Delivery Rates

5.4 )URP WKH &RXQFLO¶V SHUVSHFWLYH WKH DERYH DVVH illustrates the soundness of the approach to setting an achievable housing requirement figure in the Plan, along with a suitable level of flexibility. This is a sound position. What is far less clear is that to propose a higher requirement as a sound proposition, this would require significant evidence not yet presented, to show how the market and development industry could sustain much higher delivery rates year on year over the entire plan period, given the variability so far illustrated by the actual



7.1 It is unclear what source Lichfields are relying on for the numbers they reference as fir V W O \ W K H & R X Q F proposition 3 set as a range of between 8-10,000 and not an absolute of 10,000 as inferred, and also whilst they quote a dwelling figure of 8,050 in relation to the jobs led growth option this is out of date, and the actual figures from the plan indicate a dwelling growth of between 6,550 and 7,350 GHULYHG IURP UXQQQLQJ WKHUISURUVHFWLBBF WRKHORJ generating a population and labour force projection to support that, then the level of household and dwelling growth that would arise from that population growth. The housing requirement is taken from the mid-point of this range with a flexibility allowance of 14.4% added to this.

7.2 Lichfields have also applied a formula approach to calculating a relationship between jobs and housing when the Council does not feel this is a sensible or tenable approach to take. Lichfields are also missing the point that in order to achieve a dwelling growth level as predicted in growth option 6 (or indeed option 4) would require significantly high levels of net migration to occur to create that level of demand for housing provided in the plan. Clearly this demand is intended to come from attracting people to the area for economic purposes. If neither the migration or economic assumption come to fruition then it is questionable whether demand for the housing identified in the plan will materialize, let alone a higher speculatively driven figure.

Commuting

7.3 TW make reference to the need to maintain previous high levels of commuting rates (40%) as opposed







- 2.4 The Local Growth Plan (LGP) defines the strategy and sets the context for ensuring that sufficient housing is provided (above that projected by Welsh Government) to support the strategy aims. The LGP also sets out the Council's housing strategy for the period 2015-2025.
- 2.5 The ELR and Employment Growth Paper were produced in 2015 and these have not been updated at the Deposit Plan stage, and as such are now out of date. Furthermore, the Technical and Background Documents which were based on these evidence base documents and produced in 2017, are also out of date. Lichfields considers that the Council cannot rely on these documents as they will be over 5 years old by the time the Plan reaches the adoption stage.
- 2.6 It is noted that during the preparation of the Plan new household projections were released by the Government (in March 2017). Paragraph 2.7 of the Technical Paper states that:

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Therefore, the need for affordable housing is not currently being addressed within the Deposit Plan which does not provide enough affordable housing to cove

Evidence Base Assumptions

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Lichfields has significant concerns regarding the modelling and specifically the methou/000088712-0Pgy G[(









