

Matter 13 ² 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) robust and credible? Is the Local Housing Market Assessment (LHMA) strategy?

Bloor Homes 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. Bloor has significant concerns regarding the delivery of allocated sites as envisaged by the Council (see responses to Matters 3 and 7) and without these sites coming forward without any delay, the affordable housing requirement will not be met.

The Council have failed to account for the accrued shortfall of 2,012 homes which remained undelivered over the UDP plan period. Bloor Homes

Flintshire

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M13

Date: 26 April 2021

From: NJL Consulting (Consul) on behalf of Bloor Homes

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 ho(g)-206(p)-4(2 re W* n BT /F1 9.96 Tf 1 0 0 1 289.25 701.38 Tm 0 g 841.r32 8

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Development Local Plan Examination: Hearing Statement

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From: NJL Consulting (Consultee ID ²1149350) on behalf of Bloor Homes

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

Bloor have no comments in relation to this question.

j) What is the basis for restricting management of exceptions schemes in Policy HN4 -D (e)? ²
Will this deliver smaller schemes in rural areas?

Bloor Homes have no significant comments in relation to this question but would highlight that for smaller residential schemes resulting in a lesser affordable provision (e.g. <5 dwellings), there may be less of a demand from registered providers, housing associations or equivalent management organisations to take on this requirement. This emphasises the need for greater certainty on housing allocations being capable of delivering their affordable housing requirements and less of a reliance on smaller windfall sites.

k) Should the LDP specify the criteria that will be applied to determine who will qualify for an exception site?

Bloor Homes have no comments in relation to this question.

l) How will the affordable housing target be delivered and reviewed?

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

