

Flintshire County Council

Local Development Plan (LDP) Examination

HEARING STATEMENT

Hearing Session 13 : Affordable Housing ~~UbX<ACD~~

Response by Wales & West Housing Association Limited
(Consultee ID 1230461)



April 2021

Matter 13 **È Affordable Housing and HMOs 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?

Affordable Housing

Wales and West are a registered social landlord who have a development programme of 500 dwellings a year across Wales to meet Welsh Government targets and deliver

Shotton (East, Higher, West)	Main Service Centre Tier 1
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f) Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?

Affordable housing delivered through allocated and windfall sites through S106 agreements will deliver a mixture of tenure and will from experience only deliver a small number of social rented units, however this is the tenure where there is the highest demand. Historically the majority of affordable units delivered through allocations and windfall sites are types of low-cost home ownership which have differing levels of success in their delivery. Housing Associations cannot use Social Housing Grant to acquire S106 affordable properties, this has to be financed separately by the Association.

LDP07 states that the LHMA shows that 60% of the affordable housing demand is for affordable rent and 60% of that rent demand is for social rented accommodation. Social rented units are predominately delivered through Social Housing Grant (SHG) on land owned by Housing Associations. Associations are therefore limited to providing this on windfall sites within settlement boundaries or small scale exceptions sites. Housing Associations are competing with market house builders, which makes land prices more competitive and reduces the availability of sites, often

The lack of smaller allocations means it is less likely that housing associations can acquire these sites to develop with SHG.

g) How will off-site 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?

WWH is developing its own Low Cost Home Ownership product to provide affordable homeownership to a wider group of people. Attached in Appendix 1 is an Information sheet explain this product. If Flintshire accepted this product as affordable housing such a mechanism would ensure that the commuted sums generated in this way would be reinvested in the social housing sector.

h) Do affordable housing exception sites have to be immediately adjoining settlement limits?

We do not consider that exception sites need to be immediately adjoining settlement limits as it will depend on each site and location as to what may be appropriate. It is more critical that any site should have appropriate connections or linkages in terms of access on foot, or by cycling to services and facilitates or public transport options. Any site would need to meet the Placemaking Agenda and follow the site context analysis process as required by Welsh Government to meet the SHG funding requirements and is therefore thoroughly assessed.

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

The Association would welcome the ability to deliver exception site adjacent to all settlement boundaries, especially Tier 1 settlements.

plan we aim to deliver 500 new homes a year across Wales with a focus on developing in urban areas. We aim to deliver homes in sustainable locations where we have existing stock and the highest need is. We can deliver a better service to residents when looking for sites near to existing built -up areas Housing Associations are competing with market house builders, which makes land prices more competitive and reduces the availability of sites, often leaving Housing Associations exception sites were available

for Housing Associations on sites adjoining Tier 1 settlements this would greatly assist in delivering more social housing in sustainable locations. In order to meet SHG funding requirements Housing Associations are required to provide a detailed site context analysis to Welsh Government showing how the site relates to the function of the settlement and is well related to facilities and public transport.

Allowing exception sites for Tier 1 settlements would assist Housing Associations better meet the local need and the identified need shown in the LHMA such as in the

within settlement boundaries will be restricted by flood risk constraints, such as the lower ad.

Policy HN4-D has a criteria based approach to assessing exception sites in tier 2,3 and 4 settlements. In particular criteria d) states the scale, design, and layout of the proposed development are sympathetic and appropriate to the size and character of the settlement and its landscape setting, and reflect the scale of need

The explanatory text goes on to talk about making special provision to

release small housing sites in rural areas and pol
, however the type of settlements in Tier 2 Local Service Centres are in the majority not rural in nature e.g. Broughton and would have high levels of housing need. There is a concern therefore that the use of small scale exception sites is not appropriate for Tier 2 or even Tier 3 settlements. It should be left to the criteria d) in the policy, as each settlement will differ. For the Association it is more cost effective to build a site of 25 units to meet a range of housing need than 5 small sites of 5 dwellings.

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

For the Council to answer, as Housing Associations are a natural choice of the management of schemes, but would not necessarily chose to build a small site in a rural area.

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

Housing Associations should be within the critiera.

l) How will the affordable housing target be delivered and reviewed? Flintshire Local Development Plan 2015 - 2030 Schedule of Matters, Issues and Questions 8

Delivery of affordable housing in particular social housing will depend on the availability of SHG which can vary depending on Government agendas and budgets. Therefore delivery may be higher in some years than others.

m) Will the affordable housing policies ensure a balanced mix of house types, tenures and sizes, and is the required density level appropriate?

The Association aims to always provide a range of housing types on sites, where possible in order to meet local need.

n) How will housing for people/groups with special needs, such as the elderly, be provided? Should there be a separate policy and/or allocations for such housing?

We would suggest that a separate policy for specialist housing would be useful. LDP07 refers to the 51 applicants on the specialist housing register. This type of accommodation is at a lower density than general needs housing and has a greater land take in terms of providing single storey accommodation with covered parking areas. The ability to have more flexibility in the location of this housing would therefore be welcomed.

Again, in terms of accommodation for elderly people and extra care accommodation, these tend to be higher density in order to make it viable in terms of the operation of communr0 ET -3(r)130 ET -3(8qy)16iabrdeã o as t)cc-6(d)-5(e)4 149. [(a)- 1 0 0 1 72.0(p)-3(e)-3

should also be considered with provision for secure buggy/mobility scooter storage in place of this.

o) Are criteria a), b) and c) of Policy HN4-B reasonable and necessary, taking with conversion?

No comment.

p) Is the restriction on infill 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?

No comment.