

Matter 7: Provision of Sustainable Housing Sites (inc housing requirement)

Key Issue:

Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?

a) Is the housing requirement, based as it is on economic and job aspirations, realistic and deliverable within the plan period? How does the amount of housing proposed relate to the most recent Welsh Government household projections? Has the UDP under-delivery been accounted for in the LDP housing requirement figure? If not, should it be?

HBF supports the Councils' approach to basing its housing requirement on economic growth, a position which we believe has been justified by the status given to the area in the recently published National Plan and Welsh Government funding for the Northern Gateway site in Deeside. [[link to details of funding award](#)]

The HBF notes that the 2015 JHLAS study produced by the council identified a shortfall of 2012 units between the UDP housing requirement and the number of units delivered. It is clear from the Councils BP10A that they have and do not intend to include any additional requirement to take account of this.

b) Although neighbouring counties each provide for their own housing needs, does the differential in prices, particularly between England and Wales, lead to any cross-border demand? 110 595.321-2.095 (m)-2.9917

these areas:

The region should work together to consider the connections with Mid Wales, Ireland, Cheshire West and Chester and the North West of England. Promoting accessibility and inter-linkages between these areas, based on an understanding of their roles and functions, will ensure these areas operate as a cohesive whole, and do not compete against each other or take strategic decisions in isolation ¶

HBF notes the issue is touched upon in document LDP -EBD-HP3 Local Housing Market Assessment Update - January 2011 where it states at para. 3.42:

The analysis indicates a strong connection with the neighbouring areas of Wrexham and Cheshire West and Chester. Flintshire is part of the wider functional economic area including Wrexham and Cheshire West and Chester but experiences a moderate degree of self-containment.

It goes on to say:

self-contained housing market both in terms of migration and travel to work. The County is considered to be an appropriate Housing Market Area

This suggests that little consideration has been given to this issue by the Council.

HBF considers it should be given greater consideration particularly based on current trends which are showing people to move away from larger cities and look for or semi-rural locations as a result of greater home working.

c) The 14.4% flexibility allowance is slightly greater than average. On what basis has that percentage been selected?

g) Is it likely that all the committed sites identified as contributing to the housing requirement (LDP Appendix 1), and allocations which are carried over as such from the UDP, will be delivered during the plan period? What is the evidence?

Historic commitments are often not delivered for good reasons, generally across Wales we have seen levels of housing delivery increasing over