

Project : 14-065
Hearing : Matter 7² Provision of
Sustainable Housing Sites
Client :
(Rep ID:
1233028)
Date : 5 April 2021
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1. Introduction

- 1.1 This hearing statement is prepared by Emery Planning on behalf of
(Rep ID: 1233028) in relation to Matter 7 – Provision of Sustainable Housing Sites .

2. Response to Matter 7

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

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

2.3 The flexibility margin has increased to 18% based on the XSGDWHRIWKH3ODQ.V +RXVL sheet (FCC002, Appendix 1A). Whilst this figure is higher than the 10% starting point suggested at paragraph 5.5.9 of the Development Plans Manual Edition 3 (DPM3), on the circumstances of the Flintshire LDP we consider that the amount of flexibility provided is inadequate.

2.4 Firstly, Flintshire has a track record of under-delivery. As set out above, during the UDP plan period of 2000-2015, only 5,388 completions were achieved against a requirement of 7,400. This equates to a shortfall of 27% against the adopted housing requirement.

2.5 Secondly, a 14% flexibility allowance has already been proven to be inadequate for Flintshire. The UDP included a flexibility allowance of 14%, which at the time was considered by the Council and the UDP Inspector to be sufficient. Paragraph 3.5.28 of the UDP Inspector's report states:

From the comparison table set out below, it is evident that if my recommendations are accepted there will be sufficient land allocated to ensure the delivery of 7400 new homes within the plan period, a 5 year supply of land, and a healthy flexibility allowance of about 14% to ensure that if there is slippage the housing industry will still have the potential to deliver sufficient homes to ensure people have the opportunity to live in good quality affordable homes.

2.6 Therefore, despite the inclusion of the 14% flexibility allowance, actual delivery was 27% below the requirement.

2.7 Thirdly, very significant reliance is placed on the Northern Gateway strategic site to deliver. Some 1,185 dwellings are anticipated from the site. That is approximately a quarter of the remaining housing requirement (the residual requirement at 1 April 2020 is 4,341 dwellings). As we have identified in our representations elsewhere, we do not consider the proposed

2.9 Fifthly, the Council has not applied a non-delivery allowance. DPM3 makes clear that a land bank non-delivery allowance is separate to the flexibility allowance (i.e. 10%) which is applied to the plan as a whole.

2.10 Paragraph 2.1.3 of the Housing Land Supply Update (FCC002) claims that the total flexibility allowance in the plan equates to a 10% flexibility allowance plus a 46% non-delivery allowance, and is therefore sufficient. However, we consider the proposed flexibility allowance to be insufficient for Flintshire before the additional non-delivery allowance is factored in.

2.11 The Council derives the 4.6% figure from a land bank of 1,221 dwellings. However, DPM3 defines the land bank as housing completions since the start of the LDP period, units under construction and those with planning permission at the base date. DPM3 also states that :

Understanding the proportion of sites that did not come forward in the past can be a useful tool in this respect. Sites can be dis

development and realistically deliverable between now and 2030, they should be capable of being identified and allocated for development. The Urban Capacity Study by Arcadis (LDP-EBD-HP8) identified 28 potential large windfall sites, but this provides no certainty that they are suitable and will be developed during the plan period. The fact that these sites are not allocated suggests that they are unlikely to provide a reliable source of supply over what remains of the plan period.

- 2.17 Secondly, the large windfall site allowance applied by the Council is 60 dwellings per annum. However, the Urban Capacity Study recommended an allowance of 50 dwellings per annum. It is not clear why a higher rate has been applied. If anything, given the passing of time since the Urban Capacity Study was produced and the diminishing plan period, the allowance should be reduced.
- 2.18 Thirdly, and notwithstanding the above, we consider that there is double counting in the supply from windfall sites. Please see our response below to question h).
- 2.19 Fourthly, placing such great reliance upon windfall development to deliver the housing requirement means that the plan is simply reacting to land supply rather than proactively and positively planning to meet development needs. In our Matter 4 statement we have highlighted the example of Northop, which is a Sustainable Settlement, but it does not benefit from any allocations. We have also appraised the urban capacity of Northop and consider the realistic supply of land for housing to be virtually nil. Therefore, whilst it is correct to assess the supply of windfall sites, the starting point for the plan should be identifying how much land is needed for development, and where those needs should be met. Allocations can be appropriate in settlements even if there is a sufficient supply of housing land to meet the overall requirement across the County.

e) Do rates of housing delivery over recent years indicate that the housing requirement firstly, could, or secondly, should, be increased?

- 2.20 FCC002 identifies that, over the first 5 years of the plan (2015 -2020), there have been 2,609 completions at an average of 522 dwellings per annum. This demonstrates that a higher housing requirement is achievable. A higher housing requirement would assist in addressing the previous

shortfall and contribute to meeting the identified need for 238 new affordable homes per annum 1.

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?

2.21 As set out in our response to question c), we consider that a significant allowance needs to be made for non-delivery of the land bank, in addition to the flexibility allowance.



2.29 LDP3 recommends against including a large windfall allowance rate within the first 2 years of projected supply to avoid issues of double counting.

3. Conclusions

3.1 In relation to the proposed supply of land for housing, the LDP fails the following soundness tests:

Test 2: Is the plan appropriate

- x The housing land supply position is not justified by robust, proportionate and credible evidence.
- x The proposed plan will fail to provide an adequate supply of housing land to meet assessed housing needs.

Test 3: Will it be effective?

- x The plan will not be effective as the housing requirement will not be delivered.
- x The plan is not sufficiently flexible, and there are no contingency provisions if the housing trajectory fails to deliver as anticipated.

3.2

