

FLINTSHIRE LOCAL DEVELOPMENT PLAN 2015 -2030 EXAMINATION

**MATTER 7:
PROVISION OF SUSTAINABLE HOUSING SITES**

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1.2 In summary therefore a range of evidence is required to be used by Council to establish the housing need at a particular point in time for the Plan. This evidence includes projections, the LHMA and other evidence including past trends.

1.3 If, at the particular point in time that the assessment is made, part of a previous identified need remains unmet then that does not simply disappear but becomes part of the current need at that point in time. That current need must be added together with future identified needs to establish the true level of need at any particular point in time.

1.4

response to suggestions in the consultation that there should be an allowance for under provision in the previous plan period is set out in Appendix 1 of the Housing Land Supply and Delivery Background Paper (10A) updated January 2021. This confirmed that the LDP housing requirement makes no allowance for under provision from the previous Development Plan. Councils justification for this is that it is unaware of any requirement in National Guidance or any precedent for such provision to be incorporated. However, this fails to take account of policy/guidance referred to in paragraph 1.1 above. It is also common sense that identified need which remains unmet is part of a current need at that particular point in time. If a need is not met it is still there even after the plan period ends. If you start with a deficit against identified past need, then clearly that deficit needs to be addressed before you can meet projected need over the plan period or the Local Authority area will always be in deficit against actual need.

1.5 The Councils approach of simply ignoring past under delivery by suggesting that they are unaware of a requirement in National Guidance to take it into account fails to acknowledge the above requirements in the NPS and

the Development Plan Manual. It fails to meet soundness test 1 in that it does not have regard to National Policy and also fails to meet test 2 in that the evidence base to identify housing need is not supported by relevant evidence and specifically seeks to ignore ~~any~~ ^{key} element of existing need (current unmet need) at the point in time of the LDP and updated Housing Land Supply Delivery Paper (10A).

1.6

April 2015 there was a total delivery of 4645 dwellings over the ~~UDP~~ ^{UDP} period. The UDP had identified a need of 7400 dwellings over the plan period (units per annum). There is ~~there~~ ^{therefore} a shortfall against previous identified need of 2755 units.

1.7 As set out in our original submissions to the Council at Deposit Draft S

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1.13 There is therefore clearly a credible evidence base for a figure over starting guideline of 10% (and indeed a figure significantly over the 14.4% could be justified on the basis of past delivery).

1.14 This is now recognised in the latest Development Plan Manual which in addition to the flexibility allowance, refers to a - , to be factored into the land bank (sites with planning permission) of somewhere between 20 and 50%. As a number of the allocated sites (including the strategic sites which contribute a substantial amount to housing land requirement) already have planning permission, including a non-delivery allowance is appropriate in the case of Flintshire.

1.15 Clear guidance on page 118 of the Development Plan Manual on factoring in a non-delivery allowance is that:-

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

1.16 It indicates that sites can be discounted individually, or applied a percentage across the overall land bank. It advises that the latter is the simplest approach and that non-delivery allowances have ranged from 20% to 50% to date depending on local circumstances.

1.17 This is acknowledged in the latest Housing Land Supply and Delivery Background Paper (10A) at paragraph 2.12.2.13. The Council confirm that they have not included a non-delivery allowance but argue that the flexibility allowance of 1000 dwellings (which equates to nearly 14.4% above the 10% flexibility allowance referred to in the Manual. In this respect the Council are guilty of double counting in that they are on the one hand counting the 14.4% as a flexibility allowance and on the other hand banking

to include it as part of a non-delivery allowance. To accord with National Policy and to meet soundness test 1 in this regard, the evidence demonstrates that the Council need not only to make a flexibility allowance but also a non-delivery allowance.

