

# AFFORDABLE HOUSING NEEDS STATEMENT

Land at Quarry Farm, Oakenholt, Flint

Prepared on behalf of

**The Applicant – Castle Green Homes and Adra**

October 2023

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## 1 INTRODUCTION

- 1.1. This Statement has been prepared by Grimster Planning on behalf of our Client, Castle Green Homes and Adra (hereafter referred to as the “Applicant”).
- 1.2. The Statement is submitted in support of a detailed planning application (hereafter referred to as the “Application”) submitted to Flintshire County Council for the proposed development of Land at Quarry Farm, Oakenholt, Flint (hereafter referred to as the “Site”).
- 1.3. The description of development for which detailed planning permission is sought comprises the following:

**“AWAITING CONFIRMATION OF DESCRIPTION ON APPLICATION FORM”**

- 1.4. All of the proposed dwellings will be of an affordable rented and intermediate rented tenure to be owned and managed in perpetuity by Adra.
- 1.5. The proposed development will comprise the following affordable housing mix:

### *Social Rented Housing Stock*

- 20 no. 1-bedroom apartments;
- 4 no. 2-bedroom apartments;
- 26 no. 2-bedroom houses;
- 12 no. 3-bedroom houses; and
- 8 no. 4-bedroom houses.

### *Intermediate Rented Housing Stock*

- 20 no. 2-bedroom houses; an
- 22 no. 3-bedroom houses.

### *Shared Ownership*

- 8 no. 2-bedroom houses; an
- 8 no. 3-bedroom houses.

- 1.6. The Application comprises a number of supporting plans and drawings, and technical reports, which should be read alongside this Statement. This includes the Planning, Design and Access Statement

which considers the planning merits of the proposed development, drawing on the affordable housing needs and evidence documented within this Affordable Housing Needs Statement.

## 2 POLICY CONTEXT

- 2.1. For decision-taking, Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires that if regard is to be had to the development plan for the purposes of determination, then that determination must be made in accordance with the development plan unless material considerations indicate otherwise.
- 2.2. This requirement of planning law is re-iterated in Paragraph 1.21 of Planning Policy Wales 11 (“PPW11”) published in February 2021.
- 2.3. Accordingly, we set out the relevant development plan and any other material considerations relevant to this Application below:

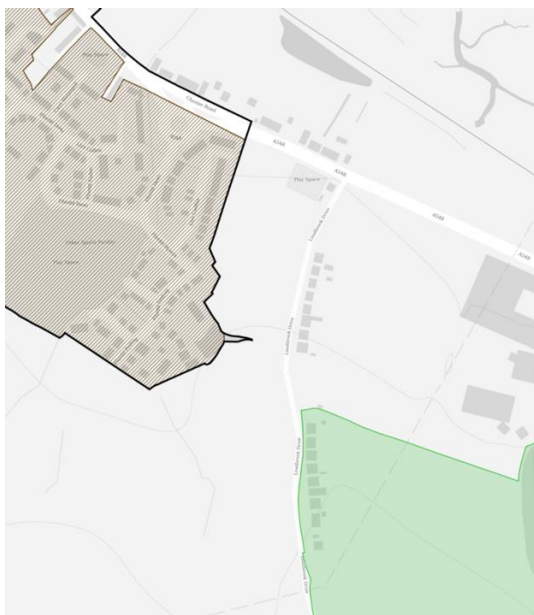
### Local Development Plan

- 2.4. The development plan for the purposes of this Application comprises the following:
  - Flintshire Local Development Plan (LDP) covering the period 2015 to 2030, adopted on 24th January 2023.

### Adopted Local Development Plan

- 2.5. On the adopted LDP Policies Map, the Site is shown as lying outside but immediately *adjacent* to the defined settlement boundary of Flint (in the open countryside), as illustrated on Figure 1 below:

Figure 1: Flintshire Local Development Plan Proposals Map Extract



- **Policy PC1** – The Relationship of Development to Settlement Boundaries
- **Policy HN4** – Housing in the Countryside

2.6. Flint is identified as a Tier 1 *Main Service Centre* under **Policy STR2** of the LDP. These Centres will be the main focus for new housing development which reinforces and contributes to sustainable settlements. The *Main Service Centres* are recognised as having a strategic role to play in delivering services and facilities to the population of Flintshire.

#### [Policy STR2 – The Location of Development](#)

2.7. Part A (iv) of Policy STR2 of the LDP recognises that the following will be permitted in *Main Service Centres* (of which Flint is one):

#### ***“Exceptions Schemes for Affordable Housing adjoining settlement boundaries”***

2.8. The Site lies immediately adjacent to the defined settlement boundary of Flint as shown on the LDP Policies Map. Locationally, the Site therefore satisfies the requirements of Policy STR2.

#### [Policy PC1 – The Relationship of Development to Settlement Boundaries](#)

2.9. Part A of Policy PC1 permits housing development outside settlement boundaries where it conforms with the specific forms of housing development set out in policies HN4/HN4-A/HN4-B/HN4-C/HN4-D.

#### [Policy HN4 – Housing in the Countryside](#)

2.10. Part F of Policy HN4 permits housing development outside defined settlement boundaries where it is for affordable housing exceptions sites on land adjoining the settlement limits, consistent with the requirements of Policy HN4-D.

2.11. Having regard to the above, it is apparent that the principle of residential development on the Site is permitted, subject to satisfying the requirements of Policy HN4-D (given the nature of the proposed development that is being applied for in this instance). The requirements of Policy HN4-D are set out below.

#### [Policy HN4-D – Affordable Housing Exceptions Schemes](#)

2.12. This Policy builds on Part A(iv) of Policy STR2, and Part F of Policy HN4, to set the following criteria for affordable housing exceptions schemes:

***“Outside settlement boundaries proposals to develop affordable housing will only be permitted, where:***

- a) There is evidence of genuine need local need for affordable housing;***
- b) There are no suitable alternative sites or properties with settlement boundaries to meet the need;***
- c) Schemes abut settlement boundaries and form logical extensions to settlements, avoiding ribbon and fragmented development and incorporating suitable boundary treatment and landscaping measures;***
- d) 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 identified; and***
- e) Houses will remain affordable in perpetuity for those in need, managed by a housing association, the County Council, a bone fide trust or similar management organisation.”***

2.13. This Affordable Housing Needs Statement specifically goes on to address **parts (a), (b) and (e)** of Policy HN4-D.

2.14. Parts **(c) and (d)** are addressed within the supporting Planning, Design and Access Statement submitted alongside this Affordable Housing Needs Statement.

### **Other Material Planning Considerations**

#### *Planning Policy Wales 11 (2021)*

2.15. PPW11 is a material consideration in planning decisions. PPW11 sets out the Welsh Government’s approach to sustainable development and core planning principles. This identifies sustainable development as the process by which to improve the *economic, social, environmental and cultural well-being* of Wales, and proposals should seek to promote sustainable development.

2.16. Chapter 4 of PPW11 includes reference to new housing provision, with the need for a supply of land which is deliverable. Local Planning Authorities are required to ensure that the Council’s Housing Trajectory forms part of the LDP, and it must set out the expected rate of housing delivery for both market and affordable housing for the LDP period. The Housing Trajectory must be used as the basis for monitoring the delivery of housing delivery in each Authority area. Accurate

information on housing delivery assessed against the Trajectory is necessary to form part of the evidence base for development plan Annual Monitoring Reports and for subsequent plan review. Under-delivery against the Housing Trajectory may require a specific early review of an LDP. Monitoring must be undertaken in accordance with the guidance set out in the Development Plans Manual.

- 2.17. Paragraph 3.60 of PPW11 recognises that *“infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing.”*
- 2.18. Paragraph 4.2.25 confirms that a community’s need for affordable housing is a *material planning consideration* in the determination of planning applications.
- 2.19. Paragraph 4.2.26 confirms that affordable housing includes social rented housing owned by local authorities and Registered Social Landlords and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents.
- 2.20. Paragraph 4.2.27 sets out the importance for local planning authorities to have an appreciation of the demand for different types of affordable housing in relation to supply.
- 2.21. Paragraph 4.2.29 sets out the requirement for all affordable housing to meet the Welsh Government’s development quality standards.
- 2.22. Paragraph 4.2.33 states that planning applications for housing on sites that comply with an up-to-date development plan should be assumed to be viable.
- 2.23. Paragraph 4.2.34 requires that affordable housing provided on exception sites should meet the needs of local people in perpetuity.

*Technical Advice Note 2 – Planning and Affordable Housing (2006)*

- 2.24. This Technical Advice Note (TAN2) is a material planning consideration that should be read alongside PPW11 as documented above, in the determination of planning applications.
- 2.25. The purpose of TAN2 is to provide advice to local planning authorities on how to determine affordability. This includes the need for a collaborative approach working alongside stakeholders.
- 2.26. Paragraph 3.2 of TAN2 sets out the need for local planning authorities to include an affordable housing target in their development plan which is based on the housing need identified in the local housing market assessment. It should set out how this target will be achieved, and monitor development on an annual basis.
- 2.27. Paragraph 5.1 of TAN2 defines affordable housing as including social rented housing and intermediate housing.



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- 2.28. TAN2 recognises that affordability is one of the key factors influencing housing demand and need. Information on affordability will therefore be an important consideration in developing policies to deliver/meet affordable housing needs.

#### *Future Wales – The National Plan 2040*

- 2.29. The Foreword to the National Plan sets out the Minister for Housing and Local Government's determination to deliver social and affordable housing. The Plan recognises that affordable housing is currently a critically important issue in all parts of Wales.
- 2.30. Policy 7 of the Plan sets out the Welsh Government's commitment to increase the delivery of affordable homes by ensuring that funding for these homes is effectively allocated and utilised. There is a particular focus on social housing.

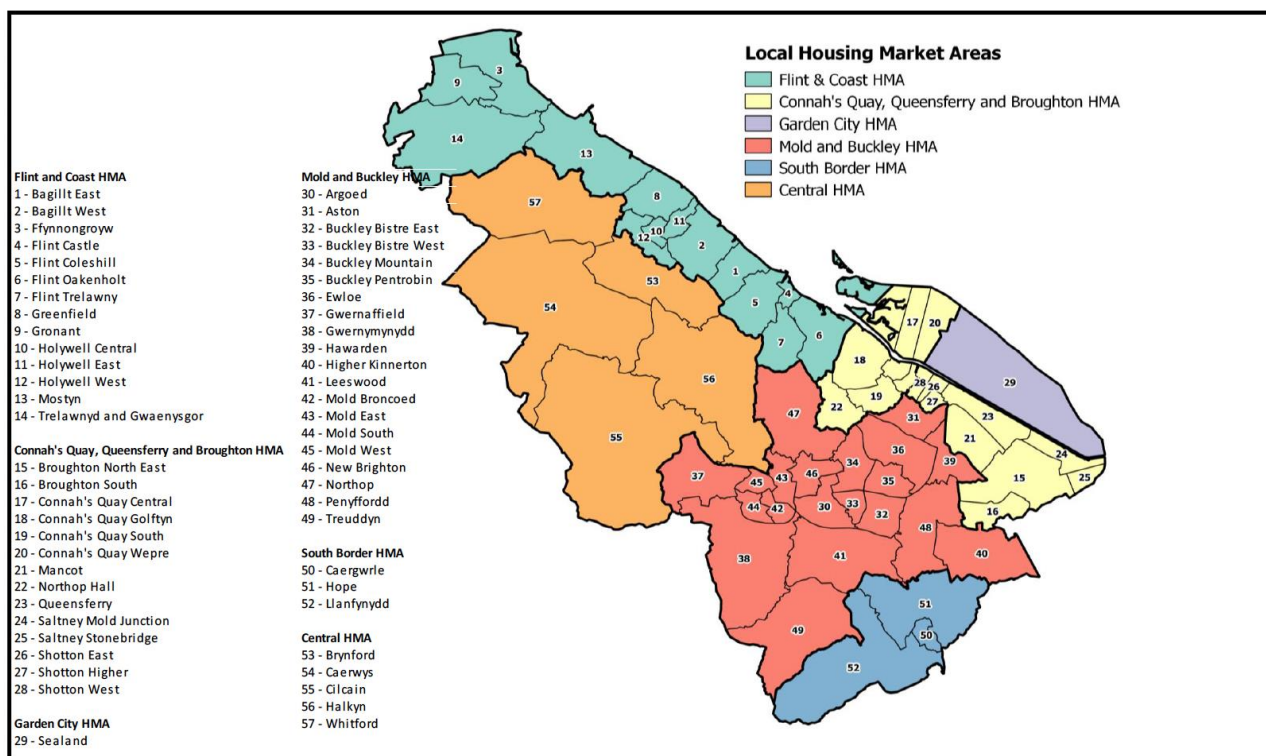
#### **Local Evidence Documents**

- 2.31. Flintshire County Council has published a number of evidential based documents which are considered to be pertinent in the consideration of this Application; further details are set out below.

#### *Flintshire Local Housing Market Assessment (LHMA) (2019)*

- 2.32. The Council's most recent Local Housing Market Assessment (LHMA) Update 2018 was published in January 2019. This replaced the previous LHMA 2015.
- 2.33. This identifies an annual shortfall of 238 affordable homes across Flintshire County, with an identified need for 1 and 2 bedroom homes (45.6%), 3 bedroom homes (28.3%), and 4 bedroom homes (12%). Older persons stock equated to 14.1%. The LHMA 2015 identified a need for 246 affordable homes per year across Flintshire County.
- 2.34. Map 3.1 of the LHMA identifies six Housing Market Areas in Flintshire, as shown below:

Figure 2: LHMA's in Flintshire



- 2.35. Flint is identified as lying within the Flint and Coast Housing Market Area (HMA).
- 2.36. Table B5 of the LHMA has identified an annual imbalance/shortfall of 1 affordable dwelling per year within the Flint and Coast HMA.
- Flintshire Affordable Housing Prospectus Draft (2021)*
- 2.37. More recently, the Council published its Affordable Housing Prospectus (Draft) in July 2021. This sets out the general needs for social rent and intermediate affordable housing across the County as demonstrated via the SARTH and Tai Teg registers.
- 2.38. This Prospectus has identified that the highest demand for affordable housing in Flintshire is 1-bedroom properties, followed by 2-bedroom homes, with an increasing demand for 4-bedroom homes.
- 2.39. The areas with the most significant demand in Flintshire are Mold and Mynydd Isa, Connah's Quay, Shotton, **Flint**, Buckley and Queensferry.

### Other Corporate Strategies published by Flintshire County Council

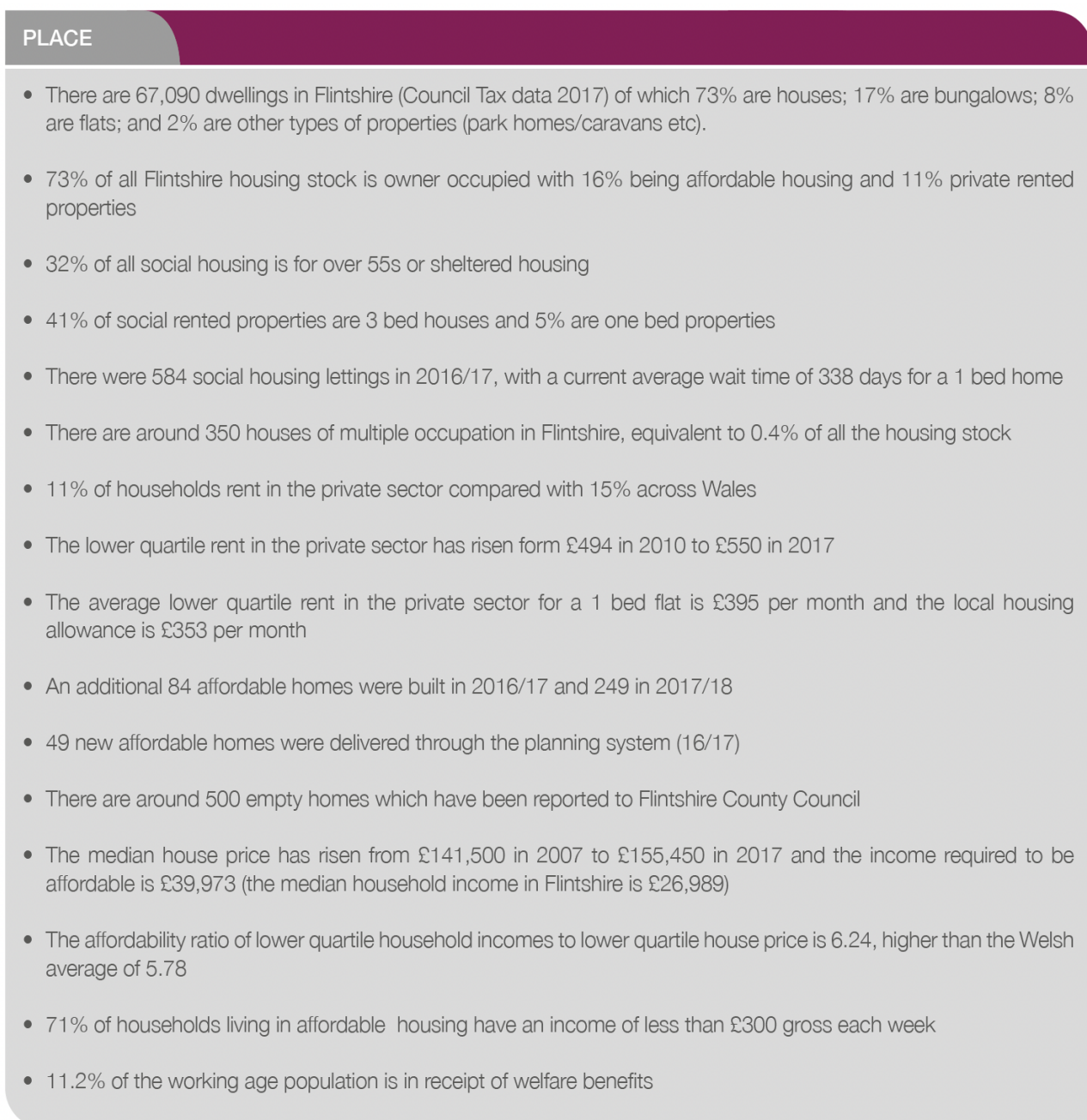
- 2.40. Flintshire County Council has published the following strategies which are considered to be relevant in the consideration of the proposed development and its justification.

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*Flintshire Housing Strategy and Action Plan 2019-2024*

- 2.41. This Strategy and Action Plan sets out the Council's *"ambition to provide affordable housing and support across Flintshire."*
- 2.42. The Strategy and Action Plan seeks to deliver this by providing the right type of quality homes and appropriate support to meet the housing needs of Flintshire's residents.
- 2.43. Paragraph 1.2 of the Strategy and Action Plan sets out three strategic priorities for the period 2019 to 2024 to delivery new affordable homes. These comprise:
- 1. Increase supply to provide the right type of homes in the right location;**
  - 2. Provide support to ensure people live and remain in the right type of home; and**
  - 3. Improve the quality and sustainability of our homes.**
- 2.44. The Strategy and Action Plan aligns with the key objectives of the North Wales Regional Homelessness Strategy, as documented further below, to prevent homelessness by ensuring that suitable accommodation is and will be available for people who are, or may become, homeless.
- 2.45. Section 2 of the Strategy and Action Plan lists a number of Key Facts. These are shown on the extract below:

Figure 3: Key Facts Extract from Flintshire Housing Strategy and Action Plan 2019-2024



2.46. The Strategy and Action Plan goes on to provide some Key Facts regarding the local population. Some of the key headlines to be drawn from this insofar as they relate to the proposed development include:

- There are around 1,400 households in housing need registered for social housing, with around a third being under the age of 35 years;
- In October 2018, there are 188 households registered for affordable rent and 153 for affordable ownership;

- 228 additional affordable homes are required each year to meet demand (*it should be noted that the LHMA Update 2018 requires a need for 238 affordable homes a year*);
- In June 2018, there were 67 people in emergency or temporary accommodation; and
- The majority of single households are in the social housing sector, with a shortfall of smaller homes being developed through the open market.

2.47. Section 5 of the Strategy and Action Plan goes on to set out how the Council's three strategic priorities will be achieved. Again, some of the key headlines to be drawn from this insofar as they relate to the proposed development are set out below:

**1. Increase supply to provide the right type of homes in the right location;**

- Increasing the supply of all types and tenures of affordable housing through new build developments, including meeting the annual shortfall of affordable homes in the County as identified in the Local Housing Market Assessment; and
- Provide the right type of homes to meet the increased demand for single person accommodation and larger properties for families, including collaboration between the Housing Strategy Team and Housing Associations.

**2. Provide support to ensure people live and remain in the right type of home**

- Reducing homelessness through prevention by working with all relevant partners in Flintshire to prevent homelessness; and
- Reducing the demand for temporary accommodation by the increasing the supply of suitable move-on accommodation, and ensuring suitable accommodation is provided to meet the needs of homeless people/families.

**3. Improve the quality and sustainability of our homes.**

- Maximising energy efficiency standards and delivery methods; and
- Improving the standard of new build properties by Housing Associations, including the promotion of Welsh Government's Design Quality Requirements and different construction methods to improve energy efficiency.

2.48. To achieve the strategic priorities, the Council is seeking to:

- 
- Increase the number of new social rent properties by 86 per annum, with 16 of these comprising one-bedroom properties;
  - Increase the number of intermediate rent properties by 57 per annum; and
  - Increase the number of intermediate ownership properties by 95 per annum.

2.49. The Strategy and Action Plan states that the Council will draw on the RSL Welsh Government Social Housing Grant Programme to increase delivery and to ensure that the maximum number of properties can be delivered using the available funding.

*North Wales Regional Homelessness Strategy 2018-2022*

2.50. The primary aim of this Strategy is stated to be addressing the root causes of homelessness. This is consistent with Part 2 of the Housing (Wales) Act 2014 which places a statutory duty on each Local Authority in Wales to carry out a homelessness review and to formulate a homelessness strategy. A joint Strategy has been prepared by the six North Wales Local Authorities.

2.51. The Strategy confirms that in July 2018, there were 7,022 households on waiting lists across North Wales, 509 people in temporary accommodation, and 84 people sleeping rough.

2.52. Some of the key issues identified in the Strategy in relation to access to a home includes a shortage of funding, upfront letting agency fees, and a shortage of the right type of accommodation (amongst others).

2.53. The Strategy sets out the need for improved access to accommodation by increasing the housing supply that is suitable and accessible including social new build and utilising more PRS stock.



### 3 CONTEXT TO FLINT

3.1. The Site is located at the edge of Flint, within the designated Ward area of Flint Oakenholt. The baseline data for this Ward is presented within this Section of the Assessment.

#### Population Profile of Flint Oakenholt Ward

3.2. As outlined above, the Site lies within the Ward of Flint Oakenholt, in Flintshire. The most recent data on the population age profile in the Ward is that set out in Table 1 below, using the most recent 2021 census data.

3.3. Table 1 shows how the population of the Ward has changed between 2001, 2011 and 2021. It also includes details for the population of Flintshire and Wales as a whole for the same period.

Figure 4: Flint Oakenholt Ward Boundary

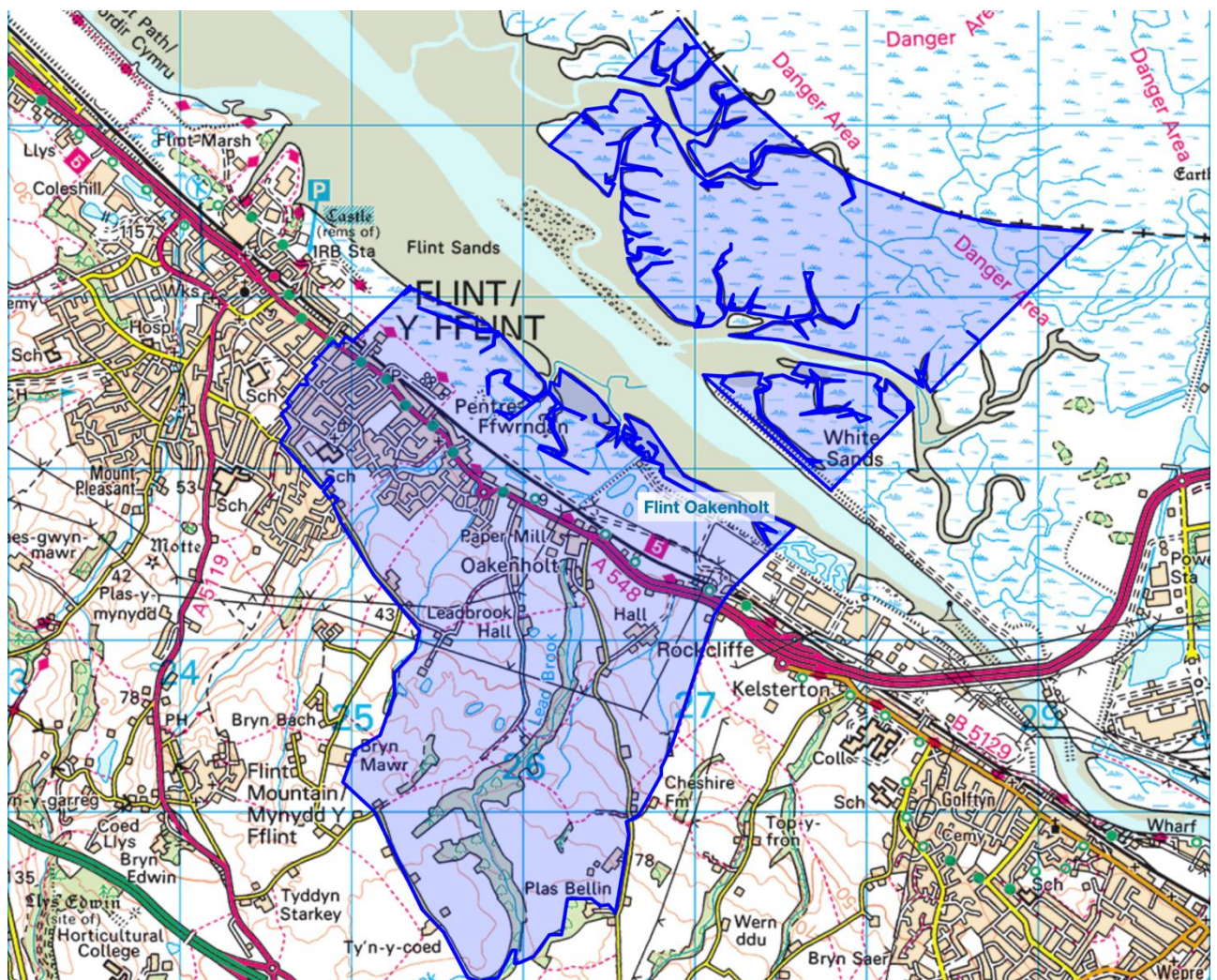


Table 1: Population in Flint Oakenholt Ward, Flintshire Authority Area and Wales (Total Population of All Ages)

|                                  | 2001      | 2011      | 2021      | Difference 2001-2011 | % Change 2001-2011 | Difference 2011-2021 | % Change 2011-2021 |
|----------------------------------|-----------|-----------|-----------|----------------------|--------------------|----------------------|--------------------|
| <b>Flint Oakenholt Ward</b>      | 2,267     | 2,342     | 3,182     | <b>+75</b>           | <b>+3.3%</b>       | <b>+840</b>          | <b>+35%</b>        |
| <b>Flintshire Authority Area</b> | 148,594   | 152,500   | 155,000   | <b>+3,906</b>        | <b>+2.6%</b>       | <b>+2,500</b>        | <b>+1.6%</b>       |
| <b>Wales</b>                     | 2,903,085 | 3,063,456 | 3,107,500 | <b>+160,371</b>      | <b>+5.5%</b>       | <b>+44,044</b>       | <b>+1.4%</b>       |

- 3.4. Based on Table 1 above, the Ward of Flint Oakenholt has a continued population increase largely as a result of new residential development taking place in the Ward within immediate proximity of the Site of the proposed development.
- 3.5. The highest population age groups in Flint Oakenholt are 613 people aged 30-39, 507 people aged 20-29, and 375 people aged 40-40. These are typically young single people, couple and young families, some of whom may well be seeking access to a home to rent or buy.

#### Population Profile of other Flint Wards

- 3.6. Given the size of Flint, recognised through its status as a Main Service Centre in the LDP, there are two other Ward areas which cover the settlement. Population details for these two Wards are set out in Table 2 below:

Table 2: Population in Flint Castle Ward and Flint Coleshill and Trelawny Ward (Total Population of All Ages)

|                                     | 2001  | 2011  | 2021  | Difference 2001-2011 | % Change 2001-2011 | Difference 2011-2021 | % Change 2011-2021 |
|-------------------------------------|-------|-------|-------|----------------------|--------------------|----------------------|--------------------|
| <b>Flint Castle</b>                 | 2,164 | 2,264 | 2,501 | <b>+100</b>          | <b>+4.6%</b>       | <b>+237</b>          | <b>+10.5%</b>      |
| <b>Flint Coleshill and Trelawny</b> | 8,373 | 8,347 | 8,053 | <b>-26</b>           | <b>-0.3%</b>       | <b>-294</b>          | <b>-3.5%</b>       |

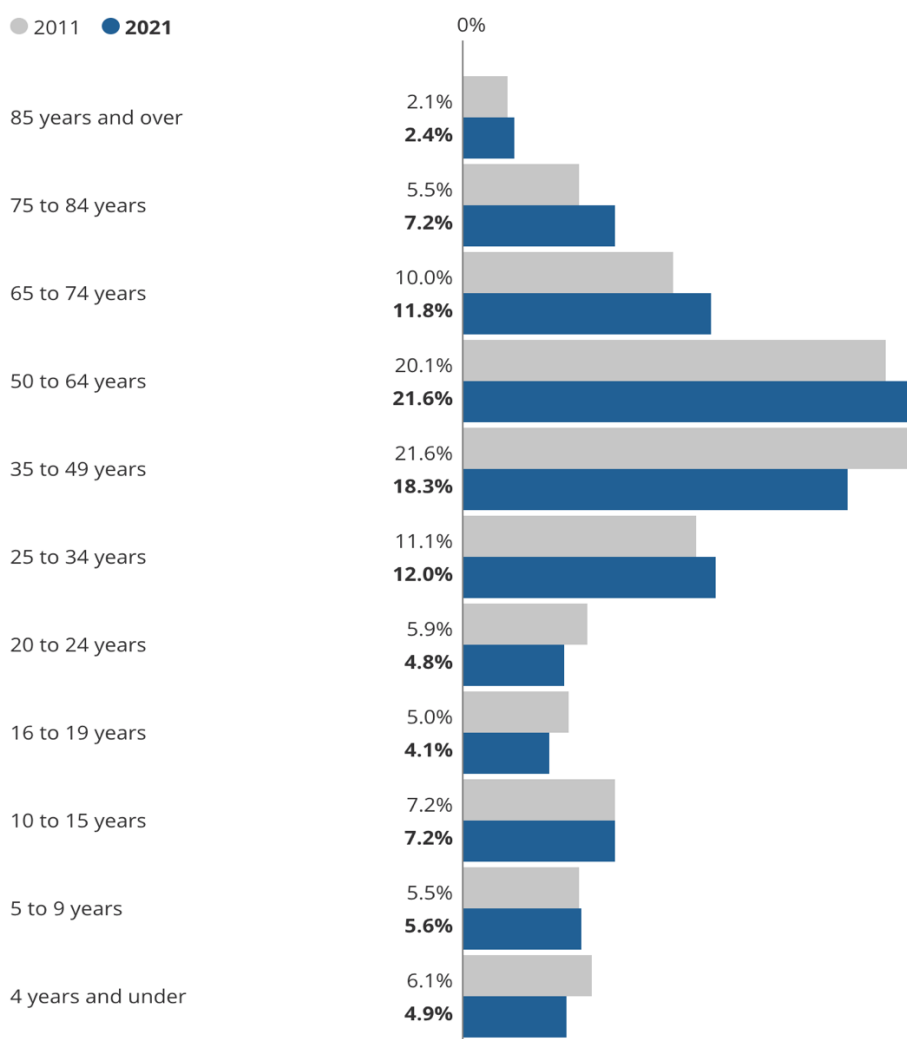
- 3.7. The total cumulative population across the three Flint wards extends to 13,736 people based on the latest 2021 census data.



### Flintshire Population Profile

- 3.8. The median age in Flintshire has increased from 41 years old to 44 years of age between 2011 and 2021 based on the most recent census data.
- 3.9. The number of residents between 35 and 49 years fell by around 4,500 across Flintshire (13.8%).
- 3.10. The number of people aged 65 to 74 years of age rose by just under 3,000 (19.5%).
- 3.11. As such, there is evidence of the local population increasing in age and living longer, thus requiring appropriate accommodation to be delivered. At the same time, people of working age and with young families have moved out of the County.
- 3.12. The changes in age group across Flintshire are shown on the diagram below:

Figure 5: Changes in Age Profile across Flintshire between 2011 and 2021



Source: ONS 2011 Census and Census 2021

3.13. In respect of housing, the proportion of households in the social rented sector across Flintshire fell from 15.1% in 2011 to 14.5% in 2021. At the same time, the number of people in the private rented sector increased from 10.6% in 2011 to 13.2% in 2021. Accordingly, there is a potential need to increase the supply of social and intermediate rented housing in order to redress the balance in the County given the increasing private median and lower quartile rental prices (as documented in the Key Facts displayed at Figure 3 of this Statement and the statistical evidence provided in Section 5 of this Statement), and the increasing median and lower quartile house prices which have been experienced year on year.

## 4 AFFORDABLE HOUSING NEEDS AND HISTORIC DELIVERY IN FLINTSHIRE

- 4.1. The policy context relevant in the determination of the proposed development is set out in Section 2 of this Statement.
- 4.2. In summary, the local policy requirements and evidenced affordable housing needs comprise the following:
- The Flintshire **LDP** was adopted in January 2023, and contains the most up-to-date policies on affordable housing delivery in Flintshire. Policy HN3 sets out the requirement for 15% of new housing on schemes of 10 or more dwellings in the Flint and Coast Sub-Market Area to be of an affordable tenure; and
  - The Council's **LHMA Update 2018**, published in 2019, set out the requirement for 238 affordable homes per annum in Flintshire County between 2019/20 and 2023/24. Before this, the **LHMA 2015** identified the need for 246 affordable homes per annum in Flintshire County between 2015/16 and 2019/20.
- 4.3. We go on in this Section to assess historic affordable housing delivery rates across Flintshire County since 2015/16 (i.e which aligns with the start of the original LHMA 2015 period).

### Affordable Housing Delivery in Flintshire since 2015/16

- 4.4. Table 3 provides details of the additions to the affordable housing stock in Flintshire for the period 2015/16 to 2020/21:

Table 3: Gross Affordable Housing Delivery in Flintshire for period 2015/16 to 2021/22

| Year                    | Total Housing Completions (Net) in Flintshire | Gross Additions to Affordable Housing Stock in Flintshire | Affordable Additions to Housing Stock (Gross) in Flintshire |
|-------------------------|---|---|---|
| 2015/16                 | 511   | 43  | 8%  |
| 2016/17                 | 472   | 84  | 18%   |
| 2017/18                 | 428   | 249   | 58%   |
| 2018/19                 | 458   | 163   | 36%   |
| 2019/20                 | 399   | 96  | 24%   |
| 2020/21                 | 442   | 228   | 52%   |
| 2021/22                 | 285   | 76  | 27%   |
| <b>Total</b>            | <b>2,995</b>                                  | <b>939</b>  | <b>32%</b>  |
| <b>Average per Year</b> | <b>428</b>                                    | <b>134</b>  | <b>32%</b>  |

Source: Stats Wales – New Housebuilding Data and Affordable Housing Provision by Location and Year

- 4.5. The information set out in Table 3 above shows that the average annual affordable housing delivery rate in Flintshire between the 7-year period 2015/16 to 2021/22 has been 134 dwellings. This is understood to be gross additions given that the dataset does not define them as net additions.
- 4.6. This figure falls significantly below the LHMA 2015 need for 246 affordable homes per year between 2015/16 and 2019/20, and the LHMA Update 2018 need for 238 dwellings a year since 2019/20. In years 2015/16, 2016/17, 2019/20 and 2021/22, delivery was less than half of the actual annual requirement.
- 4.7. Tables 4 and 5 provide a further detailed breakdown of affordable housing delivery in Flintshire since 2015/16.
- 4.8. Table 4 provides details of affordable housing delivery against the need for 246 dwellings per annum between 2015/16 and 2019/20 based on the LHMA 2015.
- 4.9. Table 5 provides details of affordable housing delivery against the need for 238 dwellings per annum between 2019/20 and 2023/24 based on the LHMA Update 2018.

Table 4: Gross Affordable Housing Delivery in Flintshire for period 2015/16 to 2019/20

| Year                    | Annual Affordable Housing Need in Flintshire | Gross Additions to Affordable Housing Stock in Flintshire | Surplus / Shortfall per Year |
|-------------------------|--|---|------------------------------|
| 2015/16                 | 246  | 43  | -203                         |
| 2016/17                 | 246  | 84  | -162                         |
| 2017/18                 | 246  | 249   | +3                           |
| 2018/19                 | 246  | 163   | -83                          |
| 2019/20                 | 246  | 96  | -150                         |
| <b>Total</b>            | <b>1,230</b>                                 | <b>635</b>  | <b>-595</b>                  |
| <b>Average per Year</b> | <b>246</b>                                   | <b>127</b>  | <b>-119</b>                  |

Source: Stats Wales – Housing Provision by Location and Year

- 4.10. Table 4 shows an annual average affordable housing delivery rate of 119 dwellings in Flintshire between 2015/16 and 2019/20. This is less than 50% of the need for 246 affordable homes per annum during that period based on the LHMA 2015, and has led to a cumulative shortfall of 595 affordable homes across that 5-year period.

Table 5: Gross Affordable Housing Delivery in Flintshire for period 2019/20 to 2023/24

| Year    | Annual Affordable Housing Need in Flintshire | Net Additions to Affordable Housing Stock in Flintshire | Surplus / Shortfall per Year |
|---------|--|---|------------------------------|
| 2019/20 | 238  | 96  | -142                         |
| 2020/21 | 238  | 228   | -10                          |

|                         |            |            |             |
|-------------------------|------------|------------|-------------|
| 2021/22                 | 238        | 76         | -162        |
| <b>Total</b>            | <b>715</b> | <b>400</b> | <b>-315</b> |
| <b>Average per Year</b> | <b>238</b> | <b>133</b> | <b>-105</b> |

Source: Stats Wales – Housing Provision by Location and Year

- 4.11. Table 5 shows an annual average affordable housing delivery rate of 162 dwellings in Flintshire between 2015/16 and 2019/20. There is an improvement over the previous 5-year period, but still remains on average 105 affordable homes a year below the identified need.
- 4.12. The cumulative shortfall during the period 2019/20 to 2021/22 against the need for 238 affordable homes a year in Flintshire stands at 315 dwellings.

### Summary Position on Historic Affordable Housing Delivery in Flintshire

- 4.13. The data set out in Tables 3, 4 and 5 above provides a clear, factual and evidential demonstration that affordable housing delivery across Flintshire since 2015/16 has fallen considerably and persistently below the annual needs identified in the Council’s own LHMA 2015 and LHMA Update 2018.
- 4.14. The average rate of affordable housing delivery during the 7-year period from 2015/16 to 2021/22 has equated to just 134 dwellings. This has led to an increasing, unmet affordable housing need across Flintshire, with a cumulative shortfall of 910 affordable homes in the County between 2015/16 and 2021/2022 (against the identified need).
- 4.15. Whilst the LDP seeks to address this through policy requirements and housing allocations, the reality is that the LDP allocations and existing housing commitments alone will not meet this outstanding and ever-increasing need. That is why Policies STR2, PC1 and HN4/HN4-D of the LDP crucially support the delivery of affordable housing exception sites as an additional means to address the major affordable housing shortfall in Flintshire.

## 5 AFFORDABILITY CONSIDERATIONS

- 5.1. As documented in Section 2 of this Statement, paragraph 4.3 of TAN2 recognises that affordability is a key factor influencing housing demand and need.
- 5.2. It recognises that information on affordability will be an important consideration in developing policies to deliver/meet affordable housing needs.
- 5.3. To this end, we go on to consider some key affordability indicators of relevance to the proposed development.

### Flintshire Housing Register

- 5.4. The Flintshire Housing Register was established as a means to make it easier for people to apply for social housing in Flintshire. The Register is a partnership involving the Council and all of the local Housing Associations.
- 5.5. Through direct contact with the Council's Housing Strategy Manager, the latest SARTH Housing Register has been provided. This list details of applications to the Register by Area and Property Type seeking accommodation in social rented housing. It is noted that the SARTH Housing Register details expressions of interest in an area, and applicants to the Register can express an interest in multiple areas.

Table 6: SARTH Housing Register – Applications for Flint Area as of October 2023

| Property Type and Bedroom Numbers | No. of Applicants |
|-----------------------------------|-------------------|
| <b>Flat</b>                       |                   |
| <b>1-bedroom</b>                  | 274               |
| <b>2-bedroom</b>                  | 106               |
| <b>House</b>                      |                   |
| <b>2-bedroom</b>                  | 162               |
| <b>3-bedroom</b>                  | 60                |
| <b>4-bedroom</b>                  | 39                |

Source: Flintshire SARTH Housing Register as of October 2023

- 5.6. Alongside the SARTH Housing Register, the Tai Teg Housing Register list details of applications made by Area and Property Type seeking accommodation in intermediate rented housing. Through direct contact with the Council's Housing Strategy Manager, the latest Tai Teg Housing Register has been provided.

Table 7: Tai Teg Housing Register – Applications for Flint Area as of October 2023 (Rental)

| Property Type and Bedroom Numbers | No. of Applicants |
|-----------------------------------|-------------------|
| <b>Flat</b>                       |                   |
| 1-bedroom                         | 30                |
| 2-bedroom                         | 46                |
| <b>House</b>                      |                   |
| 2-bedroom                         | 127               |
| 3-bedroom                         | 147               |
| 4+ bedroom                        | 14                |

Source: Tai Teg Housing Register as of October 2023 (Rental)

Table 8: Tai Teg Housing Register – Applications for Flint Area as of October 2023 (Sale)

| Property Type and Bedroom Numbers | No. of Applicants |
|-----------------------------------|-------------------|
| <b>Flat</b>                       |                   |
| 1-bedroom                         | 30                |
| 2-bedroom                         | 46                |
| <b>House</b>                      |                   |
| 2-bedroom                         | 127               |
| 3-bedroom                         | 147               |
| 4+ bedroom                        | 14                |

Source: Tai Teg Housing Register as of October 2023 (Sale)

- 5.7. In summary, both the SARTH Housing Register and Tai Teg Housing Register demonstrate a strong, current demand for social rented and intermediate rented, and intermediate sale (Shared Ownership), affordable housing stock in the Flint area. The demand for property types and bedroom numbers shown on these Registers is reflected in the proposed development.
- 5.8. It should be noted that the SARTH and Tai Teg Housing Registers do not capture all of the households in Flintshire whom are in need of affordable housing. It merely provides details of those in priority need whom the Housing Strategy Team/Department at Flintshire County Council are seeking to provide accommodation. Accordingly, the households in need of affordable housing in Flintshire (including Flint) will go beyond the number of applicants on the SARTH and Tai Teg Housing Registers.

### Private Rents in Flintshire – Median and Lower Quartile

- 5.9. Details of private rents across Flintshire have been obtained using the Stats Wales PRS Rents interactive table. These cover the period 2013 to 2019. Accordingly, we have assessed how private rents have changed in Flintshire from 2015/16 (the start of the LHMA 2015 period through to 2019 (as the latest available data).

Table 9: Median Private Rents, 2015/16 and 2019/20

| Bedroom Numbers   | Median Rent in 2015/16 | Median Rent in 2019/20 | % Change |
|-------------------|------------------------|------------------------|----------|
| <b>Flintshire</b> |                        |                        |          |
| 1-bedroom         | 412.50                 | £450                   | +9       |
| 2-bedroom         | £525                   | £560                   | +7       |
| 3-bedroom         | £600                   | £650                   | +8       |
| 4+ bedroom        | £800                   | £875                   | +9       |
| <b>Wales</b>      |                        |                        |          |
| 1-bedroom         | £410                   | £450                   | +10      |
| 2-bedroom         | £495                   | £525                   | +6       |
| 3-bedroom         | £550                   | £575                   | +5       |
| 4+ bedroom        | £750                   | £795                   | +6       |

Source: Stats Wales – Private Sector Rents Interactive Table

- 5.10. The data set out in Table 9 above shows that private rents have increased for every property size in Flintshire between 2015/16 and 2019/20. Whilst this might not be unexpected, the rate of rental growth for 2, 3 and 4 bedroom properties is well in excess of the national average at 6%, 13% and 10% respectively.
- 5.11. The same data source has also been used to assess the lower quartile rents in Flintshire over the same period. These rents are typically for people on lower incomes, including households that may be reliant on housing allowances to help cover some of their accommodation costs.

Table 10: Lower Quartile Private Rents, 2015/16 and 2019/20

| Bedroom Numbers   | Lower Quartile Rent in 2015/16 | Lower Quartile Rent in 2019/20 | % Change |
|-------------------|--------------------------------|--------------------------------|----------|
| <b>Flintshire</b> |                                |                                |          |
| 1-bedroom         | £382.75                        | £400                           | +5       |
| 2-bedroom         | £495                           | £521.25                        | +5       |
| 3-bedroom         | £550                           | £595                           | +8       |
| 4+ bedroom        | £750                           | £800                           | +7       |
| <b>Wales</b>      |                                |                                |          |
| 1-bedroom         | £360                           | £375                           | +4       |
| 2-bedroom         | £425                           | £450                           | +6       |
| 3-bedroom         | £475                           | £495                           | +4       |



|                   |      |      |    |
|-------------------|------|------|----|
| <b>4+ bedroom</b> | £625 | £650 | +4 |
|-------------------|------|------|----|

Source: Stats Wales – Private Sector Rents Interactive Table

- 5.12. As with median private rents, there has been an increase across the board for all property sizes when it comes to lower quartile private rents, albeit the level of increase has been smaller on average compared to median private rents.
- 5.13. That said, the growth of lower quartile private rents has exceeded the national average for 1, 3 and 4-bedroom properties. Furthermore, the rental averages for each property size in Flintshire are above the national average, and significantly so in respect of 2, 3 and 4 bedroom properties by 16%, 20% and 23% respectively.

### Median House Prices

- 5.14. Statistical information is available at a more localised level to understand the median house prices, and how these compare to the Ward and County averages. This comprises the HPSSA datasets 2, 9 and 37.
- 5.15. Based on the Middle Layer Super Output Area (MSOA) data for Code Area W02000061 'Flintshire 004' in which the Site is located (i.e Flint Oakenholt), the following median house price have been identified:
- **March 2015** – median house price of £108,000
  - **March 2022** – median house price of £140,000
- 5.16. This shows an increase of £32,000 to the median house price over a 7-year period at a local level, equating to a 29.6% increase.
- 5.17. At a Ward level of Flint Oakenholt, the median house price was £127,995 in March 2015, increasing to £161,500 in March 2022, an increase of 26.1% over a 7-year period.
- 5.18. In Flintshire as a County, the median house price was £145,000 in March 2015, and £185,000 in March 2022, an increase of 27.5% over a 7-year period.
- 5.19. Accordingly, the median house price increase in the MSOA area has exceeded both the Ward and County level increases between March 2015 and March 2022.

### Lower Quartile House Prices

- 5.20. As with the median house prices, statistical information is available at a more localised level to understand the lower quartile house prices, and how these compare to the Ward and County averages. This comprises the HPSSA datasets 4, 15 and 39.
- 5.21. Based on the MSOA data for Code Area W02000061 'Flintshire 004' in which the Site is located (i.e Flint Oakenholt), the following lower quartile house price have been identified:
- **March 2015** – lower quartile house price of £85,000
  - **March 2022** – lower quartile house price of £115,000
- 5.22. This shows an increase of £30,000 to the lower quartile house price over a 7-year period at a local level, equating to a 35.2% increase.
- 5.23. At a Ward level of Flint Oakenholt, the lower quartile house price was £95,000 in March 2015, increasing to £124,000 in March 2022, an increase of 30.5% over a 7-year period.
- 5.24. In Flintshire as a County, the lower quartile house price was £115,000 in March 2015, and £143,750 in March 2022, an increase of 25% over a 7-year period.
- 5.25. Accordingly, the lower quartile house price increase in the MSOA area has exceeded both the Ward and County level increases between March 2015 and March 2022

### Summary Position on Affordability Considerations

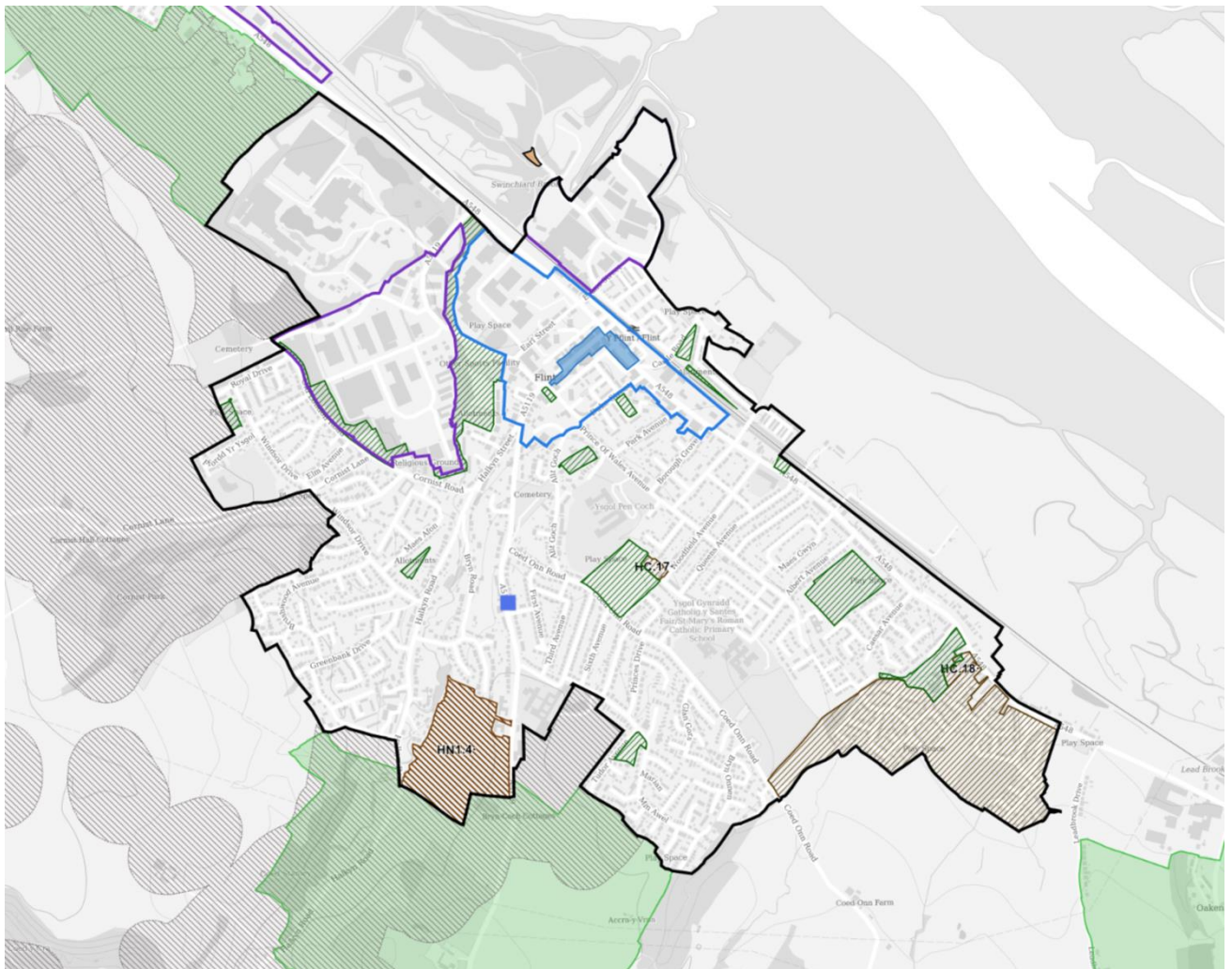
- 5.26. The key headlines to be drawn from this Section are:
- There is a high demand and need for affordable housing of different types and size in the Flint area based on the number of applicants seeking accommodation on the SARTH and Tai Teg Housing Registers;
  - Median and lower quartile rents in Flintshire have increased between 2015 and 2019, well in excess of the respective national averages; and
  - House price increases in the MSOA area where the Site is located have exceeded the Ward and County averages, all of which have increased significantly over the 7-year period from March 2015 to March 2022.
- 5.27. In view of the above, it is clear that the need to increase the supply of and access to affordable housing in Flintshire is becoming ever more important, and there is a pressing need to address issues of affordability within Flint (which includes the Flint Oakenholt Ward).

5.28. The findings of this Section, together with Section 4, demonstrate evidence of genuine local need for affordable housing, consistent with part (a) of LDP Policy HN4-D.

## 6 ASSESSMENT OF OTHER LAND AND BUILDINGS

- 6.1. As documented in Section 2 of this Statement, Part (b) of LDP Policy HN4-D requires a demonstration that there are no other suitable sites or properties within the settlement boundary to meet the identified affordable housing need.
- 6.2. The following extract is taken from the adopted Flintshire LDP Policies Map showing the settlement of Flint:

Figure 6: LDP Housing Allocations and Commitments in Flint



- 6.3. As shown on the above extract, there is one LDP housing allocation in Flint, as follows:

Table 11: LDP Housing Allocations in Flint

| LDP Site Reference                                     | Address                     | Planning Permission Reference                                      | Total No. of Dwellings | No. of Affordable Homes as Proportion of Total No. of Dwellings     |
|--|-----------------------------|--|------------------------|---|
| <b>HN1.4</b><br><br><b>Allocated for 170 dwellings</b> | Land at Northop Road, Flint | FUL/000414/22<br><br>(pending determination for 200. No dwellings) | 200                    | 30 (15%)<br><br>(Further 10 units as Grant Funded Affordable Homes) |

6.4. The Site Allocations Policy Table included at paragraph 8.2 of the LDP shows these dwellings coming forward in Years 6-10 (60) and 11-15 (110) of the Plan Period.

6.5. Alongside this, there are three existing LDP housing commitments in Flint, as follows:

Table 12: LDP Housing Commitments in Flint

| LDP Site Reference | Address    | Planning Permission Reference   | Total No. of Dwellings Remaining at 1 <sup>st</sup> April 2018<br><br>(taken from Appendix 1 of LDP) | No. of Affordable Homes as Proportion of Total No. of Dwellings  |
|--------------------|------------|---|--|--|
| <b>HC.16</b>       | Croes Atti | 035575 (Outline Planning Permission) – required 10% affordable<br><br>044033 (Reserved Matters for 189 no. dwellings)<br><br>046595 (Reserved Matters for 132 no. dwellings)<br><br>050300 (Reserved Matters for 312 no. dwellings) | 220<br><br>(now complete)  | 19 no. affordable homes under 044033 (10%)<br><br>14 no. affordable homes under 046595 (10%)<br><br>31 no. affordable homes under 050300 (10%) |

|              |                          |  |    |  |
|--------------|--------------------------|--|----|--|
|              |                          | 050967 (Reserved Matters for 55 no. dwellings) |    | 5 no. affordable homes under 050967 (10%)                    |
|              |                          | 051002 (Reserved Matters for 14 no. dwellings) |    | Amendment to 044033 above (no additional affordable housing) |
| <b>HC.17</b> | Flint Working Men's Club | 060006   | 11 | 0  |
| <b>HC.18</b> | Pandy Garage, Oakenholt  | 054077   | 16 | 0  |

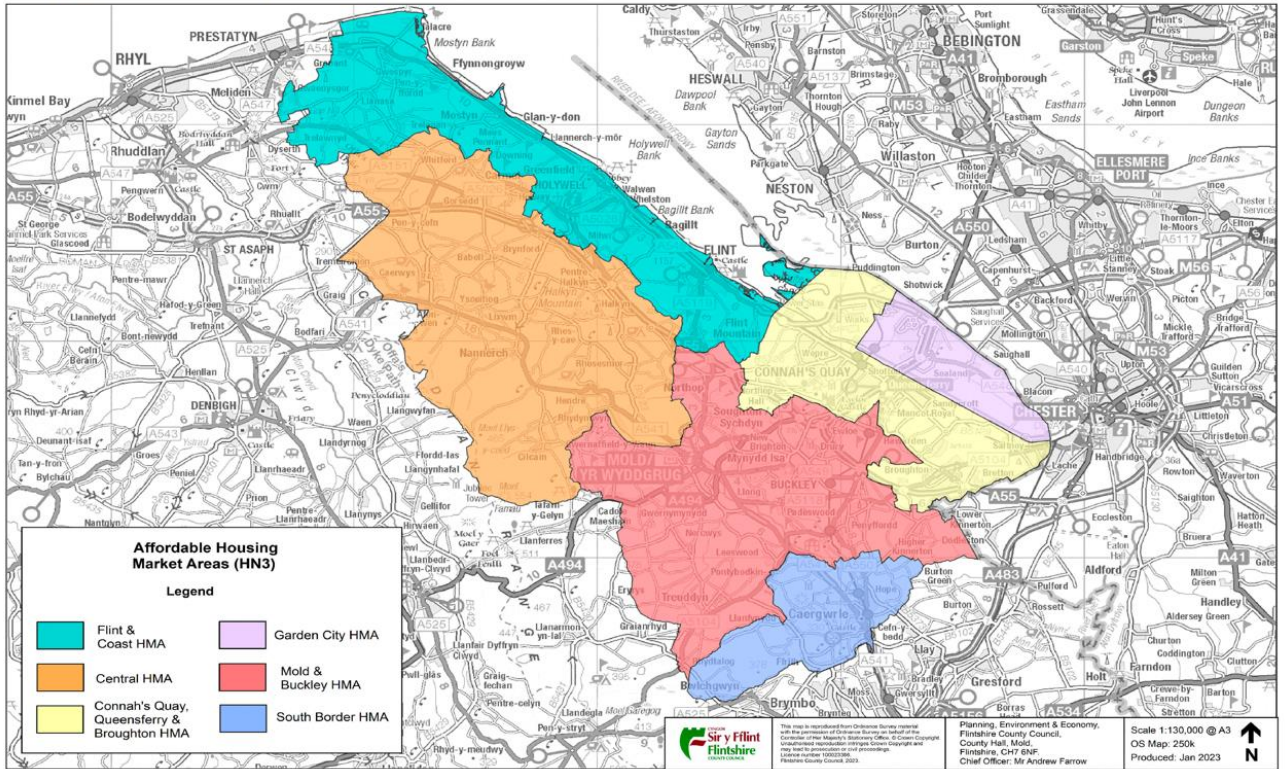
- 6.6. From Table 12 above, it can be seen that the allocated and committed sites in Flint have delivered some new affordable housing in the settlement, in the region of **99 no. affordable homes**. However, the permissions on Site Ref. HC.16 were granted prior to the commencement of the LDP Plan Period in 2015. This Statement has identified a current need for affordable housing in Flint up to the end of the Plan period in 2030, which goes beyond that which can be delivered by Site Reference HN1.4.
- 6.7. Based on the evidence of affordable housing need in response to Part A of Policy HN4-D and past delivery rates at a County level (as documented in Sections 4 and 5 of this Statement), there remains a significant residual affordable housing need in Flint which will not be met by the LDP allocations and commitments.
- 6.8. No other greenfield land outside of the settlement boundary of Flint is sequentially preferable in that regard, and indeed the land to the south, west and north-west of the settlement is constrained by other LDP policies including Green Wedge and Minerals Safeguarding. That is not the case in respect of the Site now subject to this Application. Other considerations that have to be factored in when assessing alternative parcels of land outside of the settlement boundary include best and most versatile agricultural land, flood-risk, accessibility and sustainability, and topography. These matters are considered within the accompanying Planning, Design and Access Statement.
- 6.9. It is noted that paragraph 8.23 of the LDP refers to the potential consideration of sites and buildings within other Community Council areas "*in some circumstances.*" It doesn't elaborate further on this matter.
- 6.10. In response, the Applicant's position is as follows:



- The affordable housing needs identified in Flint should only be met elsewhere in the Flint and Coast HMA, as shown on Figure 7 below. The other HMA's have their own affordable housing requirements to meet:

Figure 7: Housing Market Areas in Flint

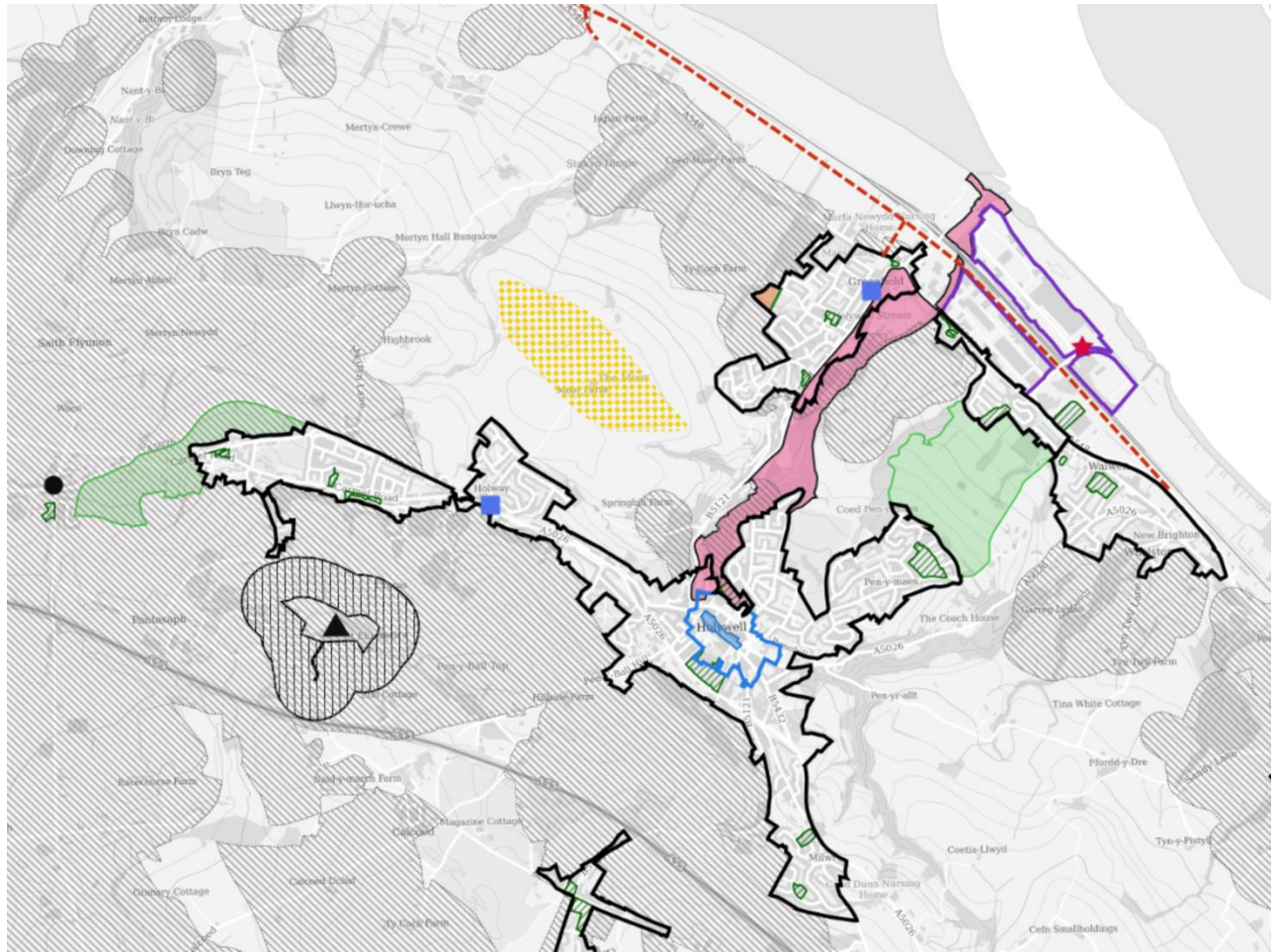
Appendix 4 Affordable Housing Sub Market Area Maps



- As a *Main Service Centre* in Flintshire, it is considered reasonable that only other *Main Service Centres* in the Flint and Coast HMA should be considered. Any other settlement is considered to be less sustainable by the Council's own admission and only identified for more *modest* growth (i.e through their categorisation as a Local Service Centre or less). To this end, the only other *Main Service Centre* in the Flint and Coast HMA is Holywell.

6.11. The following extract is taken from the LDP Policies Map showing the settlement of Holywell

Figure 8: LDP Housing Allocations and Commitments in Holywell



6.12. As shown on the above extract, there are **no** housing allocations in Holywell based on the LDP Policies Map.

6.13. Alongside this, there are two existing LDP housing commitments in Holywell, as follows:



Table 13: LDP Housing Commitments in Holywell

| LDP Site Reference | Address             | Planning Permission Reference | Total No. of Dwellings Remaining at 1 <sup>st</sup> April 2018<br><br>(taken from Appendix 1 of LDP) | No. of Affordable Homes as Proportion of Total No. of Dwellings |
|--------------------|---------------------|-------------------------------|--|---|
| HC.25              | Lluesty Hospital    | 055006 and 057006             | 89   | 0   |
| HC.26              | East of Halkyn Road | 057865                        | 44   | 44 (100%)   |

- 6.14. From Table 13 above, it can be seen that the allocated and committed sites in Holywell will deliver in the region of **44 no. affordable homes** during the LDP Plan period up to 2030.
- 6.15. Based on the Housing Register information provided by Flintshire County Council's Housing Strategy Team, the affordable housing need in Holywell is as follows:

Table 14: SARTH Housing Register – Applications for Holywell Area as of 1<sup>st</sup> June 2023

| Property Type and Bedroom Numbers | No. of Applicants |
|-----------------------------------|-------------------|
| <b>Bungalow</b>                   |                   |
| 1-bedroom                         | 36                |
| 2-bedroom                         | 17                |
| 3-bedroom                         | 11                |
| 4+ bedroom                        | 21                |
| <b>Flat</b>                       |                   |
| 1-bedroom                         | 210               |
| 2-bedroom                         | 77                |
| 3-bedroom                         | 11                |
| <b>House</b>                      |                   |
| 2-bedroom                         | 97                |
| 3-bedroom                         | 36                |
| 4-bedroom                         | 30                |

Source: Flintshire SARTH Housing Register as of 1<sup>st</sup> June 2023

- 6.16. Alongside the SARTH Housing Register, the Tai Teg Housing Register list details of applications made by Area and Property Type seeking accommodation in intermediate rented housing. There are no details for Holywell as a separate area as part of the Tai Teg Register. However, Holway is listed as a separate area despite its close relationship to Holywell, as below:

Table 15: Tai Teg Housing Register – Applications for Holway as of 13<sup>th</sup> June 2023 (Affordable Rent)

| Property Type and Bedroom Numbers | No. of Applicants |
|-----------------------------------|-------------------|
| <b>Bungalow</b>                   |                   |
| 1-bedroom                         | 0                 |
| 2-bedroom                         | 0                 |
| 3-bedroom                         | 0                 |
| <b>Flat</b>                       |                   |
| 1-bedroom                         | 1                 |
| 2-bedroom                         | 0                 |
| 3-bedroom                         | 0                 |
| <b>House</b>                      |                   |
| 2-bedroom                         | 2                 |
| 3-bedroom                         | 0                 |
| 4+ bedroom                        | 0                 |

Source: Tai Teg Housing Register for Holway as of 13<sup>th</sup> June 2023 (Affordable Rent)

- 6.17. In summary, both the SARTH Housing Register and Tai Teg Housing Register demonstrate a current demand for social rented and affordable rented affordable housing stock in and around the Holywell area.
- 6.18. In light of the above, and the outstanding affordable housing need in Flint, Holywell evidently has its own housing needs to meet. Furthermore, there are no housing allocations or other sites within the settlement boundary of Holywell which are suitable for development.
- 6.19. As with Flint, no other greenfield land outside of the settlement boundary of Holywell is sequentially preferable to the Site in that regard. Indeed, there are comparable LDP policy constraints to Flint which preclude development in parts including Green Wedge, Mineral Safeguarding, and Greenfield Valley. Again, other considerations that have to be factored in when assessing alternative parcels of land outside of the settlement boundary include best and most versatile agricultural land, flood-risk, accessibility and sustainability, and topography.

### Summary Position on Other Land and Buildings

- 6.20. The findings of this Section have demonstrated that there is **no** other land or buildings within the settlement boundaries of Flint *and* Holywell, nor LDP allocations or commitments, capable of meeting the identified affordable housing needs in Flint. Accordingly, this satisfies part (b) of LDP Policy HN4-D and provides a robust justification for the proposed development.
- 6.21. Furthermore, given that policies STR2 and HN4-D of the LDP expressly allow for exception schemes for affordable housing adjoining settlements, the development (and loss) of greenfield land is already factored into those policies. The proposed development, whilst involving greenfield development, will not involve the loss of Green Barrier land, nor cause any significant landscape and visual harm to weigh against the proposal. The Site is not a valued landscape; as above, the allowance for greenfield sites to be developed for affordable housing exception schemes means that some landscape change is already factored into the policies (and will be inevitable).

## 7 CONCLUSIONS

7.1. This Statement has been prepared in support of a detailed planning application for the proposed development of Land at Quarry Farm, Oakenholt, Flint.

7.2. The description of development for which detailed planning permission is sought is:

**"AWAITING CONFIRMATION OF DESCRIPTION ON APPLICATION FORM"**

7.3. All of the proposed dwellings will be of an affordable rented and intermediate tenure to be owned and managed in perpetuity by Adra as a Housing Association. This satisfies the requirements of Part (e) of Policy HN4-D.

7.4. The key headlines to be drawn from this Statement are as follows:

- The SARTH and Tai Teg Registers have shown a strong demand for 1, 2, 3 and 4 bed apartments and houses across the social rented, intermediate rented and intermediate sale (Shared Ownership) tenures for people seeking accommodation in Flint;
- The median private rents and lower quartile private rent increases in Flintshire have exceeded the ward and County level increases between March 2015 and March 2022;
- Private rents have increased for every property size in Flintshire between 2015/16 and 2019/20. Whilst this might not be unexpected, the rate of rental growth for 2, 3 and 4 bedroom properties is well in excess of the national average at 6%, 13% and 10% respectively;
- The growth of lower quartile private rents has exceeded the national average for 1, 3 and 4-bedroom properties. Furthermore, the rental averages for each property size in Flintshire are above the national average, and significantly so in respect of 2, 3 and 4 bedroom properties by 16%, 20% and 23% respectively;
- The median house price in Flint Oakenholt MSOA 004 in March 2022 was £140,000. The average median house price increase between 2015 and 2022 exceeded both the Ward and County average for the same period;
- The lower quartile house price in Flint Oakenholt MSOA 004 in March 2022 was £115,000. The average lower quartile house price increase between 2015 and 2022 exceeded both the Ward and County average for the same period;

- 
- There is no other land or buildings in the settlement boundaries of Flint and Holywell capable of meeting the identified affordable housing needs. Whilst some of the LDP allocations and commitments will deliver a proportion of affordable housing, these alone will not meet identified local needs; and
  - The proposed dwellings will be managed by Adra as the Housing Association and remain affordable in perpetuity.
- 7.5. The proposed development of 128 no. affordable homes on the Site will make a significantly positive impact in meeting the identified affordable housing needs in Flint, delivering a balanced mix of 1, 2, 3 and 4 bedroom homes in the form of apartments and dwellings (semi-detached and mid/end terraced).
- 7.6. There is clear evidence that median and lower quartile house prices and rents are increasing at a local and County level. At the same, affordable housing delivery across Flintshire has fallen well short of the level of need identified in the LHMA 2015 and 2018 Update.
- 7.7. To this end, there remains a **significant unmet housing need across the County**. This should be directed towards those areas with identified needs, and which are sustainable enough to accommodate the proposed level of growth presented as part of this Application.
- 7.8. The scale of the proposed development would equate to 53.7% of the Council's annual affordable housing requirement of 238 dwellings per annum, albeit which is not a 'cap.' There would be no harm from this figure being exceeded, and the proposed development would not lead to unsustainable levels of housing growth in Flint.
- 7.9. The delivery of 128 no. affordable homes represents a significant benefit given that in the seven-year period since the start of the LHMA 2015 period in 2021/22, net affordable housing delivery has only equated to 32% of gross overall housing delivery (equivalent to 134 gross affordable dwellings per annum), well below the identified need set out within the Council's own housing evidence.
- 7.10. The Council's Housing Strategy and Action Plan, and the Regional Homelessness Strategy, both identify the need to increase affordable housing delivery across the County, and the proposed development will do just that through the provision of social rented and intermediate rented, and intermediate sale (Shared Ownership), homes for local people who are on the waiting lists. This in turn will help the Council to meet its identified affordable housing needs and with it support a wide range of households with urgent accommodation needs, including those who are homeless.
- 7.11. This also aligns with key objectives of the Welsh Government as set out in PPW11, the Future Wales – *National Plan*, and TAN2.

7.12. The proposed development is supported by Policies STR2, PC1, HN4 and HN4-D of the LDP, and this Statement has shown compliance with parts (a), (b) and (e) of Policy HN4-D. Reference should be had to the accompanying Planning, Design and Access Statement to assess how the proposed development conforms with the full requirements of Policy HN4-D and other policy considerations set out in the development plan and other material considerations.