

Flintshire County Council

Development Local Plan Examination

Our Ref: 2012-067-EIP/AS

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

Additional Submission: Northern Gateway Housing Position Statement

This further statement has been prepared in response to the Northern Gateway Housing Position Statement (Ref: FCC007) that has recently submitted to the LDP examination.

It is noted that the Position Statement projects a further increase in housing delivery on the Northern Gateway strategic allocation, with build out rates forecasted in excess of 180 dwellings per annum between 2022/23 to 2025/26. The figures set out in Table 1 below highlight the extent to which delivery rates projected to 2024 have changed in as little as 3 - 6 months (since the LDP was submitted). The total number of dwellings forecasted under BP10A and BP10 are respectively 20% and 34% below the latest position as presented in Document Ref: FC007. Considering the extent to which the LDP is reliant upon Northern Gateway this represents a significant variance which provides little in terms of certainty of outcomes for the LDP and meeting the housing requirement.

Table 1 – Comparison of Delivery Rates at Northern Gateway

Document (Submission Date)	2020/21	2021/22	2022/23	2023/24	Total	Variance (%)
Northern Gateway Housing Position Statement Ref: FCC007 (April 2021)	112	120	187	181	600	–
Background Paper 10A Housing Land Supply and Delivery Ref: FCC002 (February 2021)	90	90	150	150	480	-20%
Background Paper 10 Housing Land Supply and Delivery Ref: LDP-EBD-BP10 (October 2020)	94	100	100	100	394	-34%

The need for Northern Gateway to deliver post-adoption of the LDP is emphasised by the point made in our response to Matter 12 regarding the over-estimation of housing delivery early in the Plan Period. When comparing Anticipated Annual Build Rates (ABBR) under BP10 and BP10A, Table 2 highlights the Council's acceptance that 412 fewer homes will be built in the period to 2023 as initially anticipated just 6 months ago. There is subsequently an increased reliance on Northern Gateway as a strategic site to pick up this unmet need.

Table 2 – Comparison of AABRs under BP10 and BP10A

Document	2020-21	2021-22	2022-23	Total
Background Paper 10A - Ref: FCC002	434	452	581	1,467
Background Paper 10 - Ref: LDP-EBD-BP10	672	662	545	1,879
Cumulative Difference				-412

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As set out under the Development Plans Manual, the Housing Trajectory forms part of the Development Plan itself. The recent amendments presented to the LDP examination¹ therefore would propose a change to the LDP itself. We would therefore seek clarification as to whether the Council are presenting this updated evidence as a modification to the LDP.

LPC's responses to Matters 3, 7 and 12 set out in detail our significant concerns over delivery at Northern Gateway, especially when set in the context of its failure to deliver in the UDP, the scale of development being proposed, and the inherent delays associated with the development of strategic sites of this nature. This is increasingly significant given that the deliverability of Warren Hall has already been called into question through the examination process and highlighted major aeronautical constraints. If build rates at Northern Gateway were to then also stall this would further compromise the robustness of the LDP to deliver on its housing requirement.

This over reliance has been highlighted by the Council's claim that the LDP has built in a significant flexibility allowance of 18.1% - equating to 1,260 units. On submission of the LDP in October 2020, the Council set out an allowance of 1,000 units, however the 'additional' flexibility being proposed is simply derived from an increased reliance upon Northern Gateway, with 75% of additional dwellings coming from this strategic site alone.

The fact that one of the development partners on the former Airfields site at Northern Gateway (Anwyl Homes), have cast doubt over delivery rates on the Pochin-Goodman site, is in itself significant. As set out in their Hearing Statement to Matter 3², Anwyl Homes *'have greater concerns with regards to the Pochin Goodman part of the Site and its ability to deliver the level of housing envisaged [...] In the case of the Pochin Goodman Northern Gateway element, a package of enabling works is still required to be implemented following reserved matters approval and therefore it is even questionable if housing units will begin to be delivered on the site within years 6-15 of the plan period as detailed with Table 3A of document FCC002'*.

Furthermore, we have undertaken land registry searches for the Northern Gateway allocation covering both Praxis and Pochin-Goodman owned sites. The registers have shown that other than Keepmoat Homes and Countryside Properties, who are beneficiaries of their respective parcels, none of the other preferred developers identified under the Position Statement Ref FC007 have control of the site. This would only suggest that these land deals are all subject to planning permission being approved, reinforcing the need for the Council to clearly show how lead-in periods associated with pre-application consultation, submissions, determination and S106 negotiations have been factored into the Trajectory.

In its current form, the LDP is constrained by its over reliance on strategic sites and significantly exposed to any unforeseen delay which would risk the deliverability of the Plan. This echoes

¹ See Background Paper 10A – Housing Land Supply; and Northern Gateway Housing Position Statement (Ref: FCC007)

² Hearing Statement – Matter 3 (Ref: M3.15) Para. 2.3

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arguments that have been presented through the examination process and emphasises the need for real caution when determining the deliverability of the strategic site under the LDP.