

**Flintshire County Council**

**Local Development Plan (LDP) Examination**

## HEARING STATEMENT

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### **Hearing Session 12: New Housing Development Proposals (Inc Density and Mix)**

**Response by Wales & West Housing Association Limited (Consultee ID 1230461) Re: Land at Liverpool Road, Buckley**

April 2021

## Preamble

Wales and West are a registered social landlord who have a development programme of 500 dwellings a year to meet Welsh Government targets and deliver predominately social housing. We are therefore interested in how development plan policies affect our ability to achieve this aim and to help deliver affordable housing targets.

Asbri Planning Limited has been instructed by Wales and West Housing Association to submit this Statement and attend Hearing Session 12 – New Housing Development Proposals.

The statement fully considers and addresses the HN1.1 Well Street, Buckley proposed allocation and it is noted that:

- The Well Street site has been allocated for over 20 years and has not yet been delivered. A Statutory Pre-Application Consultation (PAC) was undertaken in August 2020. However to date a planning application has not been submitted for the site some 10 months on. This clearly raises questions over the deliverability of the site.
- The Well Street Site only provides 159 units for the Tier 1 settlement of Buckley over the relatively short remaining time period of the LDP. As it has been allocated since the adoption of the UDP in 2000, over 20 years ago, this raises significant issues for Buckley if it continues to not come forward. It is entirely reasonable that delays in delivering the site could continue and these delays will only exacerbate the housing need in Buckley further. In addition, the Liverpool Road, site has been subject to a pre-application enquiry (planning ref 062288) which has provided advice in relation to the ecology, and housing requirements, to ensure that the site can be developed effectively without adverse effects on the adjoining SSSI and SAC.
- In terms of housing delivery, it is considered that the allocation of Well Street, Buckley in isolation for Buckley is not sufficient to address housing demand and the growth of the settlement moving forward. As of February 2021, Buckley has an established need for 836 affordable housing units, plus open market demand (figures confirmed by LPA as part of the pre-application process). An allocation of just one site for 159 units over the remaining plan period will go nowhere near to addressing the need and demand that currently exists.
- It is noted that there have only been 197 completions over the last 5 years. The provision of small windfall sites will also not address the housing need requirements for this settlement where demand is only going to increase.
- As the owners of the Liverpool Road, Buckley site, Wales & West confirm that the site is deliverable within the Plan period, and can be delivered quickly for a mix and range of affordable tenures, as the submission of a planning application is currently being prepared.
- The Liverpool Road site is well related to the existing settlement pattern and lies in a settlement which has a range of facilities – including an existing employment estate directly adjacent to the site's northern boundary – associated with a town with a population of some 15,000 inhabitants and should be included as an additional allocation within Buckley.

## **Matter 12: New Housing Development Proposals.**

**Key Issue: Have relevant alternatives been considered; is the identification of the housing sites based on a robust and rational site selection process? Are the sites deliverable within the plan period and will they make an appropriate contribution to the housing requirement?**

**Are the policies for the housing sites clear and reasonable?**

The Matters to be Addressed, under Question 12 of the Inspector's Matters, Issues and Questions Agenda are responded to below under the appropriate headings.

**a) Did the presence, or otherwise, of Best and Most Versatile agricultural land (BMV) influence the selection of housing sites?**

The Well Street, Buckley site is grade 3b agricultural land. As such the issue of Best and Most Versatile Agricultural Land does not appear to have been a consideration in the proposed allocation of the site. It should be noted that the site at Liverpool Road, Buckley is also grade 3b and therefore has a similar 'status' in this respect as to the proposed allocation at Well Street.

**The sites which will be discussed at the hearings are:**

**HN1.1 Well Street, Buckley**

**HN1.3 Highmere Drive, Connah's Quay**

**HN1.4 Northop Road, Flint**

**HN1.6 Land between Denbigh Rd & Gwernaffield Rd, Mold**

**HN1.7 Holywell Rd/Green Lane, Ewloe**

**HN1.8 Ash Lane, Hawarden**

**HN1.9 Wrexham Road, HCAC**

**HN1.10 Cae Isa, New Brighton**

**a) Is it clear why the sites have been selected over other candidate and alternative sites?**

In view of the above we consider that the Council's rationale regarding the selection of some sites over others is flawed. This statement will consider HN1.1 Well Street, Buckley.

The Well Street, Buckley Site has been retained and rolled forward as an existing allocation from the UDP which was adopted in 2000 – over 20 years ago. The Deposit LDP suggests that the main focus on allocations has been with the strategic sites. However the LDP does not explain why Well Street, Buckley is the only allocation for Buckley which is a Tier 1 settlement in the Deposit LDP with a population of 15,000 which is only going to increase with the Regional Growth Area designation within Future Wales – The National Plan 2040.

**b) Are the numbers of units identified realistic and achievable?**

The Well Street Site only provides 159 units for Buckley and has been allocated since the adoption of the UDP in 2000. For whatever reason this site is yet to come forward despite being allocated for over 20 years. It is noted that a PAC was undertaken in August 2020 and to date a planning application has not yet been submitted. Therefore it is possible that delays in delivering the site could continue and these delays will only exacerbate the housing need in Buckley further. However, this impact could be reduced through the allocation of an additional site at Liverpool Road, Buckley.

An emphasis on one single allocation in Buckley will fail to provide the market with a sufficient range and choice of options. Buckley is identified in Policy STR2 of the Deposit LDP as a Tier 1 Main Service Centre with the presence of key facilities and transport connections. With the lack of sites allocated within Buckley it is considered that this could result in potential future market pressure to provide the level of housing and growth projected – should either Well Street not come forward, or even in the unlikely event that it does. This could result in piecemeal developments which would not accord with PPW placemaking objectives which can be met through the site at Liverpool Road which could be delivered through the LDP.

Buckley has a population exceeding 15,000 residents (2011 Census) and a single allocation on a longstanding site for 159 dwellings is clearly inadequate for the scale and function of the town. Indeed, larger numbers of dwellings are proposed to be allocated in the Tier 2 settlements of Ewloe (298) and Hawarden (288). It is noted that over the last five years there have been just 197 completions which equates to on average just 39.4 (40) units being completed per year. To meet the housing demand for Buckley for additional sites will need to be brought forward and delivered.

Housing need figures provided by the Council as part of the Liverpool Road pre-application submission (planning reference - 062288) confirms as of February 2021 the need for 728 homes within the social rent category, 61 homes in the intermediate rent category and 47 homes in the intermediate purchase category. The full break down is confirmed below.

<b>Buckley Feb 2021</b>	<b>1 Bed Flat</b>	<b>2 Bed Flat</b>	<b>2 Bed House</b>	<b>3 Bed House</b>	<b>4 Bed House</b>	<b>5 Bed House</b>	<b>6 Bed House</b>	<b>1 bed bungalow (General)</b>	<b>1 bed bungalow (Over 55s)</b>	<b>2 bed bungalow (general)</b>	<b>2 bed bungalow (Over 55s)</b>
<u>Social</u>	311	55	128	32	29	10	3	33	88	18	21
<u>Rent</u>											
<u>Intermed iate rent</u>		7	26	25	3						
<u>Intermed iate purchase</u>		1	16	27	3						

The need and demand for all tenures of housing will only increase during the next few years, and over the remaining LDP period. In addition, the specific need identified above is only for affordable housing.

As such it is noted that Policy 7 of Future Wales – The National Plan 2040 states that opportunities to increase affordable housing supply should be considered. An allocation at Liverpool Road would ensure that Wales and West’s intention to deliver the housing within the LDP plan period can be met. As such this site would help to meet the aspirations of PPW11, the provisions of the Well-being of Future Generations Act 2015, Policy 1 (Identification of Growth Areas), Policy 7 (Affordable Housing) in Future Wales – The National Plan 2040, TAN2 (Affordable Housing), Policy STR2 (Location of New Development), Policy STR11 (Provision of Sustainable Housing Sites), Policy HN3 (Affordable Housing) of the Deposit LDP.

**c) What are the various constraints affecting the sites? In the light of constraints, and other matters, where is it set out what the requirements are for each site? Is there sufficient clarity and certainty?**

Well Street, Buckley is a greenfield site comprising of grade 3b agricultural land. It is noted that the PAC for Well Street was completed in August 2020 and to date a planning application has not been submitted. This delay raises questions over the deliverability of the site and that potential constraints could exist which would prevent it coming forward. It is noted that the Liverpool Road site which comprises similar Grade 3b agricultural land in Buckley has reviewed all constraints and the review has confirmed that the Liverpool Road site can be delivered in the short term.

In addition the site at Liverpool Road has been subject to a pre-application enquiry (planning ref 062288) which has provided advice in relation to the ecology requirements to ensure that the site can be developed effectively without adverse effects on the adjoining SSSI and SAC. Wales and West's ecologist has also had dialogue with NRW to ensure that all ecology matters are addressed as part of the application. A strategy to provide betterment and enhancement to the SSSI and SAC is possible but only if the Liverpool Road site comes forward for development. It has also been confirmed that the access proposal are agreeable in terms of the initial phases of development.

It is noted that the LPAs Background Paper 8 – Assessment of Candidate Sites and Alternative Sites (September 2019) states that in relation to the Liverpool Road site (candidate reference (BUC022) that *“the proximity of the development site to known GCN sites is such that there would be a need to ensure that there are no long-term effects upon the GCN population through agreed avoidance and mitigation measures”*. The report states that the southern part of the site could therefore be considered for development as the site would provide a buffer to the SSSI and SAC.

**d) Having regard to constraints, where they exist, as well as the need to provide for affordable housing and infrastructure, are the sites viable?**

It has already been noted in the statement that Well Street, Buckley has been allocated for over 20 years in the UDP and is yet to come forward. An EIA Screening opinion and statutory pre-application consultation was undertaken last year but to date a planning application is yet to be submitted. The reasons for this are unclear. Although it is noted in paper (FCC002 Background Paper 10a) that the site is due to start on site in May 2021 which is now incorrect. To date the Well Street site has not demonstrated it is a viable and deliverable housing site.

Wales and West Housing Association have already undertaken the required surveys for the site at Liverpool Road which have confirmed that the site does not have any significant constraints that would affect the delivery of affordable housing and infrastructure, or negatively impact on the viability of the site. The proposals are currently being finalised and the statutory pre-application consultation will begin later in April 2021, with the planning application to be submitted in June / July 2021 once Wales and West Housing Association and the design team have had the opportunity to review and address any comments for the submission. This confirms that there are no fundamental constraints relating to the site, and associated viability issues.

**e) Are the delivery mechanisms for each site clearly identified? Is the timing and/or phasing of each site clearly set out?**

The phasing and delivery of Well Street is currently unknown. It is identified within the LDP papers (FCC002 Background Paper 10A – Housing Land Supply and Delivery) that the Well Street site is noted

as due to start on site in May 2021. According to the programme within the Background Paper it is suggested that the site will deliver 53 units per year over a 3 year period (2022-2025)

The LPA's current suggested timeline for the delivery of Well Street is therefore incorrect. An outline planning application is yet to be submitted for the site despite the PAC being completed in August 2020. The timescales for delivering units on site will not be achievable. There will still be a considerable period required to gain an outline permission. Reserved Matters applications, and other consents / licenses, would also need to be secured which would then be followed by the discharge of relevant planning conditions. This could take 2-3 years as a conservative estimate to achieve which results in the site not coming forward, if an application was submitted now, until at least 2024-25. This is well into the remaining plan period and does not assist in helping to address the very real housing need that is present now in Buckley. In addition, the site has been allocated for a considerable period (20 years) which raises questions regarding deliverability.

The Development Plan Manual (2020) at Table 18 identifies that including sites from previous plans or with planning permissions requires a detailed justification to be provided. If such sites do not come forward as anticipated, or issues arise with their delivery, this can result in a shortfall of homes (this is regularly evidenced with the under delivery of LDP housing sites across Wales).

Accordingly, it is suggested in this context that longstanding housing allocations which have yet to come forward should be removed but included within settlement boundaries. Land at Well Street, Buckley is a case in point where its identification within an extended settlement boundary would allow more flexibility in terms of the number of units which may be permissible.

It has been noted that a number of local authorities have adopted this stance where deliverability issues may exist or constraints may limit housing densities on such longstanding allocations. It may otherwise be unreasonable to remove the sites completely.

It has been noted that in Examinations elsewhere local authority officers have been asked specifically by Inspectors to identify potential sites which they consider would be included within the windfall allowance, with adequate answers not being forthcoming. By referring to old allocations which remain in settlement boundaries, at least it would offer a degree of justification in terms of the allowance for windfall sites.

For the Liverpool Road site, Wales and West currently intend to deliver up to 200 homes over two phases. It is considered that should planning permission be granted that Wales and West could deliver in the region of 40-50 homes per year. This would result in a 4-5-year build programme so all homes within the site would be delivered within the LDP plan period. Therefore, the deliverability of the Liverpool Road, Buckley Site is clearly set out. Wales and West intend to commence the statutory pre-application period later this month (April 2021) with an outline application to follow in June 2021.

### Summary

In light of the above it is considered that the Tier 1 settlement of Buckley could accommodate more than one residential housing allocation in order to meet the demand and growth that is expected in the settlement of Buckley. It is noted that:

- The Well Street, Buckley site has been allocated for over 20 years and has not yet been delivered.
- The Well Street, Buckley site has the same Grade 3b agricultural land as Liverpool Road. It has been acknowledged by the LPA in background paper 8 as part of the candidate site process that Liverpool Road is able to provide enhancements to the adjoining SSSI and SAC.
- The Well Street Buckley site completed its PAC in August 2020 and to date a planning application has not been submitted which raises questions about the site's deliverability. In addition the viability of the site has never been confirmed.

- The allocation of Well Street, Buckley in isolation for the Tier 1 Main Service Settlement of Buckley is not sufficient to address housing demand and the growth of the settlement moving forward.
- Wales and West are in a position to commence the statutory pre-application consultation later this month (April 2021) for Liverpool Road with an outline application to follow as soon as possible but likely around June 2021.
- It is on this basis that Liverpool Road should be considered as a housing allocation in addition to the Well Street.