



Hearing Statement – Flintshire Local Development Plan (LDP) 2015-2030 examination

In relation to: Matter 3 – Strategic Growth

for [REDACTED] (Rep ID: 1233028)

Emery Planning project number: 14-065

Project : 14-065
Hearing : Matter 3 – Strategic
Growth
Client : ██████████
██████████
██████████)
Date : 22 March 2021
Author : ██████████

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited trading as Emery Planning.

Contents:

1. Introduction	1
2. Response to Matter 3	1

1. Introduction

- 1.1 This hearing statement is prepared by Emery Planning on behalf of [REDACTED] (Rep ID: 1233028) in relation to Matter 3 – Strategic Growth.
- 1.2 This hearing addresses matters relating to the strategic sites, which we commented upon in our representations to the Deposit consultation. We will address related housing land supply issues (including the Council's new housing land supply background paper, FCC002) through our hearing statement in relation to Matter 7.

2. Response to Matter 3

Key Issue: Is the growth strategy coherent and based on a clear and robust preparation process? Is it realistic and appropriate in the light of relevant alternatives and is it based on robust and credible evidence?

b) When were i) the Northern Gateway site and ii) the Warren Hall site granted outline planning permission? Have circumstances changed significantly since then?

c) How will their strategic allocation in the LDP improve their viability and deliverability? Are the rates forecast for their delivery in the LDP realistic and achievable?

d) How advanced is development on the Northern Gateway site? What is the reason for its allocation rather than recording it as a commitment?

- 2.1 The Northern Gateway is a site that has been identified as a strategic allocation by the authority dating back to the Flintshire Unitary Development Plan (UDP) 2000-2015. It is a complex site that is not in single ownership.
- 2.2 As discussed above, we will address housing land supply in further detail in our response to Matter 7. However, it can be noted that Background Paper 10: Housing Land Supply and Delivery (LDP-EBD-BP10) identified the following delivery timescale for the Northern Gateway site during the plan period:

- 2020-2025: 494 dwellings

- 2025-2030: 500 dwellings

2.3 Our representations to the Deposit Draft set out our view that this rate of delivery was not realistic. However, the Council's updated Topic Paper 10A (FCC002) now, without justification, anticipates the following delivery:

- 2020-2025: 620 dwellings
- 2025-2030: 565 dwellings

2.4 The Council's trajectory therefore now assumes a completely unrealistic delivery rate of 118.5 dwellings per annum from the Northern Gateway allocation during the plan period. This is despite the Council's acknowledgement in paragraph 5.3.2 of the Preferred Strategy consultation document (2017) that:

"The experience of other large sites in Wales suggests they can be difficult to get off the ground and are not delivering development as anticipated. This can have a negative effect on securing and maintaining a 5 year housing land supply from adoption onwards."

2.5 The Council has not provided robust evidence for the application of such a high build rate. Paragraph 1.2.7 suggests that the Council's evidence for the proposed build rates comprises of developer interest, progress on planning applications, and including an updated delivery statement from the agents acting for one of the landowners on Northern Gateway. In response, we would expect the Council to have assessed the local delivery record, including delivery from any similar sites in North Wales, and explain why it assumes this build rate could be applied to the allocated site. However, no such evidence is provided in the published evidence base.

2.6 The Council has not provided robust evidence to demonstrate that there will be more than one developer on site at the same time. The Council appears to be assuming that there will be at least four developers on site at the same time (as necessary to achieve 118.5 dwellings per annum), but there is no evidence to suggest how this will be achieved for the duration of the plan period. We note that the current reserved matters approval for the first 283 units is one developer only (Countryside). This should be reflected in the delivery forecasts. It is not realistic to assume 118.5 dwellings per annum from one developer.

2.7 In terms of lead-in times for the remainder of the site, which falls within two distinct land ownerships, the Council has failed to consider the following:

- how long a planning application will take to prepare, submit and be determined (if the site does not already have planning permission);
- how long it will take for the Section 106 agreement to be negotiated and agreed;
- whether an allowance needs to be made for the site to be sold to a developer / housebuilder;
- how long it will take for applications for reserved matters and discharge of conditions to be made, considered and approved;
- whether there is infrastructure that needs to be put in place before the site can start delivering dwellings and how long this will take; and
- whether there are any other site-specific considerations which would affect a start on site.

2.8 To conclude, the Northern Gateway will not deliver anywhere near the level of housing the trajectory currently anticipates during the plan period. We will discuss the housing land supply implications, including the resultant issues of soundness, in our response to Matter 7.