

**Flintshire County Council**

**Local Development Plan (LDP) Examination**

## HEARING STATEMENT

---

---

### **Hearing Session 3: Strategic Growth (including Strategic Sites)**

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

March 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 3 – Strategic Growth (including Strategic Sites).

The site in question, land at Liverpool Road, Buckley was promoted as a Candidate Site (BUC 22) and subsequently representations were submitted on the Deposit Plan (Ref: 926).

The site was previously assessed by the Council as Amber and it was acknowledged that it complied with the preferred strategy and was well sited in relation to Buckley, surrounded on 3 sides by development.

The Council stated in the assessment of the candidate site that the main barrier to its inclusion as a housing land allocation related to the ecological issues with the presence of the SSSI and SAC. It was indicated that a smaller land parcel on the southern side of the site could be more appropriate for inclusion in the LDP.

An amended area was subsequently submitted for consideration as an Alternative site in line with the provisions of the Development Plan Manual.

The site area was subsequently reduced from 12.4 hectares to 5.3 ha with the reduced area having the ability to deliver approximately 120 units, along with ecological mitigation, Suds and open space and can be designed to allow for future growth into the adjoining additional land if considered appropriate in the future. The public footpath would form the access road into the site and all development would be to the south of the existing footpath. This would leave a significant buffer to the GCN SSSI/SAC.

As the owners of the site, Wales & West confirm that the site is deliverable within the Plan period, and can be delivered quickly, as the submission of a planning application is currently being prepared with a target date of April 2021 for submission.

The site is well related to the existing settlement pattern and lies in a settlement which has a range of facilities associated with a town with a population of some 15,000 inhabitants.

### **Matter 3: Strategic Growth (including Strategic Allocations).**

**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?**

The Matters to be Addressed for each site, under Question 3 of the Inspector's Matters ,Issues and Questions Agenda are responded to below under the appropriate headings.

**a) What is the justification for adopting an aspirational growth strategy, led by an ambitious target for new jobs?**

The Local Development Plan identifies sites to accommodate 7,950 dwellings to deliver a housing requirement of 6,950, which includes a flexibility allowance of 15%.

Regardless of the disablement of TAN 1, the Council is still required to monitor housing land supply and to collate the information as part of the evidence base for the LDP. The Council therefore produces an annual monitoring report which follows the guidance in TAN1 and contains the Council's estimates of the number of units likely to be completed in the next five years. The latest is the 2019 study which shows a calculated supply of 3041 units.

In the 5 years (2015 – 2019 inclusive), since the 'end' of the Unitary Development Plan (2000-2015), the monitoring report shows annual average completions of 543, against an average annual LDP requirement of 463 (6,950 /15). This reflects a period during which the Unitary Development Plan was out of date. It is considered that these relatively high numbers were a result of the time lag it took in adopting the UDP (2011), so it only had a 'compacted' 4 years left to run. Also the release of UDP sites which were proposed for allocation, but not allocated, ultimately came forward for housing as well in the absence of an up-to-date plan.

It is apparent therefore that the ten years which remain in the LDP period should make provision for a higher housing target, particularly as, given the number of dwellings already delivered in the first 5 years of the plan period, the remaining residual requirement will be reduced to just 423.5 (6,950 - 2715/10).

Furthermore the employment-led growth forecast needs to address potential consequences of the Covid pandemic by making appropriate provision for growth in order to compensate for job losses in those sectors most at threat, including the aero industry and hospitality. Additional housing numbers should reflect this, particularly in order to bolster the construction sector.

As well as the above considerations, there is also the need to increase the range and choice of allocated sites due to the high level of dependency on the two strategic sites identified, which amount to some 24% of the number of new dwellings allocated (1,625 dwellings). This is discussed in detail below under the responses to the related questions.

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

Northern Gateway

Outline planning permission (ref: 050125) was granted on 13<sup>th</sup> May 2014 for the Pochin Goodman Land and, on 7<sup>th</sup> January 2013 (ref: 049320) for the northern part of the site by Crag Hill Estates. Both were granted a 7 year permission and 5 years to submit the reserved matters. The Northern Gateway site is already a commitment as both of these outline permissions envisage large scale residential development.

Progress has been made on the southern part of the site since the Deposit stage of the LDP with an application being made to relax conditions (ref: 059635) relating to the highway conditions which allows more phases of development to come forward before highway improvements are required.

This raises two issues;

1. Should the site be included as an LDP allocation given that the reserved matters for the residential elements are currently progressing on site, and have advanced as demonstrated by the following;
  - a) Application 059514 283 units by Countryside properties approved 25<sup>th</sup> September 2019 – under construction
  - b) Application 060411 for 129 dwellings by KeepMoat approved subject to S106 4<sup>th</sup> March 2020
  - c) Application 061585 104 units by Lane End Developments which is under consideration and was valid on 27<sup>th</sup> July 2020
- 2) Is the site capable of delivering the anticipated number of units in the plan period? Although applications are now coming forward the length of time it has taken to get to this stage is considerable in housing delivery terms. A further application (ref: 062409) for the reserved matters for the infrastructure works to enable the residential phases 1b,2 & 3 to come forward has been submitted for consideration. While this is positive step forward it does question the LPA's timeframe to deliver the site and how deliverable the suggested numbers are in the plan period.

Warren Hall

In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation.

The Outline Planning Permission (ref: 038744) for the business park allocation in the UDP had a planning condition imposed indicating that foul drainage improvements and extensions were required prior to any development on the site. Are the LPA aware if a solution to this been found, otherwise this could still be a barrier to the site coming forward? Although an application was submitted for the reserved matters for the business park, we understand that this was eventually withdrawn as obviously issues over the site could not be overcome. This brings into question the LPA's proposed deliverability timeframes of this site in the LDP

**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?**

In terms of their viability and deliverability the two sites are considered in turn below. In our view as both of the sites have outline planning permission their allocation should not make any material difference to their viability and deliverability.

Northern Gateway

Concerns remain with regards to the Pochin Goodman part of the Northern Gateway Site and its ability to deliver the level of housing envisaged. The high level masterplan and delivery statement which has been prepared for this part of the Strategic Site provides an indication of the infrastructure which will be required and the anticipated timescales when development is expected to commence. 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. This has only just been submitted for planning 062409 and is yet to be consulted upon.

The Northern Gateway site is a complex and difficult site to develop. There are abnormally high development costs that have necessitated significant public sector financial assistance. Even with this support the technical and ground condition difficulties and on-site constraints have necessitated the large housing element as 'enabling development' despite the description of the regeneration project as being 'employment led'. This is misleading as development for employment purposes would not be financially viable and it is dependent on the largest housing allocation in the Plan, albeit wholly within a C1 flood risk area.

There have been massive injections of public funding from the EU, UK and successive Welsh Governments following the closure of the former Shotton Steelworks with the loss of 15,000 jobs. That level of support is no longer available due to the high level of protection which is now given to the Dee estuary. It is also important to acknowledge that the inward investment mobility that Wales experienced at the time has long gone and employment land take up rates have substantially reduced infrastructure and ground preparation.

Strategic allocations can be slower to be built out as the market becomes saturated and delivery rates can slow in subsequent phases as evidenced on the UDP allocation at Croes Atti, Flint. However the Council's trajectories show completions increasing into the Plan period on the Northern Gateway site.

The 2019 Council's Housing and Supply and Delivery Background Paper (January 2021) (Document FCC002) refers to the 1,185 dwellings proposed 'NW of Garden City', with 90 completions forecast for 2020/2021 and 2021/22, 150 in the two years 2022/23 and 2023/24, with 120 for the following years up to 2028/29 when completions are 105. The remainder, 140, are categorized as outside the 5 year supply.

The scale of completions forecast has not recently been experienced on any other comparable large site in Wales. Examples include the Glan y Llyn (former Llanwern Steelworks site) in Newport and the Plas Dwr site in Cardiff, in both cases where several housebuilders are on site but where figures for units under construction have yet to average 100 a year.

Including some 600 dwellings within the 5 year land supply is therefore unrealistic. Competitor sites will be coming forward, not only in Flintshire but in West Cheshire and Chester City, including Wrexham

Road, Chester and large developments in Ellesmere Port, where several outlets will be developed by major housebuilders.

In the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date. Given the points set out above, the discounted figure should be much higher and alternative sites such as Liverpool Road, Buckley should be allocated to compensate for the resulting shortfall.

### Warren Hall

Policy STR3: Strategic Sites allocates Warren Hall for 300 new homes, 22.7 hectares of B1 and high quality B2 employment land, a commercial hub involving hotel, leisure, local centre and retail; plus associated landscaping and transport links.

The site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable.

In addition, the location of Hawarden Airport which is located approximately 2 km to the north-west of the Warren Hall site will inevitably impact on the height of dwellings which can be brought forward on the site. Consequently the development density and numbers which can be achieved overall are likely to be fewer than envisaged.

The 2019 Council's Housing and Supply and Delivery Background Paper (January 2021) (Document FCC002) refers to the site as delivering 30 dwellings in 2023/24 and 45 a year up to 2029/30. This is optimistic given the issues highlighted above.

In response to Question c) therefore it is disputed that their strategic allocation in the LDP will improve their viability and deliverability and the rates forecast for their delivery in the LDP is not realistic or 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?**

It is considered that the site should be identified as a commitment rather than a strategic site allocation as set out above.

### **e) Is there enough site-specific guidance and information in the LDP to satisfactorily address the individual circumstances, including constraints, on the two strategic sites? Are there master plans or development briefs for them? How will the principles of placemaking be applied to these sites?**

The above matters are for the Council to address.