



Hearing Statement

Flintshire Local Development Plan – Matter 3:
Strategic Growth

on behalf of:

Anwyl Homes

Land between Denbigh Road
and Gwernaffield Road, Mold

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Prepared by

SATPLAN LTD,
The Bridgewater Complex,
36 Canal Street,
Liverpool L20 8AH

www.sat-plan.co.uk



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1. INTRODUCTION & CONTEXT

Purpose

- 1.1 This Written Statement has been prepared by SATPLAN LTD in connection with the Examination in Public of the Flintshire Local Development Plan (LDP).
- 1.2 It specifically addresses the Inspectors Matter 3 (Strategic Growth) and the issue of 'Whether the growth strategy is coherent and based on a clear and robust preparation process.'
- 1.3 This Statement also addresses the additional questions raised by the Inspector in relation to Matter 3.

Context

- 1.4 The context of this Statement concerns land between Denbigh Road and Gwernaffield Road as indicated on the plans below. A Vision Document also supports the promotion of the Site.



- 1.5 The Site is in a single ownership and has now been allocated for 246 dwellings within the LDP Submission Draft (Allocation HN1-6 Land between Denbigh Road and Gwernaffield Road).
- 1.6 The Site has been promoted at earlier stages of Flintshire Local Development Plan on behalf of Anwyl Homes. As the Site benefits from single ownership and is subject to a contract with

Anwyl Homes. It can therefore be delivered comprehensively and is currently subject to a live planning application (ref 061994).

References

- 1.7 This Written Statement relies upon and should be read in conjunction with the documents constituting the Examination Library.



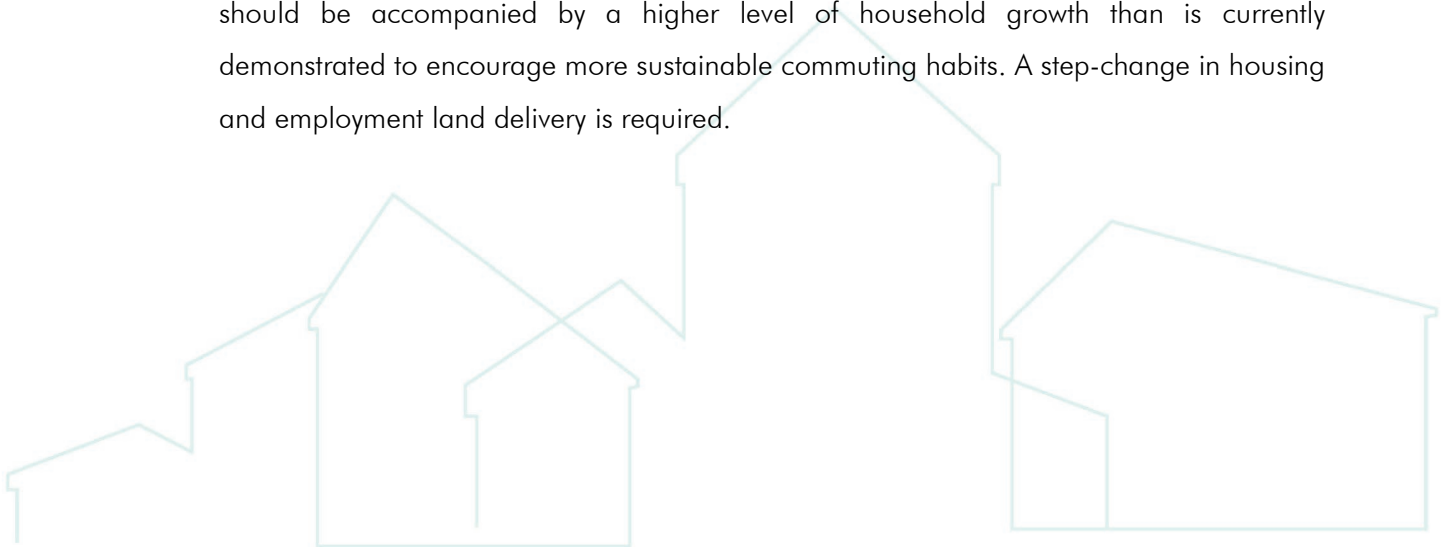
2. RESPONSE TO MATTER 3- STRATEGIC GROWTH

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?

Question 3a) What is the justification for adopting an aspirational growth strategy, led by an ambitious target for new jobs?

- 2.1. In general, we support the Plans Strategy which is based on an aspirational approach to job creation and employment development. In principle, the employment-led projection allowing for 8-10,000 new jobs within the plan period is generally supported and would enable the Council to deliver on their aspirations for Enterprise Zones and help to ensure that key strategic employment sites deliver significant employment during the plan period. It is considered that planning for this level of employment is ambitious yet realistic, and a higher level of household formation could be achieved and therefore should be planned for.

With this in mind, if the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A step-change in housing and employment land delivery is required.



Question 3b) When were i) the Northern Gateway site and ii) the Warren Hall site granted outline planning permission? Have circumstances changed significantly since then?

Question 3c) 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?

2.2. We have reviewed the Council's response to the Inspectors Preliminary Questions [FCC001] and are encouraged by the documented and more recent development progress which is now evident on the Northern Gateway Site. The recent key permissions set out in Question 10 demonstrate that the site is progressing well and appears deliverable.

2.3. This assertion is supported by an imminent planning application for the Airfields part of the Strategic Site by Anwyl Homes and Bellway Homes for Plots H3, H4, H5, H6, H7 & H8a for a minimum of 438 units. The predicted delivery rates and timeframes are provided in the table below.

PLOT	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
H3					20	32					
H4							48	24			
H5					10	48	32				
H6/H7/ H8a			80	80	58			6			

2.4. We do however, have greater concerns with regards to the Pochin Goodman part of the Site and its ability to deliver the level of housing envisaged. The very 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 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.

- 2.5. In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP acknowledges that the delivery of the Warren Hall 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. We do not dispute this assertion but consider that 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.
- 2.6. 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. Whilst bungalows would help to provide an alternative mix of housing on the site, the development density and numbers which can be achieved overall is likely to be fewer than envisaged.
- 2.7. Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites.
- 2.8. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that *"Flintshire County Council have adopted a pragmatic approach to show that there are no major 'showstoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place."* This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of such large sites.
- 2.9. An updated Housing Balance Sheet is provided within document FCC002, Table 1A (1/4/20) Given the lack of delivery during the UDP period we continue to doubt whether it

is realistic to assume that the remaining 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.

Question 3d) How advanced is development on the Northern Gateway site? What is the reason for its allocation rather than recording it as a commitment?

2.10 Response- See response to Questions 3b & 3c in relation to the development on the Northern Gateway Site.

Question 3.6e) 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?

2.11 Response- Question for Council to address.

