

# EiP Statement

## Flintshire Local Development Plan 2015 – 2030

### Taylor Wimpey UK Limited

#### Representor ID: 1224983

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**Our ref** 60174/05/CM/NMi  
**Date** April 2021

**Subject** **Matter 7: Provision of Sustainable Housing Sites (including housing requirement)**

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### 1.0 Introduction

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [TW] to make representations on its behalf to the Flintshire Local Development Plan 2015 – 2030 [FLDP].
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 7 Examination in Public [EiP] hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 4: Location of Development
  - 2 Matter 3: Strategic Growth (inc Strategic Sites)
  - 3 Matter 12: New Housing Development Proposals (incl Density and Mix)
  - 4 Matter 16: Green Barriers
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the FLDP [Representor ID: 1224983].
- 1.5 These representations are made in relation to Taylor Wimpey's land interests in Mynydd Isa, namely the development of the Ffordd Fer site [the Site]. The Site has been promoted for residential development through the emerging FLDP but has not been identified as an allocation.
- 1.6 This statement expands upon TW's previous representations made throughout the FLDP preparation process in light of the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness in the Welsh Government's Development Plans Manual [DPM], Edition 3 (March 2020) and the relevant national planning guidance.

## 2.0 Planning Issues

### Key Issue:

**Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?**

*a) Is the housing requirement, based as it is on economic and job aspirations, realistic and deliverable within the plan period? How does the amount of housing proposed relate to the most recent Welsh Government household projections? Has the UDP under-delivery been accounted for in the LDP housing requirement figure? If not, should it be?*

- 2.1 We set out in detail in our representations to the Deposit FLDP concerns with both the proposed housing requirement and Flintshire's economic growth targets. It is considered that the Council should be planning for a higher housing requirement and a more aspirational job growth target and the two should be aligned.
- 2.2 It is considered that the Council, as a minimum, should be planning for the upper end of the housing requirement (as set out on page 29 of the Deposit Draft LDP), which identifies 490 dpa. This would increase the housing requirement to 7,350 rather than 6,950; and a flexibility allowance should be added to this higher figure. This would derive a housing figure of 8,410 for the Plan period.
- 2.3 Identifying a higher housing requirement would better align economic growth and housing need. Currently, there appears to be a misalignment with the Council's economic evidence base, particularly the 'Further Employment Growth Scenarios Assessment', undertaken by BE Group (2015). This states that for Option 4 (shown on page 29 of the FLDP) which identifies a housing requirement of 440 dpa, there is a net land requirement of 22.6ha and 3,204 jobs would be required (as detailed in Table 2 of the BE Group Report). In the FLDP, the Council is pursuing a jobs target of around 3-times higher than 3,204 jobs but a housing target of only 5% higher than 440 dpa. It is therefore not clear to TW why there has not been an equivalent increase in housing requirement to support the very significant increase in jobs being planned for in the Plan.
- 2.4 In this regard, we note the comments in the later BE Group Document 'Employment and Housing Advice' which seeks to provide clarification on the projections, terminology and the relationship between employment and housing projections. It notes that there is not an exact and direct relationship between housing and jobs and advises that the +8000-10,000 jobs/6,950 dwelling growth scenario identified should only be read as indicative.
- 2.5 TW would also note that in the Council's Technical Paper there is a linear relationship between job growth and new dwellings assuming that, despite an ageing population, 1.24 extra jobs will be supported for every additional dwelling. TW considers this is not appropriate as, for example, this does not account for the existing labour supply coming back to work and assumes that all new residents will work in Flintshire and not commute out. TW would query whether this assumption is realistic and suggests that the housing requirement is increased to ensure the job target is achievable and matched by an appropriate housing supply.
- 2.6 Furthermore, the need for Affordable Housing as set out in the National Development Framework [NDF] (Policy 7) is significant, comprising 3,500 homes a year over the five-year

period 2019-2024. Across the North Region, the Welsh Government estimates 16,200 additional homes are needed in the region until 2039. Policy 20 states that over the initial five years (2019-20 to 2023-24) 53% of the additional homes needed should be affordable homes. This equates to 2,146 affordable homes over this period or 429 affordable homes per annum. This huge need for affordable housing can only be delivered by allocating more land for housing and boosting the supply. Flintshire's Local Housing Market Assessment [LHMA] 2018 identifies an annual shortfall of 238 affordable homes, yet the Affordable Housing Background Paper (2019) notes a target of only 132 dpa. Therefore, the need for affordable housing is not currently being addressed within the Deposit Plan which does not provide enough affordable housing to cover Flintshire's own need to support the NDF targets.

- 2.7 TW notes that the most recent 2018 -based household projections were released in August 2020 (as a revised version of projections originally published on 27 February 2020 caused by incorrect processing of cross-border flows between Wales and England, resulting in the projected mid-2028 population for Wales being approximately 65,000 too low). The projections suggest a rise in the number of projected households in Flintshire for the period 2015-2030 (4,001 households/267 per annum)<sup>1</sup> compared to the figures for the equivalent period using the 2014-based projections (3,757 households/250 per annum) and the 2011-based projections (3,439 households/229 per annum). However, the Council does not appear to have provided any evidence which considers the implications of these latest projections in a transparent manner. From a broader perspective, TW consider that the household projections do not reflect national and local committed strategies for economic growth and regeneration and fall far short of actual housing need in Wales. However, the Council should still consider their implications given that they represent the most up to date evidence available.
- 2.8 As noted above, TW also considers that the housing requirement should be significantly higher based on an alignment with an economic aspiration aligning with the growth objectives of the Welsh Assembly. As noted in our response to Matter 3, TW supports the premise of Flintshire pursuing a job growth target but considers that the Council is not being sufficiently aspirational with its job growth and the target bears no correlation to the importance of Flintshire in delivering planned economic growth in North Wales. TW disagrees with the content of §5.6 of the FLPD which ascertains that the strategy set out in the Plan “*is deliberately focused on supporting employment growth*”. This is not the case. The growth being pursued does not align with national aspirations.
- 2.9 Flintshire, alongside five local authorities and other bodies in North Wales, has joined the North Wales Economic Ambition Board [NWEAB] and has adopted ‘A Growth Deal for North Wales’ up to 2035. The NWEAB aims to grow the value of the economy by 2.8% per annum and create over 120,000 new jobs, to align with the aspirations of the Northern Powerhouse and build the economic link to the north west of England. Flintshire also forms part of the Mersey Dee Alliance [MDA] which recognises the shared economic interests across the West Cheshire, Wirral and North East Wales area.
- 2.10 There is a strong growth ambition for North Wales based on the North Wales Growth Vision and numerous documents that support this. TW does not consider that the proposed housing figure fully supports the ambitions of growth in the area and there is a mis-match between the basis of employment land policies and the economic aspirations of the Council itself as part of the wider economic thrust for the area, which should be underpinned by supporting and aligned housing growth. Housing is a driver of economic growth and a well-functioning housing market is

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<sup>1</sup> Using the 2015 base population from the 2014 projections to cover the plan period.

important for an area to remain competitive and attractive to businesses and economic activity which promote growth, in line with the aspirations of the NWEAB and Welsh Government. The Council, in its Rebuttal Statement to our previous representations<sup>2</sup>, suggests that Flintshire is already contributing significantly towards the Growth Vision. It seeks to justify this point by comparing average delivery over the first 4 years of the LDP period (536 dpa) to the planned housing growth rate of 530 dpa (including flexibility). However, this doesn't suggest a pro-growth position. It suggests that the LDP is planning for a lower growth rate than the average completion rate achieved, which TW also notes has been achieved without an adopted LDP in place. In addition, TW notes that, excluding flexibility, the annual housing requirement of 463dpa is significantly below the average completion rate identified. TW therefore considers that a much higher housing requirement than 463 dpa should be considered as an achievable target in the Local Plan going forward.

- 2.11 Flintshire (as part of Deeside), alongside Wrexham, is the driving force behind growth in North Wales and makes a significant contribution to the Welsh and UK economies. As such, the Wrexham and Deeside area is identified as the main focus for growth and investment in the North region as set out in the NDF. Policy 20 of the NDF emphasises that LDPs across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure. The NDF sets the direction of development in Wales, and Policy 20 looks at strategic development issues across North Wales and identifies areas for growth including Buckley (2.5km from TW's site at Mynydd Isa). Again, TW does not consider that the Council's proposed housing figure aligns with Welsh Assembly's aspirations for Flintshire as a key driver of growth in North Wales.
- 2.12 In conclusion, Lichfields does not consider that Flintshire, within its FLDP, is planning for enough jobs to fully support the drive from the Government for economic growth in North Wales. If the Council re-evaluates its jobs growth figures to be more aspirational then there would be a corresponding need for increased housing numbers to support job growth.
- 2.13 TW considers that its site in Mynydd Isa, which is well-located in relation to both Chester and Wrexham would support the Council and the wider strategic focus on this part of North Wales.
- 2.14 In conclusion, TW considers the FLDP does not meet:
- 1 Soundness Test 1 as the evidence base does not provide sufficient justification as to why the Council has not chosen to meet the upper end of its objectively assessed housing need to support the wider regional and national economic growth ambitions.
  - 2 Soundness Test 2: as the plan is not aspirational in terms of growth and does not seek to meet the full assessed need. Delivering more homes boosts economic growth and provides significant benefits in terms of creating employment.
  - 3 Soundness Test 3: as Policy STR1 is not effective and does not plan for appropriate housing requirement to implement and support economic growth.
- b) Although neighbouring counties each provide for their own housing needs, does the differential in prices, particularly between England and Wales, lead to any cross-border demand for housing? If so, has this been accounted for?*
- 2.15 TW has no comment on this matter.

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<sup>2</sup> LDP-EBD-HP13 Rebuttal Statement (March 2020)

*c) The 14.4% flexibility allowance is slightly greater than average. On what basis has that percentage been selected?*

2.16 The DPM advises that the level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility. TW supports the inclusion of a 14.4% uplift in the total supply over and above the housing requirement, which is in excess of the starting point suggested in the DPM. It is considered that this is appropriate, and that the flexibility allowance will assist in overcoming uncertainties regarding housing deliverability and viability.

*d) Is the housing requirement over reliant on the provision of dwellings on windfall and small sites?*

2.17 Whilst TW accepts that the Council has applied a 50% reduction in past trends<sup>3</sup> when identifying the windfall allowance, the large number of windfall sites must be viewed in the context of Flintshire not having an up to date LDP, which allocated housing sites. Once the FLDP is adopted, it is reasonable to assume that the delivery of units from windfall sites will be significantly reduced. Accordingly, TW requests that the Council places less reliance on the delivery of windfall sites contributing to its housing supply and instead plan positively by identifying an appropriate level of allocations particularly bearing in mind the uncertainty over the supply of windfalls and the relatively short plan period.

2.18 To account for housing shortfall created by this reduced windfall allowance, TW would request that the Council identifies sufficient housing land within the FLDP, such as TW's site at Mynydd Isa, which is available to meet the housing requirement.

2.19 The updated housing balance sheet and trajectory in the Council's Housing Background Paper (January 2021) incorporates a zero large sites windfall contribution for the first two years in accordance with the requirements of the DPM. This approach is supported by TW.

*e) Do rates of housing delivery over recent years indicate that the housing requirement firstly, could, or secondly, should, be increased?*

2.20 The Council's Housing Background Paper<sup>4</sup> identifies the following completions between 2015 and 2020:

Table 1 Delivery Rates

Year	Completions
2015-2016	662
2016-2017	421
2017-2018	608
2018-2019	454
2019-2020	464

Source: Flintshire Background Paper FCC002

2.21 The table above shows an average past delivery rate of 522 dpa. It is not, therefore, clear to TW why the Council, who claims to be pursuing a housing figure that supports economic growth, have put forward an annual housing requirement (463dpa) that is less than the completion figures over recent years. If the Council can deliver these rates without a Plan in place, TW

<sup>3</sup> FCC002 Background Paper 10A : Update re Housing Land Supply and Delivery (January 2021) §2.5.5

<sup>4</sup> FCC002 Background Paper 10A : Update re Housing Land Supply and Delivery (January 2021), page 7

considers that a much higher housing requirement should be considered as an achievable target in the Local Plan going forward. Essentially, the Plan is planning for housing and economic decline.

*f) Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?*

2.22 Whilst TW has no objection in principle to the allocation of committed sites, it is not clear why sites would need to be allocated if the Council is confident that they will be implemented prior to planning permission lapsing and will deliver dwellings over the plan period. Care should also be taken to ensure that there is no ‘double counting’ of dwellings in the housing land supply in calculating the number of committed and allocated dwellings.

2.23 In any event, for the reasons set out in this statement and our responses on the other matters, TW considers that the Council has identified insufficient housing land and additional land should be allocated within the FLDP to reduce the reliance on large strategic sites and windfall development. TW’s site at Ffordd Fer is in a sustainable location and well-positioned to provide additional housing need. As a consequence, the Ffordd Fer site should be allocated in the plan.

*g) Is it likely that all the committed sites identified as contributing to the housing requirement (LDP Appendix 1), and allocations which are carried over as such from the UDP, will be delivered during the plan period? What is the evidence?*

2.24 As set out in our representations to the Deposit FLDP, we consider that there is a clear need to identify more non-strategic housing sites in the FLDP in order to help deliver housing across the Plan Period. TW has significant concerns with the Council’s housing supply and considers that a diverse range and choice of sites are required to ensure a continuous supply of land.

2.25 The Housing Background Paper<sup>5</sup> notes that the Deposit LDP allocates land for some 3,168 residential units over the Plan period, and the trajectory indicates that 1,485 dwellings are on two Strategic Mixed Use allocations at Warren Hall, Broughton, and Northern Gateway, Deeside. TW considers that further evidence needs to be provided to confirm the delivery trajectories identified for these strategic sites. The Housing Background Paper indicates that delivery on these sites alone over the plan period, represents 21% of the Council’s housing requirement of 6,950 dwellings. The Statement of Common Ground for Warren Hall<sup>6</sup> suggests that it does not currently benefit from planning permission for residential development and is not subject to a current planning application. TW would therefore invite the Council to provide the evidence to illustrate how the build rates identified for the sites have been derived.

2.26 TW is also aware that there are a number of non-strategic housing allocations that have been brought forward from the UDP. The deliverability of some of these sites is also questionable. For example, TW questions the delivery of smaller allocations such as Well Street Buckley (159 dwellings) and Highmere Drive Connah’s Quay (150 dwellings). These sites have been allocated for nearly 10 years but have yet to be developed and the Housing Background Paper records that neither has planning permission. The Statement of Common Ground for Highmere Drive<sup>7</sup> indicates that it is not currently subject to a planning application for residential development.

<sup>5</sup> FCC002 Background Paper 10A : Update re Housing Land Supply and Delivery (January 2021) §2.6.1

<sup>6</sup> SOCG007 Statement of Common Ground STR3B Warren Hall (February 2021)

<sup>7</sup> SOCG001 Statement of Common Ground HN1.3 Highmere Drive, Connah’s Quay



They have failed to deliver in the past, there is no convincing evidence to demonstrate that they are deliverable and will come forward over the remainder of the FLDP period.

2.27 TW therefore considers that additional sites should be allocated for residential development to ensure that the Council can meet its housing requirement. The Ffordd Fer, Mynydd Isa site would represent a sustainable location for new development on the edge of existing settlement, and its allocation would align with national planning guidance, in the absence of suitable previously developed land (which is acknowledged in the §7.13 of the FLDP). The site is supported by excellent local infrastructure and well located to access the existing services and public transport facilities in Mynydd Isa, as well as the wider area. The site also falls entirely within Flood Zone A so is not considered to be at risk from flooding as detailed in the supporting Delivery Statement.

2.28 TW has proposed to build 580 high quality dwellings at densities ranging between 30 and 38 dwellings per hectare which is considered to be an effective use of land. There has been a focus on placemaking to ensure that the scheme is well designed, fits into the wider spatial context and creates a safe and attractive place for local people to live. The site features an open village green and a green infrastructure network which provides pedestrian and cycling routes into the services of Mynydd Isa. It is considered that this would enhance the biodiversity potential of the Site which is currently considered to be of limited ecological value.

*h) How does the LDP avoid the issue of double counting in respect of large windfall sites?*

2.29 The updated housing balance sheet and trajectory in the Council's Housing Background Paper (January 2021) incorporates a zero large sites windfall contribution for the first two years in accordance with the requirements of the DPM. This approach is supported by TW.

*i) What will be the implications for the delivery of the housing requirement of the comparatively short plan period remaining at adoption?*

2.30 TW has concerns regarding the proposed plan period as, assuming an adoption of the FLDP in 2021 at the very earliest, this will only effectively cover a 9-year period. TW considers that it would be more appropriate to look forward to a 15-year or 20-year plan period post adoption to provide more long-term certainty over housing delivery and ensure the longevity of the Plan particularly bearing in mind the length of time Flintshire's last Plan was adopted (2011) and expired (2015) and the time taken to get this plan to EiP stage. A longer time period would align more closely with the aspirations of NDF which looks forward to 2040. Consequently, it is recommended that the plan period is extended until at least 2036 (i.e. 15 years post adoption).

2.31 TW's site at Mynydd Isa is available and deliverable to meet housing need in the short term.

*j) Is the wording of Policy STR11 appropriate, particularly the use of the word 'expected' and the inclusion of the final paragraph?*

2.32 TW supports the inclusion of a policy promoting sustainable housing sites, which should help to ensure that the Council delivers the housing requirement and reduce the likelihood of the need for a plan review. However, TW has concerns over the generality of the policy which may cause uncertainty for developers. In particular:

- 1 It is not clear what is required in Part i of this policy in regard to affordable housing provision. TW would question whether Part i is required, as there is a separate affordable housing Policy (Policy HN3) which covers this provision.

- 2 As currently worded, the Part ii of Policy is vague and ineffective and needs to quantify what is meant by ‘appropriate density’.
- 3 With regard to Part iv, It is not clear from the Council’s Local Housing Strategy that the requirement for specific housing has been considered separately to the objectively assessed housing need. It is important that these housing requirements are considered separately, given that the needs of the future occupiers are different. Furthermore, it does not appear that the cost of delivering specialist housing has been considered within the Viability Report. It is important that the cost to deliver these requirements are based on robust evidence so as not to impact the viability of development proposals.

2.33 The final paragraph of the policy and explanatory text should be re-worded to reflect the revocation of TAN1 and the new policy approach set out in National Planning Guidance where the housing trajectory, as set out in the adopted LDP, will be the basis for monitoring the delivery of development plan housing requirements as part of LDP Annual Monitoring Reports (AMRs). The DPM requires that where there is a shortfall of cumulative housing completions for 2 consecutive years, LPAs must consider the scale of any deficiency and set out its conclusion/monitoring action in terms of implications for delivering the requirement level homes/strategy. The Policy should clearly explain what the Council would do in these circumstances.