

**Flintshire County Council**

**Local Development Plan (LDP) Examination**

## HEARING STATEMENT

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### **Hearing Session 7: Provision of Sustainable Housing Sites**

**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 7 – Provision of Sustainable Housing 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 and surrounded on 3 sides by development.

The Council stated in later stages of 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 7: Provision of Sustainable Housing Sites.**

**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?**

The Matters to be Addressed for each site, under Question 7 of the Inspector's Matters ,Issues and Questions Agenda are responded to below under the appropriate headings.

**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?**

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.

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, in summary there is also the need to increase the range and choice of allocated sites. This is also 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).

**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?**

The above matter is for the LPA to comment on.

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

The above matter is for the LPA to comment on.

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

The above matter is for the LPA to comment on in detail. There is however a need to widen the range and choice of allocated housing sites, particularly in towns such as Buckley which have been identified as being sustainable by the LPA in order to ensure the soundness of the LDP.

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

This is covered under point a) above.

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

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 strategic 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.

**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?**

The Northern Gateway area and Warren Hall Development site which are proposed to provide for 1,625 homes between them over the plan period. There appears to be a heavy reliance on these sites to deliver 24% of the new homes required. Specific issues relating to delivery of these sites has been covered under Matter 3.

As is commonly accepted 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 2019 Monitoring Report refers to the 1,325 dwellings proposed 'NW of Garden City', with 100 completions forecast for 2021, 120 in 2021, 220 in 2023, and 220 in 2024, with the remainder, 665, outside the 5 year supply.

The scale of completions forecast has not recently been experienced on any other comparable large

site in Wales. An example is the Glan y Llyn (former Llanwern Steelworks site) in Newport where the maximum number of completions in one year to date has been 155 (March 2018 to April 2019). Similarly the Plas Dwr site in Cardiff, a greenfield site with 3 housebuilders involved, only achieved 128 completions in 2018/19.

Including 660 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.

In terms of Warren Hall 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.

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

The above matter is for the LPA to comment on.

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

It is apparent 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).

**j) Is the wording of Policy STR11 appropriate, particularly the**

The above matter is for the LPA to comment on.