

## Flintshire Local Development Plan Examination

### Notes on behalf of Redrow Homes Ltd (1148956) in relation to the Inspector's Schedule of Matters, Issues and Questions.

#### Issue 12 – New Housing Development Proposals.

##### HN1.1 – Well Street, Buckley (159 dwgs).

This site was initially allocated for housing in the current UDP, but has not been brought forward in the subsequent ten years. No SoCG has been provided to give an update as to why, after all this time, the site should now be regarded as one that can be relied upon in terms of delivery.

It is noted that there was apparently a PAC undertaken on this site in the middle of last year, but it is not known what the outcome of this exercise was or whether any significant issues may have arisen. It is understood that Clwyd Alyn have had an interest in the site, but it is not known whether this is still the case or whether they have funding in place for their development proposals. However, what is apparent is that there is still no planning application for the development of the site.

A screening opinion was submitted in August of last year (061706) relating to an outline application for up to 150 dwellings, this indicates that the application process will involve both outline and reserved matters submissions which will lengthen the process before development can commence. The current trajectory envisages 53 dwellings being delivered in 2022/23, this is clearly unrealistic, even if an outline application was submitted in the next few weeks, it is unlikely with the need for subsequent reserved matters approval that there would be a start on site before 2023/24 and 53 completions in year 1 seems very optimistic – we would suggest half that number might be more likely.

The need for improvements at the wastewater treatment works, referred to within the Welsh Water SoCG, for which there does not appear to be any date programmed, seems likely to delay development for a much longer period

However, in the absence of detailed information to the contrary, a site that has not delivered housing on the back of an allocation over a ten year period should not be relied upon at all, other than as a potential windfall.

HN1.3 – Highmere Drive, Connahs Quay (150 dwgs).

It is noted from the SoCG that Edwards Homes have an interest in the site, although their letter indicates that contractual terms have been agreed as opposed to them being formally entered in to. We further note that Edwards Homes are not a signatory of the SoCG and give no detailed indication in their letter of the timescale for the delivery of development other than indicating that they will still be undertaking survey work, presumably in preparation for an application, in the Summer of this year, they do, however, suggest that the revised trajectory is “achievable” (which is different to saying that it is in line with their programme).

A timescale for development that would seem realistic is as follows:

- Completion of background research/application preparation – late Summer 2021.
- Pre-application consultation – Autumn 2021
- Submission of planning application (assuming a detailed proposal) – beginning of 2022.
- Determination and completion of S.106 – end of 2022.
- On site – beginning of 2023/24.
- First year completions (having regard to preparatory site works etc) – 15 dwgs
- Annual completions thereafter, in accordance with Table 3A of Background Paper 10A = 30 dpa

Consequently, the revised trajectory for this site, assuming that the development does finally proceed, is still overly optimistic, completions prior to 2023/24 are not achievable and the first year delivery should be reduced to a more realistic level which would mean that the site would be completed in 2028/29.

#### HN1.4 – Northop Road, Flint (170 dwgs)

This site is projected to have 20 completions during 2022/23, but the site currently has no developer involvement, an application first submitted in 2018 has been withdrawn, and the SoCG is signed by only one of two landowners between whom there appears to be some disagreement relative to access.

It is clear that there will be no completions from this site in 2022/23, given the need to find a developer, design a scheme, undertake pre-application consultation, submit proposals, obtain permission and get on site. The SoCG gives the impression that there are considerably more difficulties with this site than are being acknowledged, in particular, the PAC resulted in a response from CADW that raised issues in relation to the impact of the development on the Scheduled Ancient Monument located to the north of the site which, it commented, had not been adequately assessed. The subsequent application appeared to acknowledge the need for further assessment, but did not include this work and, therefore, at this point it is impossible to conclude other than that this issue has the potential either to result in the refusal of planning permission outright, or to limit the dwelling capacity of the site to an unknown extent below that presently contemplated.

In all of the above circumstances, it seems unwise to place reliance on this site being delivered, the selected development partner has walked away and there is a longstanding heritage issue that has not been resolved.

Without prejudice to the above, were it to be concluded that the site should be retained, then, at the very least, the trajectory should be revised so as to place the first completions in 2024/25.

#### HN1.7 – Holywell Road/Green Lane, Ewloe (298 dwgs).

It is extremely difficult to understand how this site might have been concluded to be preferable to the land proposed by our Clients at Aston Hall Farm, Ewloe having regard to considerations such as its relationship to the settlement, green barrier, access to facilities

and visual impact. In particular, there is concern that this site would result in a more significant extension of built form and a consequently greater erosion of the Green Barrier between Ewloe and Connahs Quay than would be the case with our Clients land which would not extend the existing built form beyond the existing settlement, but, rather, would lie behind existing development on Holywell Road on land enclosed by clearly defined defensible boundaries

However, the SoCG in relation to this site concludes by indicating that the Council and the two landowners consider the allocation to be sustainable, viable and deliverable (para 9.1), it is noted that Anwyl are not, apparently party to that agreement and the SoCG highlights their disagreement in relation affordable housing provision which, clearly, has a potential impact in terms of viability/deliverability.

An application on this site is, presumably, not considered practical unless, or until, the site is removed from the Green Barrier through the adoption of this LDP and with all the steps involved in obtaining planning permission and getting on site, completions in 2023/24 seems to be overly optimistic.

Furthermore, Welsh Water indicate that a hydraulic modelling assessment is required, subsequent to which, there may be a need for upgrading works. Based on previous experience, it would be unwise to assume that this requirement would not delay the development by up to a further year, even assuming that no major works were required. (The Redrow experience at Penyffordd of a similar requirement resulted in delays whilst Welsh Water quoted for the work, which they insisted in undertaking themselves, and they then failed to keep to their programme for its delivery, the delay in this case totalled 8 months). However, notwithstanding the need for a hydraulic modelling assessment, the SoCG also identifies the need for improvement of the wastewater treatment plant for which there is no programme.

The SoCG indicates that some work has been undertaken in preparation for an application, but it is clear that there is much more to be done and there is no indication of a timescale for this. In these circumstances we have assumed that this work will not commence unless or until the Inspector's report is received confirming the allocation which, we have speculated, will not be before late Autumn of this year. From this point, the following timescale would appear possible:

- Completion of application preparatory works and hydraulic modelling – late Autumn 2022.
- Completion of Pre-Application Consultation and assessment/revision – early 2023.
- Submission of planning application and negotiation of S.106 – end of 2023.
- On-site beginning of 2024/25, 15 completions in first year having regard to preparatory works etc.
- 45 dpa thereafter would indicate a total of 240 dwgs by the end of the Plan period, resulting in a shortfall of 58 dwgs.
- If, of course, there was a significant delay in providing the required improvements to the wastewater treatment plant, then the trajectory would be moved back accordingly and the shortfall would increase.

#### HN1.8 - Ash Lane, Hawarden (288 dwgs)

This site is presently in the Green Barrier and, therefore, moving the site forward depends on the Inspector supporting its removal. It is apparent from the SoCG that there is no developer interest at present although Anwyll's are suggested to be the preferred developer, it is not suggested that a developer would not be interested in this site, but negotiations would delay implementation, as would the need for a developer to design a layout/masterplan. It is, again, highlighted that there is an issue in relation to the affordable housing contribution which potentially impacts on viability, as would education payments identified, at present cost levels, at nearly £1.8 million.

In line with our comments in relation to HN1.7 above, a commencement to the delivery of houses on this site in 2023/24 appears to be unduly optimistic.

Finally, once again, a hydraulic modelling assessment is required and the treatment works require upgrading, this makes it very difficult to put forward any date with certainty as to when the houses can be delivered from a practical point of view.

Assuming a similar programme to bring the site forward as set out in relation to HN1.7 above, we conclude that a total of 44 dwgs would remain undelivered at the end of the Plan period and, once again, this could increase dependent upon the date when the required wastewater treatment work improvements were delivered.

### HN1.9 – Wrexham Road, HCAC.

Once again, it is queried whether this site can realistically deliver dwellings in 2022/23 as suggested in the SoCG, in this instance, the Council's trajectory of completions in 2023/24 seems more realistic.

### Conclusions

It is not suggested that any of the above sites are incapable of being brought forward, assuming that their allocation is confirmed through the LDP. However, there is a consistent theme in that the LPA's assumptions relative to delivery seem generally over-optimistic, the time involved in preparing applications, undertaking pre-application consultation, submitting and negotiating planning applications and then entering into legal agreements seems to be reduced well below that which experience of major residential applications would suggest to be the case. Furthermore, the comments of Welsh Water in relation to the capacity of a number of treatment works, plus the need for hydraulic modelling assessment, suggest that further delays are inevitable which in certain cases could result in a block on development pending works that are not programmed and could conceivably be years into the future.

Consequently, it is concluded that the Allocated Sites Trajectory does not have the necessary level of certainty associated with it to support the reliance required of it in relation to a development plan where delivery is a key requirement. We have identified four sites, totalling 431 dwelling, with which there are significant concerns in relation to delivery prior to the end of the Plan period. Some of the conclusions may prove to be overly cautious, but as this Plan relies on these sites, a cautious approach is more appropriate than one which is too optimistic. The potential for problems with wastewater treatment capacity remains an unknown which could make the situation significantly worse.

The solution to the above concerns is to allocate additional suitable sites, Redrow Homes have proposed two such sites for consideration:

- Land North-East of Holywell Road, Ewloe (180 dwgs)
- Land at Daisy Bank, Penyffordd (120 dwgs)

Using the same assumptions as have been used in this paper relating to lead-in times etc, both of these sites are of a size whereby they could be delivered in full within the Plan period.