

Hearing Statement – Matter 3

Flintshire Local Development Plan

On behalf of Pochin Goodman (Northern Gateway) Ltd
(PGNGL)

March 2021



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Pochin Goodman (Northern Gateway) Ltd (PGNGL) in respect of:
- Matter 3: Strategic Growth
- I.2. PGNGL has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.3. PGNGL control the former Corus Garden City site, which forms part of the strategic Northern Gateway site. This scheme is an important part of the national, regional and local growth agenda and can positively contribute towards the economic and housing growth for the area.
- I.4. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with PGNGL comments upon the submission version of the Flintshire Local Development Plan, dated September 2019.
- I.5. PGNGL has also expressed a desire to attend and participate in Matter 3 of the Examination in Public.

2. Matter 3 – Strategic Growth

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?

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

- 3.1. PGNGL **supports** an aspirational growth strategy and the identification of Northern Gateway (STR3A) within that context. Northern Gateway is a key site within the Deeside Enterprise Zone identified for investment opportunities.
- 3.2. This approach reflects Flintshire’s role as a key gateway to Wales and an important part of a regional economic area that interlinks with North West England. The Plan recognises the Northern Gateway site is crucial to the economic growth ambitions of the region. It is consistent with the National Development Framework (Future Wales: The National Plan 2040, February 2021), which identifies Wrexham and Deeside as a National Growth Area. The NDF promotes their continued Growth and regeneration and the focus for large scale employment opportunities and housing growth. This is similar to the Wales Spatial Plan (2008) which identifies Deeside as a primary key settlement, a key regeneration area, key business sector and hub that are nationally significant. However, for clarity it may be useful to update references to the NDF in the Plan as the Wales Spatial Plan has now been superseded.

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

- 3.3. PGNGL has prepared a Delivery Report, which is attached to this hearing statement. This report is an update to the Delivery Statement dated 5 September 2019. This report analyses and summarises the technical assessments undertaken on the site and explain the site’s

availability, suitability and achievability and therefore deliverability in the context of Planning Policy Wales and the Development Plans Manual.

3.4. PGNGL control the former Corus Garden City site, which has an extensive planning history. The planning history is explained in detail within the attached Delivery Report.

3.5. The former Corus Garden City Site was granted outline permission (ref: 054758) for an employment led mixed use development in May 2014. The outline planning permission, including means of access, secured permission for:

“Employment-led mixed-use development, incorporating Logistics and Technology Park (B1, B2, B8) with residential (C3), local retail centre (A1), hotel (C1), training and skills centre (C2, D1), new parkland; conversion of buildings, demolition of barns; and associated infrastructure comprising construction of accesses, roads, footpaths / cycle paths, earthworks and flood mitigation / drainage works at Northern Gateway, Land off Welsh Road, Deeside.”

3.6. Following the grant of planning permission a number of Section 73 applications have been approved, along with a number of enabling works Reserved Matters and discharge of conditions. Furthermore, Reserved Matters have also been submitted by Keepmoat Homes relating to the first phase of residential development, which were approved at planning committee on 4th March 2020, subject to the S106 Agreement, which is currently being finalized by Flintshire CC Legal Officers.

3.7. Since the grant of the original outline planning permission significant public sector investment has occurred in relation to strengthening and raising the River Dee flood defences and the Welsh Government will also deliver the internal access roads.

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?

3.8. PGNGL **supports** the continued allocation of the site in the LDP. This provides clarity and certainty for the site’s future development for housing and employment uses.

3.9. The attached Delivery Report explains the broad delivery timescales for the proposed scheme. This explains that there is developer interest in the site with Keepmoat, Lane End and Bellway bringing forward the first three plots of new housing.

- 3.10. Furthermore, there is also strong market demand for the employment land and this will come forward upon completion of the Welsh Ministers roads.
- 3.11. The trajectory within the attached Delivery Report is based on feedback from the housebuilders and incorporates a slightly conservative approach from the suggested potential build out. The average delivery rates assumes 25 market dwellings per annum from each outlet. In addition, Plot 1 is being entirely developed by a Registered Provider for social housing. For employment land delivery, this assumes an average of 3.5 hectares per annum, albeit it is likely that actual delivery per annum will fluctuate around this average. The delivery of the employment land will follow completion of the Welsh Minister's roads.

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

- 3.12. PGNGL **supports** the allocation of the Northern Gateway site. PGNGL notes national guidance on rolling forward allocations within the Development Plans Manual and highlights the attached Delivery Report in relation to demonstrating sustainability and deliverability. There is clear evidence that the site will come forward during this plan period, but for clarity and certainty with the need for further Reserved Matters and planning applications as further phases come forward, the site should remain allocated within the LDP as cited by the Council in paragraph 5.19.

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?

- 3.13. PGNGL **supports** the allocation of Northern Gateway through Policy STR3A. However, PGNGL note that PPW is clear that development proposals should look to the long term and consider how they can be flexible and adapt to future issues and needs. PGNGL note that the Council have acknowledged that market demand has changed since the site was first allocated

within the explanatory text. **PGNGL consider that the explanatory text should be amended in order to acknowledge that there is potential for market demand, identified needs and the economic climate to change through the lifetime of the emerging Local Development Plan.** As such PGNGL consider that STR3A should **not be overly rigid** with regards to the quantum and nature of housing and employment to be provided on site. This will enable the authority and landowners to respond to changing economic circumstances, market demands and changing needs and allow for flexibility. **PGNGL consider the wording in the policy STR3A, criterion i) and ii), should be amended** and should be preceded with 'approximately'. Furthermore, **the policy does not reflect the latest masterplan for the site**, which includes a bus interchange plot off Welsh Road. The justification text should be amended accordingly **to introduce greater flexibility over the lifetime of the Plan.** This approach is consistent with PPW.

Proposed Change

3.14. To overcome the objection and address soundness matters, the following changes are proposed:

- Amend references to the Wales Spatial Plan (2008) and update to the National Development Framework (Future Wales: The National Plan 2040, February 2021)
- Create flexibility within Policy STR3A and reflect the most recent masterplan.
- Amend criterion i and ii of Policy STR3A, and precede each criterion with the word 'approximately'.
- Amend the justifying text, to ensure the Plan is sufficiently flexible and can respond to changing economic circumstances, demands and identified needs, over the lifetime of the Plan.

Appendix I: Delivery Report

Pochin Goodman (Northern Gateway) Ltd

Former Corus Garden City, Northern Gateway

Delivery Report

February 2021



Revision Record

Revision Reference	Date of Revision	Nature of Revision	Author	Checked By
A	Feb 2021		AR	GW

Report Author	██████████
Report Date	Feb 2021
Project No.	2883
Document Ref.	P0-TP-SPA-RP-P2883-0024-A
Revision	A

Contents

1.	Introduction	4
2.	National Planning Policy Context	6
	Planning Policy Wales	6
	Development Plans Manual.....	6
3.	Site Location and Proposals.....	10
	Site Context.....	10
	Site Location and Description.....	11
	Overview of proposals	12
4.	Deliverability.....	14
5.	Conclusion.....	26

I. Introduction

- I.1. Spawforths have been instructed by Pochin Goodman (Northern Gateway) Ltd (PGNGL) to prepare a Delivery Report for the site at Northern Gateway.
- I.2. Pochin Goodman (Northern Gateway) Limited is a joint venture between Goodman and Northern Powerhouse Land.

Goodman

- I.3. As a specialist global industrial property group, Goodman owns, develops and manages industrial real estate in strategic locations across 13 countries.
- I.4. Founded more than 30 years ago, its focus is on developing and managing high quality properties in key locations to benefit its customers now and into the future.
- I.5. At the heart of this is Goodman's 'Own, Develop, Manage' model - an integrated customer service offering that underpins the business and helps its customers and partners to grow and succeed.
- I.6. Goodman's success is founded on the quality and integrity of its people and the long-term relationships it builds with its customers, combined with an unrivalled knowledge of the industrial property markets in which it operates.

Northern Powerhouse Land Limited

- I.7. Northern Powerhouse Land Limited (NPLL) is a family run business focusing on strategic land development and property investment in North Wales and the North West.
- I.8. NPLL was established by directors Jim and Bob Nicholson who have over 50 years of property development and investment experience between them, having worked and delivered numerous successful property schemes across North Wales and North West England undertaking acquisitions, planning and delivery.
- I.9. Using our local expertise to generate added value and our strong connection with the North West market to deliver projects across the region. The company is currently involved in the delivery of 350 acres of mixed use strategic land with consent for over 2,000,000 sqft of commercial space.

- 1.10. This report provides an update to the Delivery Statement dated 5 September 2019. This report will analyse and summarise the technical assessments undertaken on the site and explain the site's availability, suitability and achievability and therefore deliverability in the context of Planning Policy Wales and the Development Plans Manual.

2. National Planning Policy Context

Planning Policy Wales

- 2.1. The Welsh Government's core planning objectives as established through the Planning Policy Wales (PPW): Edition 10, December 2018.
- 2.2. The primary objective of the PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015 and the Well-being of Future Generations (Wales) Act 2015. PPW promotes action at all levels of the planning process which is conducive to maximizing its contribution to the well-being of Wales and its communities.
- 2.3. PPW states that the Well-being Act provides a clear definition of sustainable development, and requires an improvement in the delivery of all four aspects of wellbeing: social, economic, environmental and cultural. The planning system is central to the achievement of sustainable development in Wales.
- 2.4. PPW states in para 4.2.15 that *planning authorities must ensure that sufficient land is genuinely available or will become available to provide a five year supply for housing judged against the general objectives, scale and location of development required in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable, in order to support the creation of sustainable communities.*

Development Plans Manual

- 2.5. The Development Plans Manual (Edition 3: March 2020) provides guidance on the Tests of Soundness. In relation to the delivery the most pertinent are Test 3: Will the Plan Deliver? Which is set out below:

Test 3 - Will the Plan deliver? – is it likely to be effective?

- Will it be effective?
- Can it be implemented?
- Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?
- Will it be viable?
- Can the sites allocated be delivered?
- Is the plan sufficiently flexible?
- Are there appropriate contingency provisions?
- Is it monitored effectively?

2.6. The Development plans Manual also sets out in paragraph 3.47 what a deliverable and viable candidate site is:

What is a Deliverable Candidate Site?

- The site is in a sustainable location (in accordance with the site search sequence set out in PPW which should inform the Council's candidate site methodology) the broad parameters of which will be set out by the LPA to accompany the call for candidate sites
- The site is available now, or will be available at an appropriate point within the plan period,
- The site is generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, biodiversity, landscape, heritage, flood risk issues and pollution
- If the site is in public ownership it is identified in a published disposal strategy and/or through Council resolution if the land is to be retained/or sold by the Council. There should be a clear commitment to bring the site forward at a point in time within the plan period, including where relevant, identified/committed funding streams
- What is the planning history and/or does it benefit from an extant planning permission, or is it identified as an allocation? Sites with a positive planning history may be relevant and could be considered suitable for development, although it will be necessary to assess whether circumstances have changed which would alter their suitability (see PPW)
- Where appropriate, a clear explanation and justification of how and when any barriers to delivery can be overcome

What is a Financially Viable Candidate Site?

- There is development potential for the proposed use. The site is generally attractive to the market (both private and/or public sector) for development at the proposed location
- The site can accommodate the broad levels of affordable housing, other policy/s106 requirements and infrastructure costs set out by the LPA; the broad parameters of which will be articulated by the LPA in the call for candidate sites
- Where there are financial shortfalls inhibiting development from coming forward, funding mechanisms are, or can be secured, to make the site financially viable
- A candidate site can be considered viable if, after considering the broad known costs, the value/return on the development is sufficient to provide both an adequate profit margin for the developer and a meaningful uplift in value for the land owner

2.7. The Development Plans Manual also sets out the type of information that site promoters should provide for candidate sites in order to achieve more effective and deliverable plans, although such information should be tailored to local circumstance, including land ownership details; information on physical constraints; how the site promotes sustainable development; infrastructure requirements; timescales for delivery; is there developer interest and site viability.

3. Site Location and Proposals

Site Context

- 3.1. The site forms approximately 70 hectares of the 170 hectare allocation at Land North West of Garden City (Policy STR3A). The site forms part of the Deeside Enterprise Zone and Growth Zone, which aims to be an engine for growth for the North Wales economy and is of national, regional and local importance.
- 3.2. The site is situated within the County of Flintshire in North Wales and lies close to the Wales and England border. The site lies to the west of the A494, approximately 10km North West of Chester City Centre. The nearest main town is Queensferry, located approximately 1km to the west of the site.

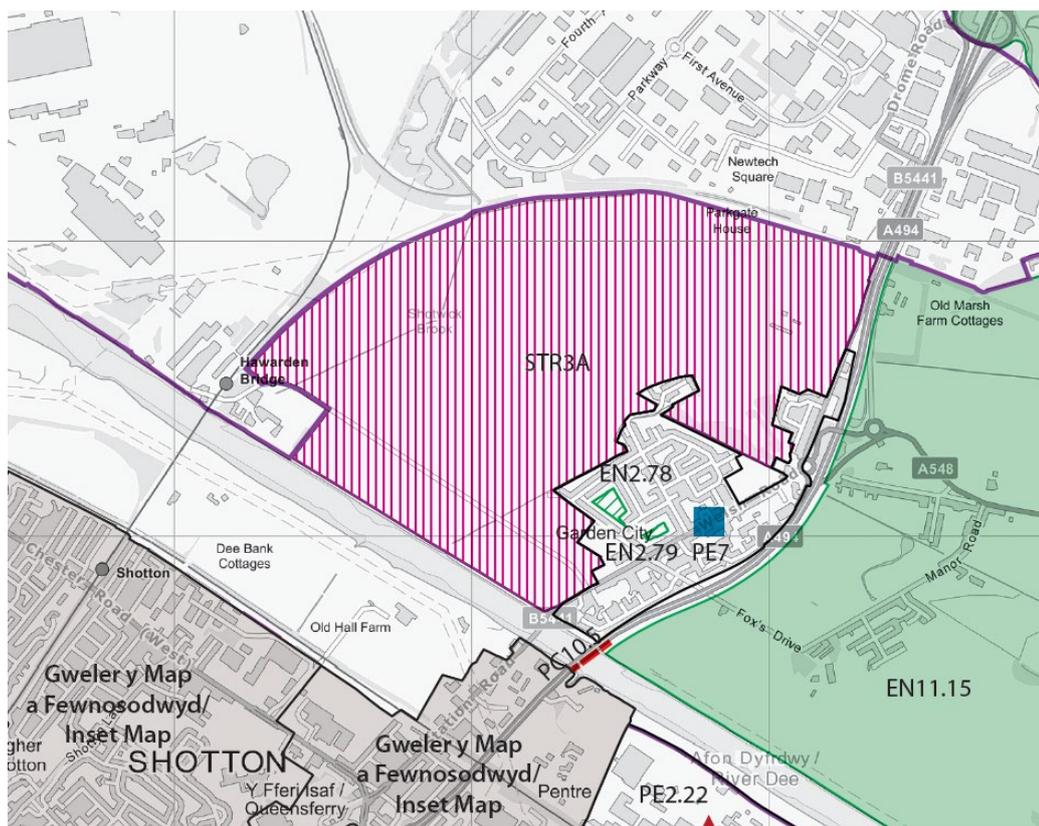


Figure 1: Flintshire Local Development Plan Proposals Map

- 3.3. The Local Plan allocation shows the site as a key strategic site to accommodate a mixed use development. The site forms a key part of the Deeside area, being designated an Enterprise

Zone. The entire Northern Gateway allocation is anticipated to deliver a new homes, B2/B8 employment land, commercial development, district centre(s) and green infrastructure. Significant public sector investment has occurred in relation to strengthening and raising the River Dee flood defences and Welsh Government will also deliver internal access roads.

Site Location and Description

- 3.4. The surrounding area comprises residential uses and employment development. Deeside Industrial Park (DIP) is located to the far north of the site and comprises a large number of manufacturing and distribution units.
- 3.5. The B5441 Welsh Road is located along the eastern boundary of the site. There are a number of residential dwellings, primary school, local shops and car salesroom in the vicinity of the site entrance on Welsh Road. To the east of the B5441 Welsh Road lies the A494 Trunk Road. The A494 is a dual carriageway that connects the M56 to the A55 and is a strategic transport route which connects North Wales to North West England.



Figure 2: Site Location

- 3.6. To the north of the site is the remainder of the strategic Northern Gateway allocation, referred to as the 'Airfields' and is being delivered by Praxis Real Estate Management Ltd on behalf of Crag Hill Estates Ltd.

Overview of proposals

- 3.7. The masterplan proposals attached at Appendix I for the Former Corus Garden City site shows a mixed-use housing and employment scheme. The masterplan shows on the frontage with Welsh Road a bus interchange plot alongside an area to expand Sealand County Primary School.
- 3.8. The masterplan shows four residential plots and employment development within a landscaped setting. The green infrastructure integrates strategic landscaping and open space alongside Sustainable Urban Drainage features, habitat creation and ecological mitigation.
- 3.9. The four residential plots are located adjacent to Garden City and Welsh Road. The employment zone is towards the rear of the site and Hawarden Bridge railway station. The employment area will be accessed through the adjacent Airfields development via the Welsh Governments road.

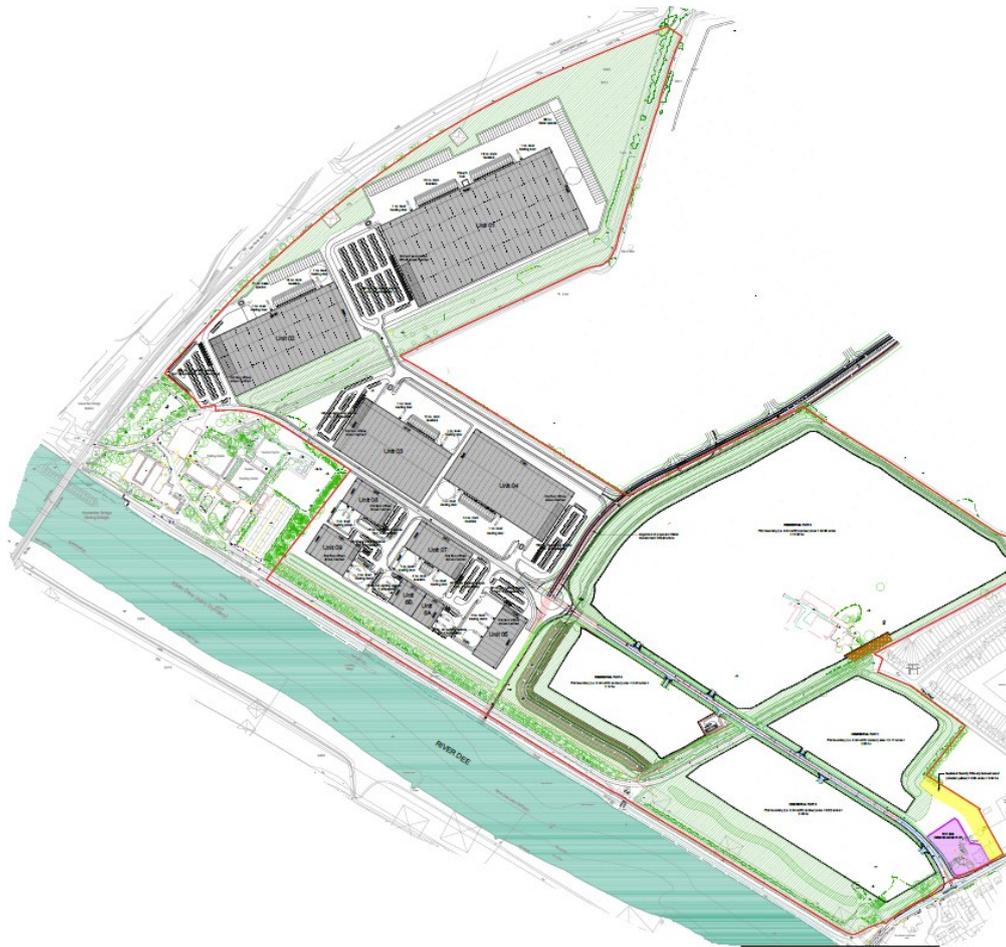


Figure 1: Masterplan

4. Deliverability

- 4.1. The Former Corus Garden City site is deliverable, in accordance with Planning Policy Wales and the Development Plans Manual, and represents a sustainable mixed-use development opportunity.

Landownership

- 4.2. PGNGL control the former Corus Garden City site and therefore there is a willing landowner. The site can therefore be considered available for development now, in accordance with guidance.

Site Suitability

- 4.3. The extant outline planning permission, discharge of conditions and reserved matters submissions show the site's suitability for development. The site is situated in a sustainable location and the delivery of the mixed-use development will provide further enhancements to the sustainability of the area.
- 4.4. The site is of national, regional and local importance and is part of the Deeside Growth Zone and Enterprise Zone. The site will facilitate economic growth in the area and act as a catalyst for new investment and employment opportunities, alongside delivering new homes that will meet the need and demand in the area.
- 4.5. The wider development proposals will also be of benefit to the residents of Garden City. Importantly, through the creation of new job opportunities and homes, but the enabling works and infrastructure will deliver part of the landscaping and public open space and flood mitigation which will significantly enhance their quality of life.
- 4.6. The submitted technical evidence in support of the planning application/submissions also confirms there are no environmental or technical constraints that would preclude the development of the site.

Planning History

- 4.7. The former Corus Garden City Site was granted outline permission (ref: 054758) for an employment led mixed use development in May 2014. The outline planning permission, including means of access, secured permission for:

“Employment-led mixed-use development, incorporating Logistics and Technology Park (B1, B2, B8) with residential (C3), local retail centre (A1), hotel (C1), training and skills centre (C2, D1), new parkland; conversion of buildings, demolition of barns; and associated infrastructure comprising construction of accesses, roads, footpaths / cycle paths, earthworks and flood mitigation / drainage works at Northern Gateway, Land off Welsh Road, Deeside.”

4.8. Following the grant of planning permission a number of Section 73 applications have been approved as follows:

- A Section 73 application was submitted in December 2015 to vary the highway conditions (6, 9 and 42) and remove conditions 17, and 18 and 19 in respect of BREEAM and Code for Sustainable Homes. This was granted in March 2016.
- A Section 73 application was submitted in February 2017 to vary conditions 5 (mix of development and phasing), 32 (highway works) and 38 (off-site highway works) and removal of conditions 6 (highway works at Station Road/Asda junction) and 10 (flood defence works), including an updated Environmental Statement and was granted in March 2018. This increased the level of residential on the site from 600 to 770 dwellings.

4.9. A number of enabling works Reserved Matters and discharge of conditions have been approved including:

- Reserved matters were submitted in August 2018 to secure detailed approval of enabling and infrastructure works in order to facilitate delivery of the first phase of residential development on the Site. The works comprise details of the development platform created including levels and cut and fill detail to facilitate residential development of phase I, details of flood prevention / alleviation and drainage and ground works, creation of flood storage and wetland area, ecological mitigation and strategic landscaping works on part of new parkland. This was approved on the 30th August 2019 under reference 058868.
- In parallel with submission of the Phase I enabling works reserved matters (ref: 058868) PGNGL have submitted a number of applications to discharge relevant pre-commencement planning conditions to facilitate delivery of the phase I enabling works and subsequent reserved matters for the first phase of residential development on the site by the preferred house builder partner. The following applications have been made to discharge relevant pre-commencement planning conditions:

- Application for approval of details reserved by condition no's 5,13,16,18,19,20,21,22 and 41 attached to planning permission reference 056540 (Ref no. 058909). These were formally discharged on the 17th October 2019.
- Application for the approval of details reserved by condition no.39 (Site Investigation) attached to planning permission ref.056540 (Ref no. 060171). This was formally discharged on the 16th October 2019.
- Application for approval of details reserved by condition no's 28, 34 and 35 attached to planning permission reference 056540 (Ref no. 059364). These were formally discharged on the 16th October 2019.
- Application for approval of details reserved by condition no's 28, 34 and 35 attached to planning permission reference 056540 (Ref no. 059364). These were formally discharged on the 16th October 2019.
- Application for approval of details reserved by condition no's 28, 34 and 35 attached to planning permission reference 056540 (Ref no. 059364). These were formally discharged on the 16th October 2019.
- Application for approval of details reserved by condition no. 26 attached to planning permission reference 056540 (Ref no. 060197). These were formally discharged on the 21st November 2019.

4.10. Reserved matters have also been submitted in January 2021 (ref: PP-09359796) to secure detailed approval of enabling and infrastructure works in order to facilitate delivery of the remaining phase of residential development on the site. The works comprise details of the development platform created including levels and cut and fill detail to facilitate residential development of phase 1b, 2 and 3¹, details of flood prevention / alleviation and drainage and ground works, creation of flood storage and wetland area, ecological mitigation and strategic landscaping works.

4.11. In parallel with submission of the Phase 1b, 2 and 3 enabling works reserved matters (ref: 058868) PGNGL have submitted a number of applications to discharge relevant pre-commencement planning conditions to facilitate delivery of the phase 1b, 2 and 3 enabling works and subsequent reserved matters for these phases of residential development on the site by the preferred house builder partners.

¹ Within this Delivery Report these phase are identified as Plots 1, 2 and 4.

- 4.12. This application to discharge conditions 5, 7, 9, 13,15, 16, 17, 18, 19, 25, 30 and 33 pursuant to S73 Application (ref: 059635) was submitted in January 2021 (application ref: PP-09359997).
- 4.13. Furthermore, reserved matters application (ref: 060411) has been submitted by Keepmoat Homes relating to the 1st phase of residential development on the Former Corus Garden City site, which proposes the erection of 129 no. dwellings together with associated infrastructure, recreational space and landscaping. The proposed scheme will deliver a mix of 2, 3 and 4 bedroomed properties in a variety of house types. This reserved matters application was approved at planning committee on the 4th March 2020, subject to completion of a S106 Agreement. The S106 Agreement is currently being finalised by Flintshire CC Legal Officers.

Site Deliverability

- 4.14. It is considered that development on this site is deliverable. The site has been fully assessed and there are no major constraints to development of the site.
- 4.15. PGNGL has commissioned a number of technical reports which demonstrate the deliverability of sites, which are summarised below:

Transportation/Movement

- 4.16. Traffic and Transportation has been considered in detail by consultants acting for both Praxis (Vectos) in respect of the Airfields part of the strategic allocation and Curtins in respect of the former Corus part of the strategic allocation. Both applications were supported by rigorous Transport Assessments and tested through the ES process. Outline applications in respect of both sites identified a series of highway related planning conditions which required infrastructure improvements at a series of off-site highway junctions based on the level of development proposed across both sites. Further work was undertaken by both consultants to understand the highway trigger points for these works to be undertaken based on trip generations associated with certain levels of development.
- 4.17. Traffic impact assessments undertaken by Curtins on behalf of PGNGL and development of the Corus site confirmed that the Corus access/Welsh Road priority-controlled junction would continue to operate within capacity following 100% completion of all the residential development granted outline planning permission (770 dwellings) and would not require any

infrastructure improvements. This confirms delivery of all residential development on this site is acceptable on highway grounds.

- 4.18. The employment element of the proposals granted under the outline application on the former Corus site would be served from a link road which will be introduced connecting the former Corus site (PGNGL) with the Airfield site (Praxis) routing traffic through this site and onto Welsh Road. This section of the link road will connect with an existing spine road which has already been constructed through the Airfields site by Welsh Government. Welsh Government are intending to submit a reserved matters for this new section of the link road connecting both sites that form part of the Northern Gateway strategic allocation and will therefore open up the employment plots on the former Corus site. The expectation is that once reserved matters are approved for this road, construction of this road will commence immediately to meet occupier need and delivery of plots on the Airfields.
- 4.19. A recent reserved matters application for employment development on the Praxis site triggered the requirement for all the remaining off-site highway works agreed by planning condition on both outline planning permissions and it has subsequently been agreed that Praxis would deliver all of the remaining off-site highway works at the same time. Completion of these off-site highway works will then facilitate full development of the Northern Gateway strategic allocation (both Praxis and PGNGL land interests).
- 4.20. The completion of these off-site highway works and delivery of the link road connecting the former Corus site and Airfields will ensure the site is deliverable in highway terms in the short term and certainly in the early part of the Plan period.

Ecology

- 4.21. Due to the site's location adjacent to the River Dee and Dee Estuary the site has been fully surveyed as part of the Outline Planning application and subsequent discharge of conditions and Reserved Matters submissions. Appropriate mitigation measures have been incorporated into the design parameters plan for the site, in particular a landscape framework plan that will ensure wildlife corridors and new wetland areas are created, including the retention of existing watercourses.
- 4.22. The Outline Planning Permissions and subsequent variations to it under Section 73 of the TCPA were also approved alongside a Framework Ecological Mitigation Strategy (FEMS)

prepared in consultation with the Council's Ecologist and Natural Resources Wales (NRW). Planning conditions were subsequently placed on the grant of outline permission requiring any mitigation for each species to be in accordance with this Framework and agreement on a long term Habitat Management Plan prior to commencement of development of each phase to ensure adequate safeguarding for protected species and their habitats. Details of a mitigation strategy in respect of the loss of arable land used by wintering birds also forms part of a S106 Legal Agreement which provides an agreed financial contribution towards an off-site project for wintering birds.

- 4.23. On these grounds there are no technical constraints to the delivery of this site on ecological grounds.

Flood Risk and Drainage

- 4.24. The Proposed Development site sits within an area known to be at risk of both fluvial and tidal flooding and Planning Policy Wales Technical Advice Note 15 – Development and Flood Risk (TAN15) (WG, 2004) Development Advice Map 2019, classifies the site as being located within Flood Zone C1. Flood Zone C1 is defined as “Areas of the floodplain which are developed and served by significant infrastructure, including flood defences”. The site has a number of land and surface water drainage systems. Shotwick Brook, an NRW designated Main River (formerly designated by EA Wales pre-2012), enters the Northern Gateway area from the north. The Northern Drain is an open watercourse running east to west which flows into the Shotwick Brook at the north-western corner of the South Camp. Garden City Drain, an NRW designated Main River, crosses the A550 from the east and enters the South Camp via a concrete culvert.
- 4.25. Detailed consultations with NRW have been undertaken throughout the long history of the development of the Northern Gateway proposals to inform assessment parameters and to discuss the suitability of proposed flood management measures.
- 4.26. An FCA was first submitted for the former Corus site at Northern Gateway in 2012 and, as agreed with NRW, 2012 has been maintained as the baseline condition across all subsequent FCA work within the Northern Gateway area to ensure consistency.
- 4.27. The FCA considers all potential sources of flood risk and confirms that the only sources of flooding that pose a potential risk to the Proposed Development are from tidal and fluvial sources. Detailed hydraulic modelling has been undertaken to reconfirm the baseline tidal

and fluvial flood risk in the vicinity of the site and, in line with Natural Resources Wales (NRW) guidance, an allowance for climate change over 100 years has been adopted for the proposed residential development. This FCA continues to use a 2012 baseline assessment date. Since the submission of the original Northern Gateway FCA in 2012, NRW's advice for showing changes in model predicted flood levels has changed from $\pm 30\text{mm}$ to $\pm 10\text{mm}$. NRW has confirmed that increases of $<30\text{mm}$ will be not be considered a 'detriment' but in line with the guidance are now mapped.

- 4.28. A number of flood mitigation measures have been embedded into the design alongside strategic measures undertaken by Welsh Government (WG) to facilitate development of the wider Northern Gateway area, including raising and strengthening of the River Dee flood defences, creating flood storage areas and land raising to create a flood free development platform in the design scenario.
- 4.29. NRW have confirmed that they were satisfied appropriate flood modelling work had been undertaken in the FCA submitted with the outline application and that other information provided demonstrated flood risk could be managed to an acceptable level in accordance with Appendix I of TAN15 (subject to the implementation of the proposed mitigation).
- 4.30. The FCA also confirms that there River Dee embankment strengthening carried out by Welsh Government in 2015 at the southern boundary of the site functions as a tidal flood defence, therefore the risk of structural failure of the existing defences adjacent to the development is very low. This defence prevents tidal waters, from the River Dee, inundating the site.
- 4.31. Providing all development and their FCA's accord with the principles and proposed mitigation measures identified in the overarching FCA approved with the outline planning permissions there are no constraints to the delivery of the site.

Landscape

- 4.32. A landscape and visual impacts in relation to the development proposals for the former Corus site was submitted as part of the ES approved with the outline planning permission. This assessed the visual impact of the proposals based on a series of approved parameters and included a visual impact assessment of the proposals to assess the site and viewpoints from potentially sensitive locations. Representative photo viewpoint locations were selected and agreed through discussion with officers from Flintshire County Council, given the views

into the site from key receptor locations on the River Dee, from residential areas and public footpaths and cycleways on the edge of the site.

- 4.33. Whilst the proposals will result in a loss of this rural landscape, mitigation measures including the limit on heights of industrial building and details of landscaping proposals in accordance with the approved landscape framework plan to be provided prior to commencement of each phase of development, these measures of control on the outline planning permission are considered acceptable and therefore this is no technical constraints to the delivery of this site on landscape grounds.

Heritage

- 4.34. The outline planning permission includes a number of heritage assets in the south-western part of the site, some of which overlook the River Dee. This includes the Grade II Listed John Summers building and clock tower and a number of locally listed buildings.. A detailed Heritage Assessment was submitted with the outline planning permission and Environmental Statement, which considered the significance of these assets and the impact of any proposals on their setting. The approved masterplan has regard to the retention of these buildings and respects the setting through the approved parameters plans. Any future proposals will have regard to these parameters and therefore there are no heritage constraints to the delivery of this site.

Ground

- 4.35. Geotechnical Reports and Site Investigations were submitted with the outline application. No significant contamination has been identified as part of site investigations submitted and based on the nature of the site and its history, no significant contamination is anticipated across the majority of the site. Site investigations need to be submitted in parallel with each phase of development in accordance with planning conditions placed on the outline planning permission. If contamination is identified localised remediation might be required dependent on the findings of any work and subsequent assessment. To date site investigations undertaken on phases which have been subject to enabling works and residential applications have not shown any evidence of contamination. Any future proposals will be subject to the same planning conditions, which control the requirement for remedial works, however based on history of the site and investigations undertaken there are no ground constraints to the delivery of this site.

Utilities

- 4.36. In preparation for the delivery of the first residential phases a number of utility provisions have been put in place.
- 4.37. A contract has been entered into with an IDNO for the provision of electricity, gas and fibre infrastructure to provide individual metered services to the residential units (up to 770).
- 4.38. A point of connection for an electricity supply has been secured off Welsh Road and gas for the development is readily available from an IP gas main that runs along the southern boundary of the Northern Gateway site.
- 4.39. A potable water main will be extended off the existing main in Welsh Road, the main will extend to the extent of the residential access roads and provide individual metered services for the residential units. Fire hydrants will be established on the extended water main, the locations of the hydrants will be agreed with the local fire authority.
- 4.40. As part of the negotiations with Welsh Ministers and adjoining landowners, Praxis, a foul water connection will be established to the Deeside Industrial Estate pumping station. A network of swales and attenuation areas around the site have been approved by both NRW and FCC and will enable all residential phases to avoid the need for any on-site surface water attenuation.
- 4.41. The employment land will benefit from the same foul and surface water drainage systems established for the residential development. Gas is available from the adjoining IP gas main and a 15MVA point of connection has been secured with Scottish Power for the employment land.

Energy

- 4.42. The Council have placed a planning condition on the outline planning permission requiring at least 10% of the energy supply of the non-residential development shall be secured from decentralised, renewable or low carbon energy sources (as described in TAN 22: Planning For Sustainable Buildings). Details of a timetable of how this is to be achieved across the whole site, including details of phasing, physical works on site, should be submitted to the Council prior to or accompanying relevant reserved matters application. This will ensure the development achieves satisfactory sustainability and low carbon standards.

Approach to Delivery

- 4.43. There is developer interest in the site with Keepmoat, Lane End and Bellway bringing forward the first three plots of new housing. This totals 673 new homes, including 104 for social housing. The remaining final plot of housing will be marketed in due course.
- 4.44. There is strong market demand for the employment land and this will come forward upon completion of the Welsh Ministers roads. Legat Owen and JLL have prepared a market update, which is attached at Appendix 3. This demonstrates that there have been large scale enquiries for the site and that there is strong market demand and interest. The site is therefore deliverable, in accordance with guidance.
- 4.45. PGNGL have developed the following trajectory, which is based on feedback from the housebuilders and incorporates a slightly conservative approach from the suggested potential build out. The average delivery rates assumes 25 market dwellings per annum from each outlet. In addition, Plot 1 is being entirely developed by a Registered Provider for social housing. For employment land delivery, this assumes an average of 3.5 hectares per annum, albeit it is likely that actual delivery per annum will fluctuate around this average. The delivery of the employment land will follow completion of the Welsh Minister's roads.

	Plot 1 Lane End	Plot 2 Keepmoat	Plot 3 TBA	Plot 4 Bellway	Market Sales	No. of Sales Outlets	Employment Land Take- up (ha)
Housing Type	Social	Market	Market	Market			
2022/23	26	15		15	30	3	
2023/24	26	25		50	75	3	3.5
2024/25	26	25		50	75	3	3.5
2025/26	26	25		50	75	3	3.5
2026/27		25		50	75	3	3.5
2027/28		14	25	50	89	4	3.5
2028/29			25	50	75	3	3.5
2029/30			25	50	75	3	3.5

	Plot 1 Lane End	Plot 2 Keepmoat	Plot 3 TBA	Plot 4 Bellway	Market Sales	No. of Sales Outlets	Employment Land Take- up (ha)
Total	104	129	75	365	569		25

4.46. Underpinning this delivery trajectory is a programme of indicative milestones, which is attached at Appendix 2 and shows each phase up to the completion of the first unit.

Viability

4.47. PGNGL has undertaken a viability appraisal of the proposed site. The viability of the proposed scheme has three key elements to it: Pochin Goodman's twin roles as developers of the employment land and master developers of the residential land, and developments to be undertaken by 3rd party housebuilders.

4.48. As described above, three housebuilders have been secured, which accounts for over 90% of the residential land. Furthermore, there is significant interest in the last available plot, but the intention at present is to conclude the first three transactions before marketing the final phase. The interest from the housebuilders clearly demonstrates that the site represents an excellent opportunity to develop profitably in this location. Their interest will also ensure that PGNGL receives an acceptable return for their role as master developers. In this regard PGNGL will be investing heavily in infrastructure works for the site and in providing fully serviced residential development plots.

4.49. PGNGL has recently gone out to tender for its first phase of infrastructure works and has submitted a reserved matters application for Phase 2 of the works. The intention will be for both phases to be undertaken simultaneously over a 12 month period starting in summer 2021.

4.50. The third aspect of the scheme is the employment land. This will come forward upon completion of the Phase 1 and Phase 2 infrastructure works and the Welsh Minister's road. As a result of PGNGL's investment in the Phase 1 and Phase 2 infrastructure packages the land will be readily serviced and will not be overburdened with infrastructure costs. Service diversions have also been put in place that will benefit this part of the site.

- 4.51. The adjoining Airfields employment site is more advanced than PGNGL's in that it was the first to benefit from the Welsh Minister's Phase I road which was completed 12 months ago. As a result, they have been able to attract both Amazon and a major manufacturer to the site. The Amazon building is completed and occupied; the major manufacturer is currently negotiating a contract for the purchase of a very substantial site.
- 4.52. PGNGL are confident that this level of activity is set to continue on their site. The employment land is ideally suited to providing large scale "big box" warehouse and distribution units which is by far the most active sector in the commercial property market and is set to remain so for the foreseeable future.

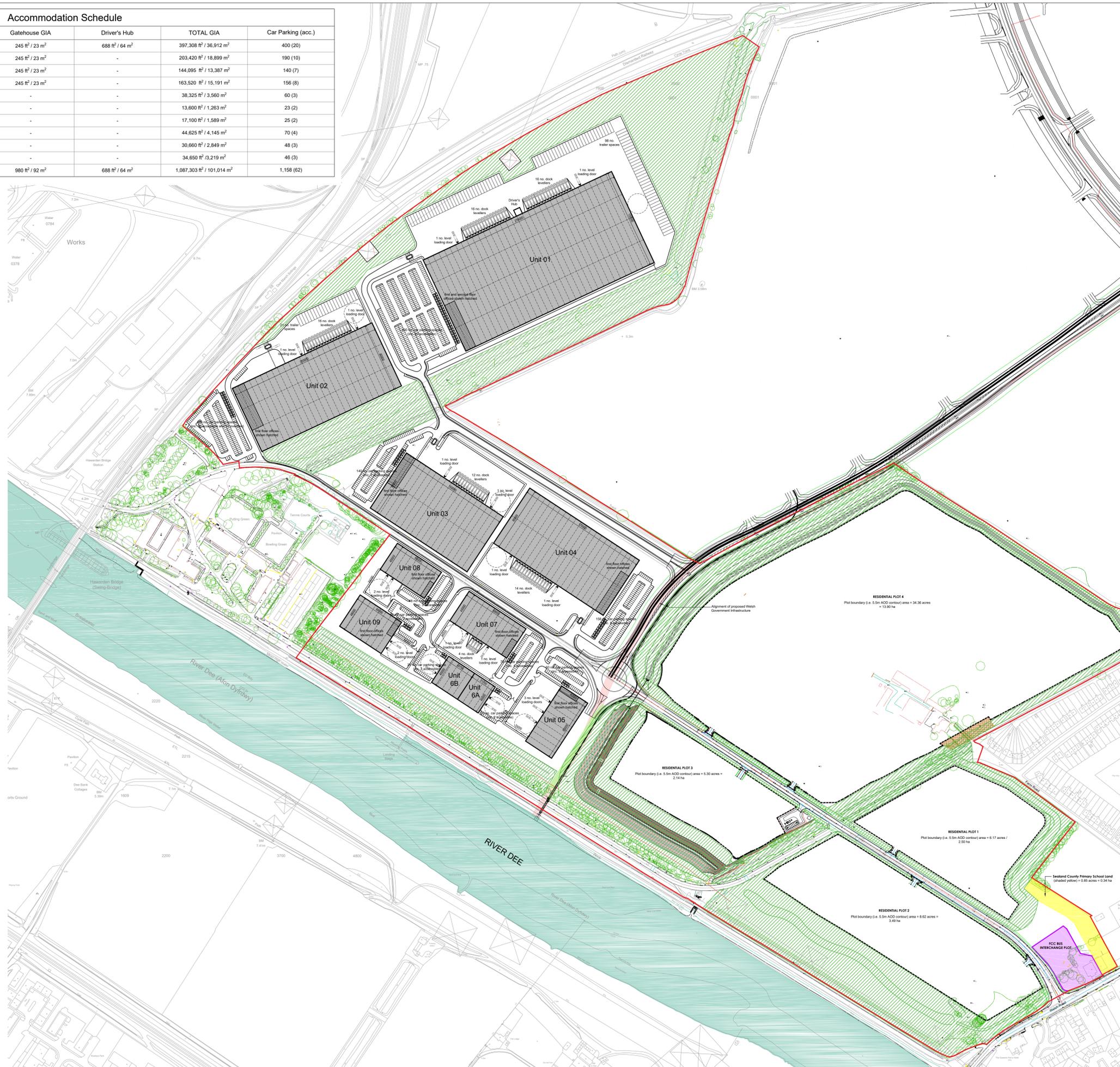
5. Conclusion

- 5.1. This Delivery Report has shown that the site is available now, in suitable location, and is generally free from physical constraints. The former Corus Garden City site is therefore deliverable, in accordance with Planning Policy Wales and the Development Plans Manual.
- 5.2. There is a need for the former Corus Garden City site to meet both the employment and housing need and demand in the area. This Delivery Report confirms the reasons for allocating the site as a key strategic site to accommodate a mixed use development within the Deeside Enterprise Zone.
- 5.3. PGNGL control the former Corus Garden City site, which is therefore available for development within the plan period. The site is a logical extension to Garden City, located within a sustainable location adjacent to major employment areas, including Deeside Industrial Park.
- 5.4. The technical work undertaken to date in respect of highways, ground conditions, ecology, landscape, flood risk and drainage, heritage utilities and energy has influenced the indicative masterplan. It has also shown that there are no known constraints, that could not be suitably mitigated, that would prevent this site coming forward within the plan period. As such, the development of the site, as shown within the indicative masterplan, is considered achievable.
- 5.5. The indicative masterplan shows how a mix of housing and employment can be accommodated within the site, alongside Public Open Space, landscaping and drainage features. It has been shown that the site can deliver a flexible and phased approach with the four residential plots coming forward in the short term alongside the employment land, which will be delivered once the Welsh Minister's road has been completed.
- 5.6. The site has been reviewed against Planning Policy Wales and the criteria for allocating sites. It has therefore been shown that the site is capable of delivery, in accordance with national planning policy and guidance. It is also attractive to the market and is deliverable within the plan period.

PGNGL are keen to deliver this significant opportunity which has substantial economic, social and environmental benefits for the local people and sub-region.

Appendix I: Proposed Masterplan

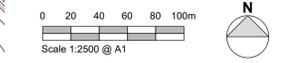
Accommodation Schedule						
Units	Ground Floor GIA	Office GIA	Gatehouse GIA	Driver's Hub	TOTAL GIA	Car Parking (acc.)
1	377,500 ft ² / 35,071 m ²	18,875 ft ² / 1,754 m ²	245 ft ² / 23 m ²	688 ft ² / 64 m ²	397,308 ft ² / 36,912 m ²	400 (20)
2	193,500 ft ² / 17,977 m ²	9,675 ft ² / 899 m ²	245 ft ² / 23 m ²	-	203,420 ft ² / 18,899 m ²	190 (10)
3	137,000 ft ² / 12,728 m ²	6,850 ft ² / 636 m ²	245 ft ² / 23 m ²	-	144,095 ft ² / 13,387 m ²	140 (7)
4	155,500 ft ² / 14,446 m ²	7,775 ft ² / 722 m ²	245 ft ² / 23 m ²	-	163,520 ft ² / 15,191 m ²	156 (8)
5	38,500 ft ² / 3,590 m ²	1,825 ft ² / 170 m ²	-	-	38,325 ft ² / 3,560 m ²	60 (3)
6A	13,600 ft ² / 1,263 m ²	-	-	-	13,600 ft ² / 1,263 m ²	23 (2)
6B	17,100 ft ² / 1,589 m ²	-	-	-	17,100 ft ² / 1,589 m ²	25 (2)
7	42,500 ft ² / 3,948 m ²	2,125 ft ² / 197 m ²	-	-	44,625 ft ² / 4,145 m ²	70 (4)
8	29,200 ft ² / 2,713 m ²	1,460 ft ² / 136 m ²	-	-	30,660 ft ² / 2,849 m ²	48 (3)
9	33,000 ft ² / 3,066 m ²	1,650 ft ² / 153 m ²	-	-	34,650 ft ² / 3,219 m ²	46 (3)
TOTAL	1,035,400 ft² / 96,191 m²	50,235 ft² / 4,667 m²	980 ft² / 92 m²	688 ft² / 64 m²	1,087,303 ft² / 101,014 m²	1,158 (62)



NOTES AEWTP026C

- All dimensions and levels are to be checked on site.
- Any discrepancies are to be reported to the architect before any work commences.
- This drawing shall not be scaled to ascertain any dimensions. Work to figured dimensions only.
- This drawing shall not be reproduced without express written permission from AEW.
- Title overlay drawings and ownership boundaries are produced using all reasonable endeavors. AEW cannot be responsible for the accuracy or scale discrepancy of base plans supplied to them.
- All works are to be undertaken in accordance with Building Regulations and the latest British Standards.
- All proprietary materials and products are to be used strictly in accordance with the manufacturers recommendations.

CDM 2015
 Client notified of duties: CDM_PD_Date
 Principal Designer: CDM_PD_Name
 Unless noted below, all known hazards have been highlighted on the drawing:



P1	22/01/21	MB	DOH
Initial Issue			
REV	Date	Drawn by: -	Checked by: -
Status	Purpose of Issue		
S2	For Information		
drawing stage	Feasibility		
client	NPL Ltd.		
project	Northern Gateway Deeside		
drawing title	Proposed Masterplan		
date	22/01/21	drawn	MB
scale@A1	1:2500	checked	DOH

Appendix 2: Indicative Milestones

Appendix 3: Market Evidence

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Jones Lang LaSalle Ltd

Landmark 1 Oxford Street Manchester M1 4PB
+44 (0)161 828 6440

jll.co.uk

Our ref AP/TAB

Date 26 January 2021

Dear [REDACTED]

Northern Gateway, Deeside

As requested, Legat Owen and JLL provide a combined market update on the industrial and distribution market in Deeside with a North West overview.

Market Overview

The North West market has seen a strong level of take-up over the last 12 months, driven mainly by the impact of the Covid-19 pandemic on the supply chain and shopping habits.

To put this in context in late 2019 the market was stabilising with the completion of the General Election and the ongoing impact of Brexit. The industrial sector started 2020 in a strong position with a number of speculatively built units available or under construction in a market which was accepting a gradual switch to e-commerce retailing and a degree of reshoring in anticipation of Brexit.

With the arrival of the Covid-19 pandemic, the marketplace changed significantly in a short period of time. There was a rush to acquire units to cope with demand from the NHS/Government, retailers - who had goods in transit from Asia and the impact of the increase in online retailing.

With the level of take up in 2020 this has reduced the available and pipeline supply in the market. In North Wales and the North West there are only nine buildings being available over 100,000 ft², with four of the units under offer and the majority of mainstream sites being called in by the Secretary of State. This has therefore put a block on the development pipeline in a number of the more major locations. There are no big box units

Regionally the take-up of Grade A stock in unit sizes of over 100,000 sq ft² in 2020 was approximately 4 million ft² split 18% build to suit, 3.5% existing stock and 78.5% speculatively built units. This shows the reliance in the marketplace on speculatively built units and the need for an adequate land supply to provide both build to suit and speculative build opportunities.

Deeside

The sub-regional market including Deeside, Ellesmere Port and The Wirral has benefitted from increased demand with recent notable transactions including:

- Amazon – 100,000 ft², The Airfields, Deeside
- Servitec - 125,000 ft² Aviator Park, Ellesmere Port
- Ifor Williams – 84,000 ft² Zone One Deeside
- Prowell – 328,000 ft² Ellesmere Port
- Honeywell – 210,000 ft² Pioneer Point, Ellesmere Port

Recent disposals and developments include Peel Ports sale of 43 acres to Firethorn Trust who plan to speculatively build up to 700,000 sq ft in units of up to c.400,000 sq ft and PLP's two unit scheme of 138,000 sq ft and 92,000 sq ft confirm the confidence in the strength of the market. By contrast we are unaware of any planned speculative development of any scale in Deeside.

Deeside Industrial Park, which adjoins the Northern Gateway and Airfields sites, is the premier industrial estate in North Wales. The wider area has an excellent labour supply, with a skilled workforce and labour rates which all prove attractive to both companies and their workforce. Deeside has excellent road links, with access to the M56, the wider regional motorway network and the major conurbations of Greater Manchester and the Liverpool City Region. Both Manchester and Liverpool Airports are within close proximity and the ports of Holyhead, Garston and Liverpool Two.

The location has attracted a range of established companies to the area including Airbus at Broughton, Toyota, Convatec, Magellan Aerospace and Tata Steel at Deeside/Shotton. The availability of land and premises in Deeside over a number of years has also helped retain occupiers who are looking to expand or improve/update their accommodation. The strong manufacturing base of the area also creates a market for component and sub-assembly suppliers.

Supply

The market in this location is therefore strong, but one of the main issues moving forward is the limited availability of modern stock. This lack of available space was recently highlighted by the Ifor Williams' acquisition of 84,000 sq ft in a speculative development of 3 separate units at Boundary Park in Zone 1 of Deeside Industrial Park. A single unit would have been a preferable solution and would have allowed the market to benefit from the 3 smaller speculative units. The lack of sites and suitable premises has now led to companies having to consider alternative locations in a larger search area.

A competition schedule is attached listing the current supply which confirms the lack of large floorplate sites.

Northern Gateway can prevent the leakage of occupiers from the location as it satisfies the principal occupier requirements. The occupational market requires a number of key elements to consider a location as suitable for development. These include:

- Ability to build large floor plate buildings
- Availability of skilled labour supply
- Utility/infrastructure provision
- Good road, port and airport access

Northern Gateway is now in a position to satisfy the four criteria.

With the project now moving into its delivery stage, it will benefit from strong local and regional market demand. There is clear need for employment land in this location and even prior to marketing the site there is already interest being shown.

Demand

At present there are several large enquiries which are generally structural relocations for companies who will consider Deeside. There are few sites that are immediately available that can satisfy their search criteria in terms of their locational preference, premises, utility and labour requirements.

The site can also provide a supply of units for SMEs and smaller occupiers with a number of smaller infill plots where the companies could be accommodated possibly at a later date.

In terms of large scale enquiries, we list a number of requirements below, due to the confidentiality of the occupiers, individual occupiers have not been named.

- Enquiry 1 500,000 ft² - locally based company looking to expand and consolidate its operations.
- Enquiry 2 600,000 ft², there is potential for a long-term relocation of the company to better premises.
- Enquiry 3 300,000 ft², with expansion land for a manufacturing company
- Enquiry 4 A 50 acre long term inward investment requirement, which has considered a number of sites in the region and has a focus on Deeside.
- Enquiry 5 70,000 ft² to 170,000 ft² requirement – this is a build to suit requirement focussed on Shrewsbury/Shropshire to North Wales.

In summary the Industrial and Logistics market remains strong with limited supply outstripped by demand. Given this level of demand, we are confident that the site's market advantage can be fully realised creating further strategic employment opportunities for Deeside and the wider area.

If you require any further information with regard to the above, please contact either [REDACTED]
[REDACTED]

Kind regards.

Yours sincerely

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]