

EiP Statement

Flintshire Local Development Plan 2015 – 2030

Taylor Wimpey UK Limited

Representor ID: 1224983

Our ref 60174/05/CM/NMi
Date March 2021

Subject **Matter 3: Strategic Growth (inc Strategic Sites)**

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 3 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 7: Provision of Sustainable Housing Sites (including housing requirement)
 - 3 Matter 12: New Housing Development Proposals (inc 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. The Ffordd Fer site is free from planning, physical and ownership constraints. It is economically viable, and would support the creation of sustainable communities. It is therefore considered to be 'deliverable'.
- 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 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?

- 2.1 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 target and the target bears no correlation to the importance of Flintshire in delivering planned economic growth in North Wales.
- 2.2 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. The supporting statement to Policy STR1 at §5.6 makes reference to “*a severe period of economic recession and austerity*’ and ‘*an uncertain post-Brexit future*”. This reference clearly reflects a suppressed economic outlook and aspiration underpinning the Plan’s preparation.
- 2.3 The UK economy has not been in recession since the final quarter of 2009, a decade ago, and there is no certainty on what impact Brexit will have. TW considers that referring to a “*post-Brexit future*” is therefore unjustified and unnecessary. As such, the supporting text for Policy STR1 should not be seeking to justify a suppressed job growth figure by referring to a recession that took place 10 years ago or a political situation where the impacts are impossible to predict. Furthermore, the UK is facing an uncertain time as the impacts of the global pandemic come to the fore, and each local authority must play its part in driving economic growth.
- 2.4 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.
- 2.5 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 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.
- 2.6 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 ‘Future Wales: The National Plan 2040’. The National Plan 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.

- 2.7 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. As a result, TW considers that its site in Mynydd Isa, which is well-located to both Chester and Wrexham would support the Council and the wider strategic focus on this part of North Wales.
- 2.8 TW also has concerns over the lack of consistency between the proposed housing requirement and Flintshire's economic growth targets. We provide further detail on this matter in our Matter 7 paper.
- b) When were i) the Northern Gateway site and ii) the Warren Hall site granted outline planning permission? Have circumstances changed significantly since then?*
- 2.9 Please see our response to Question 3c on this matter.
- 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?*
- 2.10 The Policy STR3 outlines that the two strategic sites at Northern Gateway and Warren Hall will deliver 1,635 new homes during the plan period, including 1,325 to be delivered on the Northern Gateway Site [STR3A].
- 2.11 TW has concerns with the deliverability of the number of dwellings proposed as part of the STR3A allocation by the end of the plan period. In this regard, TW notes that this site has been identified for development for a significant period of time, including its allocation within the UDP which was adopted in 2011. Despite being allocated for almost 10 years, the site is only just beginning to deliver housing.
- 2.12 It is understood that only the first phase of residential development on the site is currently taking place and this is in the early stages of development. The indicative housing delivery timetable submitted with Pochin's outline application (ref. 050125) in 2012 projected that 600 dwellings would be delivered on the Site STR3A by 2018/19. However, the Council's Housing Land Supply and Delivery Background Paper¹ suggests that there were no completions on the site up to 2019/20, which demonstrates that the delivery of the site has considerably failed to materialise as originally anticipated. The Background Paper² also suggests that there has only been one reserved matters application (ref.059514) approved on the STR3A strategic allocation (for 283 dwellings) to date.
- 2.13 Indeed, the Council's evidence also brings the anticipated delivery on Site STR3A into question and suggests that the site will fail to deliver the full allocation of 1,325 dwellings over the plan period. With regard to this matter, the Housing Land Supply and Delivery Background Paper indicates the delivery of 1,185 dwellings on the site over the plan period (it notes that 140 units have been discounted and may be delivered beyond the LDP end date). It identifies the completion trajectory shown in Table 1.

¹ FCC002 Housing Land Supply and Delivery Background Paper 10A Updated (January 2021)

² FCC002 Housing Land Supply and Delivery Background Paper 10A Updated (January 2021) §2.6.5

Table 1 Northern Gateway Site trajectory

Capacity	Built 2018 -19	Built 2019 -20	2020 -21	2021 -22	2022 -23	2023 -24	2024 -25	2025 -26	2026 -27	2027 -28	2028 -29	2029 -30	30+
1185 (1325 less 140 outside period)			90	90	150	150	120	120	120	120	120	105	140

Source: Flintshire Council Housing Supply and Background Paper

- 2.14 Given the failure of the site to deliver as previously projected, TW considers that a cautious approach should be taken to future delivery on the site. Whilst the Council’s latest trajectory indicates that not all dwellings will be delivered within the FLDP plan period, TW considers that the projected completions are still overly ambitious and actual delivery over the plan period will be significantly below the 1,185 dwellings identified.
- 2.15 For example, based on the single reserved matters approval secured by one developer, it seems unlikely that the site will achieve 90 completions in 2020/21 and 2021/22, as this would be way in excess of the typical build out rates for a single developer. The targets for the following periods are also ambitious and do not reflect typical delivery rates on sites of this size. Lichfields’ recent research on the delivery of large sites across England and Wales³ suggests that average delivery rates on sites of this size (107 dwellings per annum) are significantly below the build rates identified in Table 1 for 2022/23 to 2028/29. In addition, our research has found that brownfield sites typically deliver at a slower build out rate than greenfield sites (build out for greenfield sites in our sample was 34% greater than the equivalent figure for those on brownfield land). In this respect, we note that the Northern Gateway site represents a large area of brownfield land with significant infrastructure constraints to address including the delivery of road infrastructure and sustainable drainage and flood management. Therefore, actual build out rates are likely to be significantly lower than those identified in Table 1.
- 2.16 TW also notes that there are other factors which suggest that the site may not deliver as anticipated. For example, the FLDP⁴ states:
- “The mix and quantum of development has changed since the allocation in the UDP because the two halves of the site are in separate ownership and are being promoted separately and market demand has changed since the site was first allocated. It is considered that a renewed allocation as part of the LDP is required to re-promote the sites which will result in increased market confidence in the scheme, on the back of considerable public sector infrastructure investment”.*
- 2.17 This identified lack of market confidence suggests that there may be insufficient developer interest in the early years of the remaining plan period to deliver the significant build out rates identified in these early years.
- 2.18 Whilst TW appreciates there has been public sector investment in the Northern Gateway scheme, there appear to be significant delivery issues associated with it which has prevented the

³ Start to Finish What factors affect the build-out rates of large scale housing sites? Second Edition (February 2020)

⁴ LDP-KSDDEP1 Flintshire Local Development Plan (September 2019) §5.19

site coming forward as quickly as originally anticipated. TW is concerned that the delivery timetable for new dwellings on the site has already slipped significantly (this is typical of larger sites) and consider the revised timescales for delivery to be too ambitious for the reasons set out above.

2.19 In conclusion, given the uncertainties over the delivery of strategic site STR3A, TW would recommend that the Council allocates additional non-strategic sites that are available to come forward following adoption of the Plan, such as TW's Ffordd Fer site at Mynydd Isa, which is a deliverable site that is available to meet the housing requirement.

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

2.20 Please see our response to Question 3c on this matter.

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?

2.21 TW has no comment on this matter.