

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 3 – Strategic Growth.

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

The Council's general strategy in seeking to link housing growth to the economic growth strategy is supported, whilst there are significant employers already within the County, it is clear that there is considerable potential for additional employment growth and this, combined with appropriate levels of new housebuilding can contribute, not only towards growth in prosperity within the Region and the County generally, but also to the regeneration of the older urban areas.

However, as we seek to demonstrate in our representations relating to the housing requirement (Matter 7), we do not believe that the Plan achieves its objective as the proposed level of housing growth is more akin to that achieved over recent years in a period when the economy was static than it is commensurate with supporting significant economic growth; without an appropriate level of housing the desired level of economic growth is unlikely to be delivered.

Therefore, the aspiration is a good one, but the Plan will not deliver the required objective in its current form.

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

i) Northern Gateway

It may be significant that there is no Statement of Common Ground relating to this development site, potentially, reflecting uncertainty in respect of its delivery.

It is understood that the two outline planning permissions for the site were originally granted in 2013 and 2014, some seven years later residential development has commenced on just one phase of the development, it would appear that two additional reserved matters applications have been submitted (060411 & 061585), one remains undetermined after 18 months whilst the other has been registered for 8 months and is also undetermined.

There is no obvious change in circumstances since outline planning permission was granted, delivery in the long term is not contested, at least for the time being, but to adopt an unduly optimistic approach to housing delivery in the light of progress to date is considered to be unjustified.

ii. Warren Hall

Welsh Government do not have the most positive record in terms of bringing forward residential sites, Well St, Buckley is owned by them and was allocated for residential development in the current UDP, we are aware of several housebuilders who have been positively interested in the site and at one time the Planning Consultancy provided a fee proposal for preparing a planning brief to accompany its marketing, but still it is not developed.

Outline planning permission for a business park development on this site was obtained in 2008, emphasising the lack of confidence in the ability of Welsh Government to bring forward a site within a short time period.

However, subject to the outcome of this Examination, there will be a change in circumstances in that the LDP proposes that part of the site be allocated for residential development and, in effect, a process that has not delivered development over a 12 year period since outline permission was granted will begin again, albeit, one hopes, with a positive outcome.

- 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?*

i. Northern Gateway

It is very apparent that this has proved to be a difficult site to bring forward over many years, having regard to the split ownership, the requirement for significant preparatory works, market perception and, most recently, delays in determining planning applications. In such circumstances it is prudent to adopt a cautionary approach to delivery.

The present trajectory (Appendix 3A) anticipates 90 dwellings from this site in 2020-21, increasing to 150 dpa in 2022-23 before falling back to 120 dpa from 2024 -25. These figures are unrealistic for two main reasons. First of all, it is apparent that the single developer on the site (Countryside) will not deliver 90 dwellings in 2020/21, the Delivery Statement indicates that Countryside will only deliver 75 dpa, and even that is caveated by reference to market conditions. Secondly, if and when more housebuilders become involved in building houses on this site, then they will all be in competition with one another, in these circumstances it would in any circumstances be unwise to assume anything more than 100 dpa from the site as a whole.

Taking the above into account, and:

- having regard to lead times in terms of preparing sites for development,
- adopting a cautious approach in view of the long history and in relation to market perception of this site, and
- including the possibility that, whilst there are three developers apparently involved with the site at present, it cannot be assumed that this will be the case in the future,

it is concluded that a cautious approach to delivery should be adopted. Consequently, our assumption of 100 dpa above should be revised downwards given the uncertainty surrounding this site to no more than 75 dpa as an average – and only time will tell whether this can be achieved.

The above would suggest that a reasonable assumption of delivery from this site within the Plan period would be 750 dwellings, a reduction of 435 dwellings on that assumed within Appendix 3A; over- provision relative to development plan assumptions would not be problematical, but under-provision would be a significant problem

ii. Warren Hall.

When and if the draft allocation of this site to include 300 dwellings is confirmed, having regard to the Statement of Common Ground, the following considerations appear relevant:

- There is a difference between it being indicated that the North Wales Economic Ambition Board will provide the finance for the infrastructure and it actually being available to deliver the works, there may be delay in this process, or even, it might never happen.
- There is no outline planning permission for the residential area. It would seem most likely that such an application would be EIA development involving a comprehensive approach to the whole mixed use site, and there would be a requirement for a S.106 Agreement covering a whole range of matters, not least the delivery of infrastructure, affordable housing and education (£1.8 million – SOCG para 8.9).
- There is not at present a developer, or developers, involved. Whilst housebuilders have understandably expressed interest in the development, this may not be quite so positive when the WG aspirations in relation the affordable housing percentage, minimum space standards, zero carbon homes and dependency on renewables (SOCG para 5.7) become clearer. However, a reserved matters application will also take time (see Northern Gateway, 060411 – 18 months and not yet determined).

Having regard to the above, it is considered to be unrealistic to assume the delivery of any housing from this site before 2025/6 at the earliest and even this is considered to be optimistic. Consequently, delivery from this site within the Plan period should be reduced by 75 dwellings.

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

For the reasons set out above, it is not considered that the Northern Gateway site is at all advanced so far as housing delivery is concerned, the process has only just begun and that process may yet slow or even stop given the ongoing uncertainties.

- e) *Is there enough site specific guidance and information in the LDP to 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?*

This question is primarily for the LPA to respond to. From a developers perspective, the level of detailed information that is necessary to bring forward a site is usually revealed during the course of preparing a planning application and all the associated reports and investigations.