

Flintshire County Council

Local Development Plan (LDP) Examination

HEARING STATEMENT

Hearing Session 4: Location of Development

**Response by Wales & West Housing Association Limited (Consultee ID
1230461) Re: Land at Liverpool Road, Buckley**

March 2021



Preamble

Wales and West are a registered social landlord who have a development programme of 500 dwellings a year to meet Welsh Government targets and deliver predominately social housing. We are therefore interested in how development plan policies affect our ability to achieve this aim and to help deliver affordable housing targets.

Asbri Planning Limited has been instructed by Wales and West Housing Association to submit this Statement and attend Hearing Session 4 – Location of Development.

The site in question, land at Liverpool Road, Buckley was promoted as a Candidate Site (BUC 22) and subsequently representations were submitted on the Deposit Plan (Ref: 926).

The site was previously assessed by the Council as Amber and it was acknowledged that it complied with the preferred strategy and was well sited in relation to Buckley and surrounded on 3 sides by development.

The Council stated in later stages of the assessment of the candidate site that the main barrier to its inclusion as a housing land allocation related to the ecological issues with the presence of the SSSI and SAC. It was indicated that a smaller land parcel on the southern side of the site could be more appropriate for inclusion in the LDP.

An amended area was subsequently submitted for consideration as an Alternative site in line with the provisions of the Development Plan Manual.

The site area was subsequently reduced from 12.4 hectares to 5.3 ha with the reduced area having the ability to deliver approximately 120 units, along with ecological mitigation, Suds and open space and can be designed to allow for future growth into the adjoining additional land if considered appropriate in the future. The public footpath would form the access road into the site and all development would be to the south of the existing footpath. This would leave a significant buffer to the GCN SSSI/SAC.

As the owners of the site, Wales & West confirm that the site is deliverable within the Plan period, and can be delivered quickly, as the submission of a planning application is currently being prepared with a target date of April 2021 for submission.

The site is well related to the existing settlement pattern and lies in a settlement which has a range of facilities associated with a town with a population of some 15,000 inhabitants.

Matter 4: Location of Development Settlement Hierarchy, Settlement limits.

Key Issue: Is the spatial strategy coherent and based on a clear and robust preparation process? Are the spatial strategy and relevant strategic policies realistic, appropriate and logical in the light of relevant alternatives and are they based on robust and credible evidence?

The Matters to be Addressed for each site, under Question 4 of the Inspector's Matters ,Issues and Questions Agenda are responded to below under the appropriate headings.

a) What is the purpose of the settlement hierarchy? Will it guide new development to the most sustainable locations? Is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?

The purpose of a settlement hierarchy in any development plan should be to guide development to the most sustainable locations and allow for an appropriate level of growth according to the size, status and number and range of facilities and services in that settlement. In Flintshire Buckley is identified in Policy STR2 as a Tier 1 Main Service Centre with the presence of key facilities and transport connections.

The Council accepts that Buckley is a sustainable location for new growth. Under Policy HN1: New Housing Development Proposals, however, only one site is allocated in Buckley – Land at Well Street (159 dwellings), which was also a UDP allocation.

It is therefore the case that insufficient sites have been allocated in the Tier 1 settlement of Buckley to support the employment led growth forecast which the LDP housing numbers are based upon in Policy STR1.

The Plan, in relation to the town of Buckley is consequently failing to guide new development to the most sustainable locations.

b) What is the rationale for the proportions of development split across the tiers?

In view of the above we consider that the Council's rationale **is** flawed.

Buckley has a population exceeding 15,000 residents (2011 Census) and a single allocation on a longstanding site for 159 dwellings is clearly inadequate for the scale and function of the town. Indeed larger numbers of dwellings are proposed to be allocated in the Tier 2 settlements of Ewloe (298) and Hawarden (288).

Furthermore the Northern Gateway area and Warren Hall Development site, neither of which relate directly to the form of existing sustainable settlements, are proposed to provide for 1,625 homes between them over the plan period. There appears to be a heavy reliance on these sites to deliver 24% of the new homes required.

c) Why is it necessary to assess the comments of the UDP inspector with regard to the definition of settlement boundaries?

The defining of settlement boundaries in relation to individual sites is rarely discussed in hearing sessions in any detail as the emphasis in Examinations is the overall soundness of the Plan. There have been numerous occasions in Local Development Plan Examinations across Wales where valid reasons for reviewing Deposit Plan boundaries to include or exclude sites have not resulted in any changes for the

reason that they do not affect overall soundness.

Nevertheless the drawing of boundaries, the methodology for determining them, and the evidence base upon which they are founded are important soundness issues as they have a bearing on factors such as the extent of windfall allowances, the delineation of green barriers, and the proportion of small sites which may contribute to the overall housing numbers.

Given the above any reference to UDP related comments or methodology should be regarded as irrelevant and unnecessary as those boundaries were not formulated with the Tests of Soundness in mind. Too often local authorities have relied on UDP settlement boundaries with minimal changes being made, mainly to accommodate new allocations.

d) Where is the methodology for the assessment of settlement boundaries described? Has it been applied consistently? Where are the results of the assessment set out?

The above comments are referred to in this context. As such the definition of settlement boundaries in Local Development Plans should be based on an exercise where boundaries are reviewed thoroughly under an agreed methodology with adequate justification given to the outcome of the exercise.

It is not considered that the methodology for assessing settlement boundaries has been set out fully or, if it exists, applied on a consistent basis.

e) Are the settlement limits drawn sufficiently widely to enable the predicted amount of growth?

No. As stated above the limits drawn will constrain opportunities for the proportion of small sites and windfalls for which an allowance is made in the plan.

It is suggested in this context that longstanding housing allocations which have yet to come forward should be removed but included within settlement boundaries. Land at Well Street, Buckley is a case in point where its identification within an extended settlement boundary would allow more flexibility in terms of the number of units which may be permissible.

It has been noted that a number of local authorities have adopted this stance where deliverability issues may exist or constraints may limit housing densities on such longstanding allocations. It may otherwise be unreasonable to remove the sites completely.

It has been noted that in Examinations elsewhere local authority officers have been asked specifically by Inspectors to identify potential sites which they consider would be included within the windfall allowance, with adequate answers not being forthcoming. By referring to old allocations which remain in settlement boundaries, at least it would offer a degree of justification in terms of the allowance for windfall sites.

f) Is it appropriate for there to be a green wedge designation within the Deeside Enterprise Zone? Will it be an unacceptable constraint on the ability to maximise economic opportunities in this area?

Our clients have no comments on this issue.

Summary

In light of the above it is considered that the spatial strategy is not coherent or based on a clear and robust preparation process. Neither are the spatial strategy and relevant strategic policies realistic, appropriate and logical in the light of relevant alternatives and they are not based on robust and credible evidence?