M7.11C

Hearing Statement

Flintshire Local Development Plan – Matter 7: Provision of Sustainable Housing Sites

on behalf of:

Anwyl Homes

Land at Croes Atti, Oakenholt

Flint

March 2021

Prepared by

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1. INTRODUCTION & CONTEXT

Purpose

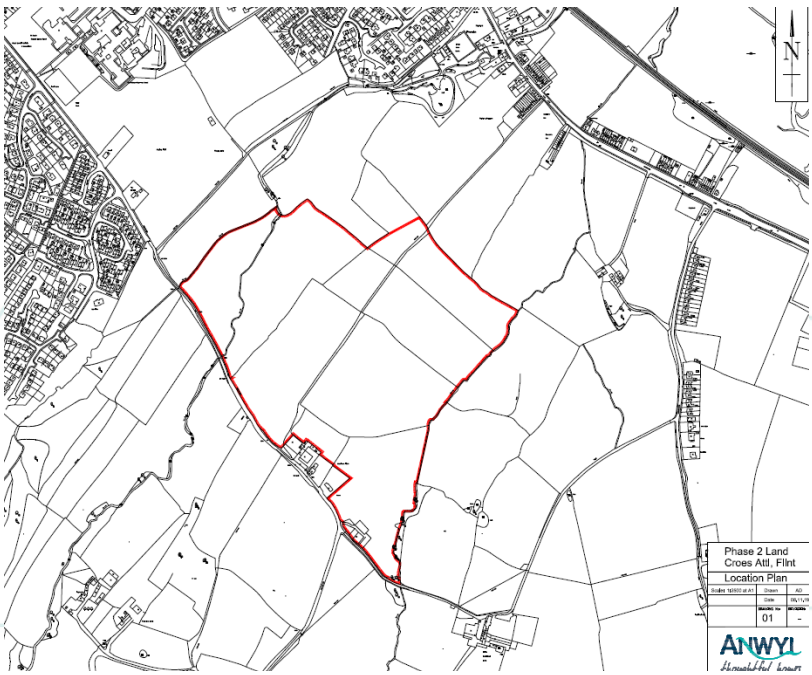
1.1 This Written Statement has been prepared by SATPLAN LTD in connection with the Examination in Public of the Flintshire Local Development Plan (LDP).

1.2 It specifically addresses the Inspectors Matter 7 (Provision of Sustainable Housing Sites) and the issue of whether *'the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?*

1.3 This Statement also addresses the additional questions raised by the Inspector in relation to Matter 7.

Context

1.4 The context of this Statement concerns land at Croes Atti, Oakenholt, Flint as indicated on the plan below.



1.5 The Site has been promoted at earlier stages of Flintshire Local Development Plan on behalf of Anwyl Homes. The Site is owned by Anwyl Homes and can therefore be delivered comprehensively. The Site to north benefits from planning approval for up to 635 dwellings and is largely complete. This Site represents 'Phase 2' of the overall aspiration for the wider Site. A Vision Document Supports it deliverability credentials.

References

1.6 This Written Statement relies upon and should be read in conjunction with the documents constituting the Examination Library.

2. Response to Matter 7- Provision of Sustainable Housing Sites

Issue – Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?

Question 7a) Is the housing requirement, based as it is on economic and job aspirations, realistic and deliverable within the plan period? How does the amount of housing proposed relate to the most recent Welsh Government household projections3? Has the UDP under-delivery been accounted for in the LDP housing requirement figure? If not, should it be?

2.1. We support the Plans Strategy which is based on an aspirational approach to job creation and employment development. In principle, the employment-led projection allowing for 8-10,000 new jobs within the plan period is generally supported and would enable the Council to deliver their aspirations for Enterprise Zones and help ensure that key strategic employment Sites deliver significant employment during the plan period. It is considered that planning for this level of employment is ambitious yet realistic, and a higher level of household formation could be achieved and therefore should be planned for.

2.2. With this in mind, if the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable

modes of transport. The use of an employment-led projection is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits.

2.3. The Council have previously argued the LDP provides a flexibility allowance to assist with the UDP under-delivery. There are various estimations of the actual under supply figure and approaches to dealing with this. This is critical to the soundness of the plan and we therefore welcome the Council's written Hearing Statements which will address whether the UDP under-delivery has been accounted for in the LDP housing requirement figure. We will respond to this Matter verbally at the Hearing Sessions if appropriate.

Question 7b)

Although neighbouring counties each provide for their own housing needs, does the differential in prices, particularly between England and Wales, lead to any cross-border demand for housing? If so, has this been accounted for?

2.4. Response- No Comment

Question 7c) The 14.4% flexibility allowance is slightly greater than average. On what basis has that percentage been selected?

2.5. We have reviewed Background Paper 10A [FCC002] and acknowledge the Councils described approach to flexibility within the LDP (specifically paragraphs 2.1.1 to 2.1.4). The Council's inclusion of 'non-delivery allowance' is recognised but it is still questionable whether the historic UDP under delivery is fully accounted for within the flexibility calculations.

2.6. As outlined in Paragraph 2.3 above, understanding the historic under delivery of the housing requirements in the UDP plan period is critical to the soundness of the plan and we therefore request to review the Council's written Hearing Statements on this specific question and reserve our right to comment further at the Hearing Sessions if appropriate.

Question 7d) Is the housing requirement over reliant on the provision of dwellings on windfall and small sites?

2.7. As above, we welcome the Council's written Hearing Statements on this Matter and will respond verbally at the Hearing Sessions if appropriate.

Question 7e) Do rates of housing delivery over recent years indicate that the housing requirement firstly, could, or secondly, should, be increased?

2.8. The content of Background Paper 10A [FCC002] provides some certainty that the borough has delivered more consistent and increased rates of housing delivery since 2015. Appendix 2A- Commitment Trajectory helps to evidence this assertion.

2.9. Our client, Anwyl Homes, can evidence consistent delivery rates across a range of their Sites in Flintshire demonstrating when Sites are available for development with an active and identified end user, they have the ability to deliver a range of dwellings across the borough.

2.10. The table below provides the number of completions across several Anwyl developments over the last 5 years, averaging 84 units per annum.

Site Location	Number of Dwellings Delivered
2016	**74**
Croes Atti - Oakenholt	12
Cwrt Isaf - Oakenholt	18
Parc Celyn - Abermorddu	15
Parc St Mary's - Northop Hall	20
The Paddocks - Buckley	9
2017	**101**
Croes Atti - Oakenholt	1
Croes Atti - Oakenholt Phase 3	36
Cwrt Isaf - Oakenholt	2
Parc Celyn - Abermorddu	15

Parc St Mary's - Northop Hall	23
Springdale Meadows - Hawarden	10
The Paddocks - Buckley	14
2018	**72**
Croes Atti - Oakenholt Phase 3	36
Parc Celyn - Abermorddu	2
Parc St Mary's - Northop Hall	14
Springdale Meadows - Hawarden	19
The Paddocks - Buckley	1
2019	**97**
Croes Atti - Oakenholt	30
Croes Atti - Oakenholt Phase 3	36
Parc St Mary's - Northop Hall	16
Springdale Meadows - Hawarden	11
The Paddocks - Buckley	4
2020	**78**
Croes Atti - Oakenholt	78
Grand Total	**422**

2.11. We consider there is clearly an appetite and need for new housing across the borough which is evidenced by sales data and take up rates. None of Anwyl's sites have stalled, the only constraint to future development is the lack of available Sites which is constraining the supply and therefore frustrating the availability of both market and affordable housing. The lack of supply will have a direct impact on the economic growth strategy and rates of migration as set out earlier in these representations.

2.12. Given the evidence above, it is clear the housing requirement could be increased. Over the last year (despite the constraints of COVID, sales of new homes for Anwyl have remained incredibly strong which indicates a real pent-up demand for new housing. As such we would

advocate an increase to the housing requirement. If the requirement were increased, there is not a shortage of proposed Sites that could deliver additional housing – indeed, our client controls a number of other Sites within Flintshire (not currently identified as allocations) that would provide an additional source of supply.

Question 7f) Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?

2.13. We do not believe Committed Sites need to be allocated – these commitments clearly form part of the wider housing land supply as set out in the submitted LDP. Clearly, if committed sites are not deliverable, they should not contribute to the identified supply that is intended to meet the housing requirement, This is arguably the historic issue with UDP under delivery argument, whereby a number of allocated Sites in the UDP have not come to fruition.

2.14. Within our Representations to the Deposit LDP, we outlined that it would be appropriate to have contingency Site provisions in place. Such Sites which are considered suitable for residential development could be held in reserve to be brought forward to increase the housing land supply, should a need for their release be demonstrated via the Annual Monitoring Report. The mechanism will ensure that the Plan is sufficiently flexible and can ensure the deliverability of housing over the plan period without the need for a formal review of the LDP which would cause further delays to sustainable development in the County.

2.15. This practice is not dissimilar to 'safeguarded' sites which are often used within English Local Plans to ensure that suitable and deliverable Sites can be brought forward easily without a review of a Local Plan should the supply of allocated and committed housing Sites not come forward.

Question 7g) Is it likely that all the committed sites identified as contributing to the housing requirement (LDP Appendix 1), and allocations which are carried over as such from the UDP, will be delivered during the plan period? What is the evidence?

2.16. Our client questions some of the committed sites identified in the LDP (Appendix 1). The table below sets out our commentary for those sites.

REF	Name	Capacity	Time frame	Comments
	Wilcox Coach Works, Afonwen	19	2024-2027	Reserved Matter Approval was granted in 2018 and site sold in 2019 but there has been no further progress. It is questionable whether this site will be delivered in the anticipated time frame or will achieve 19 units on the site.
HC.4	Land at Brook farm, Buckley	16	2022/2023	The Site has had planning permission for over 12 years which is renewed every 3 years. Appendix 2A of document FCC002 notes that Renewal has been granted and the Site is to be marketed. It is therefore clear there is no identified end user and simply rolling forward an extant consent which is clearly not being delivered is unrealistic to include in a housing commitment supply table.
	Bromfield Timber Yard Mold	122	2020-2022	Appendix 2A of document FCC002 notes the Site is unlikely to be developed in the next 5 years. The site has planning consent for 122 apartments. The site is no longer an appropriate location for apartments and therefore the site is more realistically able to achieve 35-40 dwellings. The landowners expectations for the value of the site are unrealistic and too high. It is arguable whether this site will be delivered in the remaining 9 years of the plan period.

	Station Yard Depot	49	2020-2022	Whilst Reserved Matters Planning Approval has been granted, no end user defined.

Question 7h) How does the LDP avoid the issue of double counting in respect of large windfall sites?

2.17. Response- No Comment

Question 7i) What will be the implications for the delivery of the housing requirement of the comparatively short plan period remaining at adoption?

2.18. Assuming the LDP is adopted in 2021, this undoubtably leaves a significant proportion of the housing requirement to be delivered in the remaining 9 years. It will be crucial that the delivery of the plan is monitored annually and the appropriate safeguards put in place to avoid the historic under delivery of the UDP plan period.

2.19. It is critical to provide a range of Sites across the brough which are readily available for development with identified end users – this will likely result in the need to identify additional Sites to those within the LDP as currently drafted. The range of Sites will provide greater flexibility and choice and the ability to realistically deliver the plans housing requitements over a relatively short period.

2.20. For example, the Anwyl Homes Site at Croes Atti has proven track record of housing delivery in Flintshire at the Croes Atti, Phase 1 has planning permission up to 635 dwellings. A total 126 dwellings have now been completed on the Site.

2.21. The future phases of development (or 'Phase 2') would provide a logical continuation to Phase 1. The Site is situated within a highly sustainable location and would provide essential family housing (both market and affordable) that would make a significant contribution to meeting the housing requirements for Flintshire and importantly, to meet the requirement for Flint which is a Tier 1 Settlement.

2.22. There is already an active builder on Site, the land is within Anwyl's ownership and there are no Site constraints that would prevent the development of housing; key infrastructure such

as roads and utilities are in place or readily available and therefore, early delivery could take place from this Site. Importantly, this Site would make a very significant contribution to the deliverable five-year housing supply.

Question 7j)

Is the wording of Policy STR11 appropriate, particularly the use of the word 'expected' and the inclusion of the final paragraph?

2.23. Response- No Comment