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MAC016rep2

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26 July 2022

Mr A Farrow
Chief Officer (Planning Environment and Economy),
Flintshire County Council,
County Hall,
Mold
CH7 6NB

Dear Sirs

Flintshire LDP Examination: Matters Arising Consultation. Response of [REDACTED]

I am instructed by [REDACTED] to set out the following representations.

To set wider context for the Inspectors, WJH response at this point arises from its interest in land allocated under policy HN1.4 at Northop Road, Flint. WJH is in contract with the site landowners to develop the majority of the allocation as shown on the enclosed location plan. WJH has been in extensive discussions with the Flintshire County Council since late 2021 to bring forward a planning application. It has completed informal consultation in the community (June 2022). At the time of preparing this response, WJH is undertaking Statutory Pre-Application Consultation as required by Welsh Government in advance of submitting a planning application in late summer 2022.

WJH proposals are at an advanced stage and can be treated with a high degree of certainty. It is expected that WJH application will be for 200 dwellings. The balance of the allocation would be expected to deliver a further 25 dwellings or thereabouts. This compares to the figure of 170 units in policy HN.1.4 at Deposit. WJH sets out responses in respect of:

Chartered Town Planning Consultant - [REDACTED]

- The Housing Supply Figure and Housing Balance Sheets (MACS 016, 027, 030, 038).
- Policy HN1.4 (MAC 134).

MACS. 016, 027, 030, 038. Considered unnecessary. Soundness Test 2 (robust, proportionate and credible evidence) and Test 3 (sufficiently flexible and appropriate contingency provisions) are considered not to be met. Plan can be made sound if MACs 016, 027, 030 and 038 are revised.

In summary these MACS revise the housing supply figure downwards from 7950 to 7870 and the overall number of new Housing Allocations to 855 from 874 (the total LDP allocations falling from 1874 units to 1775), They are not necessary to make the plan sound and the Inspector is requested to consider the evidence below.

MACs 016, 027, 030 (which are substantially a consequence of IMAC 001 - where the Inspectors have required the deletion of an allocation of 300 dwellings at Warren Hall) reduce the overall housing supply figure. MAC 038 further amends the new allocations requirement as identified.

This reduces certainty and flexibility in the LDP.

Remedy: Northop Road, Flint Policy HN 1.4. Revise site capacity to 225 dwellings from 170 dwellings.

WJH are at an advanced stage of scheme delivery. Its proposals have been reviewed by Flintshire County Council and been subject of community engagement. WJH proposals have been technically assessed including comprehensive Arboricultural, Archaeological, Biodiversity, Coal Risk, Drainage and Flood Consequences Reporting, Landscape Visual Impact, Transport Welsh Language Community Impact Assessment.

These demonstrate a development of 200 dwellings on WJH land is deliverable, free from planning, physical and ownership constraints and would be economically viable at the point it comes forward for development. With an additional development of approximately 25 dwellings on the balance of the allocation, 225 housing units can be delivered within the allocation at a density consistent with LDP policy HN2. Policy HN2 requires that housing sites should aim to provide a density of at least 30 dwellings per hectare. The supporting text to policy HN2 provides further guidance that on all sites of 10 units or more a general minimum net housing density of 30 dwellings per hectare is required. Future Wales

objectives to increase population density and placemaking in sustainable locations would be met, further supporting 225 units.

WJH proposals can deliver 200 dwellings on its part of the allocation and provide access to the remaining part of the allocation as well as deliver national placemaking outcomes in full. That additional section outside WJH control could deliver at least 25 further homes. Flintshire CC officers do not object to the principle of delivering 225 dwellings or thereabouts on the whole allocation.

As a consequence is it entirely reasonable and likely to assume that allocation HN1.4 will now deliver some 225 units not 170 as the Council originally envisaged.

Revising allocation HN1.4 upward to reflect now expected delivery rates (an increase of 55 units in comparison to the LDP when placed on Deposit) is founded on a high degree of evidence and certainty on site constraints and capacity. It would enable the Inspectors to

- A) retain confidence that the overall Housing Supply figure of 7950 remains achievable without MACs 016, 027 and 030 changing that figure and
- B) Adjust the numbers of allocations set out in MAC 038 to reflect the additional 55 units now expected to be delivered under allocation HN1.4.

MAC 134 Policy HN1.4.

WJH proposals have taken account the C2 flood zone boundary and associated amendment to the boundary of the allocation set out in MAC 134 and that is development can be delivered without conflicting with the C2 zone or national planning policy.

Conclusions

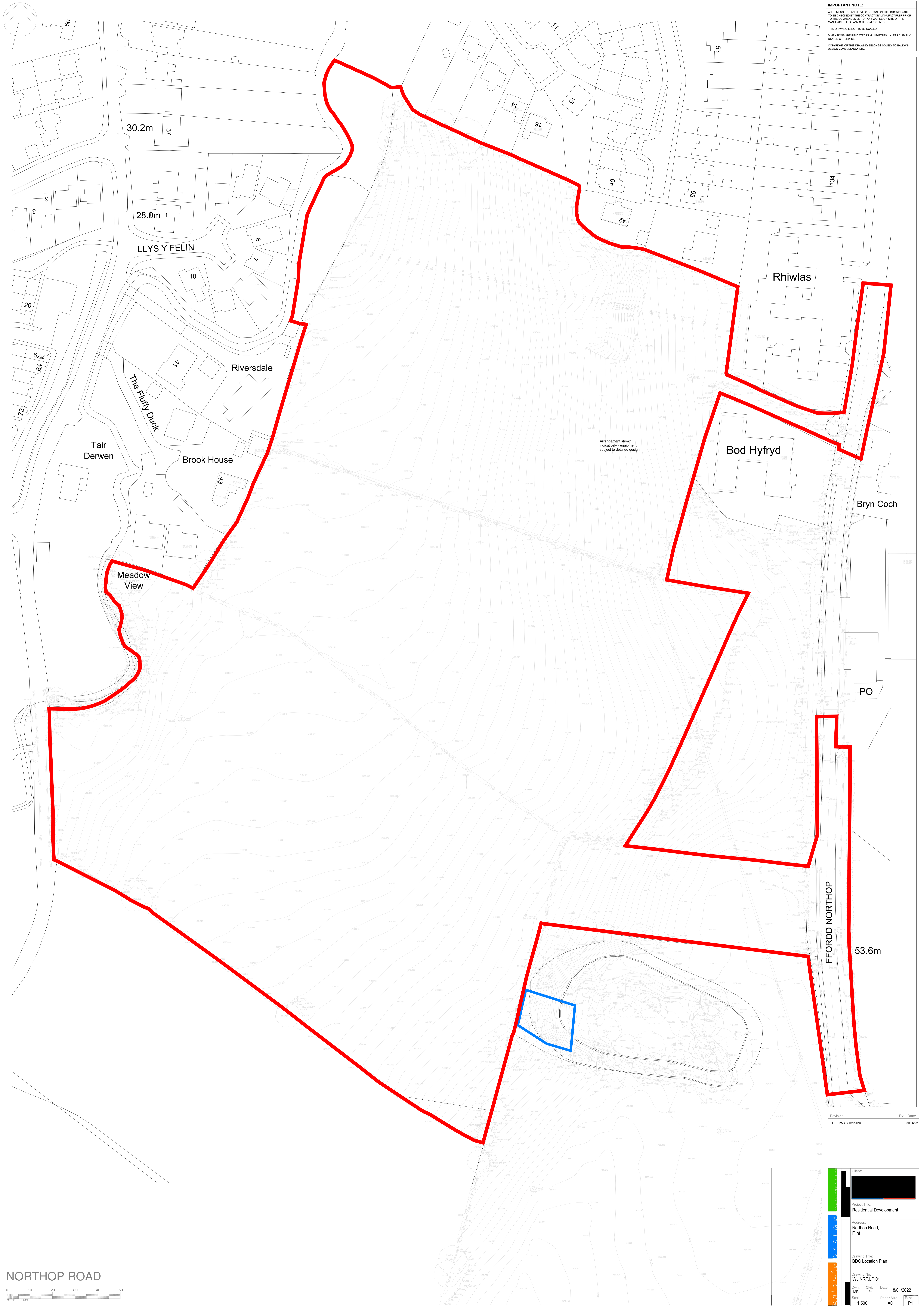
The Inspectors are requested to have regard to the evidence set out above and in order to increase certainty and maintain flexibility in the LDP delivery, to amend the proposed number of dwellings under policy HN1.4 from 170 to 225.

Yours Sincerely.

[Redacted signature]

[Redacted name]

IMPORTANT NOTE:
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NORTHOP ROAD
0 10 20 30 40 50
METRES

Revision: P1 By: PAC Submission Date: RL 30/06/22

Client: [Redacted]
Project Title: Residential Development
Address: Northop Road, Flint
Drawing Title: BDC Location Plan
Drawing No: WJ.NRF.LP.01
Dwn: MB Ckt: ** Date: 18/01/2022
Scale: 1:500 Paper Size: A0 Rev: P1