

# Flintshire County Council

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID <sup>2</sup>1149350) on behalf of Bloor Homes

---

### Matter 3: Strategic Growth (inc. Strategic Sites)

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?

Question 3a) What is the justification for adopting an aspirational growth strategy, led by an ambitious target for new jobs?

#### Employment -Led Projections

1.1 The Council sets out the target for creating 8,000 to 10,000 new jobs over the Plan Period, based on an employment -led projection, the majority of which would be provided on the two strategic sites (Policy STR3). This growth scenario is derived from forecasted population, household, and dwelling requirements in order to achieve these levels of new employment. These projections date back to 2015 and the publication of the Strategic Options Consultation Document in 2016, however they fail to properly account for the range and scale of the growth initiatives set out in Matter 2a) <sup>2</sup> all of which will have significant implications on the economic growth of the Borough.

1.2 The & RXQ FLO DFNQRZOHGJH LQ WKH / '3 WKH 1'DRUD-NDJKA LPSRUWD economic hub, contributor to output and growth in the Welsh economy as a whole and reinforces its involvement as a key partner of the MDA <sup>1</sup>. The stated MDA objectives which were published in 2017 under the Mersey Dee Growth Prospectus and were therefore not able to have been considered by the Council when setting the growth targets under the Strategic Options Consultation Document in 2016.

1.3 Similarly, it was only as recent as November 2019 that Welsh Government invested £20m LQWR WKH \$GYDQFHG 0DQXIDFWXULQJ 5HVHDFK & HQWUH·V \$0& and development facility. Despite these significant economic drivers taking effect, the projected growth scenario for jobs has remained static since 2016. Now more than ever, as areas across the UK seek to recover from the economic outfall of the COVID -19 pandemic, it is vital that the plan is prepared positively to cater for economic growth, with both employers and housing provision playing a critical role.

#### Accrued Shortfall

1.4 The Preferred Level of Growth fails to account for the housing backlog accrued over the UDP period. Of the 7,400 new homes required and targeted over the plan period

---

<sup>1</sup> Flintshire Deposit LDP (2019) Para. 3.25

Flintshire

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21149350)

# Flintshire County Council

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21149350) on behalf of Bloor Homes

---

¶ 2XWOLQH DSSOLFDWLRQ IRU WKH UHGHYHORSPHQW RI D VWU  
employment led mixed use development with new accesses and associated  
LQIUDVWUXFWXUH LQFOXGLQJ IORRG GHIHQFHV DQG ODQGVFDSL

1.16 In August 2018 a discharge of condition application (Ref: 058514) for the updated

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID

# Flintshire County Council

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21149350) on behalf of Bloor Homes

- 1.28 As the Council acknowledge in their Background Paper 10A the Warren Hall V L Wals 1 had planning permission for a number of years for a Business Park 2 yet despite that has failed to materialise into any development. The site secured planning permission prior to the adoption of the Flintshire UDP as an employment site under UDP Policy EM2. Despite benefitting from outline planning permission and a strategic allocation under the local plan, the Welsh Government (as landowner) were unable to stimulate any level of market interest to bring the site forward. The planning permission has since lapsed.
- 1.29 Similarly, in relation to the Northern Gateway allocation, it has only been as recent as 2019 that any form of development has been able to come forward.
- 1.30 It is remarkable that both these sites have been allocated for development in successive Alyn and Deeside and Flintshire development plans for the last 25 years and yet no meaningful development has taken place. This therefore reinforces the point that securing allocations alone provides little if any benefit to sites such as Warren Hall and Northern Gateway in promoting their viability and deliverability.

### Achievability and Delivery:

- 1.31 The Development Plan Manual makes clear the process on rolling forward previous allocations through the LDP process (NJL emphasis underlined):
- Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable. If an LPA wishes to retain such sites but cannot evidence they will be delivered, i.e. for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision 3
- 1.32 It is acknowledged that in the case of Northern Gateway there is evidence of delivery with the first phase of housing coming forward and subsequent planning permissions secured on the next phase of 129 dwellings. It is therefore not challenged that this st UDWHJLF VLWH FDQ EH UROOHG IRUZDUG DQG FRQWULEXWH WR over the Plan Period.
- 1.33 Both sites do however represent strategically complex development s evidenced by the abnormally high development costs which have required significant t public sector

<sup>2</sup> Background Paper 10A : Update re Housing Land Supply and Delivery (Jan 2021) Para. 2.6.2

<sup>3</sup> Development Plans Manual (2020) p. 120

# Flintshire County Council

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21149350) on behalf of Bloor Homes

---

L Q Y H V W P H Q W D Q G D V V L V W D Q F H ' H V S L W H - 0 H I G Q J D U O R P H G W I D R Q V H P V  
technical and ground conditions of the site, necessitate a significant residential  
element be brought forward as enabling development. In their own right, the delivery  
of employment development would not be financially viable on this site. These viability  
constraints therefore also risk the ability to deliver affordable housing on these sites.

- 1.34 In this context there are important questions and areas of concern on the proposed  
delivery rates. Given the extent of infrastructure and enabling works involved to open  
up future plots, proposed delivery rates

# Flintshire County Council

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21149350) on behalf of Bloor Homes

---

in our Updated Housing Trajectory (see response to Matter 7 ) including other housing allocations.

- 1.40 While it is accepted that the Deeside housing market itself could accommodate the proposed scale of residential development over the Plan Period (1185 dwellings), it is important to recognise there are multiple sub-markets within the strategic market area. Maximising the number of dwellings into the same sub-area which relies upon the same site infrastructure at the same time does not provide sufficient choice. It is instead constraining to the local authority in being so reliant upon a single strategic site, at a time when the Council should be





Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

# Flintshire County Council

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21149350) on behalf of Bloor Homes

---

involved to open up sites and future phases for development. Further information is therefore required to show how each scheme can remain viable while delivering the associated infrastructure, site enabling works and planning obligations.

Site Connfract -ha.998 (s)-9.006 (trun4 (a)-3.002 (b)-3.9s6 Tf 421.27 668.86 Td [(F)3.002 (u)5.994 (r)-10.99

# Flintshire County Council

## Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21149350) on behalf of Bloor Homes

---

Openreach underground apparatus east side of Warren Hall Court .

Openreach underground apparatus across proposed site accesses .

Hafren Dyfrdwy Water (HDW) have confirmed insufficient capacity in the local network requiring additional reinforcement to their network.

- 1.64 All the above represent significant abnormal costs, however there is no clear evidence within the Delivery Statement of any funding mechanism to overcoming such constraints, noting the significant public sector investment already towards junction improvements at the interchange of the A5104 and A55(T). The 2023 target for commencement of development for a site with significant development costs and constraints, no planning permission or developer interest is therefore extremely questionable and does not provide robust enough evidence as required by the DPM.

### Masterplans:

- 1.65 The Masterplan prepared on behalf of the Northern Gateway site and Warren Hall both have their shortcomings in providing sufficient information, particularly in relation to the precise scope and phasing of infrastructure and enabling works. As discussed, there is minimal detail over costings and funding mechanisms to underpin the delivery of these works.
- 1.66 Due to the siting of employment uses alongside housing, there are particular concerns from a place -mak1.998 (o)3.996 (n)-33.996 (n)-33.996 (n)-33.996 (n)-33.996 (n)-2s841.92 re(en)-3

to(the)JTJ ET Q q 0 0 595.32 841.92 re W\* n BT /TT0 9.96atillif

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-

## Flintshire County Council

### Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M3

Date: 22 March 2021

From: NJL Consulting (Consultee ID <sup>2</sup>1149350) on behalf of Bloor Homes

---

- 1.71 To ensure the Plan is robust Bloor Homes conclude that alternative sites should be considered to avoid the Council repeating past mistakes and failing to deliver on the housing requirement.