

FLINTSHIRE LDP EXAMINATION
MATTER 3- Policy STR 3.

SUBMISSION ON BEHALF OF ELAN HOMES LTD AND LINGFIELD HOMES AND PROP
DEVELOPMENTS LTD.

Responder ID 1231124

Prepared:



PLPLANNING

FLINTSBIRE LDP EXAMINATION SESSION 3. REPRESENTER: ID 1231124

PLPlanning: 6 Rhyd Drive, Rhos on Sea, LL28 4NE. (t) 07480 067325
(e) info@plplanning.co.uk

Contents

| | |
|---------------------------|---|
| Purpose and Background. | 3 |
| The Inspectors Questions. | 3 |
| Conclusions. | 9 |

6. I review and provide my clients response to the specific questions raised for those two key issues those below.

7. The designation of the Wrexham-Deeside Corridor as a National Growth Area (Future Wales 2040) is supported. The North Wales Growth Deal confirm both the economic opportunity and potential of the North Wales Region and the strategic location of Flintshire in delivering North Objectives. However the existence of the North Wales Economic Ambition Board confirms the risks and challenges in delivering the confidence and conditions necessary to enable and deliver development allocated in Development Plans that has to date not been capable of being delivered despite the strategic and locational advantages of proximity to labour, transport and communications etc.

8. My clients support the Council aspiration to growth to meet those objectives whilst recognising that environmental and other constraints in the County (AONB, Flooding etc) have spatial consequences. However it is crucial that the employment led strategy is underpinned and supported by housing to ensure Placemaking is delivered and employment is located near to and has a suitably large and local pool of resident labour.

9. In terms of housing growth and delivery, the Council continues to set out ¹ that the AABR will peak at 597 units in 2023-24 before trailing off significantly to 279 units in 2029-2030. This throttling back is a true reflection of a failure to address historic undersupply, a failure to provide flexibility in the LDP through reliance on a small number of Key Strategic and Allocated Sites delivering in the later phases and in my client view risks the economic ambition failing through an absence of sufficient and suitably located housing to meet the aspiration.

10. Crucially, my client has previously set out that the UDP undersupplied by some 2012 units. The inspectors consider that a matter of sufficient importance to hear evidence (Matter 7) on UDP under-delivery separately. However that cannot be considered in isolation. There is no doubt that housing delivery in the early years of the LDP was a reaction to the ÒcorkÓ in the bottle being

¹ Examination Document FCC002 February 2021

released (via a series of appeals focussed on and addressing Housing Land Supply under TAN 1(since revoked) or where UDP allocations and windfalls only came forward at the end of or post expiry of the UDP (eg Northern Gateway).

11. The LDP Housing Trajectory therefore draws strongly on delivery from planned but un-delivered housing growth which should be apportioned to the UDP phase (and which in fact respond to that UDP under-delivery). The Council places significant reliance on these consents as delivering the LDP Housing Trajectory in its early phases. The Inspectors cannot however disregard the evidence (ie the JHLAS of November 2015) which showed Flintshire had a land supply of 1.3 years, nor that much of this early phase development is in effect displaced demand from the UDP. The LDP growth figure makes no allowance for that undersupply and simply disregards it by resetting the housing delivery figure to zero from 2015 onwards.
12. The true housing figure to allow even for 'catching up' should be 6950 + 2012 amounting to a minimum of 8972 units. Even if the flexibility allowance included in the LDP were to be achieved, the plan will fail to meet past and future planned-for housing growth. The Inspector should address that matter and require additional housing land be provided to secure economic, housing and National Growth objectives.
- 13.

Welsh Government published planning application performance data in Flintshire² as a guide. This in my view represents an absolute best case scenario for the Council.

Warren Hall Housing Planning Procurement.

| M De | M | Tn | Mip | D tn |
|-----------------------|--|-----------|--|--|
| 1/12/2021 | LDP Adopted | 4 months | JR period,, | |
| 1/4/2022 | WG ID Development Partner | 3 months | Contracts, legals etc | |
| 1/7/2022 | EIA screening + Pre-application with. FCC | 4 months | EIA Screening opining, + Statutory pre-app. | CJC/ SDP Delivery agreement |
| 1/11/2022 | Additional reporting activities Plus Welsh Government Technical Scrutiny and Design Review and other/HAG | 6 months | Updated major app reporting to support PAC + Design review etc. | |
| 1/5/2023 | Commence PAC plus review responses and update reporting. | 3 months | Standard expected period | |
| 1/8/2023 | Lodge Outline Planning Application and Infrastructure Enabling works (Full) | 8 months | OPP consenting +S106. | 264 days (WG data on FCC processing for Major apps) |
| 1/5/2024 | Prepare phase 1 Reserved Matters | 6 months | Complete Design Coding and carry out detailed design and Potential further Design Review prior to lead in to Phase 1 RM submission | |
| 1/11/2024 | Reserved Matters Phase 1 submitted. | 6 months | Average determination period. | See above |
| 1/5/2025 | SAB approval and Discharge of Conditions for phase 1 RM | 4 months | Procure and submit. | |
| 1/9/2025 | Commencement and construct first dwellings. | 7 months | Site prep and Phase 1 Infrastructure for phase, 1 and unit 1build out | |
| 1/5/2026 | Unit 1 housing ready for sale/ occupation. | | | |

21. Assuming no slippage from any of these milestones, it is unlikely there would be housing delivered at Warren Hall before late Spring 2026. As a minimum,

² https://gov.wales/sites/default/files/publications/2020-01/planning-services-annual-performance-report-2018-to-2019_0.pdf. Welsh Government January 2020.

