

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M7

Date: 01 April 2021

From: NJL Consulting (Consultee ID - 1232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

Matter 7: Provision of Sustainable Housing Sites (inc. housing requirement)

Key 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?

The proposed level of economic growth and how this links to the LDP housing requirement is considered in detail in LPC's response to Matter 3a. In sum, there is a need for the housing requirement to properly reflect economic growth opportunities which have been downplayed or unaccounted for in growth scenarios underpinning the LDP, ensuring that affordable housing needs are met, and accounting for an accrued backlog during the UDP.

While the Council have not relied upon new household projection data released by the Welsh Government, it is considered that the housing requirement figure should still go further in order to realise the economic aspirations for Flintshire and the national growth area identified under the National Development Framework and North Wales Growth Deal.

There has however been no allowance made for the accrued shortfall of 2,012 homes that failed to deliver under the previous plan (see response to Matter 3a). This equated for nearly 30% of the overall UDP requirement. These needs do not dissipate under a new plan, instead 6.004 (the)T nM29

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Planning Policy Wales clearly states that when assessing the need for provision that local authorities must take account of the wider housing market area. This reflects our concerns that the Council are treating the Flintshire housing market in isolation.

LPC's concerns are not solely over the requirement itself which is broadly similar to that set under the UDP, which at the time was deemed realistic and deliverable, but the Council's decision-making in allocating the right sites. At present, up to 44% of the total number of dwellings are allocated in the LDP on two large scale strategic sites which comprise more than 1,1,485 dwellings.

Drawing upon market evidence, housing affordability ratios² for Flintshire and Cheshire West and Chester are 5.5 and 6.9 respectively³. This highlights not only the affordability issues within Flintshire, given most financial lenders cap mortgage loans typically at 4.5 times annual salary, but the clear divergence in house prices between both authorities. As a result, areas such as Deeside and Broughton where house prices are more affordable, are often seen as suitable

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Noting the progress of the Wrexham LDP Examination and significant concerns on overall housing requirement within Wrexham,

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Notwithstanding the need to increase the housing requirement to account for the accrued shortfall over the UDP Plan Period, our response to Matter 2i) highlights that meeting the housing requirement is a debate over the Council's track record of delivery but more their record in selecting the correct sites to meet their target. This was evidenced through the UDP which set out a broadly similar target of 7,400 dwellings, 16% below their delivery rates in the five year period running up to the start date of the plan¹⁰. On this basis it was perceived as a realistic and achievable target

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a business park. Likewise, the Northern Gateway site benefitted from outline permission in 2013 yet it wasn't until seven years later in 2020 that the first phase of development commenced. It

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Strategic Allocations

Concerns expressed on deliverability of Northern Gateway and Warren Hall have already been covered in response to Matters 3c), 3e) and 7a). This is significant given they account for 44% of allocated sites and 21% of the overall housing requirement.

While it is accepted that Northern Gateway will contribute to the housing requirement, delivery rates are questioned given the scale of infrastructure required to open up phases of development and the risk of over-saturating the local housing market within a single location. It is also considered that early delivery rates at the site may also be slow as the development becomes established. As seen in Cardiff, delays such as legal agreements can be an unforeseen factor in stalling development delivery. Indeed, the first phase of residential development on the Pochin-Goodman site of Northern Gateway, is still awaiting a formal decision notice and S106 Agreement to be finalised. This is a year since planning committee approved the 129 homes (Ref: 060411) in March 2020. A more prudent and robust approach to delivery rates is therefore required.

In terms of Warren Hall, it is anticipated to start delivery of units in 2023/2024, despite not benefitting from any form of planning permission and significant concerns raised on technical constraints. Notwithstanding the comments raised in response to Matters 3b), 3c) and 3e), the Statement of Common Ground (SoCG) published between Flintshire Council and Welsh Government (landowner) has raised further questions on the site's deliverability and proposed allocation.

The further Aero-nautical work undertaken re-emphasises the safeguarding concerns and constraints over heights of development. Drawing A093950-15[B]05 highlights a large portion to the south-west of the site will be restricted to less 4m-8m which inherently prohibits the delivery of contemporary, two storey housing. These concerns are echoed by Airbus who have objected to the development through the plan-making process over the safeguarding of the airport.

Despite being required there is no detail on the phasing of the strategic allocation within the Masterplan Document or SoCG. There is a suggestion that enabling infrastructure serving the commercial elements of the site be brought forward in parallel with the residential element, however this would involve the entire extent of the access road off the A5104 being implemented in full. This represents a significant amount of early works and upfront costs of at least £5.5million which will likely lead to further delay to programme.

The Transport Feasibility study is limited and does not provide sufficient detail on highway capacity issues and trip generation which is important for this site given the constraints on vehicular access at Kinnerton Lane and Lester Lane. Both represent narrow, countryside lanes which are not suitably designed to accommodate the proposed scale ed in2a764 457.27 Tm0 g0 G[()]

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as such places an increased reliance on enabling infrastructure being delivered on time and to budget.

The accompanying Phase 1

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LPC therefore suggest that the accuracy of delivery timescales within the trajectory is reviewed further as there are significant reservations about its robustness.

It is noted that within the housing trajectory, there is no double counting of large windfalls within the first two years of supply in accordance with the DPM.

LPC