

Flintshire Local Development Plan Examination

Notes on behalf of Redrow Homes Ltd (1148956) in relation to the

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HN1.1 tWell Street, Buckley(159 dwgs).

This site was initially allocated for housing in the current UDP, but has not been brought forward in the subsequent ten years. No SoCG has been provided to give an update as to why, after all this time, the site should now be regarded as one that can be relied upon in terms of delivery.

It is noted that that there was apparently a PAC undertaken on this site in the middle of last year, but it is not known what the outcome of this exercise was or whether any significant issues may have arisen. It is understood that Clwyd Alyn have had an interest in the site, but it is not

However, in the absence of detailed information to the contrary, a site that has not delivered housing on the back of an allocation over a ten year period should not be relied upon at all other than as a potential windfall.

HN1.3 t Highmere Drive, Connahs Quay (150 dwgs).

It is noted from the SoCG that Edwards Homes have an interest in the site, although their letter indicates that contractual terms have been agreed as opposed to them being formally entered in to. We further note that Edwards Homes are not a signatory of the SoCG give no detailed indication in their letter of the timescale for the delivery of development other than indicating that they will still be undertaking survey work, presumably in preparation for an application in the Summer of this year, they do, however, suggest that a programme).

A timescale for development that would seem realistic is as follows:

- Completion of background research/application preparation date Summer 2021.
- Pre-application consultation Autumn 2021
- Submission of planning application (assuming a detailed proposal) beginning of 2022.

HN1.4 t Northop Road, Flint (170 dwg)

This site is projected to have 20 completions during 2022/23, the site currently has no developer involvement, an application first submitted in 2018 has been withdrawn, and the SoCG is signed by only one of two landowners between whom there appears some disagreement relative to access.

It is clear that there will be no completions from this site in 2022/23, given the need to find a developer, design a scheme, undertake application consultation, submit proposals, obtain permission and get on site. The SoCG gives the impression that there are considerably more difficulties with this site than are being acknowledged. In particular, the PAC resulted in a response from CADW that raised issues in relation to the impact of the development on the Scheduled Ancient Monument located to the north of the site which, it commented, had not been adequately assessed. The subsequent application appeared to acknowledge the need for further assessment but did not include this work and, therefore, at this point it is impossible to conclude other than that this issue has (h)-4 (e)8 (r)5 (t)-4 (h)5, erossi

Completion of application preparatory works and hydraulic modelling late Autumn 2022.

Completion of Pre-Application Consultation and assessment/revision early 2023.

Submission of planning application and negotiation of S.106 mid of 2023.

On-site beginning of 2024/25, 15 completions in first year having regard to preparatory works etc.

45 dpa thereafter would indicate a total of 240 dwgs by the end of the Plan period, resulting in a shortfall of 58 dwgs.

If, of course, there was a significant delay in providing the required improvements to the wastewater treatment plant, then the trajectory would be moved back accordingly and the shortfall would increase.

HN1.8- Ash Lane, Harpenden (288 dwgs)

This site is presently in the Green Barrier and, therefore, moving the site forward depends on the Inspector supporting its removal. It is apparent from the SoCG that there is no d À o } % œ] v š œ • š š % œ • v š o š Z } μ P Z v Á Ç o [• œ • μ P P • š it is not suggested that a developer would not be interested in this site, but negotiations would delay implementation, as would the need for a developer to design a layout/masterplan. It is, again, highlighted that there is an issue in relation to the affordable housing contribution which potentially impacts on viability, as would education payments identified at present cost levels at nearly £1.8 million.

In line with our comments in relation to HN1.7 above, a commencement to the delivery of houses on this site in 2023/24 appears to be unduly optimistic.

Finally, once again, a hydraulic modelling assessment is required and the treatment works require upgrading, this makes it very difficult to put forward any date with certainty as to when the houses can be delivered from a practical point of view.

Assuming a similar programme to bring the site forward as set out in relation to HN1.7 above, we conclude that a total of 44 dwgs would remain undelivered at the end of the Plan period and, once again, this could increase dependent upon the date when the required wastewater treatment work improvements were delivered.

HN1.9 t Wrexham Road, HCAC.

Once again, it is quite clear whether this site can realistically deliver dwellings in 2022/23 as

seems more realistic.

Conclusions

It is not suggested that any of the above sites are incapable of being brought forward, assuming that their allocation is confirmed through the PLD. However, there is a consistent time involved in preparing applications, undertaking preapplication consultation, submitting and negotiating planning applications and then entering into legal agreements seems to be reduced well below that which experience of major residential applications would suggest to be the case. Furthermore, the comments of Welsh Water in relation to the capacity of a number of treatment works, plus the need for hydraulic modelling assessment, suggest that further delays are inevitable which in certain cases could result in a block on development pending works that are not programmed and could conceivably be years into the future.

Consequently it is concluded that the Allocated Sites Trajectory does not have the necessary level of certainty associated with it to support the reliance required in relation to a development plan where delivery is a key requirement. We have identified four sites, totalling 431 dwelling, with which there are significant concerns in relation to delivery prior to the end of the Plan period. Some of the conclusions may prove overly cautious, but as this Plan relies on these sites, a cautious approach is more appropriate than one which is too optimistic. The potential for problems with wastewater treatment capacity remains an unknown which could make the situation significantly worse.

The solution is to identify other sites, with four or more sites.



Using the same assumptions as have been used in this paper relating to ~~land~~ etc, both of these sites are of a size whereby they could be delivered in full within the Plan period.