

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M12

Date: 26 April 2021

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

Matter 12: New Housing Development Proposals (inc Density and Mix)

Key Issue:

the presence, or otherwise, of Best and Most Versatile agricultural

the selection of housing sites? The sites which will be discussed at the hearings are:

HN1.1 Well Street, Buckley

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HN1.4 Northop Road, Fn6Tu.996 (d)54id (y)TJ ET Q q 0 0 595.32 841.92 re W* n BT 0 g /TT2 9.96 Tf3.254T-

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provides flexibility to the Plan in order to ensure that past mistakes are not repeated and that the LDP housing requirement can be delivered.

The Council continue to rely upon 44% of housing allocations to be met through strategic sites. As highlighted by the significant concerns raised over the deliverability of Warren Hall as well as the delivery rates proposed at Northern Gateway, this is a matter which Bloor Homes continue to have significant reservations over.

It is not clear why more non-strategic sites have not been allocated to meet the required housing needs. Smaller, sustainable sites can come forward quicker as they require less upfront infrastructure and are more straightforward to deliver. To address this issue Bloor Homes considers the Council needs to allocate additional housing sites to ensure this need is met. In addition to this, Bloor Homes has a number of concerns with the housing requirement not accounting for previous housing shortfall or being underpinned by a robust economic analysis which accounts for the economic initiatives (e.g. AMRC Cymru and MDA Growth Prospect us) which have emerged since the strategic options stage of the LDP (see response to Matt168.0.h ()-23.002 (o)3.9

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There is currently no developer attached to either site however Statements of Common Ground confirm negotiations are still ongoing with Anywl Homes. There is however

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c) What are the various constraints affecting the sites? In the light of constraints, and other matters, where is it set out what the requirements are for each site? Is there sufficient clarity and certainty?

HN1.10 2Cae Isa, New Brighton

While the technical matters raised through the Cae Isa application and appeal are not insurmountable they are symbolic of the type of points which inevitably arise through the application process. These can lead to financial implications (e.g. by way of additional open space contributions) or lead to longer negotiations between parties and statutory consultees over detailed design matters.

In the case of the appeal, we would question why the Appellant chose not to pursue the necessary SUDS approval and demonstrate the deliverability of the scheme from a technical drainage perspective if there were no fundamental that would have meant the requisite standards FRXOGQ·W KDYH EHHQ PHW

HN1.4 2Northop Rd, Flint

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housing provision, may similarly undermine viability and the provision of key local infrastructure on a policy compliant basis .

HN1.10 2Cae Isa, New Brighton

While marginal in the context of the LDP requirement, it is worth noting that the application and subsequent appeal was on the basis of a 97 dwelling scheme despite the site being allocated for a total capacity of 105 homes. Increasing the number of smaller house types may well have led to this capacity being achieved but will inevitably have viability implications by reducing the overall Gross Development Value. This in turn could impact upon t KH V L W H · V ability to provide key infrastructure, such as open space contributions , which could not be committed to under the application or appeal.

The examples above therefore highlight the clear implications a lack of robust viability testing would have R Q W K H & R X Q F L delivered by the Plan (also see response to Matter 13) . This reinforces the need for more site -specific evidence in order to provide greater certainty on the deliverability of new homes and infrastructure .

e) Are the delivery mechanisms for each site clearly identified? Is the timing and/or phasing of each site clearly set out?

The projected delivery rates on all allocations is set out in the Housing T rajjectory in BP10A, however this falls short of providing key evidence on projected lead in periods which should be broken down into the following milestones as required by DPM:

1. Time period for pre -application discussions/ PAC consultation
2. Time between sub mission of planning application and determination
3. Time taken from planning consent to the discharge of relevant conditions to enable site construction

In addition, to the above requirements we would recommend a time allowance for S106 negotiations is also factored in given the extent to which this can influence development programmes. This has been evidenced by the Keepmoat Homes application on Northern Gateway (Ref: 060411) which has seen protracted negotiations extend beyond 12 months .

Any non -delivery of units on housing allocations undermines the delivery of the LDP and jeopardises the supply of housing throughout the plan period . Bloor Homes consider a more