

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M7

Date:

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Date: 01 April 2021

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

consider especially if in the event Wrexham are unable to address this additional housing requirement.

c) The 14.4% flexibility allowance is slightly greater than average. On what basis has that percentage been selected?

The proposed flexibility allowance has been increased from 14.4% to 18.1% over the plan period. While Bloor Homes support the proposed increase in flexibility to ensure the LDP can accommodate additional economic growth, there is concern over how this provision is picked up in the Northern Gateway allocation through the inclusion of 191 additional dwellings over the plan period. Up to 75% of this uplift in flexibility allowance is provided by Northern Gateway alone.

There is no robust evidence available to justify this increase and instead alternative sites should be brought forward in order to widen choice and ensure that flexibility is properly built into the Plan should strategic sites fail to deliver as expected. This reliance is constraining to the LPA as opposed to providing genuine flexibility to the Plan.

d) Is the housing requirement over reliant on the provision of dwellings on windfall and small sites?

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At the first phase of development commenced. It is thus not realistic to assume 100% of planning permissions granted in any given location will deliver and should therefore not be automatically allocated .

g) Is it likely that all the committed sites identified as contributing to the housing requirement (LDP Appendix 1), and allocations which are carried over as such from the UDP, will be

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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 3f) in the previous hearing. The concerns raised in the hearing on 11th March 2021 have already been covered in response to Matters 3c), 3e) and 3f) in the previous hearing. The concerns raised in the hearing on 11th March 2021 have already been covered in response to Matters 3c), 3e) and 3f) in the previous hearing.

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The accompanying Phase 1 Geo-Environmental Assessment Desk Top Study recommends that further intrusive ground investigations are required to cover the residential element noting the ~~YHU\ OLPLWHG - Khasir Assessment Ground Work~~. Considering the site context as a rolled forward allocation, the lack of market interest to date, and the clear requirement set by the DPM to demonstrate deliverability this is a clear shortfall in evidence. For example, it cannot be confirmed the extent or type of foundations required (piling, strip, combined etc) all of which would have clear viability implications.

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h) How does the LDP avoid the issue of double counting in respect of large windfall sites?

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.

i) What will be the implications for the delivery of the housing requirement of the comparatively short plan period remaining at adoption?

Bloor Homes have set out a response to this issue in Matter 2i).

In order to meet the housing requirement, there cannot be a scenario of history repeating itself whereby an over-reliance is wrongly placed upon strategic sites across a condensed Plan Period. This also places an increased pressure on sites securing planning permission post-adoption, finalising legal agreements, implementing infrastructure and discharging conditions to enable a start on-site (as seen in Cardiff).

It is critical that the Plan is robust, stable and flexible enough to accommodate togh.996 (o)3.996 (uTTd (())Tj (exi)-5.9