

Project: 14-065

Hearing : Matter 3 ² Strategic

Growth

Client

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Contents:

1.	Introduction	1
2.	Response to Matter 3	1

2025-2030: 500 dwellings

Our representations to the Deposit Draft set out our view that this rate of delivery was not realistic.

However, WKH & RXQ fateO TopiXPS per 10A (FCC002) now, without justification, anticipates the following delivery:

2020-2025: 620 dwellings

2025-2030: 565 dwellings

2.4 The & R X Q F L O · V White the floor of the life own Radishumes a completely unrealistic delivery rate of 118.5 dwellings per an num from the Northern Gateway allocation during the plan period. This is despite W K H & R X Qc Frlo @led/gement in paragraph 5.3.2 of the Preferred Strategy consultation document (2017) that:

"The experience of other large sites in Wales suggests they can be difficult to get off the ground and are not delivering development as anticipated. This can have a negative effect on securing and maintaining a 5 year housing land supply from adoption onwards."

- 2.5 The Council has not provided robust evidence for the application of such a high build rate .

 3 D U D J U D S K V X J J H V W V W K D W W K H & R X Q F L O · V H Y L G H Q F H I R U W k developer interest, progress on planning applications, and including an updated delivery statement from the agents acting for one of the landowners on Northern Gateway. In response, we would expect the Council to have assessed the local delivery record , including delivery from any similar sites in North Wales, and explain why it assumes this build rate could be applied to the allocated site . However, no such evidence is provided in the published evidence base.
- 2.6 The Council has not provided robust evidence to demonstrate that there will be more than one developer on site at the same time. The Council appears to be assuming that there will be at least four developers on site at the same time (as necessary to achieve 118.5 dwellings per annum), but there is no evidence to suggest how this will be achieved for the duration of the plan period. We note that the current reserved matters approval for the first 283 units is one developer only (Countryside). This should be reflected in the delivery forecasts. It is not realistic to assume 118.5 dwellings per annum from one developer.
- 2.7 In terms of lead -in times for the remainder of the site , which falls within two distinct land ownerships, the Council has failed to consider the following :