



FLINTSHIRE LOCAL DEVELOPMENT PLAN 2015-2030 EXAMINATION

**MATTER 3:
STRATEGIC GROWTH (STR1) (INCLUDING STRATEGIC
SITES STR3)**

STATEMENT IN RESPONSE TO INSPECTOR'S QUESTIONS

BY

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MATTER 3: STRATEGIC GROWTH

KEY ISSUE:

IS THE GROWTH STRATEGY COHERENT AND BASED ON CLEAR AND ROBUST PREPARATION PROCESS? IS IT REALISTIC AND APPROPRIATE IN THE LIGHT OF RELEVANT ALTERNATIVES AND IS IT BASED ON ROBUST AND CREDIBLE EVIDENCE?

- 1.1 As set out in our original representations to the Deposit Draft Plan, the Council's allocations rely on 2 strategic sites and 11 (predominantly fairly large) allocations. Of the 11 allocations all but 1 are over 3.5ha in area with only 3 sites being below 5ha (policy HN1). The remainder of the housing provision relies on windfall sites. In fact, the Council's total allocations amounts to 3300 units and their expectation is that windfall sites will amount to 1080 units. The Plan therefore anticipates that the level of provision from windfall sites will be 1/3 of that from allocated sites over the plan period. This in itself is contrary to paragraph 4.2.13 of PPW which requires Local Planning Authorities, when allocating sites to meet their housing requirement, to consider providing a range of suitable and deliverable sites to allow all sectors and types of house builder including small and medium sized enterprises and custom build and self-build sector the opportunity to contribute to delivering the proposed housing requirement. 10 of the 13 allocated sites are over 5ha. Sites between 1 and 5ha are therefore under-represented (with only 1 allocated site in this range and that is in the upper range at 3.5ha).
- 1.2 This failure to provide a range of sites is clearly contrary to paragraph 4.2.13. The allocations do not therefore have regard to National Policy and therefore fails soundness test 1 in this regard.
- 1.3 Where the Council are relying significantly on 2 very large strategic sites and the remaining allocations are all on relatively large sites, it is even more crucial that the

Council can demonstrate deliverability. Relevant advice/policy in this regard includes the following:-

- To be “*deliverable*” sites must be economically viable at the point in the trajectory when they are due to come forward for development (4.2.10, PPW);
- As part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a Development Plan and, in addition, for sites which are key to the delivery of the Plan’s strategy, a Site Specific Viability Appraisal must be taken through the consideration of more detailed costs, constraints and specific requirements. Planning Authorities must consider how they will define a key site at an early stage in the Plan process (paragraph 4.2.19, PPW);
- Key sites to the delivery of the Plan require greater evidence to support their delivery. Viability Appraisals should be prepared by the LPA in conjunction with developers and site promoters for key sites prior to their allocation (Table 18, page 120, DPM).

1.4 We have previously raised the issue of the Council’s approach of not subjecting the allocated sites to viability testing at the Deposit Draft stage. This is again acknowledged in 2.2.2 of the Council’s latest Housing Land Supply and Delivery Background Paper (10A) which states that the mix of sites and a lack of overreliance on new strategic sites “*backed up by evidence from developers relating to viability and deliverability*” will enable delivery of sites through the plan period. The Council therefore seem to acknowledge that they themselves have undertaken no Viability Appraisals. If this is correct, this is clearly contrary to the above advice in PPW and the DPM. Where reliance is made on 2 strategic sites and 11 fairly large allocated sites (2 of which have been carried over from the previous UDP), such Viability Appraisals are essential to demonstrate deliverability.

Without appropriate Viability Appraisals the Plan fails to meet soundness test 1 as it does not have regard to National Policy and, in terms of the key issue in this regard, it is not based on robust and credible evidence.