

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M1

Date: 22 March 2021

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

Matter 1 : Plan Preparation 2 procedural requirements

Key Issue: Has the Flintshire LDP been properly prepared?

Question 1a) Has the LDP been informed by a robust consideration of reasonable alternatives?

1.1 While the Council have considered alternative growth scenarios to inform their housing requirement over the Plan Period, as set out in the Sustainability Appraisal and Strategic Options Consultation, Bloor Homes have particular concerns over the extent to which reliance has been placed upon rolled forward strategic allocations.

1.2 Bloor Homes support the ambitions of an employment-led growth scenario which aligns with regional and nationally significant economic role. Arguably this growth scenario can go further, as recently evidenced by the £20million investment under the North Wales Growth Deal into the Advanced Manufacturing and Research Centre (AMRC) in Broughton under Policy 1 of the National Development Framework.

1.3 However, in delivering the requisite level of housing growth alongside this, there is no robust evidence to demonstrate how the Plan can be delivered should strategic sites (Warren Hall and Northern Gateway) not build out at the rate forecasted by the Council. As shown in the Candidate Sites Register, there is an extensive list of alternative site suggestions across the Borough which could be considered suitable for development over the Plan Period. Despite this, no background papers or evidence base explains how the target housing requirement could be met in the event that these strategic sites stalled or in the case of Warren Hall fail to be developed out completely.

1.4 Further work is required to show how alternative sites have been considered in more detail in Matters 2 and 3. In this context further evidential work and robust justification is required from the Council in order to show how alternative sites have been considered to

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Question 1b) Has the LDP had full regard to the Well -Being of Future Generations Act with regard to the well -being goals and ways of working?

1.5

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1.16 Bloor Homes have no comments to make in relation to this question.