

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M2

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

Matter 2: Plan Strategy 2 key Issues, vision and objectives

Key Issue: Is the overall strategy coherent and based on a clear and robust preparation process? Is the strategy realistic and appropriate in the light of relevant alternatives and is it based on robust and credible evidence?

Question 2a) ,V WKH /'3·V RYHUDOO VWUDWHJ\ FRQVLVWHQW ZLV authorities? What are the main cross boundary issues and how have these been addressed?

- 1.1 The main cross boundary i ssues with neighbouring authorities are considered to be in- and out -migration for both jobs and new homes, delivering on the economic growth agenda, boosting housing delivery and affordable housing provision balanced against

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- x Create a minimum of 50,000 jobs; and
 - x Build up to 25,000 homes.
- 1.5 Flint is the third largest town in Flintshire and is strategically located within the MDA along Chester Road 2 an important cross-border transport corridor. The Mersey Dee Area Growth Prospectus sets out the growth ambitions for the area by identifying Flint within a network of coastal settlements which play a key role as **FLQG X VW U L D O S R Z H U K R** to the MDA.
- 1.6 It is therefore evident that Flintshire plays an important sub-regional economic role, operating through an increasingly fluid cross-border relationship with neighbouring authorities.
- 1.7 This is reinforced through commuter travel patterns. As confirmed within the Local Housing Market Assessment Addendum (2020) **10,000, 330, 03, 0, 103, 30300, 3002** taking into account working commuter pattern and each authority's own distinct housing markets. The LHMA **A F R Q I L U P V W K D W M X V W R I W K H e n B U R X J K . V S** work in Flintshire. This is well below the 70% threshold for assessing an authority as a self-contained housing market. Indeed, the Council accept that this shows only a **10,000 101, 03**.
- 1.8 Notwithstanding this, the LHMA concludes the Borough as broadly being a self-contained housing market for the purposes of local plan making. This would appear an incorrect assumption given the marginal evidence which is also based upon out-of-date 2011 census data 4. We strongly recommend that stronger evidence is provided on this key cross-border issue to ensure that economic forecasts and household formation in the Borough is planned for appropriately.
- 1.9 It remains incumbent upon the LPA in the first instance to ensure that appropriate levels of growth are planned for the Welsh side of the national border and are commensurate with meeting development needs in Flintshire. The concerns raised through the Wrexham LDP Examination over the level of housing provision set within Wrexham is however a relevant cross-border matter for Flintshire to consider should Wrexham be unable to address this additional housing requirement.

Mersey Dee Area Growth Prospectus (2017) Page 4
Local Housing Market Assessment 2 Addendum (2020) Para. 3.42
Local Housing Market Assessment 2 Addendum (2020) Para. 3.42
Local Housing Market Assessment Addendum (2020) Table 3.9

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Question 2b) How have the key issues been selected? Are they all addressed directly and adequately by the vision and strategic objectives? What is the relationship between the Key Issues and Drivers (para. 3.30) and the challenges that must be planned for (para. 3.35)?

1.10 During the early stages of local plan preparation. 4.006 (c)-3.002 (a)-3.002 (l)-3.996 ()60 (p)-4e 1

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Question 2

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1.36 With the UDP being adopted as late as 2011 and only 4 years left on the plan period, it was significant that the Council continued to allocate the strategic site at Northern Gateway for 650 homes equating to circa 10% of the overall requirement. This was despite the Inspector acknowledging at the time that 1300 - 3,000 130,300 330,000. Indeed, it was not until 4 years after the plan period ended in 2019 that any form of development came forward on the site (see response to Matters 3b and 3c).

1.37 The outcome of the UDP was a resounding failure to meet the housing requirement and a significant backlog of 2,012 homes.

1.38 7KLV FRQWH[W GHPRQVWUDWHV WKH FUXFLDO SRLQW WKDW WKH housing requirement LV QRW D GHEDWH RYHU WKH & Housing Delivery WUDFN UH or the housing requirement being too high, but whether the right choices were made in terms of site selection to meet that requirement.

1.39 In choosing to pursue a site of the scale and complexity of Northern Gateway as a strategic allocation, despite there only being four years remaining over the plan period, the Council had placed themselves in a constrained position. The UDP was evidently over-reliant on this strategic site with not enough alternative sites being identified for delivery.

1.40 The Deposit LDP is likewise well into the proposed Plan Period and continues to be over-reliant upon strategic allocations that have been rolled forward from previous plans.

1.41 LPC therefore raise concerns on history repeating itself and the deliverability of the LDP. It is critical that the Plan is robust, stable and flexible enough to accommodate to changing circumstances over the Plan Period. Continuing to rely upon two strategic sites which have failed to deliver under previous development plans, does not provide flexibility it is instead restrictive.

1.42 It would therefore make sense to roll forward the plan period as a genuine 15-year plan, while ensuring that the requirement over the interim 6-years is addressed positively and at the earliest opportunity within the plan so that needs can be met. It is important the plan does not take a retrograde step by deferring this backlog to later in the Plan Period and instead addresses the housing requirement early. LPC therefore propose that alternative, smaller sustainable sites come forward to deliver the housing requirement over the Plan Period.

1.43 This is fully aligned to emerging Policy STR2 which directs growth to Tier 1 Settlements such as Flint, where residential development is encouraged alongside economic

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