

[REDACTED]

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County Hall
Mold CH7 6NB

29th July 2022

by e-mail: developmentplans@flintshire.gov.uk

Dear Sirs

We are writing on behalf of [REDACTED] with regards to the above consultation process. We have taken part in the Local Plan hearing sessions and considered the various issues that have been discussed and the areas of further work requested by the Inspectors.

We remain unconvinced that there is sufficient flexibility within the Plan to ensure that it will fully deliver the housing target. Underpinning this is the simple logic that there was a robust case made by the Council to have a higher flexibility allowance (14%), but that this case is no longer being considered.

By definition there is a much-reduced flexibility with the proposed deletion of Warren Hall, and with the concerns raised by the Inspectors over phosphate impacts.

The logical outcomes to this are either to consider a replacement site or sites for Warren Hall that links to its remaining employment allocation - i.e., new site(s) in or around Broughton, and/or an amended windfall allowance overall.

Our comments on each of the Matters Arising Changes are noted below within the above context.

The flexibility allowance and hence the total housing figure needs to be re-considered. The Council made a clear case for a higher flexibility allowance through the Local Plan, and we think this was correct - albeit we always had concerns that certain sites (as proven with Warren Hall) were not likely to be delivered in any event.

It is therefore inconsistent to accept a lower flexibility allowance as a consequential outcome without a detailed understanding of how a LESS flexible Plan is now appropriate.

This is compounded by the concerns raised by the Inspector over potential delays to delivery of sites affected by phosphates. If we assume that there are solutions to the phosphates position in the first instance, then it still follows, with the partial deletion of Warren Hall for housing, that there has to be a minimum need to maintain the SAME flexibility allowance.

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The point over flexibility is heightened by its deletion, not diminished.

It is clear that the strategy of the Plan was to include a notable amount of housing in the Broughton area through Warren Hall. Indeed, it was classed as a "strategic site."

This means that alternative housing delivery is appropriate, either by way of additional site allocations and/or by way of accepting a higher windfall allowance.

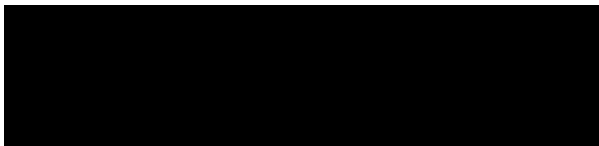
We continue to support Warren Hall for employment purposes given its planning history and strategic location.

However, we believe this continues to lead to the above question still being valid to provide housing in the sustainable location of Broughton to support employment at Warren Hall.

39 ha of employment use in /near to Broughton is approximately 31% of all employment allocations in the Local Plan but there are no housing allocations nearby. This is now a heightened concern with the removal of housing from the Warren Hall allocation.

We would also note the above comment in this context.

We would note that half of housing allocation figures are still within last 5 years of Plan period, and hence there continues to be a real concern over total delivery within this time period. This links to our observations above about the flexibility allowance.



As with the above comments we believe the data now needs updating to reflect the Development Plans Manual.

As with the above comments we believe the data now need amending to reflect the Development Plans Manual.

We support the amendment and deletion of the housing element of Warren Hall and consequent policy amendments elsewhere in the plan. As with our general comments, we believe that there should now be consequential changes to maintain the original flexibility level of the Plan.

We note the change to Housing Balance sheet – but consider a substitute site or sites would make some sense to now consider. The alternative would be a greater reliance on windfall sites for the Plan period.

Given the removal of Warren Hall for housing but retained in part for employment then it makes most sense to consider a sustainable location (s) at Broughton in the first instance.

We would be grateful for confirmation that the above comments to the Matters arising Changes have been received and will be considered accordingly.

We will welcome the opportunity to take part in further Hearing Sessions if the Inspectors deem this to be appropriate.

Yours faithfully

