

Hearing Statement – Matter 7 - Provision of Sustainable Housing Sites

FCC's Vision for the future

FCC's aspirational Plan is essentially a plan for Deeside. It is based upon the readily available employment land in Deeside and it reflects FCC's ambition for a "step-change" in employment numbers in Deeside. The consequence is the need within the Plan to identify many more housing development sites to support the highly ambitious jobs target.

Where do all these jobs spring from? In the LDP, FCC places its faith largely on the success of the North Wales Growth Vision and the Growth Deal. At the time of my original representation in Nov 2019, the talk around the North Wales Economic Ambition Board's targets seemed to suggest a 12000 new jobs for North Wales. This was to be achieved by the success of a co-dependent series of projects including the Nuclear Sector Deal, Wylfa Newydd (cancelled, for now), Growth Track 360, Northern Powerhouse and the WG's Trunk Road programme. Most of these projects are in very early stages rather than nearing completion and readiness.

Between around 2018 and the end of 2020, the NWEAB jobs target slipped from 12000 to 7000 to 5000 and when the Deal was finally signed in December 2020, the target had become 3400-4200, with 3800 as the central figure. So, **the ambitions of the North Wales Economic Ambition Board have been adjusted significantly downwards** over time. This adjustment seems to indicate that the NWEAB have realised the significance of the difficult trading and economic conditions, and have accepted the need to adjust to the reality. In contrast, FCC is doggedly sticking to its desire for 8000-10000 jobs on Deeside. This requires the rest of Flintshire's populations in its towns and villages to fall in line with a Deposit LDP that is getting increasingly detached from reality as Wales and the UK work through a very turbulent and unpredictable economic environment.

Identifying Housing Need

Wales's Spatial Strategy identifies Wrexham and Deeside as an urban cluster where Wales will grow, but FCC's plan spreads the anticipated housing needs of Deeside across the whole county. This is despite acknowledged deficiencies in frequency and coverage of the railway system in our county, and the existing over-reliance on car use. This Plan will only make this situation worse with more car travel, more pollutants and emissions, and as such it cannot be called a plan for sustainable housing.

The Preferred Strategy is for an inflated employment target which leads to an inflated housing "need". It pushes the housing requirement well beyond what might be expected based upon natural population growth, political and economic trading conditions, and migration patterns. The latest WG data (August 2020) on households shows steady growth rather than the spectacular growth envisaged by FCC. So perhaps the best description for FCC's high housing target is not that it is "Flintshire's need" but "FCC's desire".

FCC claim that their plans are supported by local people as a few people took part in the workshops. (See "Options for future development for Flintshire" October 2016 Document). My first questions on this process would be: (1) how were participants selected? And (2) how were participants in the workshops briefed on social, economic and demographic trends, so that they could make informed assessments rather than just guessing at appropriate growth levels?

Economic Trends

Airbus has been a leading source of jobs for Flintshire for many years. However, it has recently made significant job cuts in its Broughton Factory. The future of the Broughton plant is under review as new trends emerge in aircraft (and wing) design, in engine design and energy sources for the new generation of planes.

There is also a significant change in trading conditions and an increase in non-tariff barriers following Brexit. Toby Helm in the Observer (April 4, 2021) notes that UK civil servants have been advising British companies to set up subsidiaries in the EU, to locate their operations within the EU single market, to circumvent the barriers. Similarly, large multinationals such as Airbus, whose HQ is within the EU, have the option to return their British operations back into the EU to make life simpler and cheaper. Airbus is also enmeshed in the trade war with America's Boeing company, and in turn America is in a trade war with China and others in the Middle East.

More barriers to trade are expected to occur in October 2021, when the UK veterinary, sanitary and phytosanitary inspections are supposed to start, which will affect farming, food and agriculture. Most of these barriers are not temporary barriers, they are structural and permanent, and will require re-negotiation with the EU to resolve them. The port of Holyhead is operating well below capacity. This may be temporary but the ferry companies have already established direct routes from Ireland to France/EU, bypassing Holyhead, and it is not clear whether this bypass will continue over time.

Flintshire CC has set up an economic recovery plan, somewhat belatedly. If as a county we are already in trouble, then this bodes ill for a highly ambitious plan that requires all the co-dependent projects and economic conditions to prosper.

How Covid is likely to change the way businesses operate

Following the advent of Covid 19, firms are already rethinking their supply chains and indeed, rethinking their approaches to such well-established systems as "just-in-time". Flintshire's economic recovery plan accepts this change.

The switch to home working created by Covid is likely to remain in the future. Where does this leave FCC's highly aspirational job target? The "new normal" world of Brexit and Covid may mean that sites such as Deeside are no longer so relevant. Or can Deeside be part of the range of solutions? Who knows? But what is clear is that FCC's Plan is equally in the dark as to how/whether all these jobs can be created. Does the Plan need to decouple projected employment growth (of professional jobs and possibly many technical jobs) from centres such as Deeside, as home working becomes more of an option for the many white collar jobs? How does all this affect FCC's "step-change" employment scenario?

What we do know:

- The Deposit LDP is pushing beyond the limits of what might be expected in terms of economic growth, given the economic trends.
- FCC has recently put together an Economic Recovery Plan in a somewhat belated response to current problems. The economic modelling points to reduced economic growth, with consultants estimating that Flintshire and Wrexham economic area could lose £300m annually in trade, plus loss of the trade income from the supply chain.
- Many of the Deeside companies, not just Airbus, are not locally owned, making them more vulnerable to disinvestment decisions. Sectors critical to the success of Deeside such as

aerospace, automotive and advanced manufacturing have made considerable use of the furlough scheme which is masking the impact of Covid upon those sectors.

- Many low skilled Flintshire workers will be at great risk of redundancy and longer term unemployment.
- Businesses in the tourism and hospitality sector are already struggling, not having the cash reserves needed to survive

The evidence base for employment (and therefore housing) need

Obviously, Covid could not have been planned for in any detail (although arguably, pandemic planning should be considered by any organisation projecting into the medium and long term). However, Brexit should have been “baked in” to the Plan from 2016 onwards. In my original representations, I stated that I would have expected to see some scenario planning for Brexit within the analysis, but I could not find any. What advice did FCC get from its economists and business consultants? Where is the detail of that advice? Where is the detailed argument in favour of a step change in employment on Deeside in the light of various Brexit scenarios, local and national economic conditions, and global economic trends? In 3.48 of the Deposit Plan, it states that the Employment Land Review for Deeside “*did not indicate a significant need for new employment land or significant potential for job growth*”. FCC chose to ignore this and to focus only on the upside projections: “*Given the sub-regional ambition for growth and investment (including jobs) and Flintshire’s commitment to this, these low levels of growth indicated by the evidence base do not in any way represent a growth ambition within the County, or a meaningful contribution to the wider ambitions of the sub-region.*”. But these wider ambitions belong to FCC alone, not to the people of Flintshire as a whole, and are embodied in the 1034 objections to FCC’s Plan.

Sustainable plans should go beyond employment and GDP

The LDP repeatedly mentions sustainability but in fact is highly focused on the economic well-being of Deeside. It pays far less attention to prosperity elsewhere in Flintshire. The Plan seems to ignore the wider social, environmental and cultural well-being of the county. Interestingly, the Arcadis report does not consider cultural issues in the Sustainability Appraisal of Strategic Options document.

The Future Generations Commissioner, Sharon Howe, has stated (in “Wales and the Sustainable Development Goals”, 2019, p3) that “business as usual is deemed no longer fit for purpose” and “many of the objectives for a prosperous Wales fail to go beyond employment and GDP” (p4). A sustainable LDP would not just be focused exclusively on the ambition for step-changes in employment in Deeside but would also consider the non-Deeside towns and villages i.e. the places of Flintshire which are more than just places to provide dormitory housing developments for future workers in Deeside. In a sustainable plan, there would be more focus on cohesive communities, more equal communities, on vibrant culture and a thriving Welsh language. This would provide a better platform for building a Flintshire in good shape for future generations.

A case study in lack of attention to issues of sustainable housing areas

Here is just one example of lack of focus on the placemaking that underpins the FCC LDP: Mold.

- Where is the nuanced analysis of Mold as a rural town of just over 10,000 population, on the cusp of rural/urban status but being treated as an undifferentiated Tier 1 settlement within the LDP?

