

Andrew Farrow
 Chief Officer (Planning, Environment & Economy)
 Prif Swyddog (Cynllunio, Amgylchedd ac Economi)



The Planning Inspectors
 Flintshire LDP EiP

Sent by email via the Programme Officer

Your Ref/Eich Cyl
 Our Ref/Ein Cyf AR/LDP/EiP
 Date/Dyddiad 21st June 2022
 Ask for/Gofynner am Andy Roberts
 Direct Dial/Rhif Union 01352 703211
 Fax/Ffacs
 E-mail/e-bost Andy.roberts@flintshire.gov.uk

Dear Inspectors

RE: MACs consultation update and specific Query

I hope you are both well.

I am writing to confirm that the public consultation on the MACs has begun on time as per the dates previously provided to you. Whilst there has only been one representation to date it is early days and there are several weeks to go. We will endeavour to get the representations to you as efficiently as possible following the end of the consultation.

One matter that has arisen this week from several new Members of the Council not previously involved in the Plan process or EiP, is their interpretation of the intention behind MAC75:

| | | | | |
|---------|-----|---|--|--------|
| MAC 075 | HN3 | In introductory policy wording replace 'starting point' with 'target'. The revised introductory wording is 'Affordable housing contributions will be sought on developments of 10 or more units in accordance with the following quotas which should be taken as a starting-point target for negotiation on a site by site basis subject to detailed viability considerations.' | To clarify that the % affordable housing requirements are expressed as a 'maximum' | AP13.6 |
| MAC | HN3 | Add following new paragraph after para 11.9 and renumber subsequent | To explain the | AP13.9 |

Their issue is not with the MAC itself but rather where the explanation to the MAC refers to the reason for the change to the percentages sought being "as a maximum". Officers have met with the Councillors and we have clarified that the use of the word is accurate and logical as it aligns the intention of the policy and the percentages in terms of setting appropriate targets or thresholds, where those thresholds are informed by the outcome of the viability study. We have explained that those outcomes are the highest levels of affordable that can be viably achieved and hence considering them as 'targets' or the maximum viably achievable is logical and accurate.

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We welcome correspondence in Welsh. We will respond to correspondence received in Welsh without delay.
 Rydym yn croesawu gohebiaeth Gymraeg. Ymatebwn yn ddi-oad i ohebiaeth a dderbynnir drwy gyfrwng y Gymraeg.

The Councillors have suggested that officers issue a supplementary statement alongside the MAC documents that clarifies that the use of the word 'maximum' in the explanation to MAC75 is just as part of the explanation to the MAC and is not proposed as a policy wording change or cap on affordable delivery.

I have significant concerns about adding anything to the consultation process now that it has started, particularly as this relates to the reasoning in the MAC documents and not to the change itself. As such I would not wish to either set an unnecessary precedent for such an issue or run the risk of a procedural challenge for introducing additional consultation material once the consultation had started.

I would appreciate your advice on the above.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Andy Roberts". The signature is written in a cursive, slightly slanted style with a horizontal line at the end.

Andy Roberts, Service Manager Strategy