

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M1

Date: 22 March 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

Matter 1: Plan Preparation – 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 to Flintshire's sub-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 and the area's designation within a National Growth Area 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 Bloor's concerns over the delivery prospects of both strategic site allocations are set out 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:
 - a) meet the current housing requirement; or
 - b) meet a higher housing requirement based on an increased economic growth scenario.

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

Question 1c) Has the LDP been subject to an Equality Impact Assessment?

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

Question 1d) Is the LDP consistent with Future Wales: The National Development Framework, which is likely to be finalised shortly?

1.7 To an extent the LDP is consistent with the National Development Framework which identifies Broughton as one of a few settlements falling under the North Wales Growth Deal. There is however no explicit reference in the LDP to the National Growth Area. The LDP recognises the significance of the North Wales Growth Deal and sub-regional economic role of Flintshire, however the LDP should go further in recognising Broughton as being at the heart of the National Growth Area.

1.8 Policy 20 of the National Development Framework indeed states that '*Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure.*' The Council are therefore required to make clear reference to the National Growth Area within their LDP. This will ensure that policy targets on economic and housing growth are appropriately set and aligned to one another in order to deliver on this key economic initiative.

1.9 The National Development Framework makes clear that housing growth is to be delivered within the National Growth Area alongside economic development. Policies STR1 (Strategic Growth) should therefore be reworded to make clear that '*The focus of this development will be within the National Growth Area and other sustainable employment locations and in accordance with the sustainable settlement hierarchy and spatial distribution strategy*'.

Question 1e) How will the LDP be updated in the light of the revocation of TAN1? Will this lead to significant changes in LDP policies?

1.10 The revocation of TAN1 removed the requirement for a five-year housing land supply policy and replaced it with a policy statement that made clear the basis for monitoring

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the delivery of housing over the Plan Period will be through the adopted housing trajectory. This will be assessed on an annual basis through LDP Annual Monitoring Reports (AMRs).

- 1.11 The impact of this policy change adds weight to the robustness of the Council's housing trajectory and its supporting evidence base. The Development Plan Manual lists the process for developing the trajectory, with stakeholder engagement with the development industry being a key requirement. The publication of Housing Land Supply and Delivery Background Paper 10A (BP10A) in February 2021 sets out an updated position on the Council's position over housing delivery through the Plan Period. This supersedes the housing trajectory set out at the Deposit-stage.
- 1.12 The housing trajectory and supporting evidence in BP10A continues to place a strong reliance upon strategic sites (Warren Hall and Northern Gateway) over the Plan Period. While a detailed critique on this evidence is set out under Matters 2, 3 and 7, Bloor Homes conclude that LDP policies STR3, PC1 and HN4 should be amended to provide genuine flexibility to the Plan and ensure the local authority can meet its housing requirement.

Question 1f) Were consultation exercises and tools user friendly and easy to engage with?

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

Question 1g) How were consultation responses considered by the Council and taken into account?

- 1.14 Consultation has been held through the plan-making process from Strategic Options Consultation, Preferred Strategy and Deposit Local Plan Consultation. The Council's consideration of representations submitted at the Deposit Stage were set out in the Appendix 1 – LDP Council Report presented to Cabinet on 22nd September 2020.

Question 1h) When is the addendum to the HRA and accompanying Statement of Common Ground likely to be submitted to the examination?

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

Question 1i) Does the HRA take account of NRW's recently published interim advice regarding phosphate levels in river SACs.

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