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Chief Officer (Planning, Environ  
Flintshire County Council  
County Hall  
Mold  
CH7 6NB

Friday 22nd July 2022

Dear Mr. Farrow

**Re: Matters Arising Changes (MAC) Consultation**

I write to submit my representation to the consultation on the Matters Arising Changes (MACs) of the Local Development Plan. I outline the details of my objections below;

**1) MAC075**

MAC075 reads as follows: *"In introductory policy wording replace 'starting point' with 'target'".* The reason given for this change is: *"To clarify that the % of affordable housing requirements are expressed as a 'maximum'".* MAC075 changes policy wording in policy HN3 (Affordable Housing) which **has the effect of placing maximum percentages on affordable and social housing** on development sites across Flintshire.

Placing absolute caps on affordable and social housebuilding is a retrograde step that only benefits private developers and those seeking to profit from the building of homes. The UK's housing crisis is one caused by a lack of affordable and social housing. Flintshire itself needs more affordable and social homes and any attempt to restrict this in favour of more expensive houses disadvantages the people of Flintshire and significantly weakens the ability of its residents to get on the housing ladder.

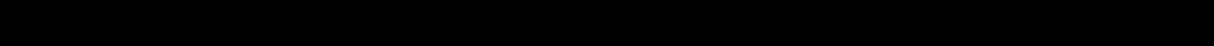
It is my understanding that this change was made following consultation responses/lobbying from a small number of private developers, homebuilders and their appointed agents. It is of course the raison d'etre of such private companies to return profits to shareholders. It is not surprising, therefore, to see a concerted attempt from them to place 'maximums' on affordable and social housing. **It is incredibly concerning that these demands have been acquiesced to via MAC075.**



Where landowners, including social landlords, are willing to include higher proportions of affordable homes than the target, this should be welcomed. A target acting as a 'maximum' would prohibit this. Landowners and social landlords should not be precluded from voluntarily exceeding affordable targets and the Council should retain the right to negotiate **above** the 'target' should it deem such a negotiation appropriate.

The use of the word 'maximum' in the explanatory wording to MAC075 should be removed and the original wording in policy HN3 (Affordable Housing) should be retained **in order to ensure that private developers fulfil their obligations to build adequate affordable and social homes in Flintshire.**

**2) MAC Consultation Process**

As a , I have had a number of queries from residents questioning the meaning of the Council's correspondence in relation to the MAC consultation. Residents have described the email/letter as 'Double Dutch' and 'unintelligible', with others asking for a 'simple explanation' as to the meaning.

The confusing nature of the information provided inhibits residents from engaging with the consultation process and I suspect that this will be evidenced by a lack of public response to the MAC consultation.

Many residents perceive that access to these consultations is made purposefully complex and that such consultations merely act as 'window dressing' aimed at confirming the Council's predetermined viewpoint. I have a great deal of sympathy with this analysis, particularly in light of the fact that **no meaningful changes were made to allocation sites which received hundreds of objections from residents** who took the time to engage with the earlier public consultation.

These concerns are further exacerbated in relation to MAC075 referenced above, where a major change to policy has been enacted following consultation responses from a small number of private developers. **When hundreds of residents' concerns are dismissed entirely, but the concerns of a small number of private companies are utilised to significantly alter policy documents, residents have every right to question the reputability of the Local Development Plan and its associated consultations.**

Yours Sincerely,