

[REDACTED]

Andrew Farrow  
Chief Officer (Planning Environment and Economy)  
Flintshire County Council  
County Hall  
Mold CH7 6NB

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by e-mail: [developmentplans@flintshire.gov.uk](mailto:developmentplans@flintshire.gov.uk)

Dear Sirs

### **Flintshire Local Development Plan – Matters Arising Changes Consultation**

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.

#### **General**

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.

#### **MAC 038 – Object**

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.

MAC061rep1



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.

#### **MAC 058 – Support**

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.

#### **MAC 061 – support**

We would also note the above comment in this context.

#### **MAC 074 – comment**

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.

We would note that the date of the information is still as at 1.4. 2020. We would query if this should be the case and that it will need updating to align with the adoption process of the Plan as per the required under the Development Plans Manual (pages 125 and 126) as follows:

*However, during the plan preparation process it may be that the phasing and delivery assumptions of sites over the remaining plan period changes. Sites could be delivered earlier, or later, or in greater or fewer quantities in future years. In addition, actual completions from the start of the plan period may not have matched those initially considered appropriate. The combination of these factors will result in a subtly different Housing Development Trajectory (relating to provision) for the remaining plan period, a subtly different shaped curve. (p125).....*

*This process of amending the AABR can be undertaken throughout the plan preparation process. It will be critical to undertake a final, amended AABR prior to adoption of the LDP. This AABR is key as it is the annual housing delivery requirement against which the plan will be monitored (see paragraphs 8.14 to 8.17). (p126) (NJL underlining).*

#### **MAC 113 – comment**



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

**MAC 115 – Appendices – Housing Trajectory Appendix 3a, b,c, d, - comment**

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

**IMAC 001 – support**

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.

**IMAC 01.26 - comment**

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

