

[REDACTED]

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County Hall
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29th July 2022

MAC115rep6

by e-mail: 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 and/or an amended windfall allowance overall.

Our comments on each of the Matters Arising Changes are noted below within the above context.

MAC 029 – Support

We support the amendment to Policy STR2 which will permit exceptions housing schemes on the edge of Tier 1 settlements. This will ensure consistency with Policy HN4-D and Planning Policy Wales (Para. 4.2,32) which requires Local Planning Authorities to make provision for affordable housing led housing sites in their development plans.

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

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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.

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 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).....

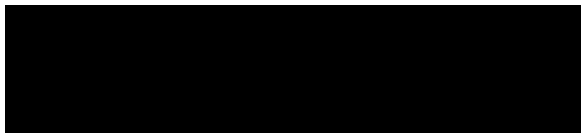
This process of amending the AABR can be undertaken throughout the plan preparation process. It will be critical to undertake a final, amended AABR prior to adoption of the LDP. This AABR is key as it is the annual housing delivery requirement against which the plan will be monitored (see paragraphs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

MAC 079 – support

We support the amendment in Policy HN4 to make more explicit the affordable housing exceptions sites policy in criterion f.

MAC 080 – support

We support the amendment to Policy HN4-D which will permit exceptions affordable housing schemes to include all settlements with a settlement boundary (inc. Tier 1). This will ensure consistency with Policy STR2 and Planning Policy Wales (Para. 4.2,32) which requires Local Planning Authorities to make provision for affordable housing led housing sites in their development plans.



We would just clarify that the introductory policy wording should be read as set out below in order to reflect the Inspector's comments in the MACs Schedule which states to delete the words 'rural areas':

'Outside settlement boundaries for tier 2, 3 and 4 settlements, proposals to develop affordable housing in rural areas will only be permitted, where:'

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.

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

