

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M1

Date: 22 March 2021

From: NJL Consulting (Consultee ID 21232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

Matter 1 : Plan Preparation 2 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, Lavington Participation Corp (LPC) have particular concerns over the extent to which reliance has been placed upon rolled forward strategic allocations.
- 1.2 LPC support the ambitions of an employment led growth scenario which aligns to the regionally significant economic role. 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 failed or in the case of Warren Hall fail to be developed out completely.
- 1.3 LPC considers 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.

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?

- 1.4 LPC have no comments to make in relation to this question.

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The impact of this policy change adds ZHLJKW WR WKH UREXVWQHVV RI WKH & R 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 SRVLWLRQ RQ WKH & RXQFLO·V SRVLWLRQ RYHU KRXLVQJ GHOLY supersedes the housing trajectory set out at the Deposit -stage.

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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, LPC concludes that LP policies STP, AC and B12 should be amended to provide continued flexibility to the Plan and ensure the local authority can meet its housing requirement.