

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M20

Date: 26 April 2021

From: NJL Consulting (Consultee ID 1232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

LPC have no further comments in relation to this question but would emphasise that a reliance upon a potential plan review does not demonstrate a positive approach to ensuring that housing needs are fully addressed. In this case it is not accepted that appropriate remedial actions have been identified.

e) *Have the main risks to delivery been identified, and how will contingencies be handled?*

As evidenced through the LDP examination, the risks to delivery have clearly not been identified or fully understood as evidenced by the continued allocation of Warren Hall. Our response covered in the Additional Submission (Ref: 2016-041-EIP/AS) to the Northern Gateway Housing Position Statement, also addresses the risks to over-estimating the delivery rates on this strategic site and the extent to which the LDP includes genuine flexibility allowance, given the reliance upon Northern Gateway.

We maintain that these risks continue to be downplayed and propose that more realistic delivery rates are planned for within the Council's Housing Trajectory. This would require that smaller, alternative sites within sustainable locations are brought forward to ensure that needs can be fully met over the Plan Period.