

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M3

Date: 22 March 2021

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

Matter 3: Strategic Growth (inc. Strategic Sites)

Key Issue: Is the growth strategy coherent and based on a clear and robust preparation process? Is it realistic and appropriate in the light of relevant alternatives and is it based on robust and credible evidence?

Question 3a) What is the justification for adopting an aspirational growth strategy, led by an ambitious target for new jobs?

Employment -Led Projections

these levels of new employment. These projections date back to 2015 and the publication of the Strategic Options Consultation Document in 2016, however they fail to properly account for the range and scale of the growth initiatives set out in Matter 2a) 2 all of which will have significant implications on the economic growth of the Borough.

1.2 The economic hub, contributor to output and growth in the Welsh economy as a whole and reinforces its involvement as a key partner of the MDA 1. The stated MDA objectives which were published in 2017 under the Mersey Dee Growth Prospectus and were therefore not able to have been considered by the Council when setting the growth targets under the Strategic Options Consultation Document in 2016.

1.3 Similarly, it was only as recent as November 2019 that Welsh Government invested £20m and development facility. Despite these significant economic drivers taking effect, the projected growth scenario for jobs has remained static since 2016. Now more than ever, as areas across the UK seek to recover from the economic outfall of the COVID 19 pandemic, it is vital that the plan is prepared positively to cater for economic growth, with both employers and housing provision playing a critical role.

Accrued Shortfall

1.4 The Preferred Level of Growth fails to account for the housing backlog accrued over

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1.12 This continued over reliance on strategic sites is constraining to the Council rather than providing added flexibility (see response to Matter 2i). In the event that delays occur on one site, this will have strategic implications for the LDP as has been shown in the past.

Summary

1.13 In sum, LPC express concerns over the growth strategy and whether this goes far enough considering how:

Economic growth opportunities have been downplayed or unaccounted for in growth scenarios, particularly those linked to the established Mersey Dee Alliance objectives, North Wales Growth Deal and the AMRC Cymru.

The significant housing backlog has \ H W W R ‡ #tgY°&Y@ 2.37 49 T8717000567.11 0.20

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1.33 Both sites do however represent strategically complex development s evidenced by the abnormally high development costs which have required significant t public sector L Q Y H V W P H Q W D Q G D V V L V W D Q F H ' H V S L W H - 0 H I G Q J D Q U R P H D G W D R Q V P technical and ground conditions of the site, necessitate a significant residential element be brought forward as enabling development. In their own right, the delivery of employment development would not be financially viable on this site. These viability constraints therefore also risk the ability to deliver affordable housing on these sites.

1.34 In this context there are important questions and areas of concern on the proposed delivery rates. Given the extent of infrastructure and enabling works involved to open up future plots, proposed delivery rates seem overly ambitious.

1.35 While Appendix 3A 2 Housing Trajectory set out in BP10A provides an indication on deli

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1.45 Evidence has shown that regardless of site size it takes approximately 3 years from the

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- 1.55 The only supporting viability evidence is a borough -wide study undertaken by the District Valuer into the delivery of affordable housing provision.
- 1.56 This represents a real shortcoming in the required evidence base to justify the delivery of these strategic sites, given their inherent complexity and scale of infrastructure costs involved to open up sites and future phases for development. Further information is therefore required to show how each scheme can remain viable while delivering the associated infrastructure, site enabling works and planning obligations.

Site Constraints - The Northern Gateway

- 1.57 The site is located in CC Flood Zone 1, where it is advised that there should be a presumption against highly vulnerable development on this site. Under the outline planning permission, it is noted that major investment is to be directed towards flood defences with the details secured for approval under Condition 7. In June 2013 planning permission (Ref: 050730) was granted for a scheme to strengthen the flood defences of the River Dee. The approved works have since been implemented in 2015.
- 1.58 The site has no further technical constraints which could not be overcome through further site assessment and mitigation.
- 1.59 While LPC do not contest the inclusion of this strategic site within the LDP, its complexity in delivery across several phases and market factors necessitates that a conservative approach is taken to forecasting build out rates.

1.60 Site Constraints 2Warren Hall

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