

[REDACTED]

29th July 2022

by e-mail: developmentplans@flintshire.gov.uk

Dear Sirs

Flintshire Local Development Plan – Matters Arising Changes Consultation

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 no clear case for a lower flexibility allowance (i.e., new site(s) in or around Broughton, and/or an amended windfall allowance overall) – 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.

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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 % URXJKWRQ DUHD WKURXJK :DUUHQ +DOO ,QGHHG LW ZDV FODVVHG D

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 ²Support

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 ²support

We would also note the above comment in this context.

MAC 074 ²comment

We would note that half of housing allocation figures are still with in 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:
