Flintshire Local Development Plan 2015 2030

Our ref 60174/06/RCA/TE
Date July 2022

Subject Representations on behalf of to the Proposed Matters Arising Change Consultation

1.0 Introduction

1.1 On behalf of has been instructed to make

1.5 Where relevant, the comments made are assessed against the tests of soundness established in the Local Development Plan Manual [DPM] , Edition 3, which states that to be sound, the LDP must meet the following three tests:

1 Does the plan fit?

2 Is the plan appropriate?

3 Will the plan deliver?

2.0 MAC 016 & MAC 017 Para 3.65 Table Update to Housing Growth

2.1 MAC 016 and MAC 017 relate to the Table associated with paragraph 3.65 and updates the proposed Housing Growth targets. Through the updates to the Housing Balance Sheet (01/04/20) (discussed in further detail as part of MAC 038) there has been a reduction in the Flexibility Allowance from 14.4% to 13.2%. This creates an overall reduction in the provision of housing required over the plan period from 7,950 dwellings to 7,870.

2.2 This reduction in the Flexibility Allowance will reduce the ability of the Council to overcome uncertainties regarding housing delivery and viability particularly in light of the issues surrounding nutrient neutrality being experienced in Flintshire.

Soundness

2.6 TW does not consider that the FLDP meets:

1 Soundness Test 1 as it does not have due regard to national policy contained within Future Wales: The National Plan 2040 [Future Wales 2040] which focusses on growth in Flintshire . The FLDP also lacks clear evidence to justify maintaining a reduced level of housing allocations and additional evidence is required to support this approach.

2 Soundness Test 2 as it does not meet the higher end of the objectively assessed housing needs nor does it contribute to the achievement of sustainable development.

3 Soundness Test 3 as it is not sufficiently aspirational, and it is not effective or sufficiently flexible to deliver the required amount of housing to support economic growth.

3.0 MAC 026 & 027 Policy STR1 Strategic Growth

3.5 The supporting statement to Policy STR1 at §5.6 also makes reference to [redacted]. This refence [redacted]

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1 Soundness Test 3 as it provides limited information on how each of the allocated site will be delivered. Further details on the delivery mechanisms for each site are required to ensure the FLDP is sound.

7.0 MAC 077 Policy HN3 Affordable Housing

7.1 MAC 077 seeks to insert a table which sets out the components of affordable housing supply over the plan period.

7.2 The need for Affordable Housing as set out in the Future Wales 2040 (Policy 7) is significant, comprising 3,500 homes a year over the five-year period 2019-2024. Across the North Region, the Welsh Government estimates 16,200 additional homes are needed in the

[redacted]

8.7 TW agrees that the A494(T) [Mold Bypass] forms a firm and defensible boundary. However, TW considers that the Green Barrier Review takes an inconsistent approach to the function that this firm and defensible boundary serves. It goes on to state[13]:

Soundness

8.13 TW does not consider that the FLDP meets:

1 Soundness Test 1 as the boundaries of the Green Wedge have not been appropriately assessed against the five purposes as outlined in PPW.

9.0 MAC 101 Policy EN15 Water Resources

9.1 MAC 101 seeks to reword Policy EN15 and its supporting text to ensure new development does not increase phosphorus levels in the River Dee and Bala Lake Special Area Conservation [SAC]. However, the MAC makes no provisions to assess the potential impact on the viability and deliverability of allocations in light of the phosphates issue , something which the Inspector highlighted as a key matter in his letter dated 10 December 2021 (Examination document INSP015). The Inspector stated:

9.2 Whilst MAC 101 seeks to address the need for mitigation in relation to increased phosphorus in the SAC, there has been no specific assessment of the viability of each of the proposed site allocations and whether they remain viable. , Q W K H & R X Q F L O ¶ V U H V S R Inspectors comments (Examination document: FCC035) it sets out that:

9.3 Whilst it is acknowledged that in some areas it may be too early to judge the impact on viability, TW considers that an assessment of each site allocation should be undertaken to

fully understand whether there is likely to be an impact on the SAC and the potential requirement for mitigation prior to the adoption of the Plan to ensure on ly sites that are deliverable are allocated within the FLDP.

Soundness

9.4 TW does not consider that the FLDP meets:

1 Soundness Test 2 as it is not supported by sufficient evidence that the sites allocated will come forward in light of the phosphates issue. TW considers that reviewing the current site allocation alongside identifying additional, deliverable allocations (such as 7 : ¶ V V LWH Hydd Dd) is the only way of ensuring that the Plan is sound.

10.0 MAC 115 Appendix 3 Housing T ables

10.1 0 $ & O R R N V W R L Q V H U W D Q Xmr E he U FLDP, as Appendices, which E O H V ¶ were previously included within FCC002 Housing Land Supply and Delivery Background Paper 10A Updated January 2021. The tables to be inserted into the plan incl