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Chief Officer (Planning, Environment & Economy)  
Prif Swyddog (Cynllunio, Amgylchedd ac Economi)



The Planning Inspectors  
Flintshire LDP EiP

By email via Programme Officer

Your Ref/Eich Cyl	Letter dated 18.01.22
Our Ref/Ein Cyf	AR/LDP/EiP
Date/Dyddiad	21 <sup>st</sup> January 2022
Ask for/Gofynner am	Andy Roberts
Direct Dial/Rhif Union	01352 703211
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E-mail/e-bost	Andy.roberts@flintshire.gov.uk

Dear Inspectors

### Re: Flintshire LDP and phosphates issue – next steps

Thank you for your letter dated 18<sup>th</sup> January 2022. The Council is very pleased that on balance you are now sufficiently reassured for the Plan to proceed and for the Council to publish the MACs for consultation. As officers we fully understand that this unprecedented situation is as difficult for you as Inspectors to deal with, as it has been for the Council.

In terms of the final part of your letter and your suggestion that we may need to amend the MACs, the Council had not envisaged and does not consider, that there is a need to make any amendments to those already set out and submitted to you. With reference to paragraph 28 of the Council's response letter, the Council is not proposing that the four allocations are undeliverable and in fact as per paragraph 15 of our response, there is sufficient flexibility in the timing of the commencement of these sites within the trajectory that addresses your concern that the issue of phosphates will delay delivery, as this can be accommodated.

The sole purpose of paragraph 28 was to illustrate the extreme 'what if' scenario in the unlikely event that none of the four allocations are developed, providing you with the reassurance that there is still underlying flexibility to support the delivery of the housing requirement.

In terms of each point made in paragraph 28:

- The Council is unaware of any evidence to categorically establish that the four allocations won't deliver at all. On this basis there is no justification to remove them from supply or the Plan;
- The 140 units at Northern Gateway illustrates that further flexibility exists in the plan and these are highly likely to come forward during the plan period given developer confidence and on-site progress. That said, the position and figures relating to delivery at Northern Gateway have already been thoroughly debated at

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[www.flintshire.gov.uk](http://www.flintshire.gov.uk)  
Neuadd y Sir, Yr Wyddgrug. CH7 6NB  
[www.sirfflint.gov.uk](http://www.sirfflint.gov.uk)

We welcome correspondence in Welsh. We will respond to correspondence received in Welsh without delay.

Rydym yn croesawu gohebiaeth Gymraeg. Ymatebwn yn ddi-oed i ohebiaeth a dderbynnir drwy gyfrwng y Gymraeg.



hearing sessions and the position from that as set out in the MACs at present should remain;

- The addition of 50 units to the Northop Road allocation again illustrates that greater flexibility exists as that site is being promoted by a housing association at a higher density but, as with Northern Gateway, the examination has already considered this site at the capacity stated in the Deposit LDP which can now be considered as a modest minimum yield for the site;
- There is no evidence that the three modest commitments will not come forward for development.

The Council is concerned that to take paragraph 28 literally as a revised position will trigger the need for extensive changes to the MACs in terms of the trajectory, affordable housing provision, and other knock on effects throughout the Plan, when it is not necessary to do so.

The Council does not see the need to make any further changes given the latent flexibility that exists in the Plan (as illustrated in the Council's response) to accommodate delays in housing delivery, should they occur. This is also supported by the monitoring framework which has contingencies to deal with delays that will be identified through the Annual Monitoring Report (AMR) process once the plan is adopted.

In the absence of definitive evidence of no delivery, the Council is unwilling to make further changes to the Plan via the MACs as this may invite further representations and the need for further debate at hearing sessions, which would be a circular process without evidence of harm.

To make progress the Council therefore respectfully intends to publish the draft MACs as previously submitted to the Inspector and is making arrangements for this to happen as soon as possible. I would be grateful if you could confirm your agreement to this proposed course of action in order for the Council to progress the MACs to consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Roberts', with a stylized flourish at the end.

Andrew Roberts  
Service Manager Strategy