

Hearing Statement – Matter 11

Flintshire Local Development Plan

On behalf of Pochin Goodman (Northern Gateway) Ltd (PGNGL)

April 2021



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Pochin Goodman (Northern Gateway) Ltd (PGNGL) in respect of:
- Matter 11: Employment Land and Sites.
- I.2. PGNGL has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.3. PGNGL control the former Corus Garden City site, which forms part of the strategic Northern Gateway site. This scheme is an important part of the national, regional and local growth agenda and can positively contribute towards the economic and housing growth for the area.
- I.4. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with PGNGL comments upon the submission version of the Flintshire Local Development Plan, September 2019, submitted in November 2019.
- I.5. As indicated in earlier communication, this is a written statement and PGNGL do not wish to attend Matter 11 of the Examination in Public.

2. Matter 11: Employment Land and Sites

Q11	Do the policies and proposals on this matter achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy? Are they based on robust and credible evidence?
	Are the policies and requirements clear, reasonable and sufficient?
a)	How would proposals for non-employment, ancillary uses in employment areas be treated?

- 2.1. PGNGL are concerned that the Plan is not sufficiently flexible in relation to non-employment, ancillary uses in employment areas. PGNGL support the need to safeguard employment sites and premises, where they are demonstrated to provide an important role in meeting future economic needs. However, PGNGL are concerned that the explanatory text to Policy STR8 does not provide sufficient flexibility over the Plan period.
- 2.2. The explanatory text does not recognise the role of some non B class uses in supporting the overall function of an employment area and its overall sustainability, and as such places unduly onerous requirements through Policy PE6.
- 2.3. Similarly, Policy PE1 restricts the use of the John Summers Buildings and grounds (Allocation STR3) to B1, B2, and B8 uses. PGNGL considers that the policy should reflect the extant permission and provide greater flexibility. Furthermore, the explanatory text for Policy PE1 does not recognise the role of some non B class uses in supporting the overall function of an employment area and its overall sustainability, and as such places unduly onerous requirements through Policy PE6, which will not achieve sustainable development.
- 2.4. Policy PE6 should recognise the role that some non B1, B2, and B8 uses have in supporting the wider function and overall sustainability of an Employment Area. Furthermore, it should

acknowledge that some Sui Generis uses are more appropriately located within Employment Areas. PGNGL consider that the policy and explanatory text should be amended to provide greater flexibility over the Plan period.

- 2.5. PPW considers that sites identified for employment use should be protected from inappropriate development and notes that Plans should control and manage the release of unwanted employment sites to other uses. However, PPW is clear that development policies and SPG should support mixed use development, including flexible live/work units, and commercial premises where these are appropriate. Furthermore, PPW seeks to manage sustainable travel patterns, aligning jobs services, housing to reduce the need for travel and dependency on the car. TAN 23 also promotes Plans that are flexible enough to respond to evolving circumstances.
- 2.6. PGNGL consider that the policy in its current form is not appropriate and is not effective and in its present form could fail to deliver sustainable development in accordance with policies in national policy. In these circumstances, we do not consider that the Flintshire Local Development Plan in its current form to be sound.
- 2.7. The explanatory text within Policies STR8, PE1 and PE6 should be amended accordingly to introduce greater flexibility over the lifetime of the Plan. This approach is consistent with PPW.

Proposed Change

- 2.8. To overcome the objection and address soundness matters, the following changes are proposed:
 - Amend the Explanatory text to explain the circumstances where and what type of alternative uses will be supported. Supporting non B1, B2, and B8 uses that are suitable on employment sites can contribute to the overall function of the employment area.