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**Flintshire Local Development Plan 2015 – 2030
EXAMINATION IN PUBLIC**

Hearing Session Matter 2

Tuesday 13th April 2021

Plan Strategy

Key Issues, Vision, Objectives

Hearing Statement by Flintshire County Council

Flintshire Local Development Plan (2015 - 2030) Examination in Public

Flintshire County Council Statement: Matter 2 Plan Strategy: Key Issues, Vision and Objectives

This statement has been prepared by Flintshire County Council (FCC) in response to the Inspectors' hearing questions:

Key Issue:

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

Council's Response:

1. The Plan's overall strategy is based on an understanding of the strategic and local context within which to plan for the area over the time period of the plan. This is set out from paragraph 3.25 of the Deposit Written statement which sets out the national legislative and strategic policy context within which Flintshire is considered to provide a greater than local contribution to prosperity and well-being in Wales, defined amongst others via Planning Policy Wales Edition 11 (PPW11) and the Wales Spatial Plan (WSP). Much of this recognises Flintshire's strategic locations both in a North Wales context, as well as serving as a gateway to England and the economic markets of the North West, as well as Flintshire's role as an economic hub for the wider sub-region.
2. Regionally and collaboratively, Flintshire is part of a number of overlapping shared commitments to improving the economic, social and environmental characteristics of the area as well as ensuring that its communities can benefit from a focus on investing, supporting and protecting these key important matters. The West Cheshire North East Wales Sub Regional Strategy set the context for a lot of this collaborative thinking and developed into the ongoing work of the Mersey Dee Alliance (MDA) whose focus is on promoting the wider economic area that straddles the national border as a contiguous economic entity. Following on from the sub regional strategy produced in 2006, the MDA more recently has produced a Growth Prospectus containing key strategic locations within Flintshire, as well as a complementary rail investment prospectus, Growth Track 360.
3. Importantly, Flintshire is also part of the North Wales Growth Deal which was confirmed by the UK and Welsh Governments in December 2020 which has secured significant government funding to provide necessary infrastructure to support investment in the region to boost economic productivity and performance. It is to this and the above context that the allocation of key strategic sites in the plan at Northern Gateway and Warren Hall are aligned and where, particularly in the case of the latter, this infrastructure investment will enhance the ability of that site to deliver within the plan's timeframe.

4. Other contextual influences on the strategy and its preparation include the Council Plan and Deeside Plan, as well as the Council's Well-Being Assessment carried out to support the transition to the Flintshire Public Service Board. Clearly the plan is also based on both a statistical profile of the key indicators for the area, as well as a comprehensive background assessment of some of the key influences on the plan, discussed in a series of succinct Topic Papers produced at an early stage in the plan process, and derived from an assessment of the emerging evidence base. Clearly the plan has also had regard as required, to Welsh Government Population and Household Projections although the degree to which these assist the Council in developing any sort of positive strategy is debateable, given that successive projections (2011, 2014, and 2018 based) consistently predict very low levels of housing need which the plan could effectively meet without the need for new sites. This is not the approach taken as the strategy aims to be more positive and ambitious, particularly as that is what the strategic context requires.
5. The additional investment of time and effort by the Council in a Key Messages stage and consultation early on in pre-deposit participation, has helped the Council to test the direction the plan should go in and how the strategy should be formed and from that and the other stages under Regulation 14, a number of key issues and drivers for change emerged, supported by a consensus view which are set out in paragraph 3.30 of the Deposit written statement. Without repeating these, they summarise the strategic context and need for the plan to positively approach job growth and economic ambition. The plan also needs to, support infrastructure including sufficient housing to support growth, locate development in the most sustainable places, whilst maintaining well-being by ensuring our natural, built and historic environments are protected and enhanced.
6. These have in turn influenced the development of the Plan's Vision and objectives which were developed with a significant amount of early community and stakeholder involvement as well as with elected members. The vision and objectives define and explain the focus for the plan and to set the context for how these intentions translate into the policy framework of the plan, and where in terms of the strategic policies these links and relationships are clearly identified in the 'policy context' section that follows each policy.

Question a)

Is the LDP's overall strategy consistent with those of neighbouring authorities? What are the main cross boundary issues and how have these been addressed?

Council's Response:

a.1 Whilst there is no approved Regional Planning Guidance per se in North Wales, and also individual Local Authorities are at very different stages of development plan preparation or review, Flintshire's LDP strategy has emerged in a similar

timeframe to that of Wrexham, and is not that far behind its cross border neighbour in Cheshire West and Chester. The other North Wales County that borders Flintshire is Denbighshire who are in the process of reviewing their first LDP. Each of these Local Authorities has been part of the preparation of the plan, as part of the Key Stakeholder Forum, and have made representations on the plan. That said none of these authorities have made fundamental objections to the plan on the basis that the Flintshire LDP is not in line with, or conflicts with the respective strategies of their plans.

- a.2 Perhaps Flintshire and Wrexham are most closely aligned in terms of their respective strategies, both in terms of the respective positions in the LDP process, as well as similarities in the level of employment and housing development each authority is proposing. Both Council's sought to collaborate on mutual pieces of background evidence gathering and worked together on work relating to viability and affordable housing, employment land review, and their respective Housing Market Assessments. In terms of the collective growth levels in each plan, these are considered to be in broad alignment with the intentions for growth for the two authorities set out in the draft National Development Framework, and soon to be published Future Wales Plan. Both versions of the national Development Plan focus on Wrexham and Flintshire as a national growth location, and the cumulative housing requirements of the two LDPs are in general conformity with the annualised level of housing need set out in the Draft NDF, both plans take a similar needs/viability driven approach to the provision of affordable housing, and both seek to base their strategies on healthy levels of job growth, thereby meeting the intention for the area to be considered as a national growth location.
- a.3 In relation to the adopted CWAC Local Plan, this seeks an ambitious level of housing growth prompting release of green belt land near the Flintshire border. The plan also acknowledges that the area's economy is relatively self-contained and as such CWAC have therefore substantially planned for their own economic growth. Under the duty to co-operate the Council liaised at an earlier stage of the LDP as CWAC progressed their plan through its statutory stages.
- a.4 As stated earlier, Denbighshire being an early adopter of an LDP are in the process of reviewing their plan and have reached the stage of revising their preferred strategy. Given this and the position with the Flintshire LDP, this provides Denbighshire the opportunity to align with the strategy of the LDP.
- a.5 In terms of related/common issues: all of Flintshire's neighbouring authorities are looking to promote growth via large strategic scale sites in their respective plans but where, in the case of Flintshire, the strategic sites in the LDP are at a more advanced stage of development/deliverability, assisted by the Growth Deal and accelerated developer interest in the main site at Northern Gateway. Equally, all of the plans in the wider area seek to deliver significant housing requirements within similar timeframes, but where the Flintshire LDP trajectory shows that the

plan is 'on track' to deliver at the planned rate coming into the EiP, and for the 9 years of the plan period that will remain post adoption.

- a.6 Other cross border issues relate to the levels of economic interdependency indicated by the respective level of travel to work movements, mostly focused on the relationship between Flintshire and CWAC. These movements essentially involve in commuting for primarily manufacturing jobs, and similar outflows to access the service and financial services jobs across the border. Given the cumulative levels of housing requirements in respective plans of neighbouring authorities there is some concern as to whether there is sufficient regional developer capacity to deliver this level of provision, particularly given the commitment in most authorities to significant housing in strategic green field sites.

Question b)

How have the key issues been selected? Are they all addressed directly and adequately by the vision and strategic objectives? What is the relationship between the Key Issues and Drivers (para. 3.30) and the challenges that must be planned for (para. 3.35)?

Council's Response:

- b.1 The vision, issues and objectives were developed as part of a Key Stakeholder Forum workshop held on 27/02/15 [LDP-KPD-KSF](#). These were then further refined and presented as part of the consultation on the Key Messages document early in 2016 [LDP-KSD-KM1](#). This stage also included consultation on the Settlement Audits Reports [LDP-KSD-KM2](#) as set out in the Consultation Report [LDP-KPD-CR1](#). From that the key messages consultation exercise a number of key issues and drivers were summarized from the consensus view given and a vision was then developed to encapsulate those issues. The vision sets out the main aims of the plan, the Objectives then add more detail in order to focus more clearly on the land use roles of the plan in addressing these Issues.
- b.2 The key issues were also informed by the Strategic Environmental Assessment and Sustainability Appraisal (SA) Scoping Report March 2015 [LDP-KPD-IIA](#), and the 18 Summary Topic Papers produced to summarise the assessment of the evidence base at that time.
- b.3 The land use issues that the Plan needs to address have come from an analysis of the evidence base, the review of other plans and strategies and engagement with partners, consultees and stakeholders. Sustainability issues, including those affecting the environment, were identified in section 5 the SA Scoping Report [LDP-KPD-IIASA](#) and the Consultation Report [LDP-KPD-CR1](#) details how engagement on the issues was undertaken.
- b.4 The Plan's Vision and Strategic Objectives have been formulated to ensure that the Plan addresses all the key issues identified and sets out how they will be addressed through the land use planning system. Objectives are clearly set out in

the Deposit plan as after each policy in the plan there is a table which sets out which Objective is being addressed by that policy. Also SEA/SA Scoping report in Appendix D sets out the Internal compatibility of the SA objectives and finds that no objectives are mutually incompatible.

- b.5 The key issues and drivers (para 3.30) have directly identified the challenges to be planned for (para 3.35). In combination these helped to define the vision and objectives of the plan which in turn, set the basis to translate the intentions of the plan into the policy framework, where the policy context section of each strategic policy identifies the links back to these objectives.

Question c)

Is the vision appropriate and sufficiently detailed?

Council's Response:

- c.1 The role of the LDP's vision is to define the main purpose of the Plan by reflecting the main objectives of the Plan in addressing the key issues (para 3.91 Development Plans Manual). It has been formulated to ensure that the Plan addresses all the key issues identified after consulting stakeholders and the wider public. The vision reflects the importance of getting the right balance between the different social, economic and environmental needs of people. The three strategic objectives themes of Enhancing Community Life, Delivering Growth and Prosperity, Safeguarding the Environment are embodied in the vision.
- c.2 Reference to a "regional gateway" derives from Paragraphs 16.1-16.6 of the Wales Spatial Plan which recognises that the area harnesses the economic drivers on both sides of the border to benefit North East Wales and the wider geography, east and west.
- c.3 The vision sets out that the County is an area identified for economic investment but that wishes also to protect historic and cultural heritage which would include buildings landscape, wildlife and language. Significant stakeholder engagement was undertaken to produce the vision and objectives of the plan. The vision is therefore considered to be appropriate and sufficiently detailed.

Question d)

What are the implications, both positive and negative, of Flintshire's gateway location on a national border? How are these accounted for in the LDP?

Council's Response:

- d.1 This is informed by joint working and engagement with neighbouring authorities and the evidence base, the main cross-boundary issues are the Plan's growth levels (housing and employment); the strategic role played by Flintshire's key employment areas and the economic interrelationships; transport infrastructure, including the A55, A483, railway connections and the prospect of a North Wales Metro.

d.2 The strategy of promoting growth and investment is consistent with the WSP vision for North East Wales and as transposed into the Future Wales, the national development Plan. The levels of employment and housing growth are broadly balanced, ensuring that they are sustainable by not displacing employment or housing to (or from) neighbouring border authorities, given the relatively positive levels of employment and housing self-containment in the area. Each authority is providing for their own needs and none object to the respective positions of the others.

d.3 There are challenges that are posed by Flintshire's location examples of which follow, along with how the plan helps to mitigate them in the context that CWAC and Wrexham like Flintshire have planned for their own housing and employment needs, and none object to each other's respective positions:

- Flintshire's gateway location involves reasonably high levels of travel to work commuting both into and out of the area on a daily basis, but where the key flows are complementary in that workers come in for manufacturing jobs, and residents travel relatively short distances to CWAC for service and financial sector jobs. There is also economic resilience on both sides of the border supported by common aims e.g. collaboration via the MDA;
- The need to maintain the higher than Wales or UK level of employment in manufacturing are supported by the sub-regional recognition of Flintshire role in providing these roles, and the opportunities to maintain investment in this sector;
- Generating sufficient investment interest in sites, particularly strategic sites, from competing locations. The plan provides advanced development ready strategic sites which are either already under development having had key infrastructure provided, or where the need to provide the infrastructure to advance them is supported and funded via the Growth Deal;
- The capacity of regional housing developers to be able to take up and develop all of the available housing allocated in plans in the sub region is a concern, but where the LDP identifies viable, sustainable, deliverable and market attractive sites in areas of demand;
- Ensuring that there is sufficient ambition in the LDP strategy to meet the expectations of national and regional policy for Flintshire as a national growth area;
- Ensuring that other sub regional authorities meet the requirements of their respective strategies – this is difficult as the Council and LDP have no real control, but the plan makes and is demonstrating delivery of a greater than proportionate contribution to local, regional, and national growth and investment;
- Aligning housing growth to job growth and ensuring that housing growth doesn't take place without economic growth. It is accepted to a degree that housing may need to lead especially on strategic sites in order to create site wide values and investment interest;

- A dependence on strategic sites when most neighbouring local authorities are also planning large scale sites. Unlike many regional large scale greenfield strategic sites, which are dependent on the need for major infrastructure before development can take place, the strategic sites in the LDP are development ready in that they are either already delivering development having had major infrastructure put it, or where the infrastructure will be funded via Growth Deal funding.

d.4 On the basis of the above, these illustrate that the area is making the most of its location and competitive advantages, and the plan is helping to deliver on this.

Question e)

Does the LDP address the physical and mental health of the population?

Council's Response:

- e.1 In as far as a land use plan can, the key land use planning influences on health have been embedded in Plan through the Sustainability Appraisal (SA) and the Health Impact Assessments (HIA). Climate change and health are considered holistically in the Plan, reflecting their cross-cutting nature.
- e.2 The policy context section following each strategic policy identifies which policies are linked to the objectives and the relevant Well-being Goals from which it can be seen that many of the Plan's policies deliver outcomes relevant to these objectives.
- e.3 The Council has engaged with the Local Health Board, Betsi Cadwaladr University Health Board (BCUHB) at regular intervals during Plan preparation to ensure compatibility and consistency with the Plan Strategy. Indeed, BCUHB are a member of the Key Stakeholder Forum. BCUHB have been consulted at all stages of the Plan process and provided with the opportunity to comment on the emerging Plan and influence its development.
- e.4 The Plans framework of strategic and detailed policies have been drafted in accordance with PPW11 and seek to ensure sustainably located development which is close to services, facilities and employment where the opportunity exists to make sustainable journeys through walking, cycling and public transport. Policies seek to ensure that Placemaking principles are achieved in new development through high quality living environments with green infrastructure networks and open space. These measures should have a positive influence on physical and mental health in as far as a land use plan can..
- e.5 The HIA carried out by Public Health Wales and contained in Appendix 31 of the Consultation Report [LDP-KPD-CR1c](#) , demonstrates that the Plan is effective in addressing the physical and environmental conditions affecting health through good design of development, access to employment, services, hospitals and employment and through improvements to the quality of housing provision and

the environment. Economic development provides health benefits from employment and the delivery of homes will help retain skilled workers and graduates.

Question f)

What is the purpose of the strategic policies? Are they useful and useable in development control terms?

- f.1 The Strategic policies have a key role in translating the vision and strategic objectives that define the intentions of the plan, into a policy framework that can help to deliver these intentions in a land use context. They set out the key requirements of the plan in a land use sense, and also help defines the way in which the intentions of the plan should deliver sustainable development and place making.
- f.2 The Strategic policies clearly identify what is required in order to achieve sustainable development, setting out which of the plan's objectives they help to achieve, whilst at the same time identifying the areas of national policy that are delivered by the policy as well as the relationship the policy has to the Well-Being goals. They also set the broad context for the specific area of the plan they focus on, from the identification of the overall levels of growth that the plan sets out to make provision for the delivery of, the way economic development should take place, the approach to tourism, Culture, and Leisure, climate change and environmental protection, to minerals development.
- f.3 Finally the strategic policies map to the detailed development management policies in the plan that should be read in combination with the Strategic policy and in relation to the specific proposals being considered.
- f.4 As written they are capable of being used for development management purposes (include some of the examples you have opposite) as well as with more detailed policies for more complex development proposals, where it is important to read the plan as a whole.

Question g)

What is the policy position on Best and Most Versatile Agricultural Land?

Council's Response:

- g.1 The preparation of the LDP has involved close working with Welsh Government in identifying the predicted loss of BMV as part of the assessment of candidate and alternative sites. On all allocations involving the potential loss of BMV an on-site survey has been arranged and results verified by Welsh Government. In identifying allocations the Council has sought to minimize the loss of BMV.
- g.2 The approach is set out in Background Paper 09 [LDP-EBD-BP9](#) which has been supported in principle by Welsh Government. In summary Welsh Government

developed an initial means of predicting the likely loss of BMV on Candidate Sites and this was further refined into an improved and more accurate set of results. Having worked closely with WG Agricultural Division in this way, and recognizing that many of Flintshire's more sustainable settlements have BMV in proximity to them, the Council have sought to minimise the loss of BMV. Where BMV has been used for housing allocations, these sites are otherwise in the most sustainable locations when assessed against all other relevant criteria and planning considerations. The approach has been supported by the WG Development Plans team in their formal comments on the Deposit LDP and the WG Agricultural Division do not object to any of the allocations in the LDP on the basis of an unacceptable loss of BMV.

Question h)

Are the Proposals and Inset Maps accurate and user friendly?

Council's Response:

i.1 Yes The Proposals and Inset Maps are an accurate and useable representation of the LDP proposals and are available in hard copy, pdf and as an interactive online version. Also alongside the online version of the proposal map is a separate constraints map, produced by experienced cartographers who have significant experience in producing development plan proposals maps. The design of the maps has sought to reduce the costs of having an individual plan for every settlement, necessitating a 'book' format.

Question i)

In the light of the time which will remain if the LDP is adopted in 2021/2, is the plan period (2015-2030) appropriate?

Council's Response:

i.1 Paragraph 7.4 of the LDP Manual Edition 3 states that LDPs should have at least 10 years of the Plan period remaining upon adoption and only 8 years will remain if the Plan is adopted in 2022. However, given the statutory requirement to produce a Plan and to maintain a housing land supply to facilitate and guide growth in the area, the important role that the Plan will play in facilitating local and regional employment growth, the importance of the Plan to infrastructure providers and stakeholders and the absence of an up to date development, all indicate that adopting an appropriate Plan as soon as possible is essential. This matter does not impact on the fundamental soundness of the Plan but trying to extend the Plan period will only delay its adoption even further. Covid has already created a constraint on the ability of the Council to progress its plan in the normal way and has posed a series of challenges in terms of the need to maintain progress on the plan and minimise the further delay the pandemic has caused, on the previous timetable for plan production. Had Covid not happened and the plan had progressed as per its previous approved delivery agreement then at adoption

it would have been closer to the guidance in the manual relating to remaining plan period.

i.2 These matters are wholly out of the control of the Council who have performed effectively in minimising delays caused by the Pandemic and in getting the plan 'back on track'. Clearly in agreeing the latest delivery Agreement timetable which the plan remains on track with, the Welsh Government had no concerns over this aspect of the guidance in the DPM. Given the position now reached, the Council considered that it would neither be appropriate to 'pause and reflect' as per guidance to other LPAs at various stages of plan review, or to consider 'extending' the plan period given the amount of work, new evidence, ability to engage with the public, and identification of potential additional sites, that would have been involved in extending the plan period.

i.3 There is also the time that this would have added to the prospect of Flintshire gaining an adopted development plan for its area, to use in a plan-led context in making decisions on planning applications. Finally, given the fact that unlike many LDPs at Examination, the Flintshire LDP is 'on track' in terms of delivery housing growth at the level expected by the Plan and in line with the revised housing trajectory. This evidence of the plan's ability to deliver its intentions is more than sufficient mitigation for not meeting the requirement of the guidance in the DPM, and given the approach to SDPs that will come in the near future with the implementation of Corporate Joint Committees, it is far more preferable for both Flintshire and Wrexham to have adopted plans in place to both inform the SDP development process, and set the context for a plan review at the right time and with the SDP context to inform it. It is also essential that the County is brought back under a plan-led system as soon as possible or it will continue to be subject speculative development and 'Planning by appeal'.

Question j)

What will be the status of Place Plans, when prepared, and how will they relate to the LDP?

Council's Response:

j.1 Welsh Government advice in PPW11 (para 1.28) is that 'Place Plans are non-statutory documents. They may be prepared at the initiation of the local community and are a powerful tool to promote collaborative action to improve well-being and placemaking'.

j.2 PPW11 has clarified the status of Place Plans with the guidance in para 1.28 which states 'Place Plans should support the delivery of LDP policies and are adopted as supplementary planning guidance'. Further guidance is set out in para 5.7 of the Development Plans Manual 3 where Welsh Government state "Place Plans should be in conformity with the development plan and adopted by the LA as SPG to the plan (chapter 9). They can inform an LDP review, be prepared in parallel with an LDP, or following adoption, providing there is a sufficient 'policy

hook' within the plan. They cannot duplicate or introduce new policy, nor can they de-allocate sites identified in the adopted development plan. Place Plans are not part of the statutory development plan; instead they add detail to the adopted plan''.

- j.3 Once the LDP is adopted there is clearly scope to look at how the Place Plans sit with the LDP and for consideration to be given as to their role and relationship to the adopted Plan.