

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M20

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

Matter 20 – Monitoring Framework

Key Issue: Does the LDP enable adequate monitoring of its effectiveness?

a) Are clear targets and measurable outcomes in place for effective monitoring of delivery of the development and allocated sites and achievement of LDF objectives?

There remain significant gaps in the Council's Housing Trajectory which represents a key monitoring tool as part of the LDP in order to assess housing delivery over the Plan Period. This includes a lack of detail on lead-in periods for housing allocations, based upon key milestones. Table 20 of the DPM clearly sets out the required level of detail which should be factored into the Trajectory.

Moreover, there is no detail on how affordable housing will be delivered and subsequently monitored over the course of the Plan Period. As set out in our response to Matter 13, the affordable housing target falls short on meeting actual housing needs within the Borough which as a corollary will maintain the existing shortfall in affordable housing. It is therefore critical that further information is provided within the Trajectory and comprehensively scrutinised. Until this has been addressed there can be no clarity on how housing and affordable housing targets can be effectively monitored over the Plan Period.

b) Are triggers timely and do they allow for an effective response to be made in the event that remedial action is required? In particular, how will additional sites be brought forward if there is a persistent shortfall in housing delivery?

There are currently no policy provisions in place within the LDP to address any persistent shortfall in delivery. The Council have expressed that should they fall below the AABRs set out in the Trajectory then a plan review can be undertaken at such time. It would however be more prudent to have flexibility already built into Policy HN4 to enable alternative sites to come forward without the need for a formal review. This would enable the Council to positively address any stalled delivery and address any shortfall early in the Plan Period.

LPC have proposed rewording to Policy HN4 (see response to Matter 10b) which reflects the requirements of the DPM and the trigger for a plan review should LPAs fail to deliver against AABRs for two consecutive years. This proposal to Policy HN4 would build in greater flexibility into settlement boundaries which have remained tightly defined. Should strategic sites and other housing allocations fail to deliver, as we predict (see response to Matter 12), then it is all the more important that genuine flexibility is allowed for within the LDP in order to meet the housing requirement.

c) Are clear arrangements in place for monitoring and reporting the results?

LPC have no comments to make in relation to this question.

d) Have remedial actions been identified?

Flintshire County Council

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M20

Date: 26 April 2021

From: NJL Consulting (Consultee ID – 1232396) on behalf of Lavington Participation Corp. and Duncraig Investment Corp.

LPC have no further comments in relation to this question but would emphasise that a reliance upon a potential plan review does not demonstrate a positive approach to ensuring that housing needs are fully addressed. In this case it is not accepted that appropriate remedial actions have been identified.

e) *Have the main risks to delivery been identified, and how will contingencies be handled?*

As evidenced through the LDP examination, the risks to delivery have clearly not been identified or fully understood as evidenced by the continued allocation of Warren Hall. Our response covered in the Additional Submission (Ref: 2016-041-EIP/AS) to the Northern Gateway Housing Position Statement, also addresses the risks to over-estimating the delivery rates on this strategic site and the extent to which the LDP includes genuine flexibility allowance, given the reliance upon Northern Gateway.

We maintain that these risks continue to be downplayed and propose that more realistic delivery rates are planned for within the Council's Housing Trajectory. This would require that smaller, alternative sites within sustainable locations are brought forward to ensure that needs can be fully met over the Plan Period.