

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

**Hearing Session Matter 3
Wednesday 14th April 2021**

**Growth Strategy
(Including Strategic Sites)**

Hearing Statement by Flintshire County Council

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

Flintshire County Council Statement: Matter 3: Growth Strategy (Including Strategic Sites)

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

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

Response:

1. The LDP growth strategy sets out to embrace the need to promote economic development and job creation whilst also seeking to align this to an appropriate level of housing delivery that both supports economic recovery and also meets deliverable housing needs for market and affordable housing. The employment focus of the strategy aims to capitalize on the County's role as a regional economic hub and to assist in delivering regional strategies through projects in the North Wales Economic Ambition Board Growth Deal [LDP-EBD-EM4](#) (funding now approved).
2. The role of the County in a wider regional economic and housing context is also clearly set out in the Wales Spatial plan and now the emerging [Future Wales - The National Plan](#), which identifies Deeside and Wrexham as a National Growth Area under Policy 20 of the draft plan. The close alignment of the preparation of the Wrexham and Flintshire LDPs and the strategies they are based on, will also inform the consideration and scoping for a Strategic Development Plan for North Wales, as this requirement emerges with the inception of Corporate Joint Committees later in 2021. The basis for the Growth Strategy of the plan is also broadly supported by Welsh Government in their comments on the Deposit LDP where they state that "the Welsh Government is broadly supportive of the strategy, the level of homes and jobs proposed, considers it aligns with national policy and is in general conformity with the emerging NDF".
3. In terms of its preparation, The LDP strategy has followed the guidance in the Development Plans Manual Edition 3 (DPM3) where the most up-to-date Welsh Government Population and Household Projections (and subsequent revisions) have been used as "a fundamental part of the evidence base" and as a starting point in assessing the preferred level of housing growth in the Plan. Whilst Welsh Government do not publish national economic projections of any form, the Council as per DPM3 has nevertheless also sought to develop an economic evidence base to underpin the LDP strategy. This has involved carrying out an Employment Land Review ([LDP-EBD-EM1](#)) as well as economic forecasting ([LDP-EBD-EM2](#)) to try to understand the demand for and scale and type of employment needs over the plan period. The difficulty with using the available

national population and household projections, and recognized economic forecasts carried out for the Council by its consultants is that both sets of projections/forecasts rely on past trends to look forward, and where the trend period coincides with the extended period following the last significant recession in 2008 whose effects were felt for some time. Nevertheless it has sought to explore the relationship between appropriate jobs growth and housing levels, accepting as the Manual does that there is no direct mathematical relationship. The plan has also generated and considered a number of Growth Scenarios based both on demographic led projections approach where key assumptions were varied, and a jobs led scenario. These are described fully in background papers that support the preparation of the plan ([LDP-KSD-SO1](#); [LDP-KSD-PS3](#)) and that were the subject of public and stakeholder consultation, where the consensus view informed the selection of the preferred option (option 6 employment led) for the Preferred Strategy of the plan. Also and as per the DPM3, there are commonalities between the preferred growth option 6 and option 4 which serve to confirm or endorse the setting of an appropriate level of growth.

4. No alternative projections based growth strategies were presented by interested parties for consideration in response to various consultation exercises on the Plan, with the focus rather being to either simply to seek reduce the amount of growth to remove the need for one site or other (community based objectors), or to push the number higher to provide space to include more land (landowners and developers). Neither of these approaches really take an informed strategic planning approach to considering the soundness of the LDP, and both either just seek to say 'not here' or, at the other extreme, to reduce the plan process to an exercise in adding value to land. The Council does not subscribe to either as being in line with the purpose of examining the soundness of the LDP strategy.

Question a)

What is the justification for adopting an aspirational growth strategy, led by an ambitious target for new jobs?

Council's Response:

- a.1 Flintshire's geographic and functional role as an economic hub for the wider sub region combine to set the context for the ambitious but realistic and deliverable target for jobs growth. This is supported by the national and regional acknowledgement for this provided by the emerging National Development Framework/Future Wales Plan (due to be published in final form February 2021) and the North Wales Growth Deal (formally signed December 2020). These both create a strategic growth focus for Flintshire (and Wrexham) as well as focus on strategic sites at Warren Hall and Northern Gateway as major contributors to delivering the national and regional growth ambition contained in those documents.
- a.2 To have set a modest or projection trend-led growth strategy would firstly not have met this ambition, and would have simply perpetuated negative trends from a recessionary period, and projected them forward for the plan period. This would

have been totally against the advice in the [planning circular letter](#) issued in 2014 in relation to projected trends and development plans. In addition this would not deliver the level of affordable housing identified within the [Local Housing Market Assessment \(LHMA\)](#).

- a.3 From a housing perspective, this would have meant that with the combination of completions and commitments within the current LDP housing balance sheet, there would have been no ‘technical’ need to identify additional new housing allocations (with all of the associated difficulties of justifying such an approach). Equally this would not have sent the right message in terms of identifying opportunities for investment to contribute towards economic growth, and now particularly recovery post Brexit and Covid.
- a.4 From the “Further Advice Note” ([LDP-EBD-EM3](#)) prepared by the Council’s economic consultants, “this employment-led approach is a reasonable approach for Flintshire, recognizing the large potential opportunities for Flintshire due to its capacity for growth on employment land. By aligning housing growth to the demand for labour, it helps to support business growth and reduces the risk of businesses being stifled due to labour constraints”. In terms of an ambitious growth approach, the third scenario forecasts additional growth of 7,200 jobs and 6,500 dwellings which in terms of the differential over the plan period, the growth strategy of the plan only exceeds these projections by +800 and +450 respectively, or +53pa and +30pa respectively. Whilst no objector presents their own employment led alternatives, none appear to doubt the achievability of the jobs target, and in fact many consider it is not ambitious enough, although this is not evidenced, and the Council does not agree.
- a.5 The above economic and nation/regional policy and strategic context sets an ambition that is ‘greater than local’ for Flintshire to make a contribution, and Flintshire has the site capacity to enable the job growth to be achieved. Clearly, what is harder if not impossible for a development plan to do is to directly attract the investment either in employment or housing, as that is for the market interacting with developers and fulfilling an identifiable demand to do. What the plan clearly has done, is to make sufficient provision for growth to happen to facilitate the national and regional recovery aimed for in national policy and the Growth Deal.
- a.6 The relative alignment of the Flintshire and Wrexham LDPs and the levels of job and housing growth within each strategy, also aligns with the intentions of the National Growth Area policy in Future Wales soon to be published, as well as the inception of Corporate Joint Committees later this year, where the need to consider the scope of a Strategic Development Plan for North Wales can be directly informed by the combined strategies of the Flintshire and Wrexham LDPs.

a.7 One of the questions listed in the DPM3 under Soundness Test 2 Is The Plan Appropriate, asks “are the vision and the strategy positive and **sufficiently aspirational**” (Council’s emphasis in bold) and for the reasons summarized above and in the evidence base, the Council considers it is.

Question b)

When were i) the Northern Gateway site and ii) the Warren Hall site granted outline planning permission? Have circumstances changed significantly since then?

Council’s Response:

b.1 The Northern Gateway Strategic Site (STR3A) is in two parts with the northern part being delivered by Praxis and the southern part by Pochin.

b.2 In respect of the north part of the site the Deposit LDP was accompanied by a Masterplan and Delivery Statement [LDP-EBD-STR3A.2](#) prepared by Ancer Spa on behalf of Praxis. Section 2 of the document sets out the key planning history of the site whereby outline planning permission was first granted in 2013 ([049320](#)) for a mixed use development and that this had been the subject of Environmental Impact Assessment. Since then considerable progress has been made in discharging conditions as explained in section 3 of the document. Progress has also been made in delivering site enabling works as set out in section 4 of the document and which includes the spine road which was largely completed in 2017. Enabling works have also been approved for plots H6 / H7 ([060311](#)) and for H3 / H5 ([061018](#)). As referenced in the Council’s response to Q10 of the Inspector’s Preliminary Questions [FCC001](#) reserved matters ([059414](#)) has been approved for 283 units on plots H1, H2 and H8 (part) and Countryside Homes are on site. Also, reserved matters have been approved ([060222](#)) for a 10,000 sq m warehouse on plot A. Discussions are presently taking place with developers on all of the remaining housing plots.

b.3 In respect of the south part of the site the Deposit LDP was accompanied by a Masterplan and Delivery Statement [LDP-EBD-STR3A.1](#) prepared by Spawforths on behalf of Pochin. Section 2 of the document sets out the key planning history of the site whereby outline planning permission was first granted in 2014 ([050125](#)) for an employment led mixed use development. A subsequent application ([056540](#)) was approved to increase the level of dwellings on the site from 600 to 770. Reserved matters have been approved ([058868](#)) for phase 1a enabling and infrastructure works and progress made in discharging pre-commencement conditions. More recently, a reserved matters application ([060411](#)) on Phase 1 for Keepmoat Homes to deliver 129 dwellings and a reserved matters application ([061585](#)) on Phase 2 for 104 dwellings for Lane End Developments Construction Ltd (Clwyd Alyn Housing Association) are both presently under consideration.

b.4 The context for a strategic site in this location arose from the Wales Spatial Plan [link](#) which identified this part of North East Wales as a Growth Hub. The site sits

comfortably within the more recent context provided by the draft National Development Framework [link](#) where policy 17 '*supports Wrexham and Deeside as the primary focus for regional growth and investment*' and that '*Local Development Plans across the region should recognise Wrexham and Deeside as the focus for strategic housing and economic growth*'. The site also forms a key strategic site within the Deeside Enterprise Zone. The strategic context for a strategic site at the heart of Deeside remains as valid today as when the site was first allocated in the adopted UDP.

- b.5 The Warren Hall site was first granted outline planning permission in 1989 for a business park and has been the subject of planning applications since. The most recent and relevant planning history relates to an outline consent (038744) in 2008 for a business park, hotel and associated leisure facilities. Details of this and subsequent planning applications are referenced in the agreed Statement of Common Ground [SOCG007](#) including the junction upgrade to facilitate full access to the site, which has already been built. The site no longer has an extant planning permission although the Council considers that the principle of a business park at this location has been well established through previous allocations and permissions. The proposals have been refined over time and the present proposals in the LDP are considered to represent a sustainable mixed use development in close proximity to a number of settlements, particularly the employment and economic importance of Broughton. As with the Northern Gateway, the site is considered to be of strategic importance within the context provided by the Wales Spatial Plan, draft National Development Framework and the North Wales Growth Deal.

Question c)

How will their strategic allocation in the LDP improve their viability and deliverability? Are the rates forecast for their delivery in the LDP realistic and achievable?

Council's Response:

- c.1 Both of the strategic sites in the LDP have an existing planning context where their principle has been established by allocation in a previous plan and/or through (at least) an outline permission. In the case of Northern Gateway which will provide the majority of the growth assigned to the two strategic sites in the plan, this is further advanced having had a number of permissions for outline and reserved matters development and essential infrastructure and groundworks, and where these have or are being implemented. The mix and quantum of development on this site have changed however, and this has partly informed the re-positioning of this site in the LDP.
- c.2 Given this position with the Northern Gateway site in terms of its advanced readiness for development, and the request from Welsh Government via its candidate site submission to broaden the uses at Warren Hall to enhance viability and deliverability, it was appropriate to allocate both sites from this perspective in the LDP. Warren Hall has previously had consent for business park development

and other ancillary uses and the concept and location of these as being a key driver for generating jobs and economic development still remain within the ethos for the site. The main addition has been for 300 homes to add to the sustainable mix for the site, which in relative terms is no greater an amount of housing than some of the sites allocated for housing under policy HN1.

- c.3 The Council has done a lot of work with the respective site owners and developers to establish the development status of each site, as well as gaining an understanding directly from the development that is proposed/permitted/or actually on site and happening, of what are the delivery rates for the site. This has informed a revision of the background paper relating to Housing Supply ([BP10A](#)) within which the housing trajectory has been updated to reflect the present position with completions, commitments, and expected development of all sites that feature in the Plan's housing balance sheet.
- c.4 The housing delivery position for both strategic sites have been criticised by objectors (mostly landowners, agents and developers seeking to include more land) but on the basis of submitting no empirical or widespread research of sites relied on in the plan for housing delivery. Instead, it appears that a deliberately pessimistic position has been taken on the likelihood of the delivery of the strategic sites, primarily based on an assumption that because they are large sites they will have difficulties in delivering. Having looked beyond these superficial assumptions, the Council as stated above has worked with the site deliverers to establish the current position in terms of housing delivery, as set out below.
- c.5 The two Masterplan and Delivery Statements supporting the Deposit LDP both contain information relating to the forecast delivery of housing and employment on the Northern Gateway site. The Council's Background Paper 10 Housing Land Supply [LDP-EBD-BP10](#) contains a housing trajectory (Appendix 3) which references 94 units being delivered by 20//21 and 100 per year thereafter, with 331 units remaining to be delivered beyond the Plan period. The Council has since reviewed and updated this in the form of Background Paper [10A](#) which updates the Housing Balance Sheet to the position at April 2020. Appendix 3A of the updated paper identifies 90 completions in 20/21 and 150 units thereafter, with the amount to be delivered beyond the end of the Plan period reduced to 140. This is still considered to be a conservative but achievable delivery when compared with the trajectories provided in the Masterplan and Delivery Statements, and in terms of recent feedback from Praxis and Pochin. There is likely to be at least 4 developers on site and annual completion rates of 37 dwellings per developer is considered to be realistic on a strategic site like this.
- c.6 In respect of the Warren Hall allocation the Council's Background Paper 10 Housing Land Supply [LDP-EBD-BP10](#) contains a housing trajectory (Appendix 3) which references 30 completions being achieved in 2023/24 and 45 units per annum for the next 6 years. This remains unchanged in the updated Background

Paper [BP10A](#). Welsh Government has recently established its Land Division in order to accelerate the provision of exemplar housing sites on publicly owned land embracing higher levels of affordable housing as explained in the Statement of Common Ground [SOCG007](#) for this site, agreed with Welsh Government Land Division and the North Wales Economic Ambition Board. The North Wales Growth Deal contains a commitment to fund the necessary infrastructure to facilitate the Warren Hall site. The delivery of the forecast rates of development as part of a strategic site is considered to be realistic and achievable.

Question d)

How advanced is development on the Northern Gateway site? What is the reason for its allocation rather than recording it as a commitment?

Council's Response:

d.1 The main purpose of allocating the Northern Gateway site was to maintain a focus for developers on investing in this site in order to bring it forward. During the preparation of the Deposit Plan in 2019, the position with the site began to change, on the back of the key infrastructure requirements for flood defence improvements and internal spine roads having been completed. The site then began to attract reserved matters applications from developers with the ability and capacity to develop at this strategic scale, and this was the evidence for the Council of the momentum it had sought to create by allocating or re-presenting the site in the LDP. The level of developer interest in the site is now considerable. Had the site been left as a 'commitment' based on its outline consents, then it is the view of the Council that there would have been less impetus and focus on the available land on this site, and a much greater pressure to simply allocate more greenfield housing only sites elsewhere.

Question e)

Is there enough site-specific guidance and information in the LDP to satisfactorily address the individual circumstances, including constraints, on the two strategic sites? Are there master plans or development briefs for them? How will the principles of placemaking be applied to these sites?

Council's Response:

Northern Gateway

e.1 Policy STR3A provides headline guidance in respect of the mix of development and key development requirements. However, the delivery of the site is progressing in the context of the planning consents for the site, as referenced above. For the northern Praxis part of the site, section 2 of the Masterplan and Delivery Statement [LDP-EBD-STR3A.2](#) explains that there is an approved development brief including Land Use Masterplan and a Design Statement. The masterplan is presented in Appendix 1 and this illustrates the employment plots A-D for B2 and B8 uses, the housing plots H1-H8, District Centre plots 01 and 02 and an employment plot 03 earmarked for a broader mix of B1, B2, B8, D1 and D2 uses. For the southern Pochin part of the site, Appendix 1 of the Masterplan and Delivery Statement [LDP-EBD-STR3A.1](#) presents the masterplan / phasing plan which illustrates Residential Phases 1-4 and Employment Phases 1 and 2.

Warren Hall

e.2 Policy STR3B provides headline guidance in respect of the mix of development and key development requirements. The allocation of the Warren Hall site in the Deposit LDP was accompanied by a Masterplan and Delivery Statement [LDP-EBD-STR3B.1](#) which referenced and summarised a wide range of background and technical studies which informed an illustrative masterplan for the site. This evidence has been submitted as part of the Council's submission documents and includes market assessment, agricultural land classification, ecology, geo-environmental assessment, built and historic environment, NALO (noise, air, lighting, odour), transport and utilities. This has been supplemented in the agreed Statement of Common Ground [SOCG007](#) by a placemaking appraisal and aeronautical assessment. The Masterplan provides a clear framework for the location of different land uses, vehicular, pedestrian and cycling access points and links, green infrastructure and ecological safeguarding. Key development principles are also set out in the agreed Statement of Common Ground [SOCG007](#) including the intention to secure an outline planning permission for the whole site and then reserved matters for different parts of the site.