

WELSH GOVERNMENT
Examination Hearing
Statement

Flintshire County Council
Local Development Plan

Matters 3 & 4
Strategic Growth and
Location of Development

14 April 2021

Matter 3: Strategic Growth (Inc. Strategic Sites)

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?

It will be for the LPA to discuss/explain the selection/appropriateness of individual sites/allocations and the delivery and timing of them, which is not the role of Welsh Government. However, in terms of the overall growth levels, the housing/job requirement, and the delivery of such levels, the Welsh Government makes the following comments in the context of the requirements of the NDF – Future Wales, PPW and the DPM.

The Welsh Government considers the housing requirement (6,950 homes) is realistic, appropriate and is founded on robust and credible evidence. It is also the Government's view that the overall growth levels in the plan have been sufficiently informed by, and are broadly consistent with, the relevant policy requirements in PPW (4.2.3 – 4.2.8) and guidance in the DPM (5.25-5.57). As stated in a previous hearing statement, the Welsh Government has raised no concerns with focus of housing/job growth at Deeside, a key driver for growth levels in the plan which is in 'general conformity' with the NDF-Future Wales.

The Government considers that the relevant projections (2014-based at Deposit) have been adequately taken into account by the Council, along with other relevant policy considerations set out in PPW, in arriving at the chosen growth option / housing requirement. The Council will need to explain the impacts of the 2018-based household projections at the examination sessions (PPW 4.2.6)

In arriving at its conclusions, the Government has placed great emphasis on ensuring the proposed growth levels and housing requirement can be delivered. PPW (4.2.10 – 11) and the DPM (5.58 -5.74) places great emphasis on development plans being deliverable, including the delivery of housing via robust components of housing supply, articulated through a trajectory.

When considering the updated housing trajectory within FCC002 (February 2021) the Council is well on track to deliver the housing requirement. The average annual build rate is 463 dwellings per annum. The Council has completed 2,609 units at the 2020 base date, above the 2,315 units required over the same period. Proposed delivery rates in the remaining plan period (FCC02, Appendix 4A, Row L) are considered realistic and deliverable in light of past build rates. Appendix 5A of FCC02 also demonstrates that with an increased housing provision of 8210, there is sufficient flexibility in the plan to deliver on these rates in the remaining plan period.

The Welsh Government has no objection to the approach to windfall development in the plan. The windfall allowance is based on detailed urban capacity work as advocated in the DPM (5.63 and Table 18.). A 50% discount on past 18 year rates has been applied resulting in 120 per annum on large and small sites in this plan period.

As a final point, past build rates should and do provide an important context when considering future development (DPM, 5.55-5.57). The Council has considered past rates and how they relate to the growth level chosen in the context of the current strategy, sustainability principles and infrastructure provision. The levels proposed in the LDP (465 p/a) are below the 10 year average, but above recent 5 year completion rates. This will be a matter for the LPA to explain in detail.

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

See previous response. The Council has explained through its evidence base that to plan for the 2014-based projections (Deposit figures) would result in 'planning for decline' with significant negative demographic outcomes/negative and recessionary trends. The 2014-based and 2018-based principal household dwelling requirement would result in a need for around 260dph to 230dph respectively (WG non-statistical analysis). These rates would also result in completions rates significantly below what has been achieved historically.

The Council has identified that their economic growth strategy and job target is ambitious in order to reflect Flintshire's role and strategic location as a sub-regional economic hub and contribute towards the North Wales Economic Ambition Board (NWEAB) Growth Vision of creating, amongst other things, 120,000 new jobs. The majority of the jobs in Flintshire are expected to come forward on the strategic sites at Northern Gateway and Warren Hall. Both of these sites have been identified for significant new growth and job opportunities as part of the Mersey Dee Alliance and Growth Deal bid. The Welsh Government does not object to the plans growth strategy. This approach is also in 'generally conformity with the NDF – Future Wales'. See also our statement regarding employment (Matter 6).

The merits or otherwise of individual sites will be a matter for the LPA to justify not Welsh Government.

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

This is for the LPA to answer. PPW and the DPM is clear that the 'rolling forward' of allocations from previous plans requires special justification in respect of their delivery (PPW, 4.2.17 and DPM, Table 18).

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?

This is for the LPA to answer.

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

This is for the for the LPA answer.

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?

The ethos of PPW is that the development plan should deliver the key infrastructure and place making principles as intended in order to give certainty to communities and deliver more effective planning outcomes.

It is fundamental that plans contain sufficient information to ensure their delivery and effective monitoring of the plan. Specifically, what key elements of the masterplanning/development brief principles, delivery statements, SOCGs, and the infrastructure plan, should be in the plan to ensure good design, place making and comprehensive development.

The DPM sections 5.2 – 5.5 set out the place making requirements of what development plans should contain in relation to strategic sites and placemaking. The DPM also contains guidance on SOCGs and Infrastructure Plans.

The Council has undertaken much of this work already. The key point is that key site constraints, key master planning and design principles (key fixes/design parameters) should be in the plan rather than a supporting document. This creates certainty that key site requirements (green space, infrastructure, schools etc.) will happen, gives certainty to communities and gives the LPA ‘teeth’ while negotiating planning applications. At present strategic site policy STR3 is ‘light’ on detail and does not convey these matters adequately and thus is not fully aligned with the place-making approach in PPW.

Adopted plans such as Cardiff, Swansea, Neath Port Talbot, and Wrexham’s emerging plan are examples of how the information already produced by the Council can be transferred into the plan and its strategic site policies.

**Matter 4: Location of Development
Settlement hierarchy, settlement limits.**

Key Issue:

Is the spatial strategy coherent and based on a clear and robust preparation process? Are the spatial strategy and relevant strategic policies realistic, appropriate and logical in the light of relevant alternatives and are they based on robust and credible evidence?

See previous statements and comments in this statement. This is for the LPA to answer.

a) What is the purpose of the settlement hierarchy? Will it guide new development to the most sustainable locations? Is it clear what types and

amount of development, other than housing, will be appropriate in each tier of the hierarchy?

A settlement hierarchy based on the role and function of places within the plan area is essential to set out where, when and what development will happen in the plan period. The DPM (5.19-5.24 and Table 12,) explains that the plan must clearly articulate how the spatial strategy will be delivered and that a settlement hierarchy must be included to clearly articulate in a policy the specific levels of growth attributed to each tier. See also our response to the following question, the WG has no fundamental concerns of how this has been presented. Albeit the 'missing' DPM tables (explained in earlier statements) should be in the plan and not a background paper.

The settlements themselves, their scoring, role and function analysis, and their position in the hierarchy is for the LPA not Welsh Government.

b) What is the rationale for the proportions of development split across the tiers?

See previous comments. The proportion of development across each tier is not a target to reach; rather they should demonstrate how the overall components of housing supply are directed across the settlement hierarchy and how this accords with the principles of national policy, i.e. development is directed to the most sustainable places. The inclusion of the percentage figures in the table at para 5.13 of the Deposit Plan (updated as per new figures in FCC002) are supported and aids the clarity of the plan and the strategy. It shows that around 85% of housing development is directed to Tier 1 and Tier 2 settlements. Coupled with the other tables required by the DPM, and those in the plan at STR 1-3 and, HN1 and PE1, they collectively explain the spatial strategy and distribution of housing and employment growth and form an effective basis for future monitoring. The Welsh Government has no fundamental concerns on this matter.

c) Why is it necessary to assess the comments of the UDP inspector with regard to the definition of settlement boundaries?

This is for the LPA.

d) Where is the methodology for the assessment of settlement boundaries described? Has it been applied consistently? Where are the results of the assessment set out?

This is for the LPA.

e) Are the settlement limits drawn sufficiently widely to enable the predicted amount of growth?

All growth in the plan period must be deliverable and the settlement boundaries are a key element of that discussion. In particular, DPM 5.20 states that settlement

boundaries must be appropriately drawn, taking into account the aims of the strategy and the scale and location of windfall development proposed.

f) Is it appropriate for there to be a green wedge designation within the Deeside Enterprise Zone? Will it be an unacceptable constraint on the ability to maximise economic opportunities in this area?

The rationale for including a green wedge designation (EN11.15) within the Enterprise Zone boundary is unclear. In our hearing statement to Matter 6, we have highlighted the importance of the Welsh Government Enterprise Zone designation and how it supports the economic focus of the plan and must be shown on the Proposals Map. So as not to confuse, preclude or constrain appropriate development from taking place in the Enterprise Zone, the rationale for the green wedge designation must be explained/justified. Welsh Government is unclear how this designation aligns with the purpose of a green wedge in PPW (3.67 – 3.78). We elaborate on this matter in our specific hearing statement covering green wedge designations. In addition, what is the view of the relevant Welsh Government department on this matter, as ultimately they are best placed to comment on this matter and any issues of delivery?

As has been the case in previous examinations, development in the Enterprise Zones has been managed through a specific land-use policy in the plan, where, for example, development has been precluded in the Enterprise Zones on nature sites of national and European importance or areas of constraint. See the adopted Snowdonia National Park LDP as an example.

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