

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

Hearing Session Matter 6

Thursday 15th April 2021

Economy and Employment

**STR7 Economic Development, Enterprise and
Employment**

STR8 Employment Land Provision

STR9 Retail Centres and Development

STR10 Tourism, Culture and Leisure

Hearing Statement by Flintshire County Council

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

Flintshire County Council Statement: Matter 6: Economy and Employment

(inc STR7 Economic Development, Enterprise and Employment; STR8 Employment Land Provision; STR9 Retail Centres and Development; STR10 Tourism, Culture and Leisure)

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

Key Issue:

Is the economic strategy coherent and based on a clear and robust preparation process? Will it address the Key Issues and Strategic Objectives effectively and efficiently? Are the strategy and strategic policies realistic and appropriate in the light of relevant alternatives and are they based on robust and credible evidence?

Response:

1. The Plan's approach to economic growth is at the centre of its overall growth strategy as set out in response to Matter 3. The economic strategy acknowledges Flintshire's physical and function role and position as a gateway location between England and Wales, as well as a sub-regional economic hub, where in terms of economic interactions the national border is a secondary consideration. Unlike housing provision in the plan which is in comparison far more prescribed, needs driven, and determined by controllable parameters, the role that a development plan can play in facilitating economic growth is far less prescribed. The plan needs to be positive, ambitious and flexible in creating the conditions for market driven economic investment to take place. Flintshire's employment rate is almost 80% which is higher than both Wales and the UK and is an indicator of the area's focus on employment and prosperity.
2. In the absence of national economic projections, reliance on recognized sources such as Cambridge Econometrics have their limitations, particularly in being positive and ambitious, when the methodology is sector based and relies on past trends that are a reflection of and influenced by the lasting effects of the last recession from 2008, whose prolonged impacts lasted for some years and influenced the forecasting trends. This was manifested in the outcome of the initial work done by the Council's consultants on the Employment Land Review [LDP-EBD-EM1](#), and where the outcome in terms of very flat levels of future employment need did not reflect either the emerging ambition in the Council and amongst North Wales local authorities as part of the North Wales Growth Vision, or the similar level of ambition coming from the Mersey Dee Alliance, and finally

the clear importance ascribed to the contribution Flintshire's economy should play to the national position in the WSP and later NDF.

3. This is why the Council commissioned the further work on growth scenarios (Flintshire Further Employment Growth Scenarios Assessment [LDP-EBD-EM2](#)) from their economic consultants which firstly identified the broad job potential of the two strategic sites allocated in the plan, as well as then running revised forecast scenarios for a more positively based, ambitious growth level for employment. When the two approaches are compared, the job target in the Plan derives from the potential of its strategic sites to deliver jobs, whilst forecast scenario 3 produced a very broad range of potential growth, ranging up to a need for 50.6 ha of employment land or the generation of 7,200 jobs. This is only -800 below the lower range of the job target in the plan or an annualized difference of only -53pa. Further advice (Employment and Housing Advice [LDP-EBD-EM3](#)) provided by the Council's consultants in 2019 to support the Deposit LDP usefully rationalises and explains the overall approach taken and also concludes that the Council is right and entitled to take an open-for-business approach to support its post Brexit, and now post Covid contribution to local, regional and national economic recovery, and play the 'greater than local' role envisaged for it in a number of plans and strategies.
4. The Wales Spatial Plan which is now dated and about to be superseded by the Future Wales Plan, clearly recognised Flintshire's importance both in a North Wales context as well as cross border, defining a 'growth triangle' between Deeside, Wrexham and Chester. Over 10 years on from the last refresh of the WSP, the National Development Framework consulted on in 2019 has now been incorporated into the emerging Future Wales Plan which is about to be published in its final form. Its first policy identifies what are the primary locations in Wales to promote and continue their contributions to national growth, and one of those three areas, and the only growth area in the north is Wrexham and Deeside. Future Wales describes the three areas identified including Deeside as "economically distinctive, supporting a range of businesses, enterprises, and universities, and offering culturally rich lifestyles to residents and visitors. They are internationally and nationally significant places and this strategy promotes their continued growth and regeneration".
5. This not only recognises the 'wider than local' sub-regional role that Flintshire plays, but also places an expectation on it to continue to do this. In combination with the Wrexham LDP strategy, the combined levels of jobs and housing within both plans, whose adoption dates are likely to be reasonably coterminous, provides the basis to meet the challenge set out in the national plan, and also aligns the potential contribution that both strategies could play in developing a Strategic Development Plan for North Wales, as part of the work of the new Corporate Joint Committees which will come into operation later this year.

6. This context is clearly picked up by some of the key objectives of the Plan which seek to facilitate growth and diversification of the local economy, to increase skills and high value employment, and to support development that positions Flintshire as an economically competitive place and an economic driver for the sub region. The Plan makes provision for a large and varied portfolio of employment sites to assist with this, with the strategic sites providing opportunities to accommodate large and very large industrial units, something that is becoming an increasingly rare commodity in the N E Wales N W England economic corridor.
7. This marries up with the focus on Flintshire contained within the North Wales Growth Deal ([LDP-EBD-EM4](#)), the Deeside Plan ([LDP-EBD-TR3](#)), the Mersey Dee Area Prospectus ([LDP-EBD-EM5](#)), and policy 20 of the emerging Future Wales Plan which references Deeside as part of a national growth area where “the Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Wrexham and Deeside’s strategic role **and ensure key investment decisions support places in the National Growth Area and wider region**” (Council’s emphasis in bold).
8. Flintshire’s economic strategy and strategic policies relating to facilitating employment and jobs provide these “places” envisaged in the national and regional plans, strategies and ambitions, have more than sufficient land to accommodate the job growth aimed for, and help create the conditions that allows investment to take advantage of strong economic conditions when these occur.

Question a)

Has sufficient employment land been identified? Will the key strategic sites deliver the number of jobs forecast?

Council’s Response:

- a.1 Given the clear national and regional economic growth policy and strategy context set out in the plan and above, the Council is committed to, and as certain as it can be, that sufficient provision has been made to facilitate the expected role the County needs to play in enabling employment development at both local and strategic scales, and to serve as an economic driver for the sub-region.
- a.2 Flintshire has a strong economic base, including a significant range of internationally, nationally and regionally significant employers, and the LDP has identified key strategic sites that are likely to be the locations for similarly important new business investment which, as the Welsh Government states in policy 20 of the emerging Future Wales plan, will be the focus for key investment decisions. With the Northern Gateway site now accelerating in its advancement and readiness for development, there is clear evidence that the promotion of these key sites in the LDP is having the positive effect sought by the original intention to re-present such sites in the Plan, and avoid the easier option to consign them to ‘slow burning’ commitments, and over-allocate other greenfield

land instead. Unlike other Strategic sites in the wider sub-region, the key sites on the LDP are generally free from major constraint and have had significant investment already (particularly Northern Gateway) in enabling infrastructure, or are supported by the commitment of infrastructure funding via the Growth Deal (Warren Hall) to ensure their viable commencement and attraction to the market.

- a.3 From the work undertaken by the Council's economic consultants, the strategic sites have the potential to facilitate jobs at the scale set out in the plan, and whilst these sites clearly will make a substantial contribution to job growth as they are developed over the plan period, the plan allocates more land in addition to the strategic sites to provide options for employment development by local companies or new investment seeking a certain scale of sites to invest in. One such site for example at Hawarden Park (PE1.2) provides key supply chain and high quality employment opportunities in proximity to one of the County's most significant employers Airbus, in a location that benefits from Enterprise Zone incentives and concessions. This example illustrates the flexibility within the portfolio of employment land provided in the Plan, which whilst centred on the delivery of the key strategic sites, also provides the range of choice of opportunities required to attract a diverse market.
- a.4 Clearly, not all economic sectors will require an industrial location to facilitate growth and investment and the policies relating to town centres and the encouragement of the tourism and leisure sectors for example, have the potential to facilitate investment and potential job growth outside of key employment sites. Furthermore, the further policy approach to safeguarding existing employment locations (Principal Employment Areas PE2) prioritises these locations as on-going locations for employment.
- a.5 Notwithstanding the clear strategic direction set out by the Plan's economic strategic and provision of sufficient employment land, unlike the housing sites that the plan allocates, there is less control and certainty about the development of the local economy which will be subject to impacts (positive and negative) from wider regional, national, and international economies. The ability of the economy and therefore the Plan to meet its ambitious targets is therefore influenced by outside forces which are beyond the control of the Council or other regional bodies. What is clear is that the Council considers it has made adequate and appropriate employment land provision through the strategic sites and other employment policies in the plan which provides sufficient choice and flexibility to meet the national and regional requirements for ambition and economic recovery, perhaps more so than any other north Wales LDP to date. This can feed into the forthcoming requirement to prepare a Strategic Development Plan which will focus on addressing any imbalances in provision across north Wales.

Question b)

In terms of the economy, what are Flintshire's special characteristics? How will they be harnessed 'to benefit not only North East Wales but the wider geography, east and west', as advised in the Wales Spatial Plan.

Council's Response:

- b.1 Flintshire's economy has a strong dependency on high quality high value manufacturing which accounts for a significantly higher proportion of jobs and GVA than either the Wales or UK average. Flintshire's role as an employment hub for the wider sub-region has ensured that this sectoral advantage has been protected and developed to provide high value outputs and where certain sectors have an international attraction and reputation such as in aerospace and automotive manufacturing. This contrasts with Cheshire West where successful high value service sector growth has taken place, not least in the financial sector. This creates a level of sub-regional complementarity and inter-dependence which characterizes a significant proportion of the travel to work movements to and from Flintshire, with workers coming in to manufacturing jobs, and residents commuting out to work in this financial services sector.
- b.2 This sectoral dominance and ability to generate a high value contribution to the national economy, coupled with Flintshire's strategic location between north Wales and the north west of England means that Flintshire's influence is multi-layered in geographic and economic terms. This is reflected in the emphasis placed on Flintshire's role and contribution to the sub region in the North Wales Growth Deal, the Deeside Plan, and the Mersey Dee Area Prospectus.
- b.3 The imminent publication of Future Wales which in effect supersedes the WSP confirms the role and function of Flintshire's economy and its importance to national prosperity, where Deeside and Wrexham are recognized as one of three National Growth Areas, which will act as a focus for decisions about future investment.
- b.4 It is this context that has influenced the reason for and content of the economic strategy for the LDP.

Question c)

What is the cross-border employment relationship? What proportion of the existing jobs within Flintshire are filled by employees from outside the County? How many of Flintshire's residents travel to work outside the County? How has the Council accounted for such movements in its employment forecasts?

Council's Response:

- c.1 The emerging Future Wales Plan recognizes that "commuting patterns are a distinctive feature of our regional economies, with significant daily movements of people to their place of work. These patterns reflect long-standing and well-developed regional hierarchies and centres of employment". As in the response to question b) above, Flintshire's manufacturing dominance contrasts with Cheshire West where successful high value service sector growth has taken

place, not least in the financial sector. This creates a level of sub-regional complementarity and inter-dependence which characterizes a significant proportion of the travel to work movements to and from Flintshire, with workers coming in to manufacturing jobs, and residents commuting out to work in the financial services sector.

c.2 In terms of travel to work movements, the 2011 census provides an analysis of travel to work patterns and the extent to which residents in Flintshire County travel to other areas together with details of how many people commute into the area. The 2011 Census identified the travel to work patterns of 69,276 individuals (using actual specified workplaces) and of these:

- 43,733 lived and worked in Flintshire (including 6,697 who work at home);
- 23,817 commuted into Flintshire for work but lived outside the area; and
- 25,543 lived in Flintshire but commuted out of the area for work.

c.3 Overall, 63.1% of Flintshire County residents worked in Flintshire, 15.4% in Cheshire West and Chester, 6.6% in Wrexham and 0.4% in Shropshire.

c.4 As the employment forecasts are based on the degree to which the existing level of employment provided in Flintshire will grow, this is influenced more by sectoral trends than travel to work trends. The overall growth strategy is also premised on creating a level of population and therefore labour force growth that exceeds the low level Welsh Government projections, and where the level of housing provided will encourage an element of in-migration to the area. This will not necessarily increase travel to work, as in principle this should increase the level of self-containment within the economy and reduce commuting patterns and distances.

Question d)

What is the status of the Deeside Enterprise Zone? Is it clear which LDP policies will apply to this area and how proposals will be determined? Should it be identified on the Proposals Map?

Council's Response:

d.1 The boundary of the Deeside Enterprise zone is shown diagrammatically on the Welsh Government website <https://businesswales.gov.wales/enterprisezones/zones/deeside> and this explains that it encompasses a number of strategic sites. The sites referred to can be broadly grouped into the following geographical areas:

Geographical Area	How identified in Deposit LDP
Deeside Industrial Park (inc Tata Steel and Northern Gateway allocation) to the north of the R. Dee and west of the A494(T)	Principal Employment Area PE2.11 and STR3A
The triangular shaped former DARA site on the east side of the A494(T)	Principal Employment Area PE2.11

Employment development between the south side of the R.Deer and the B5129 at Pentre and Sandycroft	Principal Employment Areas PE2.21 / 22 / 27 / 28 / 29
Hawarden Airport and employment development comprising Hawarden Industrial Park, Airbus and Broughton Mills Industrial Estate, located to the north of Broughton	EM1.1 and EM1.2 and Principal Employment Areas PE2.4 and 16

d.2 The LDP therefore makes provision for development within the Deeside Enterprise Zone by allocating the key sites within policy STR3 or PE1 or identifying existing employment areas as Principal Employment Areas in PE2.

d.3 The Welsh Government identifies in the website above the ‘reasons to locate in Deeside’ and these are:

- Business Environment – skills and academia / sectors / who’s already here / quality of life
- Support and Incentives – financial incentives / support from a pro-business Government
- Business Ready Infrastructure – transport links / broadband, data security and ICT.

d.4 The only ‘planning’ role that can be performed by Enterprise Zones is the establishment of simplified planning regimes which was considered by the Council but not pursued. It is therefore evident that the benefit of the Enterprise Zone is the ‘incentives’ the designation brings rather than any planning role or function.

d.5 The Enterprise Zone has been mapped as a continuous polygon rather than as a series of separate polygons and this has resulted in the inclusion of intervening open countryside. The key sites and existing employment areas are separated by large swathes of open countryside / green barrier and it would be inappropriate for the LDP proposals map to show a boundary for the EZ whereby it could be interpreted as supporting employment development outside of identified employment allocations and areas and in direct conflict with key policy designations in the Plan.

d.6 Although the issue of referencing the DEZ has been referenced in the representation by Welsh Government Planning (id1150) this representation stated ‘*This will be for the relevant Department of Welsh Government to comment on*’. No such representation has been made by Welsh Government Department of Economy, Skills and Natural Resources. In view of this it is not considered appropriate or necessary for the DEZ boundary to be delineated on the proposals map.

Question e)

How will the LDP maintain and enhance the County's tourism, culture and leisure offer?

Council's Response:

- e.1 The County has a distinct and varied tourism offer with its traditional market towns, the Dee Estuary and Coast, the AONB, country parks and a range of cultural attractions including Theatr Clwyd, Greenfield Valley and St Winefrides Well amongst others. The Plan does not seek to identify sites or allocations for new tourism development as it is difficult to do so, given the nature of the tourism sector, but instead sets out strategic principles in policy STR10 supported by more detailed guidance in policy PE12 Tourist Accommodation, Facilities and Attractions, PE13 Caravan Development in the Open Countryside and PE14 Greenfield Valley. The intention of this policy framework is to ensure that new development is appropriate in terms of its location and type and scale.
- e.2 This policy framework aims, in a land use sense, to support the broad aims for tourism in PPW11 which focus on job creation, regeneration, and improvement of the natural and built environment, as well as health and well-being. It can also support and facilitate the Council's aim of creating high quality places to visit and stay, to spend leisure time and to work, as articulated by the Council's [Destination Management Strategic Plan](#).
- e.3 In respect of policy STR10 representations (id349 and 802) highlighted that the policy wording did not reflect the policy title in respect of culture and leisure. In its response the Council indicated that it had no objection to suitable amendments to the policy wording and it is proposed that criteria i) should be reworded 'Supporting new and extended tourism, **cultural and leisure** development which is....' along with minor editing changes to the explanatory text.
- e.4 In response to representations from NRW on policy PE13 and PE14, amendments to policy and explanatory text wordings have been agreed between NRW and the Council which have satisfied NRW and this is set out in the Statement of Common Ground NRW ([SOCG006](#)).

Question f)

Is the assessment of comparison retail need sufficiently robust to inform the Plan's approach to retail allocations?

- f.1 The Council has provided in its response to Q29 of the Inspector's Preliminary Questions an overview of retailing in the County, the recognition of the changing nature of retail centres and the findings of the Retail Study. Against this context and evidence, it explained that the Council did not consider that it was appropriate to make 'comparison' goods retail allocations in the Plan based on:
- The number of Town and District centres
 - The experience of small retail allocations in the UDP not coming to fruition
 - An allocation in one centre, preventing a scheme coming forward in another centre

- f.2 The response explained that it is sensible to let suitable market led schemes to come forward or for schemes to come forward as a result of town centre action plans and strategies. This approach is considered to be sensible in the light of the effects of Covid-19, following a period of time where retailing and retail centres were already struggling. The Council has set up a number of working groups as part of its Covid-19 Recovery programme and one of the Groups 'Places' has representatives from across the Council, including Planning Policy. This is led by the Service Manager - Enterprise and Regeneration and is actively looking at funding sources, initiatives, sites and projects with which to begin the recovery of the retail centres. One such initiative is the possibility of the Council purchasing vacant and problematic properties in retail centres in order to facilitate refurbishment and re-use. An initial report was approved by Cabinet in March 2020 and this work is still progressing.
- f.3 One objector considers the Plan's approach to town centres is not pro-active enough and that policies must be more specific and determined in being committed to masterplans and action plans and using planning mechanisms such as its CPO powers to assemble land involving vacant buildings. As explained above these initiatives are being pursued at present but this is being done outside of the LDP. The role of the LDP is to put in place a framework of land use policies with which to implement the Welsh Government's 'town centres first' approach. The Plan has already recognised the changing role and composition of town centres by adopting a more pragmatic approach to addressing non-retail proposals in Principal Shopping Areas (PE8). It is not considered that a LDP covering a period of 15 years is the most appropriate or effective way to set out such intervention strategies. The Covid-19 pandemic has demonstrated the need for a rapid response to economic recovery and this can work hand in hand with the policies in the LDP. Policy STR9 has clearly referenced in the third paragraph the role to be played by health checks, masterplans and action plans and this is considered to be sufficient.
- f.4 The Council's Retail Study [LDP-EBD-RET1](#) has been prepared by experienced specialist consultants and involves an assessment of retail floorspace needs over the County and a commentary on the performance of each town and district shopping centre as well as Broughton Shopping Park. The Study concluded that there was no convenience floorspace need over the Plan period but that there was a small need for comparison floorspace. In responding to representations, the Council accepted that one of the retail commitments at Saltney Retail Park had expired and that this increased the scope for comparison goods retail development over the Plan period. The Retail Study sets out in para 6.6 '*A number of other key indicators should be monitored by the Council to determine likely changes to retail floorspace requirements over the development plan period...*' and the first bullet point states '*The implementation of existing retail commitments. Non-implementation of commitments or the expiry of existing planning permissions will release additional capacity*'. Clearly, there is now

greater scope for comparison goods retail development over the Plan period. Notwithstanding this, it is still not considered appropriate for allocations to be made in the Plan, given the context set out earlier.