

Development Local Plan Examination: Hearing Statement

Our Ref: 2016-041-EIP/M6

Date: 22 March 2021

From: NJL Consulting (Consultee ID – 1149350) on behalf of Bloor Homes

Matter 6: Economy and Employment and Enterprise (inc Economic Development, Enterprise and Employment; Employment Land Provision)

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?

Question 6a) Has sufficient employment land been identified? Will the key strategic sites deliver the number of jobs forecast?

- 1.1 Bloor Homes welcome the Council's approach to going beyond the projected employment land need of 28.5ha as identified within the Employment Land Review (2015). This level of provision would clearly fail to align the Plan to the economic growth ambitions for the Borough, as required by the Wales Spatial Plan and National Development Framework. It is vital that the Plan is aspirational as possible in order to truly fulfil the strong national policy support targeting significant growth in Flintshire and specifically Broughton.
- 1.2 Policy STR1 (Strategic Growth) sets out the requirement for the Plan to make provision for 139.67ha of employment land. Should the Warren Hall allocation (22.7ha) fail to deliver within the Plan Period in housing terms, as we project, it may be that an element of employment development is secured on the site. Notwithstanding our strong reservations over the deliverability of the Warren Hall allocation, it is important to note that Broughton maintains a close relationship with the Deeside Enterprise Zone (particularly the AMRC and Hawarden Business Park). In this context it remains vital that deliverable housing sites are appropriately allocated in order to meet housing needs and support the economic growth of the area. Delivering this economic growth agenda is not solely reliant upon the success of Warren Hall which has failed to materialise into any form of development since securing outline consent for a business park in 2008.

Question 6b) 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.

- 1.3 The County of Flintshire occupies a unique border location in the North East corner of Wales, serving as the principal gateway to the North Wales Region from North West England.

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- 1.4 Of all settlements within Flintshire, Broughton is most strategically placed along the border of England and Wales. The settlement benefits from its proximity to major transport corridors through the County, most notably the North Wales Expressway (A55), which links in with a number of settlements north of Flintshire and forms part of the E22 Trans European Road Network (TERN), linking Dublin to continental Europe. Located just 4km west of Junction 38 along the A55, Broughton is within close proximity to the A483 which acts as a strategic corridor linking Chester to Wrexham.
- 1.5 Flintshire (and particularly Broughton) also benefits from high accessibility to the M56 corridor across the national border which connects to the wider North West region and inherently shares a spatial relationship with west Cheshire and the Wirral due to commuter patterns and housing markets.
- 1.6 All of these key connections have reinforced Broughton's role at the heart of the National Growth Area and attracting major investment. This is best exemplified by the presence of Airbus, which currently employs 6000 staff in their wing assembly plant, the establishment of the AMRC and sub-regional role played by Broughton Shopping Park – the Borough's largest retail offer.
- 1.7 The Deeside Enterprise Zone and Hawarden Airport are both located immediately north of the settlement boundary of Broughton and share similar characteristics and roles as economic drivers for the Borough. It is therefore evident that Flintshire as a whole and more specifically Broughton, are well placed to capitalise on its important economic role locally, regionally, and nationally and accommodate a substantial level of employment development.

Question 6c) 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?

- 1.8 The extent of the cross-border relationship with neighbouring authorities such as Cheshire West and Chester, is covered in our response to Matter 2a and best exemplified by Flintshire's role in the Mersey Dee Alliance (MDA). As neighbouring authorities, both Flintshire and Wrexham set out a joint Employment Land Review (ELR) (2015). Paragraph 7.192 concludes that all of the Welsh authorities which neighbour Wrexham and Flintshire have sufficient employment land to meet their needs and do not need to look to the two counties to support any shortfall. In addition, '*Of the English authorities, only Cheshire West and Chester may need to look to Flintshire to support*

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*further industrial growth*¹. This is significant for calculating the employment land requirements of Flintshire and supports the need for ambitious targets.

- 1.9 Of all authorities in North Wales, Flintshire had the highest number of out-commuters (29,300) in 2012 representing 41% of the total across the region². Table 18 of the ELR confirms that as much as 19.8% of out-commuters travelled to Cheshire West and Chester, more than any other neighbouring authority. Overall, the percentage of people who lived and worked in Flintshire was calculated to be 59% of the total employed population – the lowest of all neighbouring authorities which reinforces this cross-boundary relationship. Latest figures for 2019 from ONS Annual Population Survey³ reinforces this trend with 39,100 residents both living and working within Flintshire (50.6%).
- 1.10 This falls well below the 70% threshold set for assessing self-contained housing markets, illustrating the fluidity of commuter patterns within the Borough and neighbouring authorities. In applying this key trend to policy making, there is clear evidence which contends the Council's assertion that Flintshire represents a self-contained housing market. It is noticeable that in the Council's Local Housing Market Assessment Final Report Addendum (2020) that Table 3.9 relies upon 2011 census data to understand commuting flows. This is clearly out of date and cannot be used to inform key policy decisions that will have wider implications on determining housing needs within Flintshire to 2030.

Question 6d) 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?

- 1.11 The Deeside Enterprise Zone is one of eight Welsh Government backed Enterprise Zones, identified as providing the optimum conditions for businesses to thrive through public investment, financial incentives and access to high quality infrastructure.
- 1.12 The Deeside Enterprise Zone plays a strategically important role for Flintshire and as such we would recommend that this is reflected in the LDP Proposals Map and more specifically defined under policies⁴ addressing employment development/ allocations.
- 1.13 As noted in Matter 5b, the settlement of Broughton is strategically located on the boundary of the Deeside Enterprise Zone. In this context, it is important that the

¹ Flintshire and Wrexham Employment Land Review (2015) Para. 7.192

² Flintshire and Wrexham Employment Land Review (2015) Table 17

³ <https://statswales.gov.wales/Catalogue/Business-Economy-and-Labour-Market/People-and-Work/Employment/Commuting/commutingpatterns-by-welshlocalauthority-measure>

⁴ Flintshire Deposit LDP (2019) Policies PE1, PE2 and PE3

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development needs of the settlement (e.g. housing provision) are aligned to the continued economic growth of the Deeside Enterprise Zone (such as the AMRC).

Question 6e) How will the LDP maintain and enhance the County's tourism, culture and leisure offer?

1.14 Bloor Homes have no specific comments in relation to this question but would reinforce the important retail and leisure role played by key developments such as the Broughton Shopping Park which play an important local and sub-regional role.

Question 6f) Is the assessment of comparison retail need sufficiently robust to inform the Plan's approach to retail allocations?

1.15 Bloor Homes have no comments in relation to this question.