

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M6

Date: 22 March 2021

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

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 LPC 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 the north of the County.
- 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 key settlements such as Broughton, Deeside and the Deeside Enterprise Zone (particularly the AMRC and Hawarden Business Park) remain within the National Growth Area and are prime locations to deliver employment development of substantial scale. 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.
- 1.3 As identified by the MDA, large coastal settlements such as Flint play a key role as industrial powerhouses and supporting this growth agenda. Delivering these growth ambitions are therefore 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.

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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.

- 1.4 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.
- 1.5 Flint benefits from being strategically placed near the national border with England and close proximity to major transport corridors through the County. The settlement is approximately 4km (7 minute drive) north of 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.
- 1.6 Similarly, the site is located just over 3km west of Flintshire Bridge along the A548 which acts as a strategic corridor over the national border linking directly to Chester.
- 1.7 Flintshire (and settlements like Flint) also benefits from high accessibility to the M56 corridor across the national border, located just 10 minute drive away, 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.
- 1.8 All of these key connections have informed the designation of a National Growth Area and attracting major investment under the North Wales Growth Deal. This is best exemplified by the presence of major employers such as Airbus and Tata Steel UK, who employ thousands in the local economy.
- 1.9 The Deeside Enterprise Zone and Hawarden Airport are both within a key gateway location at the national border and share similar characteristics and roles as economic drivers for the Borough. It is therefore evident that Flintshire as a whole and more specifically Flint, 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?

- 1.10 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

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

- 1.11 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%).
- 1.12 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?

- 1.13 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 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>

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1.14 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.

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

1.15 LPC have no specific comments in relation to this question but support the emphasis placed to promoting service provision in the Borough's most sustainable town centres such as Flint.

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

1.16 LPC have no comments in relation to this question.

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