

Hearing Statement – Matter 2

Flintshire Local Development Plan

On behalf of Pochin Goodman (Northern Gateway) Ltd
(PGNGL)

March 2021



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Pochin Goodman (Northern Gateway) Ltd (PGNGL) in respect of:
- Matter 2: Plan Strategy
- I.2. PGNGL has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.3. PGNGL control the former Corus Garden City site, which forms part of the strategic Northern Gateway site. This scheme is an important part of the national, regional and local growth agenda and can positively contribute towards the economic and housing growth for the area.
- I.4. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with PGNGL comments upon the submission version of the Flintshire Local Development Plan, dated September 2019.
- I.5. PGNGL has also expressed a desire to attend and participate in Matter 2 of the Examination in Public.

2. Matter 2 – Plan Strategy

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

a) Is the LDP’s overall strategy consistent with those of neighbouring authorities? What are the main cross boundary issues and how have these been addressed?

3.1. PGNGL have no specific comments to make in relation to this issue.

b) How have the key issues been selected? Are they all addressed directly and adequately by the vision and strategic objectives? What is the relationship between the Key Issues and Drivers (para. 3.30) and the challenges that must be planned for (para. 3.35)?

3.2. PGNGL have no specific comments to make in relation to this issue.

c) Is the vision appropriate and sufficiently detailed?

3.3. PGNGL have no specific comments to make on this issue.

d) What are the implications, both positive and negative, of Flintshire’s gateway location on a national border? How are these accounted for in the LDP?

3.4. PGNGL supports the Plan’s recognition that Flintshire is a key gateway to Wales and an important part of a regional economic area that interlinks with North West England. The

Plan recognises the Northern Gateway site is crucial to the economic growth ambitions of the region. It is consistent with the National Development Framework (Future Wales: The National Plan 2040, February 2021), which identifies Wrexham and Deeside as a National Growth Area. The NDF promotes their continued Growth and regeneration and the focus for large scale employment opportunities and housing growth. This is similar to the Wales Spatial Plan (2008) which identifies Deeside as a primary key settlement, a key regeneration area, key business sector and hub that are nationally significant. However, for clarity it may be useful to update references to the NDF in the Plan as the Wales Spatial Plan has now been superseded.

e) Does the LDP address the physical and mental health of the population?

3.5. PGNGL have no specific comments to make on this issue.

f) What is the purpose of the strategic policies? Are they useful and useable in development control terms?

3.6. PGNGL **supports** the strategic policies. It is good practice to incorporate strategic policies and strategic sites in Plans. Strategic policies set out the overall strategy for the pattern of development and can identify key strategic sites for the Plan. Within that context Northern Gateway (STR3A) is identified.

3.7. However, PGNGL is **concerned** that internally there is a lot of unnecessary repetition within the document, this is particularly noticeable for when comparing strategic policies with respective development management policies. This approach does not accord with the Development Plans Manual which states that “an LDP should be succinct and clear”, “should be focussed”, “not repeat national policy” and “not be a compendium of policies to cover every eventuality”.

3.8. It is particularly noticeable with regards to climate change, employment land provision and protection and housing. It is considered unnecessary when the Plan is intended to be read as a whole. There is also an element of repetition between STR3, STR7 and STR8 with regards

to employment land provision. Whilst PGNGL supports elements of the individual policies, there is scope to reduce unnecessary repetitions and become more focused.

g) What is the policy position on Best and Most Versatile Agricultural Land?

3.9. PGNGL have no specific comments to make on this issue.

h) Are the Proposals and Inset Maps accurate and user friendly?

3.10. PGNGL have no specific comments to make on this issue.

i) In the light of the time which will remain if the LDP is adopted in 2021/2, is the plan period (2015-2030) appropriate?

3.11. The Local Development Plan is intended to cover the period 2015-2030. However, upon adoption the Plan will have less than 10 years remaining. The Development Plans Manual explains within the section “Period for which an LDP has Effect” that an LDP ceases to be a LDP on the expiry of the period specified. Furthermore, within paragraph 7.4 it continues stating that “when a plan is adopted, there should be at least 10 years left of the plan period remaining”.

3.12. PGNGL is therefore **concerned** that there is insufficient time remaining on the Plan, especially if the LDP policies cease to have an effect following 2030. PGNGL consider this could be remedied through either an extension of the plan period or an immediate review of the Plan to ensure the next plan is in place prior to 2030.

j) What will be the status of Place Plans, when prepared, and how will they relate to the LDP?

3.13. PGNGL have no specific comments to make on this issue.

Proposed Change

3.14. To overcome the objection and address soundness matters, the following changes are proposed:

- Amend references to the Wales Spatial Plan (2008) and update to the National Development Framework (Future Wales: The National Plan 2040, February 2021)
- Extend the plan period or undertake an immediate review.
- Remove repetitious elements of policies.