

Development Local Plan Examination: Hearing Statement

Our Ref: 2012-067-EIP/M4

Date: 22 March 2021

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

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?

Question 4a) 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?

- 1.1 The settlement hierarchy establishes the spatial strategy for the Plan and the distribution of development across Flintshire in order to meet development needs.
- 1.2 In terms of setting out what types of development would be accommodated within the settlement hierarchy this is only specific to housing and does not include other commercial or industrial development. Likewise, the policy justification makes clear the Council's intentional approach is not to set out numerical methods or target quotas for development distribution across settlements.
- 1.3 A breakdown of housing allocations in the Deposit Plan as set out in BP10A is as follows:

Settlement Hierarchy	Breakdown
Tier 1 Main Service Centres	46%
Tier 2 Local Service Centres	37%
Tier 3 Sustainable Settlements	14%
Tier 4 Defined Villages	2%
Tier 5 Undefined Villages	1%

- 1.4 LPC are broadly supportive of the proposed settlement hierarchy under Policy STR2 which identifies Flint as a Tier 1 settlement. It is suggested however that additional policy flexibility is afforded to Main Service Centres to reflect the growth ambitions of the Borough. This is exemplified by the Deeside Enterprise Zone, the Wrexham-Deeside-Chester Hub, MDA and North Wales Growth Deal.
- 1.5 It is only logical that this settlement is prioritised for residential development given its designation as a highly sustainable settlement and relationship to the National Growth Area. To avoid compromising this growth agenda, it is vital that the Plan provides flexibility to Flint should any committed sites or allocations fail to deliver at the rate projected.

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- 1.6 LPC therefore propose that the Plan achieves this through further allocations on sites considered as sustainable alternatives, such as Land at Quarry Farm, as well as providing additional flexibility terms of the application of settlement boundaries around Flint (see response to Matter 20a).

Question 4b) What is the rationale for the proportions of development split across the tiers?

- 1.7 The Plan proposes a flexible approach to distributing growth in a sustainable manner, principally across the upper three tiers of the settlement hierarchy, within the main and local service centres.
- 1.8 However, the distribution of growth is out of kilter with the settlement hierarchy. For example, housing allocations are identified across Tier 1, 2 and 3 settlements yet some larger settlements have no corresponding employment growth.
- 1.9 For example, Tier 1 settlements of Aston & Shotton, Queensferry and Saltney and Tier 2 settlements of Broughton and Greenfield have no housing allocated yet have a significant amount of employment space allocated over the plan period. In contrast, some smaller settlements are identified for comparatively large levels of housing growth (emerging Policy HN1, Table 19.1).
- 1.10 Therefore, there is a clear uneven distribution of proposed growth across Flintshire, notwithstanding the plan does not allow for enough growth overall.
- 1.11 It is therefore considered that development must be better dispersed across the Tiers to allow for a proportionate level of growth across Flintshire. This means a broader distribution of housing sites particularly across Tier 1 and 2 settlements (such as Flint), and particularly when settlements have large employment allocations, yet no housing.
- 1.12 LPC propose Land at Quarry Farm as a suitable alternative site to meet this requirement within a sustainable location to Flint.

Question 4c) Why is it necessary to assess the comments of the UDP inspector with regard to the definition of settlement boundaries?

- 1.13 The Inspector's Report on settlement boundaries, dating back to 2009, judged the approach to defining settlement boundaries based on individual settlements rather than identifying urban areas '*as illogical and backward rather than forward looking*'¹.

¹ Inspector's Report on the Flintshire UDP (2009) Para. 3.5.37

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This was in relation to discrepancies whereby settlement boundaries were not reflective of those settlements which have overtime become continuous built-up areas with shared facilities and services (e.g. Mynydd Isa and Buckley).

- 1.14 It is however significant that at the time of examining the UDP, the Inspector was unable to perform a fundamental review of the settlement boundaries and role of green barriers and open countryside in parts of the County, due to a lack of available information. Moreover, the Inspector recommended that due to the inevitable delay to address this shortfall in evidence, it would be more appropriate to assess settlement boundaries through the LDP process. The adopted settlement boundaries are therefore underpinned on an out-of-date evidence base pre-dating 2000. The implications of this and extent to which settlement boundaries have been proposed for amendment are considered further in our response to Matter 4d).

Question 4d) 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?

- 1.15 The current settlement boundaries are not flexible enough to accommodate for changing circumstances over the Plan Period, such as stalled housing delivery on strategic sites. In its current form Policies HN4 and HN4-D are too rigid in the application of settlement boundaries. This is particularly so for open market housing schemes, with the policy wording making clear such schemes will not be acceptable on sites outside settlement boundaries. As a result, this creates an inflexible scenario where open market housing will only be supported on sites within settlement boundaries which remain tightly defined across the Borough.
- 1.16 LPC propose that the LDP is amended to either allow for a significant relaxation of Policy HN4 for land outside settlement boundaries to include open market housing or for the boundaries themselves to be built in with added flexibility through allocating more sites to come forward over the Plan Period.
- 1.17 In setting out clear and robust settlement boundaries covering the Plan Period, this would provide more certainty to the development industry and the Council by removing any potential risk of being challenged or requiring an early plan review.

Question 4e) Are the settlement limits drawn sufficiently widely to enable the predicted amount of growth?

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- 1.18 Noting our response to Matter 4d, LPC do not believe the correct approach has been taken to setting settlement boundaries.
- 1.19 It is noticeable that despite being based upon an out-of-date evidence base, settlement boundaries around Flint remain tightly defined. The only amendment under the Deposit LDP is to include the housing allocation at Land at Northop Road (Policy HN1.4) to the south of the settlement. At the same time, UDP housing allocation (Policy HSG1(1) – Land at Halkyn Road) for 50 dwellings has now been removed from the settlement boundary and instead designated as Green Space (Policy EN2).
- 1.20 This reinforces the need for additional flexibility to be applied to the settlement boundaries around Flint given the clear growth aspirations for the north of Flintshire around the MDA and National Growth Area. This will allow for more sites to come forward for development and provide greater certainty on ensuring the Plan can be delivered both in terms of its economic and housing growth ambitions.
- 1.21 At present, the boundaries remain too tightly defined with insufficient urban capacity to allow for sustained windfall provision over the Plan Period. The Plan is currently over reliant upon the delivery of Strategic Sites (see response to Matters 2 and 3) and is not seen as a credible solution.
- 1.22 Not providing sufficient flexibility risks undermining the Plan, a trend which was evidenced under the UDP through the Council's failure to meet its housing requirement by 2,012 dwellings. In approving the UDP, the Inspector concluded that a housing target of 7,400 homes would provide sufficient flexibility, however it is important that lessons are learnt, and that flexibility is applied to the settlement boundaries to allow for alternative sites to come forward rather than being solely underpinned by two strategic sites.
- 1.23 This is all the more significant given the need to ensure that the backlog in housing accrued over the UDP is addressed early within the Plan Period.

Question 4f) 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?

- 1.24 LPC have no comments to make in relation to this question.