

FLINTSHIRE LOCAL DEVELOPMENT PLAN
EXAMINATION IN PUBLIC
MATTER 12: NEW HOUSING DEVELOPMENT PROPOSALS
HN1 (ALLOCATIONS)

This Statement is submitted on behalf of my client company, Llay Hall Investments, who considers the & R X Q approach to meeting the projected housing requirement to be not entirely μ V R X Q G ¶

Policy STR1 of the emerging LDP outlines a requirement for 6950 houses within the plan period and makes provision for 7950 houses with a flexibility allowance. This is considered to be a conservative estimate given the economic growth aspirations for the County and it should be seen as a minimum target rather than a maximum figure.

In order to ensure that the minimum target figure is met, it is important that a sufficient number of sites and allocations are identified. The Settlement Hierarchy approach set out in policy STR2 of the emerging LDP is logical and

settlements are the locations for housing development which is related to the scale, character and role of the settlement.

However, it is considered that the proportion of housing units to be delivered by allocated sites within the first three Settlement Tiers is too heavily reliant on large sites:

- 917 units to be delivered in Tier 1 Settlements across 6 sites of 159, 32, 150, 170, 160 and 246 units;
- 666 units to be delivered in Tier 2 Settlements across 3 sites of 298, 288 and 80 units; and
- 291 units to be delivered in Tier 3 Settlements across two sites of 105 and 186 units.

It is noteworthy that only one site is less than 100 units and this is located within a Tier 1 Settlement.

which clearly defines the end of the settlement of Mold and the development of the site would amount to logical infilling.

- The site has no insurmountable physical or technical constraints which would prevent residential development of up to 30 dwellings; and
- There is no reason why the site could not be developed in the short term, thereby making an immediate impact on the 5 year housing supply.

For the above reasons, it is considered that the current approach to the delivery of housing is not sound because of an over-reliance on small and windfall sites, a small number of large allocations and two very large strategic sites. As a result, there is serious risk that the housing requirement will not be delivered within the plan period.

The appointed Inspector is respectfully requested to reconsider its approach to housing supply and also reconsider the merits of designating a number of