



Hearing Statement – Flintshire Local Development Plan (LDP) 2015-2030 examination

In relation to: Matter 4 – Location of Development

for)

Emery Planning project number: 14-065

Project : 14-065
Hearing : Matter 4 - Location of
Development
Client :

Date : 22 March 2021
Author :

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2.6



2.13 Paragraph 5.13 states:

2.14 The above statements suggest a highly refined approach to the distribution of development, where a range of considerations are balanced, such as housing need, environmental capacity and the settlement hierarchy. However, the evidence base does not demonstrate that any such assessment has taken place. For Northop specifically, there is no assessment within the evidence base of housing need, employment need, service provision or the role that the settlement plays in the hierarchy.

2.15

2.18 For other Sustainable Settlements which are to accommodate significantly higher levels of growth, such as New Brighton and Penymynydd, the evidence base does not provide any analysis as to why they are receiving significantly higher levels of growth. The reality is that the distribution to the Sustainable Settlements has been based upon existing supply rather than any evidence of need / capacity within each settlement. Northop is a sustainable location for growth and should be distributed a reasonable proportion of the development for the Tier 3 Sustainable Settlements.

Employment land requirement / allocations in the Tier 3 Sustainable Settlements

2.19 Policy STR2 makes no provision for employment or other uses within the Sustainable Settlements, or indeed the rural area. Paragraph 5.6.1 of PPW1 provides:

Conclusions

2.29 On the matter of the location of development, and in particular the distribution to the Tier 3 settlements including Northop, the plan fails the following soundness tests:

Test 1: Does the plan fit?

The plan does not have sufficient regard to national policy (PPW1 1) or TAN6.

Test 2: Is the plan appropriate?

The plan and the evidence base do not address the key issues of housing and employment needs in rural areas.

The proposed distribution of development is not underpinned by robust, proportionate and credible evidence.

The rationale for the proposed distribution of development cannot be demonstrated.

The plan would not meet assessed BT /F0lad the 0.000008868Tf 1 0 0 1 112.22 448.37 Tm 0.235