

The Soundness of the LDP Proposed Housing Allocations by Dave Mackie April 2021

This submission is based on the document Flintshire Local Development Plan 2015 – 2030.

Deposit Plan September 2019 LDP-KSDDEP1

## DISCUSSION 1

The following extracts are from Page 46

**Tier 1 - Main Service Centres** will be the main locations for new housing development which reinforces and contributes to sustainable settlements.

**Tier 2 - Local Service Centres** will be the locations for more modest levels of new housing development.

Pages 148 and 149 show the allocations proposed in tiers 1 and 2 as follows

Tier 1.

Well St, Buckley	159
Broad Oak, Connah's Quay	32
Highmere Drive, Connah's Quay	150
Northop Road, Flint.	170
Maes Gwern, Mold.	160
Denbigh Road, Mold.	246

Tier 2.

Holywell Rd, Ewloe	298
Ash Lane, Hawarden	288
Wrexham Road, HCAC	80

The largest allocations of 298 and 288 are in tier 2 centres so are not "more modest" than any in the tier 1 centres. These allocations do not comply with the statements on page 46.

## DISCUSSION 2.

Since the FUDP expired there have been 3 significant developments in Ewloe

Off Old Hall Rd	41 houses	valid Dec 2013	approved March 2015
At 59 Wood Lane	23 houses	valid Aug 2017	approved Sept 2018
The Boars Head	31 flats and houses	valid April 2018	approved August 2019

This totals 95 new dwellings in the settlement of Ewloe now occupied or nearing completion since the FUDP expired and within the period of the LDP (2015 to 2030). Appendix 1 of LDP-KSDDEP1 does not show these numbers.

A further proposal for 130 affordable homes on the Candidate Site EWL007 has been submitted. If this proposal is approved, which seems likely as it is an all affordable development, there will be the

potential for an additional 225 new homes in Ewloe since the FUDP ended, which is more than all but one of the allocations in tier 1 above.

#### DISCUSSION 3

If the 298 allocation for Ewloe is retained and added to the 225 in Discussion 2 there will be an increase of 523 new homes in Ewloe, far more than for any Centre in tier 1.

#### DISCUSSION 4

The list of Main Service Centre Settlements on page 46 includes all the main towns and communities in the county, but not Hawarden, a community with a similar number of properties to Buckley and Connah's Quay. The proposed allocations for Ewloe (298) and Hawarden (288) are both in the Hawarden Community area and would impose an additional 583 on that community, which would rise to 808 with the 225 additional properties mentioned previously as already built or likely to be built within the LDP period. This number far exceeds anything proposed for any other town or community in Flintshire with the added concern that Hawarden is not considered to be a Main Service Centre.

#### PROPOSAL 1.

There has already been developments within the LDP period of 95 properties in Ewloe and that would be enough to satisfy the condition for a tier 2 settlement of "more modest" than tier 1 settlements.

The allocation of 298 properties at Holywell Road, Ewloe is on green barrier land, whilst EWL007 is not and a planning application for 130 affordable properties there has been lodged. May I propose that Holywell Road, Ewloe should be taken out of the LDP and EWL 007 added in place. That would preserve the green barrier but still take the total allocation for Ewloe to 225 which would be greater than every tier 1 Main Service Centre apart from Mold.

#### PROPOSAL 2.

Ash Lane Hawarden at an allocation of 288 is larger than any Tier 1 allocation and I suggest should be reduced in size so the "more modest" requirement of Tier 2 is met. If the Ewloe allocation is reduced to 225 and Ash Lane Hawarden retained at 288 the Community of Hawarden will have a total allocation of 513 much greater than the 341 (159 + 32 + 150) total of the similarly sized Buckley and Connah's Quay combined.