

**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 Council's approach to meeting the projected housing requirement to be not entirely 'sound'.

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 is supported. Mold is a Tier 1 Main Service Centre (the main locations for new housing development). This is agreed as Mold is a sizeable town which provides a full range of services and significant sources of employment.

Policy STR11 explains that two strategic allocations (the Northern Gateway and Warren Hall) will yield 1294 dwelling units within the plan period. It is of note that these are not located within Tier 1 Main Service Centres. As discussed within earlier Hearing Sessions, it is questionable whether these sites are deliverable, or certainly at the build rates suggested.

This policy also explains that 1691 units will be delivered by existing completions and a further 1771 units will be delivered by existing commitments (sites which already benefit from an extant planning permission). It projects that 1320 units will be delivered by 'small' and 'windfall' sites, leaving a balance of 1874 units to be delivered via new housing allocations.

According to policy NH1 of the emerging LDP, there are only six housing allocations proposed for Tier 1 Settlements, yielding a maximum of 917 units. Three allocations are proposed within Tier 2 Settlements which would yield a maximum of 666 units and two allocations within Tier 3 Settlements which would yield a maximum of 291 units.

Para 5.12 of the justification to policy STR2 explains that the Plan does not seek to apportion development spatially by the use of numerical or mechanistic methods relating to growth bands, rates, targets or quotas. Rather, the Plan seeks to distribute development in a sustainable manner having regard to the settlement hierarchy and by identifying the most sustainable settlements and sites. It also explains that sustainable

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. Furthermore, it is considered that the proposed allocation of housing sites is imbalanced because two of the sites within Tier 2 Settlements are significantly larger than the sites within Tier 1 Settlements, which have a greater sustainability rating. Clearly, a reliance on a small number of larger sites to deliver the required number of dwellings carries more risk than a larger number of smaller sites where delivery risk is spread more widely.

In addition, it is asserted that the LDP relies too heavily on small and windfall sites for the delivery of a large proportion of housing units (1320). The justification for this approach is that similar numbers were delivered during the Unitary Development Plan period. However, by definition, the ability to continue to deliver small and windfall sites at the same rate will diminish over time unless settlement boundaries are enlarged to increase the number of opportunities for such developments. The settlement boundaries of the Tier 1-3 Settlements have not altered significantly from those of the previous Unitary Development Plan and therefore the capacity and ability to deliver such a large number of housing units from small and windfall sites is questioned.

For all of the above reasons, it is considered that the model for meeting the housing requirement over the plan period is flawed and results in a risk that the requirement will not be met.

Furthermore, with only two allocations which would deliver a maximum of 406 dwellings over the plan period, it is considered that the model does not provide sufficient housing for the Main Service Centre of Mold, which offers a wide range of local services and employment opportunities and is well connected by public transport, in accordance with the intention of policy STR2.

Moreover, it is unclear why the site on land between Denbigh Road and Gwernaffield Road (Ref. NH1-6) for up to 246 dwelling units is deemed a more appropriate location for residential development. This site is relatively remote from Mold Town Centre and the majority of local services that one

would expect to use on a daily basis are not within reasonable walking distance, whilst public transport services are limited. As a result, future occupiers would be reliant upon private motor vehicles to go about much of their daily business. It is highly probable that a high proportion of the vehicular traffic would head out of the site and towards Mold and 'MacDonalds' Roundabout', which is already very congested at peak periods.

In contrast, Candidate Site MOL040, like other sites at the south-western end of Mold, is well connected to the town centre and it has the advantage of being located immediately next to the Mold Bypass. This means that a significant amount of future residents who may need to drive in the direction of Queensferry and beyond could avoid the centre of Mold at peak periods.

To this end, it is considered that the proposed allocation NH1-6 does not enjoy a sustainable location and therefore is in conflict with the location criteria outlined within policy STR4 of the emerging LDP. It is also in direct conflict with Planning Policy Wales which states that minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport are important considerations when selecting sites for new residential development (paragraph 3.38).

In addition, the proposed allocation encroaches into open countryside and does not have such clear or defensible boundaries as Candidate Site MOL040, which is contained by a trunk road. You will be aware that in 1991, the Local Plan Inspector opined:

3.116 Moreover, in the interests of proper and effective development of the land south of Ruthin Road, and in the interests of the adjoining Green Barrier, it is clearly important that the boundary between the two should be obvious and defensible. I conclude that the most suitable boundary lies along Upper Bryn Coch Lane.

Aside from the Green Barrier designation (and the LDP proposes to remove other sites from the Green Barrier in order to be designated as housing allocations such as HN1-7), it is asserted that there is no logical reason as to why Site HN1-6 is preferred over and above sites at the south-western end of Mold such as Candidate Site MOL040.

Nevertheless, even if Site HN1-7 was to be retained, it is asserted that further sites should be identified in order to provide a range of sustainable places to live within Mold and to increase the prospect of the housing requirement being met. To this end, Candidate Site MOL040 offers the following benefits:

- The site is well related to Mold Main Service Centre, which is one of the largest settlements within the County;
- The site makes a very limited contribution to the purposes of including land within a Green Barrier, given its position on the inner side of the bypass. The bypass is considered to be the logical defensible barrier

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 smaller housing sites, including Candidate Site MOL040.

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