

Objector – [REDACTED]

Consultee I.D.- [REDACTED]

In addition to my previous objections to the inter-related policies STR 2, STR 11 and HNN 1, I would like to re-emphasise and add the following comments and respectfully ask the Inspector's to consider these matters in their analysis of the Flintshire Local Development Plan.

1. The issues below relate to Matter 4 : Location of Development – settlement hierarchy, settlement limits which have been identified by the Inspector's as relevant to the Examination.
2. There is a significant bias of new development opportunities being located to the east of the County at the expense of opportunities in the west. The spatial approach taken by the County has inevitably perpetuated new growth to the most populated areas of the County without allowing sufficient flexibility for more rural areas. As far as can be ascertained there are no new housing allocations in the western half of the County. Whilst there is much emphasis of the links with Wrexham and the border with England there is almost no spatial analysis of the links with Denbighshire. Many of the villages in the west including Caerwys, Trelogan, Trelawnyd, Gwaenysgor and even towns such as Holywell look towards the settlements of Rhyl , Prestatyn and St. Asaph for employment and retail services. Further south the towns of Denbigh and Ruthin play a significant role in providing retail, educational and employment opportunities. The audit of individual settlements does not recognise the influence of larger settlements outside the plan in Denbighshire and the sustainable links with villages in Flintshire.
3. This has resulted in almost all the villages in the west being categorised in either Tier 4 or 5 in the settlement hierarchy. In all, the Plan allocates a mere 3 % (208 dwellings) of the overall housing requirement to the 32 villages in Tiers 4 and 5. This is a small percentage but even this rate may be difficult to achieve given the tight settlement boundaries and the need to cross subsidise windfall sites with exception sites in Tier 4 villages. This will be impractical as windfall site boundaries will not be contiguous with possible exception sites and will not be in the same ownership. The Plan should consider making smaller allocations in Tier 4 villages by amending settlement boundaries on the periphery of villages which would give more opportunities for adjacent cross subsidised exception sites to come forward in accordance with the affordable housing policy. Allowing affordable exception sites only (with no adjacent allocation or windfall sites)will not provide sufficient affordable housing numbers due to the complexities of delivery and the management of the properties in perpetuity. In addition, Housing Associations are more likely to get involved on the larger urban sites with house builders where economies of scale and delivery options are more favourable.
4. The candidate site TLD001 in Trelawnyd is a small rounding off on the western edge of the village with existing housing development to the north and east. As it is a small natural extension to the village it would not harm the AONB. F.C.C. in their comments on candidate sites appear to discount any new development in the AONB irrespective of scale or relationship to the existing built-up form and overall suitability for development. New housing development can be allowed in the AONB depending on normal site selection criteria.
5. In conclusion F.C.C. should allow more flexible opportunities for new housing in Tier 4 settlements such as Trelawnyd which has no windfall sites opportunities, has a thriving

school and is accessibly located within five miles to the larger settlements of Rhyl and Prestatyn in Denbighshire.