M4.13

Hearing Statement

Flintshire Local Development Plan – Matter 4: Location of Development

on behalf of:

Anwyl Land

Land to the Western Edge of Mold/ South of Gwernaffield Road

March 2021

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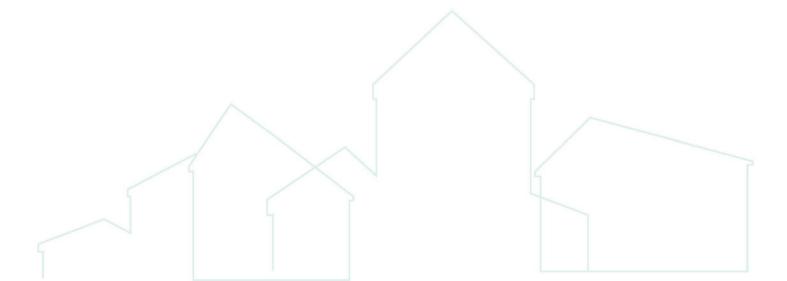
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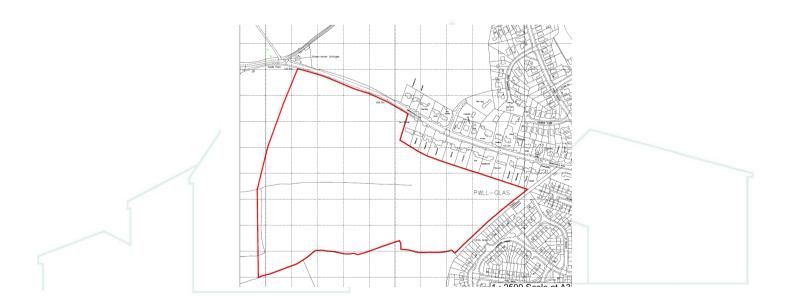
1. INTRODUCTION & CONTEXT

Purpose

- 1.1 This Written Statement has been prepared by SATPLAN LTD in connection with the Examination in Public of the Flintshire Local Development Plan (LDP).
- 1.2 It specifically addresses the Inspectors Matter 4 (Location of Development)) and the issue of whether 'the spatial strategy coherent and based on a clear and robust preparation process? Are the spatial strategy and relevant strategic policies realistic, appropriate and logical in the light of relevant alternatives and are they based on robust and credible evidence'.
- 1.3 This Statement also addresses the additional questions raised by the Inspector in relation to Matter 4.

Context

1.4 The context of this Statement concerns land to the Western Edge of Mold/South of Gwernaffield as indicated on the plan below.



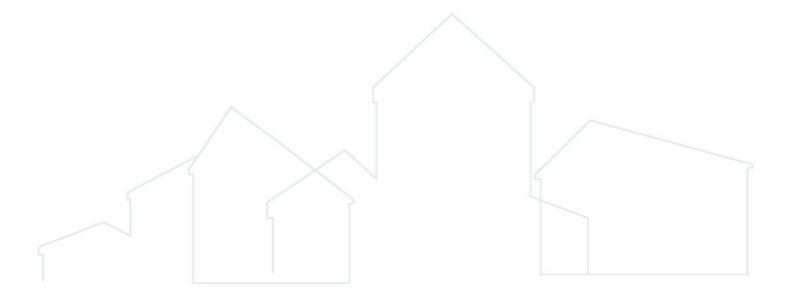


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1.5 The Site has been promoted at earlier stages of Flintshire Local Development Plan on behalf of Anwyl Land. As the Site benefits from single ownership it can therefore be delivered comprehensively.

References

1.6 This Written Statement relies upon and should be read in conjunction with the documents constituting the Examination Library.





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2. RESPONSE TO MATTER 4- LOCATION OF DEVELOPMENT

Issue – Is the growth strategy coherent and based on a clear and robust preparation process? Is it realistic and appropriate in the light of relevant alternatives and is it based on robust and credible evidence?

Issue – Is the spatial strategy coherent and based on a clear and robust preparation process? Are the spatial strategy and relevant strategic policies realistic, appropriate and logical in the light of relevant alternatives and are they based on robust and credible evidence?

Question 4a) What is the purpose of the settlement hierarchy? Will it guide new development to the most sustainable locations? Is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?

2.1. Response- No Comment, Question for Council to answer

Question 4b) What is the rationale for the proportions of development split across the tiers?

- 2.2. The updated Housing Land Supply Document [FCC002] updates the spatial distribution of development in Policy STR2 which has marginally changed from 47% to 46% in Tier 1 settlements and 37% from 36% in Tier 2 settlements. This approach is supported by our client in principle, as it seeks to provide an appropriate level of housing for each settlement. However, it is recommended that any targets provided are given as a minimum to ensure full flexibility and to assist Flintshire in maintaining their five-year supply of housing. Apportioning a strict percentage growth to each settlement as undertaken within the existing failed UDP would very likely result in Flintshire continuing to under deliver on their housing supply and frustrate the market from delivering sustainable housing sites.
- 2.3. Allowing further growth to the Main Service Centres with Sites which are readily available and unconstrained will help to ensure sufficient flexibility and deliverability of housing.



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Question 4c)

Why is it necessary to assess the comments of the UDP inspector with regard to the definition of settlement boundaries?

2.4. Response- No Comment

Question 4d) Where is the methodolog

Where is the methodology for the assessment of settlement boundaries described? Has it been applied consistently? Where are the results of the assessment set out?

2.5. Response- No Comment

Question 4e)

Are the settlement limits drawn sufficiently widely to enable the predicted amount of growth?

- 2.6. Question 11 within the Council's response to the Inspectors Preliminary Questions provides the rationale as to how settlement boundaries have been defined including the consideration of Candidate Sites and Planning Permissions which seeks to draw boundaries based on the planned growth for Flintshire.
- 2.7. A key matter which the EiP is exploring is whether the growth strategy is deliverable from the identified strategic sites and should this be in doubt, there is no question that settlement limits must be revisited and Candidate Sites, which are deliverable and are adjacent to the settlement boundaries as currently drawn should be considered for inclusion within the settlement hierarchy.

Question 4f) Is it appropriate for there to be a green wedge designation within the Deeside Enterprise Zone? Will it be an unacceptable constraint on the ability to maximise economic opportunities in this area?

2.8. Response- No Comment



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