

Flintshire Local Development Plan  
Examination in Public  
Matter 12: New Housing Development Proposals (HN1) Allocations

This Statement is submitted on behalf of my clients Messrs J & E Williams who wish to register F R Q F H U Q W K D Wapleach to meet the projected housing requirement is not entirely μ V R X Q G ¶

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.

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

occupiers would be reliant upon private motor vehicles to go about much of their daily business ±

respectfully invited to reconsider the merits of designating Candidate Sites MOL005 and MOL006 as housing sites.

David Fitzsimon  
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