

SUBMISSION STATEMENT

in respect of

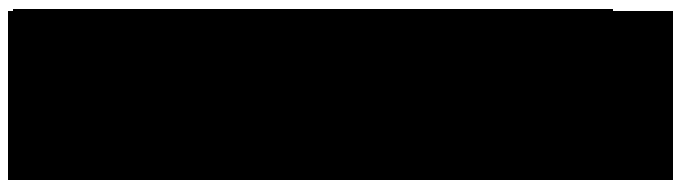
Flintshire LDP

Matters Arising Changes

on behalf of



July 2022



AC 029 : A**b**

So, whilst the Inspectors might be happy for the plan to be found sound, which would naturally delight WG and FCC as a job well done the reality of the situation is that the development industry will, in Flintshire, largely be at an impasse because the Phosphates issue has introduced a moratorium on all new development that flows into the riverine system of the River Dee / Bala Lake SAC.

Thus, the practicalities of actually delivering a large amount of development across the County will be frustrated and impeded for what could be at the very least the next 2-years until a solution can be found.

The reality is that permissions will not be granted and new homes will not be delivered which will place a massive amount of pressure upon the delivery trajectory to the extent that almost as soon as this plan is adopted it will be behind on its delivery path.

The plan identifies a total of some 3,014 allocations but 550 of these (20%) :

- x HN1.1 Well Street Buckley (140)
- x HN1.5 Denbigh/Gwernaffield Road Mold (238)
- x HN1.9 HAGwettn tc0.00ghHi8--cEM 0 Tw-i (e1.7 (4)-1.5 0 Tdmp)7 (i)(23)-(o)1.1 ((.9)d82 0 Tdwu)5
Th

There is every chance that the Council will already be under-delivering on its trajectory and there will be a need for supplementary sites coming forward. Yet t

However, what is clear is that this has compounded slippage in delivery and could still have dramatic and fatal consequences. Thus, the suggestion that a distant two-year trigger is sensible to apply becomes a little academic since there is every chance the under-delivery of this emerging plan will be so great that far more drastic action is needed and a plan review is not going to be the panacea.

The Council has failed to produce a liv(8)017(i)10.7 (o)13.6f(i)2.7 (r).1 (v(8)0e (r)14.1v(t)-6.1 (e)10.9 (v(8)0 (j)2.7