SUBMISSION STATEMENT

in respect of

Flintshire LDP

Matters Arising Changes

on behalf of

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 impasses 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 2-3 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%) :

- HN1.1 Well Street Buckley (140)
- HN1.5 Denbigh / Gwernaffield Road Mold (238)
- HN1.9 HAAC (80)
- HN1.10 Cae Isa New Brighton (92)

are constrained by Phosphates and none have planning permission in place.

Their delivery is, like the other large housing allocations, strategic to the plan successfully delivering; yet their under or non-delivery would, along with windfalls which might have come along in Phosphates areas, wipe out the Flexibility Allowance with some ease.

The Council's Phosphates Hearing statement of 23 November 2021 stated that the Council were assuming just a 12 month delay and that the sites would all be able to deliver in full by April 2026 (HN1.5 by April 2028). This is pure fantasy and the trajectory tables (with their base date of April 2020) need to be urgently re-aligned to mirror the reality of the slippage in not only the plan, decision-making but also the harsh reality that the Phosphates issue has not moved on and is here to stay.

The Council will clearly defer the problem as being the fault of the development industry and down to the Phosphates problem and if this scenario of under-delivery does take place then I

There is every chance that the Council will already be under

MAC075 and MAC077 : Amendment to Policy HN3

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 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.

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