
Flintshire Local Development Plan 2015

± 2030

Our ref 60174/06/RCA/TE

Date July 2022

Subject Representations on behalf of
Change Consultation to the Proposed Matters Arising

1.0 Introduction

1.1 On behalf of [redacted] has been instructed to make representations in relation to the Flintshire Local Development Plan [FLDP] Examination Matters Arising Changes [MAC] (June 2022) Consultation. These representations have been prepared by [redacted] Flintshire and focus on the site at Ffordd Fer, Mynydd Isa, which lies adjacent to the settlement of Mynydd Isa.

1.2 This SWD WHP HQW H [SDQGV XSRQ 7 : ¶ V SUHYLRXV UHSUHVHQWD Plan preparation process, including responses to the Matters, Issues and Questions raised by the Inspector for the Examination in Public [EiP] hearing sessions.

1.3 TW is seeking to bring forward a high quality sustainable and comprehensively masterplanned residential extension on land at Ffordd Fer, Mynydd Isa. TW considers that the site should be identified as an allocation in the emerging Plan. The site is deliverable and would assist in the delivery of sustainable development within Flintshire by making a significant contribution towards meeting the identified needs for market and affordable housing.

1.4 These representations focus on the following key MAC changes:

- x MAC 016 & MAC 017 ±Para 3.65 Table ±Update to Housing Growth
- x MAC 026 & 027 ±Policy STR1 ±Strategic Growth
- x MAC 029 & MAC 030 ±

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3.5

which is well-located to both Chester and Wrexham would support the Council and the wider strategic focus on this part of North Wales.

Soundness

3.10 TW does not consider that the FLDP meets:

- 1 Soundness Test 2 as the evidence presented is insufficient and it is considered that the Council's Growth Strategy does not align with the national aspirations to provide well located homes at the heart of communities and job opportunities .

4.0 MAC 029 & MAC 030 ± Policy STR2 & Para 5.13 Distribution of Development Across Settlements

4.1 MAC 029 & MAC 030 relate to policy

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the generality of the policy, which may cause uncertainty for developers. As set out in previous representations⁷ TW considers:

- 1 Part i of the Policy to be unclear in regard to affordable housing provision. TW again question whether Part i is required, as there is a separate affordable housing Policy (Policy HN3) which covers this provision.
- 2 As currently worded, the Part ii of Policy is vague and ineffective and needs to quantify

rates have remained close to the 463 dwellings per annum [dpa] set by the FLDP. However, it is difficult to fully determine the true nature of delivery in recent years, given no new evidence has been prepared since April 2020 (as set out within the latest housing Land Supply and Delivery Background Paper 10A, updated January 2021)

Soundness

5.5 TW does not consider that the FLDP meets:

- 1 Soundness Test 3 as Policy STR1 is not effective and remains generalised which may cause uncertainty for developers and impact the delivery of site.

6.0 MAC 074 ± Policy HN1 ± New Housing Development Proposals

6.1 Policy HN1 continues to lack any significant details on the constraints affecting the allocated sites. The requirements for each site continue to be provided in a very short

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on each site. For example, it makes limited statements such as

and

without

any further expansion to explain what is required and why.

6.2 The precise policy requirements for each site are therefore unclear and the FLDP instead partially relies on the generic policy requirements in Policies PC2 to PC5 to inform the development of the sites. In order to ensure that the plan is sound, TW considers that further detail is required to inform the deve 70.584 437.C(e)-5 y[04 42 (t)4.00696 (n o)7.008 (rd)(rt)5 (ial

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- 1 Soundness Test³ as it provides limited information on how each of the allocated site will be delivered. Further details on the delivery mechanisms for each site are required to ensure the FLDP is sound.

7.0 MAC 077 ±Policy HN3 ±Affordable Housing

7.1 MAC 077 seeks to insert a table which sets out the components of affordable housing supply over the plan period.

7.2 The need for Affordable Housing is set out in Table 5.2a (p. 20) of Policy 95.83 5bT Q q 0 leTf 45784 significant, comprising 3,500 homes a year over the five-year period 2019-21[1 10.56 Tf 392 841.92g0 5

8.0 MAC 097 ±Policy EN11 ±Green Wedges

8.1 MAC 097 seeks to reword both Policy EN11 and the supporting explanatory text to reflect
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ensure the FLDP aligns with the wording of the of Planning Policy Wales which refers to
Green Wedges as mechanisms for managing settlement re W* n BT /.56 Tf 9(tBT /.56 Tf 9(tBT /.5 0 595.32

8.7 TW agrees that the A494(T) [Mold Bypass] forms a firm and defensible boundary. However, TW considers that the Green Barrier Review takes an inconsistent approach to the function that this firm and defensible boundary serves. It goes on to state¹³:

Soundness

8.13 TW does not consider that the FLDP meets:

- 1 Soundness Test1 as the boundaries of the Green Wedge have not been appropriately assessed against the five purposes as outlined in PPW

9.0 MAC 101 ±Policy EN15 ±Water Resources

9.1

