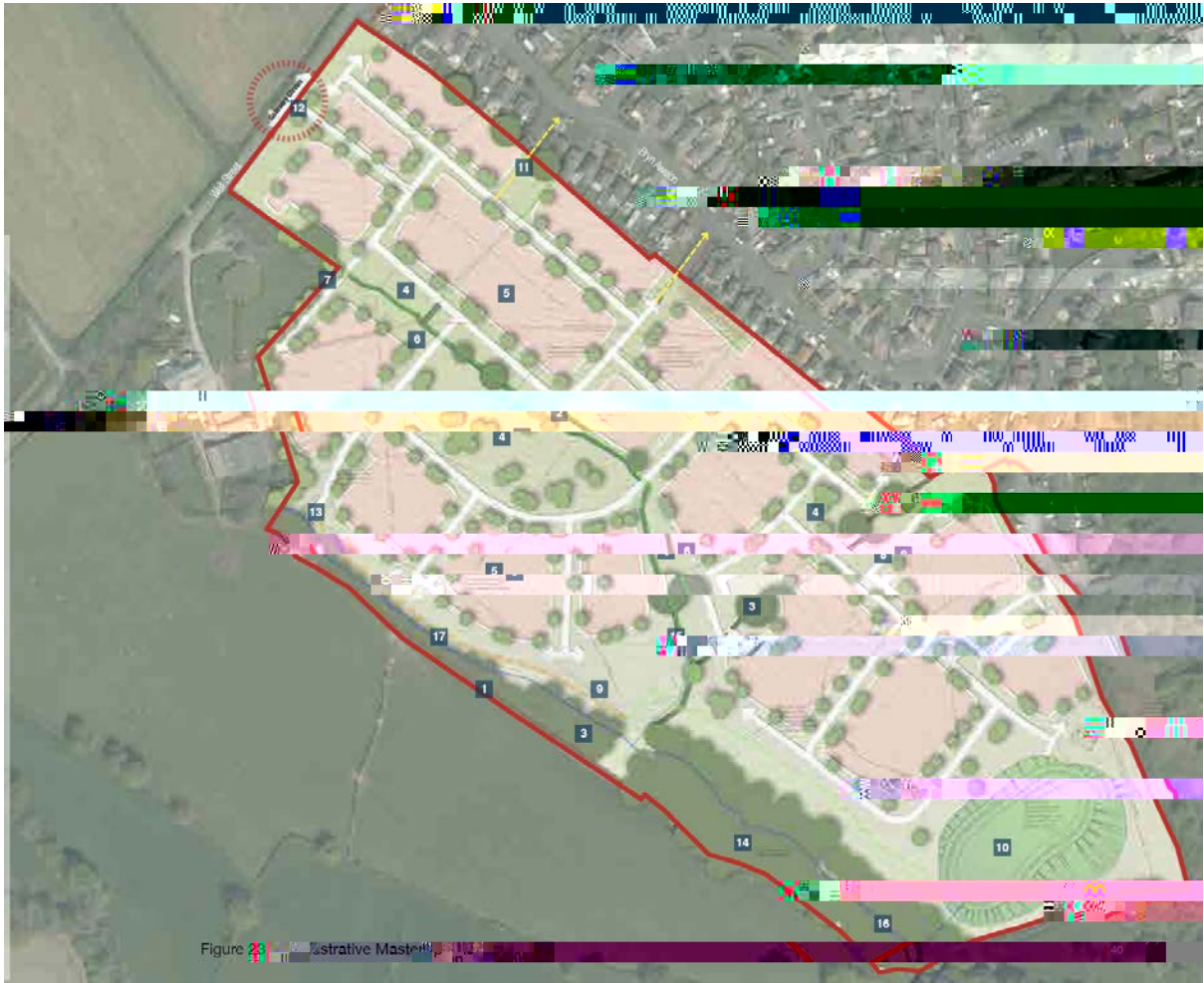


## SUBMISSION STATEMENT

in respect of





In the absence of any other reasonable alternatives this site offers a suitable candidacy for housing growth, all things considered.

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No they don't: please refer to table below.

PC1 Relationship of development to settlement boundaries	Evidence base has not made proper assessment of settlement boundaries and have ignored issues such as sequentially selecting sites based upon proper and thorough assessment of BMV, a proper Green Barrier Review and considering sustainable placemaking principles	a hle24 B.002 Tc 04.9(tn3(e)-3(n)2.2(t Tw 4.7

a) Has the special character of Mold been adequately considered in drawing up the settlement hierarchy/boundaries?

No comment

b) Is it clear how proposals in the open countryside will be treated, in particular that new building will generally be strictly controlled?

No comment

c) Is the requirement for electric charging points in non-residential development in Policy PC5 consistent with national guidance?

No comment



The sites which will be discussed at the hearings are:

- HN1.1 Well Street, Buckley
- HN1.3 Highmere Drive, Connah's Quay
- HN1.4 Northop Road, Flint
- HN1.6 Land between Denbigh Rd & Gwernaffield Rd, Mold
-

c) What are the various constraints affecting the sites? In the light of constraints, and other matters, where is it set out what the requirements are for each site? Is there sufficient clarity and certainty?

Please refer to site tables below.

No detail for sites is provided.

d) Having regard to constraints, where they exist, as well as the need to provide for affordable housing and infrastructure, are the sites viable?

Please refer to site tables below.

Limited to nil viability evidence has been provided in meeting PPW11 and DPM3 guidance.

e) Are the delivery mechanisms for each site clearly identified? Is the timing and/or phasing of each site clearly set out?

Please refer to site tables below.

The FCC trajectory indicates delivery timescale, but no detail is provided to justify the assumptions made.



	HN1.1
	Well Street (west), Buckley
	Buckley
	5.3
	159
	150
	CAHA
	WG
	DMO and EIA screening 2020 PA has been lodged (awaiting validation)
	YES : rolled over allocation (HSG1(3)) for 162 units
	NO
	NO : assumed to be 3b but no evidence provided
	Very Uncertain  FCC002 trajectory assumes 53 units per annum from 2022/23 and completion by 2025
	No SoCG  No viability evidence (sic. education, affordable, open space, drainage)  If Warren Hall SoCG is followed then WG will insist on higher than expected levels of affordable (at least 50%) and insist on zero carbon and will also want to manage the delivery – these will significantly impact on viability and deter potential partners (to CAHA) from tendering; unlike Warren Hall it has no additional WG infrastructure funding  Drainage issues (HMA needed and unspecified contributions will be sought) as per DCWW SOCG  Site has poor track record on not being delivered  DMO undertaken - significant local opposition and no support locally  No planning approval and no s106  Only allocate as aspirational (due to UDP roll-over) but for a



	HN1.6
	Land off Denbigh Road and Gwernaffield Road, Mold
	Mold

	HN1.7
	Land off Holywell Road and Green Lane, Ewloe
	Ewloe
	9.9
	298
	No detail available – although masterplan layout might suggest 279 units
	Anwyl : no evidence of agreement
	Multiple owners – no evidence of collaboration/equalisation
	No PA (no DMO)
	NO
	YES : inconsistent approach to release
	YES : but report only assessed 7.5 ha of land not 9.9 ha Predictive mapping indicated 3a Survey results show mostly Grade 3a and very small element of Grade 2
	Very uncertain  FCC002 Trajectory assumes 28 units in 2023/24 and delivery by 2030

SOCG available but far from convincing

No viability evidence (sic. education sum of £882k + £960k, 40% affordable, open space incl. a MUGA, drainage, highway access and associated improvements needed)

Promoters have raised concerns about level of affordable sought – this naturally undermines any position on viability

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	HN1.8
	Ash Lane, Hawarden
	Hawarden / Mancot
	10.9
	288
	No detail available
	Anwyl
	Hawarden Estates
	No PA (no DMO)
	NO
	YES : inconsistent approach to release
	YES : report (considered out of date – undertaken in May 2010 and only assessed 6.0 ha out of 10.9 ha It states it involves Grade 2 (5%), 3a (49%) and Grade 3b (44%)
	Very uncertain  FCC002 Trajectory assumes 28 units in 2023/24 and delivery by 2030

SOCG available but far from convincing

No viability evidence (sic. education sum of £845k + £923k, 40% affordable, open space incl. a MUGA, drainage, highway access and associated improvements needed)

Promoters have raised concerns about level of affordable sought – this naturally undermines any position on viability

	HN1.10
	Cae Isa, New Brighton
	New Brighton
	105
	92 – but this could be driven down further due to GCN, POS and SUDS solutions
	Stewart Milne
	Refused PP (ref. 060220) and then Planning Appeal dismissed on 2 Feb 2021 (
	NO
	YES : former Green Barrier
	YES :
	Some uncertainty due to dismissed appeal  FCC002 assumes full delivery of 105 units with a start in 2021/22 and completion by 2024
	No SOCG  Trajectory is suspect  No evidence of viability (sic. education sum, 40% affordable, open space, SUDS, playspace, ecology)  Great Crested Newt mitigation  Inadequate level of playspace  No safe route to school (questionable sustainability credentials)  SUDS compliance is uncertain and main drainage easement crosses the site  This all points towards the need to submit a new application and for the density to be driven down further with increased costs
	Review in light of Active Travel, BMV and appeal refusal  Better alternatives exist

Please refer to [redacted] and the [redacted] for more detail

a) Is the required level of affordable housing need based on robust evidence? Is the Local Housing Market Assessment (LHMA) sufficiently robust to inform the Plan's housing strategy?

Policy HN3 seeks to split the target levy as follows:

- 40% in the Central sub market area;
- 35% in the Connahs Quay, Queensferry and Broughton sub market area;
- 15% in the Flint and Coast sub market area;
- 20% in the Garden City sub market area;
- 40% in the Mold and Buckley sub market area;
- 30% in the South Border sub market area.

This is based upon the LHMA defined housing market areas as illustrated by the Ward map below.

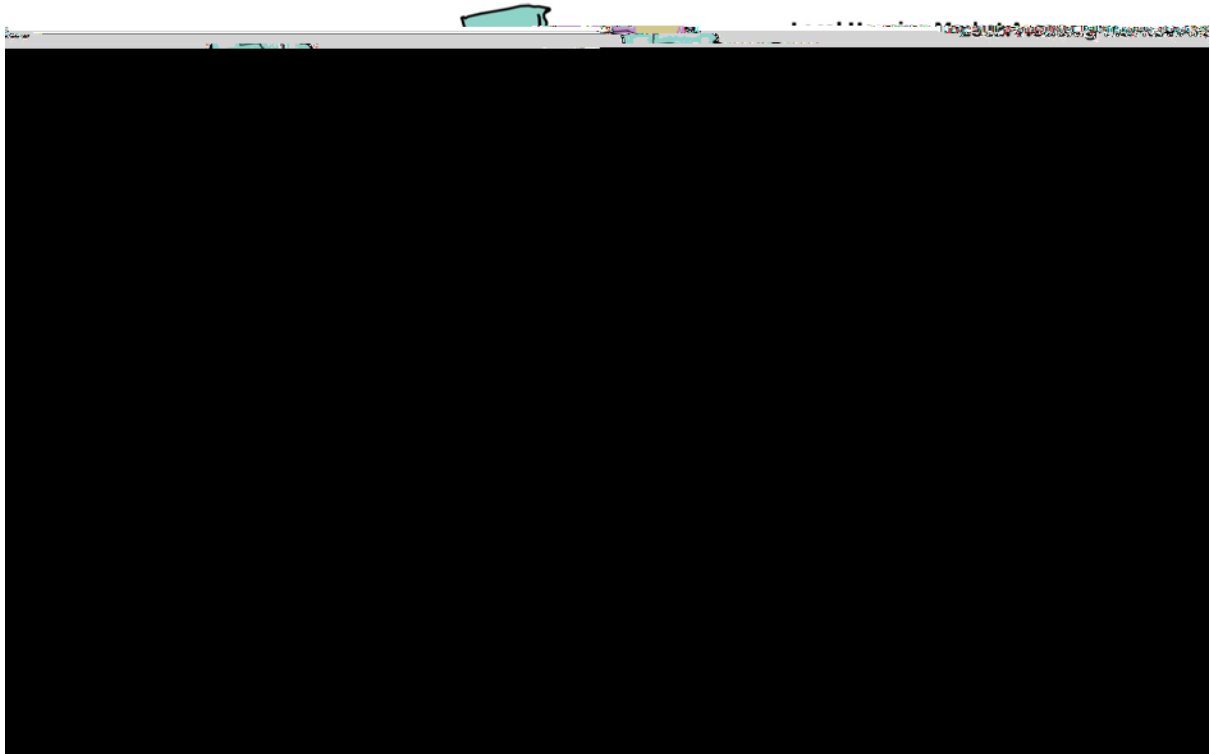


Table 2 of the Council's Background Paper No 7 identifies the anticipated delivery of affordable housing across the draft allocations as follows:

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LHMA evidence on past trends (Table 5.4 page 55) suggests that the average delivery over the past 10 years (2008 to 2018) has been 95 no. affordable dwellings per annum – a total of 950 units. If we assume this were to continue for the remainder of the plan period (2018 to 2030) this would generate an additional 1,140 units; the draft housing allocations are expected to contribute 915 units. But even this risks target levels not being achieved.

More sites are required to deliver mixed and balanced communities.

Putting it into context, Flintshire has a housing stock of 67,090 and of this the extant social housing stock is 10,135 units which equates to c.16% of all stock – one of the highest in the Principality – so to suggest higher levels in already saturated locations (like Garden City) is questionable.

**b) Will the affordable housing target meet the local housing need? If not, what other mechanisms are available?**

See above

**c) Does the plan clearly identify all components of affordable housing supply?**

No, the trajectory provides no affordable breakdown.

**d) Are the required affordable housing contributions and thresholds in Policy HN3 founded on a credible assessment of viability?**

We have reservations about the target of 40% given that neighbouring authorities are promoting lower levies (e.g. Cheshire West & Chester is 30%, Wrexham is 25%, Denbighshire is 10%) which risks making Flintshire uncompetitive and unattractive to develop.

**e) Are the requirements of Policy HN3 clear, and consistent with national policy?**

The accompanying “zone/area plan” is not entirely clear so this could be better identified on the Proposals Map as to where wards (HMA’s) start and finish.

The trouble with published targets is that Officers (and Members + others) will look at the words “starting point for negotiation” and simply assume that the level quoted is the level that should be met and indeed this should be the minimum.

As such no discretion or flexibility will end up being enabled. The danger is that the 40% is what will be expected regardless of any other abnormalities and viability issues that might be involved.

Moreover, the policy applies to STR3, HN1 and windfall sites, yet PPW11 and DPM3 expect all draft allocations to be viable having taken into account issues such as affordable housing so it surely cannot be right that an exception can be made for these sites and it should only apply to windfalls.

**f) Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?**

No : see earlier comments above.

g) How will off-site or commuted sum contributions for affordable housing be secured and managed? What mechanis

m) Will the affordable housing policies ensure a balanced mix of house types, tenures and sizes, and is the required density level appropriate?

We fear that balance will not be achieved: see earlier comments above.

It is pure fantasy to expect that the target level of affordable dwellings in certain areas will be achieved and delivered by the market; the Council need to take a reality check because the RSL's will not be capable of delivering this volume and nor will open market housing developers be able to viably deliver higher than viable levels.

Fundamentally, landowners will not release their land with such inflated target rates/thresholds as the land value will drop through the floor and there will be no incentive to develop their land.

We are not suggesting here that no Affordable Housing can be provided, but the level sought must be proportionate and robustly justified. A level closer to 30% for somewhere like Mold would seem to better reflect past delivery rates across Flintshire and likely to be more suitable for most sites,

subject to viability testing in accordance with the Planning and Regeneration Act 2015 (19-03-2019) (103(4)(b)(ii)(3)(a)(i)(b)(c)(d)(e)(f)(g)(h)(i)(j)(k)(l)(m)(n)(o)(p)(q)(r)(s)(t)(u)(v)(w)(x)(y)(z)(aa)(ab)(ac)(ad)(ae)(af)(ag)(ah)(ai)(aj)(ak)(al)(am)(an)(ao)(ap)(aq)(ar)(as)(at)(au)(av)(aw)(ax)(ay)(az)(ba)(bb)(bc)(bd)(be)(bf)(bg)(bh)(bi)(bj)(bk)(bl)(bm)(bn)(bo)(bp)(bq)(br)(bs)(bt)(bu)(bv)(bw)(bx)(by)(bz)(ca)(cb)(cc)(cd)(ce)(cf)(cg)(ch)(ci)(cj)(ck)(cl)(cm)(cn)(co)(cp)(cq)(cr)(cs)(ct)(cu)(cv)(cw)(cx)(cy)(cz)(da)(db)(dc)(dd)(de)(df)(dg)(dh)(di)(dj)(dk)(dl)(dm)(dn)(do)(dp)(dq)(dr)(ds)(dt)(du)(dv)(dw)(dx)(dy)(dz)(ea)(eb)(ec)(ed)(ee)(ef)(eg)(eh)(ei)(ej)(ek)(el)(em)(en)(eo)(ep)(eq)(er)(es)(et)(eu)(ev)(ew)(ex)(ey)(ez)(fa)(fb)(fc)(fd)(fe)(ff)(fg)(fh)(fi)(fj)(fk)(fl)(fm)(fn)(fo)(fp)(fq)(fr)(fs)(ft)(fu)(fv)(fw)(fx)(fy)(fz)(ga)(gb)(gc)(gd)(ge)(gf)(gg)(gh)(gi)(gj)(gk)(gl)(gm)(gn)(go)(gp)(gq)(gr)(gs)(gt)(gu)(gv)(gw)(gx)(gy)(gz)(ha)(hb)(hc)(hd)(he)(hf)(hg)(hh)(hi)(hj)(hk)(hl)(hm)(hn)(ho)(hp)(hq)(hr)(hs)(ht)(hu)(hv)(hw)(hx)(hy)(hz)(ia)(ib)(ic)(id)(ie)(if)(ig)(ih)(ii)(ij)(ik)(il)(im)(in)(io)(ip)(iq)(ir)(is)(it)(iu)(iv)(iw)(ix)(iy)(iz)(ja)(jb)(jc)(jd)(je)(jf)(jg)(jh)(ji)(jj)(jk)(jl)(jm)(jn)(jo)(jp)(jq)(jr)(js)(jt)(ju)(jv)(jw)(jx)(jy)(jz)(ka)(kb)(kc)(kd)(ke)(kf)(kg)(kh)(ki)(kj)(kk)(kl)(km)(kn)(ko)(kp)(kq)(kr)(ks)(kt)(ku)(kv)(kw)(kx)(ky)(kz)(la)(lb)(lc)(ld)(le)(lf)(lg)(lh)(li)(lj)(lk)(ll)(lm)(ln)(lo)(lp)(lq)(lr)(ls)(lt)(lu)(lv)(lw)(lx)(ly)(lz)(ma)(mb)(mc)(md)(me)(mf)(mg)(mh)(mi)(mj)(mk)(ml)(mm)(mn)(mo)(mp)(mq)(mr)(ms)(mt)(mu)(mv)(mw)(mx)(my)(mz)(na)(nb)(nc)(nd)(ne)(nf)(ng)(nh)(ni)(nj)(nk)(nl)(nm)(no)(np)(nq)(nr)(ns)(nt)(nu)(nv)(nw)(nx)(ny)(nz)(oa)(ob)(oc)(od)(oe)(of)(og)(oh)(oi)(oj)(ok)(ol)(om)(on)(oo)(op)(oq)(or)(os)(ot)(ou)(ov)(ow)(ox)(oy)(oz)(pa)(pb)(pc)(pd)(pe)(pf)(pg)(ph)(pi)(pj)(pk)(pl)(pm)(pn)(po)(pp)(pq)(pr)(ps)(pt)(pu)(pv)(pw)(px)(py)(pz)(qa)(qb)(qc)(qd)(qe)(qf)(qg)(qh)(qi)(qj)(qk)(ql)(qm)(qn)(qo)(qp)(qq)(qr)(qs)(qt)(qu)(qv)(qw)(qx)(qy)(qz)(ra)(rb)(rc)(rd)(re)(rf)(rg)(rh)(ri)(rj)(rk)(rl)(rm)(rn)(ro)(rp)(rq)(rr)(rs)(rt)(ru)(rv)(rw)(rx)(ry)(rz)(sa)(sb)(sc)(sd)(se)(sf)(sg)(sh)(si)(sj)(sk)(sl)(sm)(sn)(so)(sp)(sq)(sr)(ss)(st)(su)(sv)(sw)(sx)(sy)(sz)(ta)(tb)(tc)(td)(te)(tf)(tg)(th)(ti)(tj)(tk)(tl)(tm)(tn)(to)(tp)(tq)(tr)(ts)(tt)(tu)(tv)(tw)(tx)(ty)(tz)(ua)(ub)(uc)(ud)(ue)(uf)(ug)(uh)(ui)(uj)(uk)(ul)(um)(un)(uo)(up)(uq)(ur)(us)(ut)(uu)(uv)(uw)(ux)(uy)(uz)(va)(vb)(vc)(vd)(ve)(vf)(vg)(vh)(vi)(vj)(vk)(vl)(vm)(vn)(vo)(vp)(vq)(vr)(vs)(vt)(vu)(vv)(vw)(vx)(vy)(vz)(wa)(wb)(wc)(wd)(we)(wf)(wg)(wh)(wi)(wj)(wk)(wl)(wm)(wn)(wo)(wp)(wq)(wr)(ws)(wt)(wu)(wv)(ww)(wx)(wy)(wz)(xa)(xb)(xc)(xd)(xe)(xf)(xg)(xh)(xi)(xj)(xk)(xl)(xm)(xn)(xo)(xp)(xq)(xr)(xs)(xt)(xu)(xv)(xw)(xx)(xy)(xz)(ya)(yb)(yc)(yd)(ye)(yf)(yg)(yh)(yi)(yj)(yk)(yl)(ym)(yn)(yo)(yp)(yq)(yr)(ys)(yt)(yu)(yv)(yw)(yx)(yy)(yz)(za)(zb)(zc)(zd)(ze)(zf)(zg)(zh)(zi)(zj)(zk)(zl)(zm)(zn)(zo)(zp)(zq)(zr)(zs)(zt)(zu)(zv)(zw)(zx)(zy)(zz)

The following checklist table provides our assessment of National Planning Policy comprising the NDP Future Wales (February 2021) and PPW11 (February 2021) along with the procedural guidance published by WG (DPM3 – March 2020) and the recent WG paper entitled Building Better Places (“Placemaking and the Covid Recovery”) published in July 2020.

We have found that the eLDP has failed to follow DPM3 guidance and fails to reflect the policies of the NDP or PPW11, to such an extent that when one considers the tests of soundness you arrive at no other conclusion than to find this plan unsound.






Para 3.30 regarding evidence base	45	





Para 3.75 regarding new sites

11.10  
11.11  
(11.12)  
11.13  
11.14  
11.15

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Para 5.62 Table 18  
regarding components of  
housing supply

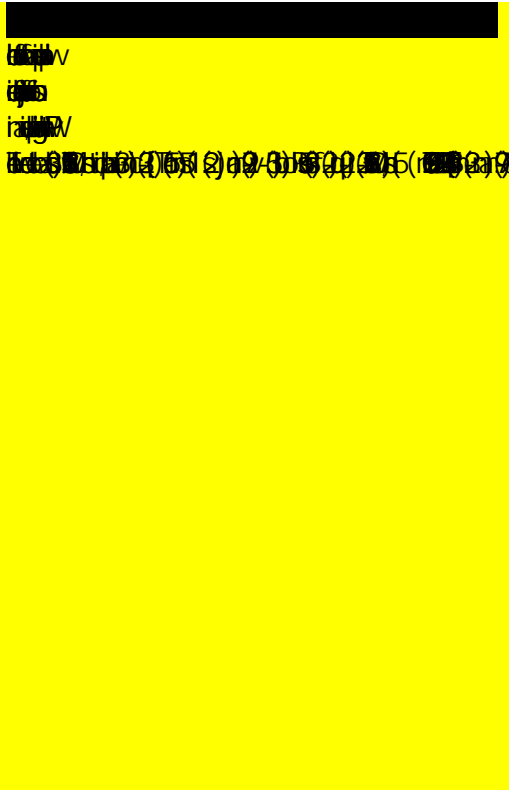
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Table 18  
Components of housing supply

<p>Para 5.107 Table 18 regarding affordable targets</p>	<p>/( v ( ( ) OE o Z } μ • ] v P §</p>	<p>FCC's assessment of viability is flawed as it assumes rates of affordable delivery that outstrip those of neighbouring areas (CWAC 30%, Wrexham 0 to 30%, Shropshire 10%).</p>
<p>Para 5.109 regarding infrastructure costs and</p>		

Para 1.18 : sustainable development	<p> <del>5.1</del>  <del>5.2</del>  <del>5.3</del>  <del>5.4</del>  <del>5.5</del> </p>	Key aim is to achieve sustainable development – the eLDP spatial strategy and many of the housing sites cannot claim to be sustainable.
Para 1.26 : LDP's	<p> <del>5.1</del>  <del>5.2</del>  <del>5.3</del> </p>	The eLDP evidence base is poor 93(s)-5.3( w)-5.4(hi)-2.3(ch i)-2.2(s)-5.3

3.54 : new settlements

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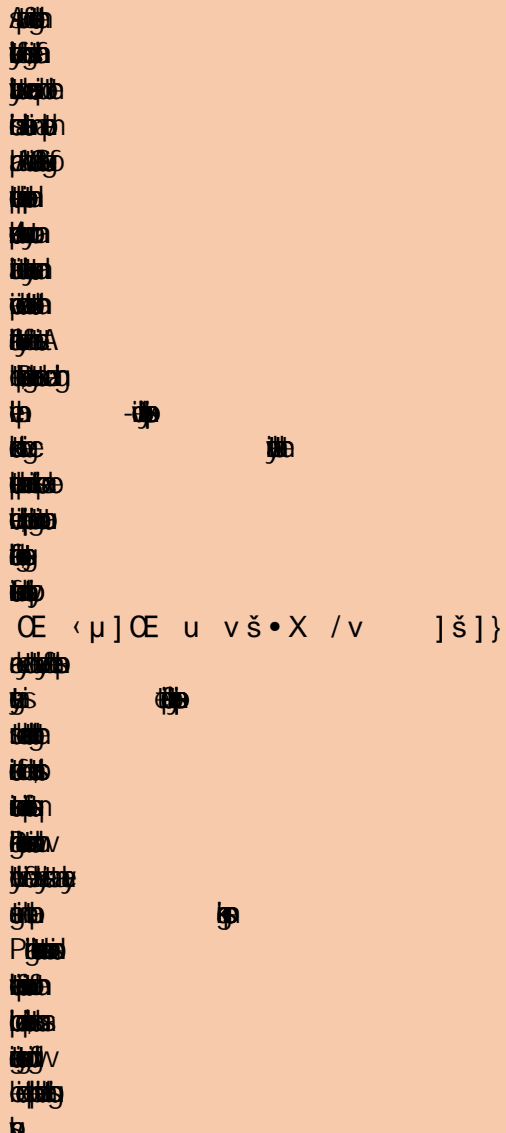
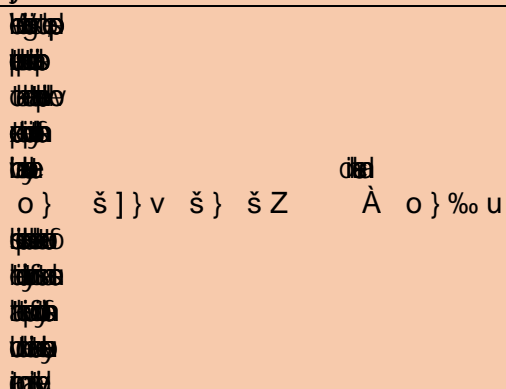

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<p>Para 4.2.19 : deliverability</p>		<p>No financial viability is evidenced in support of the housing allocation sites.</p>
<p>Para 4.2.20 : affordable levy and viability</p>		<p>The affordable housing policy is itself unviable yet the housing allocations do not demonstrate that levels of affordable are viable.</p>
<p>Para 4.2.25 : affordable homes for all communities</p>		<p>The eLDP makes no clear provision for how need can be delivered on anything but a site located within defined settlement limits.</p>



The following checklist table provides our assessment on the soundness of the LDP following the Para 6.26 (Table 27) tests of soundness approach set out in DPM3. We find that the eLDP must, in its current state with its associated evidence base, be found to be unsound. The Inspector is invited to concur with this and recommend FCC withdraw their plan. The only potential way of avoiding this is for FCC to agree with our overall findings, particularly in respect of the way they have approached BMV, Green Barrier, reasonable alternatives and increasing housing land supply, and identify the sites we have identified at Mold, Buckley and Broughton.

Does it have regard to national policy PPW / NDF and in general conformity with the NDP?	No