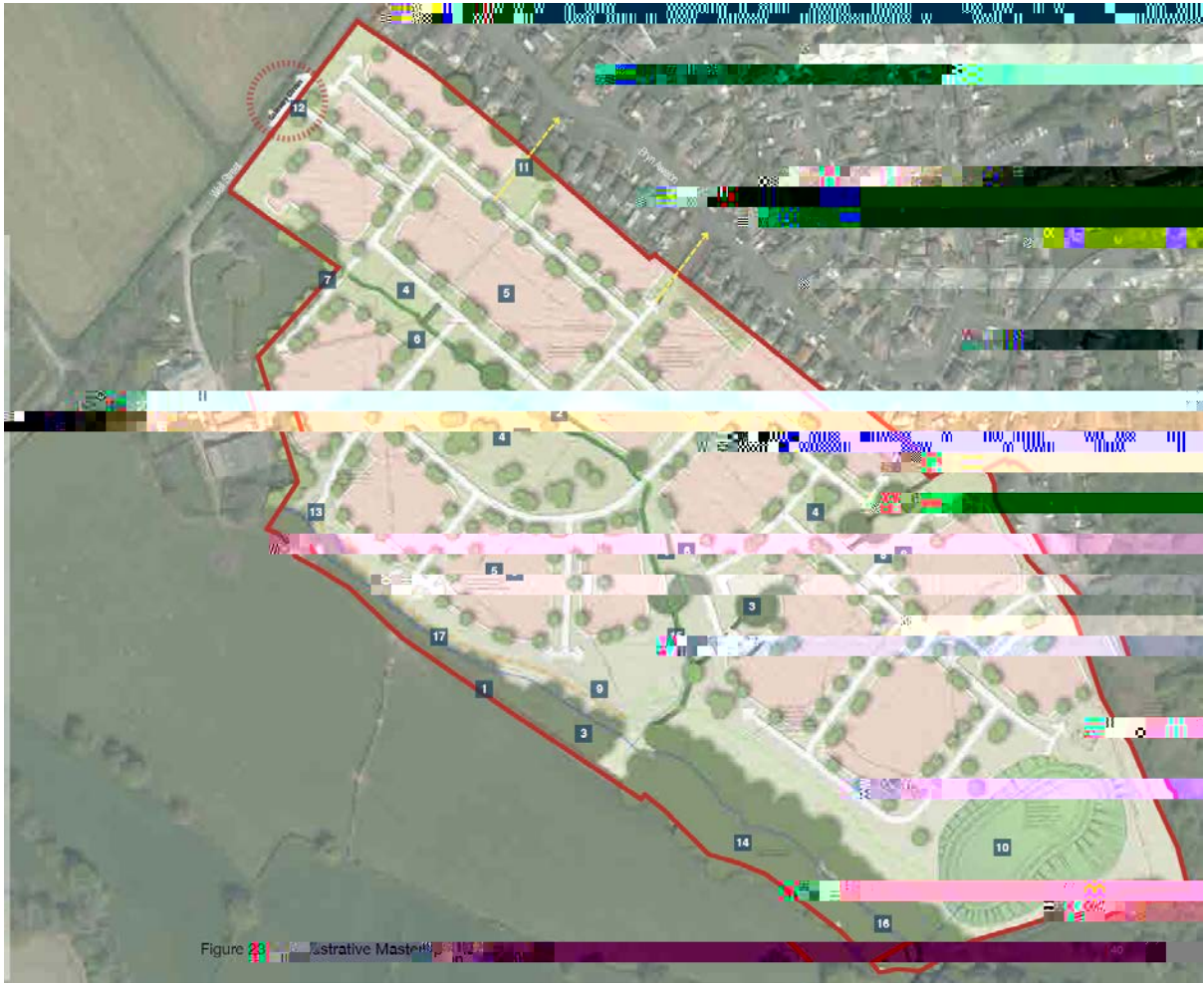


Castle Green are (at the time of this submission) on the cusp of signing an option agreement with the (single entity) owners of the land (N & P Jones).

The site extends to include



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

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

(incl.

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 partn.

	HN1.6
	Land off Denbigh Road and Gwernaffield Road, Mold
	Mold
	11.22
	246
	238
	Anwyl
	Assumed in single family ownership
	PA submitted in Oct 2020 – undetermined
	NO
	NO
	YES : Grade 2 But claim is made by promoters that this is actually 3b due to chemical imbalances WG LQAS / ADAS report does not agree with such findings
	Uncertain FCC002 Trajectory assumes 40 units in 2022/23 and delivery by 2028
	No SOCG Significant highway (link road) and drainage infrastructure works are required : suggests start is unlikely until at least 2024, which will mean it not being delivered within plan period No viability evidence (sic. education, 40% affordable, open space, drainage, highway access) Indeed PA assumes 30% affordable not 40% Significant drainage issues (e.g. strategic easements cross the site + HMA needed and unspecified contributions will be sought) as per DCWW SOCG

	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

	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 and the
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 We W699.5 ()-m.8 5ba W699.5 ()-b3

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

A rectangular area that has been redacted with a solid grey fill, obscuring the content of the table mentioned in the text above.

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

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	<i>Detailed evidence upfront and early in</i>	

Para 3.75 regarding new sites

The two avenues for including new sites post deposit stage are Focussed Changes (FCs) at submission or Matters Arising Changes (MACs) post submission proposed through the examination process

Para 5.62 Table 18
regarding components of
housing supply

*rolled forward from a previous plan will
require careful justification for inclusion
in a revised plan, aligning with PPW.
There will need to be a subs.3(.)-1u3bian*

BT/CS1w2M 0 scnn, t id plan, in a revi.3(.n ci)-2.

<p>Para 5.107 Table 18 regarding affordable targets</p>	<p><i>If an affordable housing target is set too high it is unlikely that those levels will be delivered and may impact on the delivery of sites and elongate the development management process. The targets chosen must be realistic and align with the evidence base and the assumptions within it.</i></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	<i>Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise</i>	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	<i>Evidence is needed to support LDP policies which is tested through the Examination procedure.</i>	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

New settlements should only be proposed where such development would offer significant environmental,

policy mechanisms, such as settlement

robust. The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.

<p>Para 4.2.19 : deliverability</p>	<p><i>As part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a development plan. At the 'Candidate Site' stage of development plan preparation land owners/developers must carry out an initial site viability assessment and provide evidence to demonstrate the financial deliverability of their sites. At the 'Deposit' stage, there must be a high level plan-wide viability appraisal undertaken to give certainty that the development plan and its policies can be delivered in principle, taking into account affordable housing targets, infrastructure and other policy requirements. In addition, for sites which are key to the delivery of the plan's strategy a site specific viability appraisal must be undertaken through the consideration of more detailed costs, constraints and specific requirements. Planning authorities must consider how they will define a 'key site' at an early stage in the plan-making process. Planning authorities must also consider whether specific interventions from the public and/or private sector, such as regeneration strategies or funding, will be required to help deliver the housing supply.</i></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><i>Where new housing is to be proposed, development plans must include policies to make clear that developers will be expected to provide community benefits which are reasonably related in scale and location to the development. In doing so, such policies should also take account of the economic viability of sites and ensure that the provision of community benefits would not be unrealistic or unreasonably impact on a site's delivery.</i></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><i>A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on</i></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