



## SUBMISSION STATEMENT

**This representation is submitted on behalf of Bartlett & Kitchen.**

However, we can confirm that the land promoted also includes another landowner ( ) and there is agreement between all 3 parties to act collaboratively in promoting their land.

The site extends to include the parcels edged red on the plan below.

It is located in a highly sustainable and accessible position directly adjacent to the Broughton settlement boundary (a Tier 2 settlement) and would offer an ideal residential extension close to the strategic employment centres of Broughton Retail Park, Airbus and Hawarden and Queensferry industrial estates.

Highway access is available off Mold Road (A5104).

The land has been assessed as being largely Grade 3b.

It comprises an area extending to 9.2 ha which is considered to be capable of delivering up to 230 units.

**We would invite the Inspector to consider (under the power vested in them and as guided by Para 6.58 of DPM3) to recommend this site be included as a new / alternative site. This is endorsed by the opportunity to identify new sites under Para 3.75 as part of any MACs process.**



b) Are triggers timely and do they allow for an effective response to be made in the event that remedial action is required? In particular, how will additional sites be brought forward if there is a persistent shortfall in housing delivery?

No.

It is unclear how any additional sites will be brought forward.

FCC have suggested during the Examination that they believe they are over-allocating which provides a cushion.

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## PLANNING POLICY FRAMEWORK ASSESSMENT

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

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Policy 3 : public sector leadership	<i>The public sector's use of land, developments, investments and actions must build sustainable places that improve health and well-being.</i>	WG's assets in FCC are not meeting the needs of this Policy; STR3B (Warren Hall) is not sustainable and HN1.1 (Well Street) is not showing it will deliver anything different from mainstream market housebuilders; both failed to come forward in the UDP.
Policy 7 : affordable homes	<i>Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing</i>	The evidence base is weak and flawed.
Policy 12 : regional connectivity	<i>Sustainable growth is supported in urban areas where aim is to improve and integrate active travel and public transport. So where there are key nodes, this would suggest growth should be concentrated at these locations; particularly if they are National and Regional Growth Areas.</i>	Many of the housing allocations (in particular STR3B, HN1.6 and HN1.7) cannot justifiably meet sustainable travel aspirations.
Policy 19 : strategic policy	<i>Must take account of cross-border relationships and issues.</i>	eLDP fails to consider key cross-boundary issues (e.g. housing, Green Belt).
Policy 20 : national growth area	<i>Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth</i>	Deeside is a National Growth Area, yet the growth and spatial strategy does not concentrate upon this for housing growth.
Policy 23 : North Wales Metro	<i>Planning authorities should plan growth and regeneration to maximise the opportunities arising from better regional and cross border connectivity, including identifying opportunities for higher density, mixed-use and car-free development around new and improved metro stations.</i>	This policy is not even registered in the eLDP and spatial growth has certainly not reflected such aspirations.





DEVELOPMENT PLAN MANUAL (DPM3)	What the policy document says	J10 Comment
Para 3.30 regarding evidence base	<i>Detailed evidence upfront and early in the plan making process is essential to inform the delivery of the preferred strategy and subsequent plan stages. A greater depth of evidence at the candidate site stage is essential.</i>	FCC did not undertake detailed evidence for Green Barrier or BMV this has meant that candidate sites were discounted too early in the plan making process and others were taken forward ignorant of their sustainability, deliverability or technical (GB/BMV) credentials. This is a fatal flaw of the plan, along with not considering reasonable alternatives and discounting them too easily and early on.
Para 3.36 regarding key principles behind any evidence to prove and justify allocations	<i>The evidence must enable the LPA to assess the following:  can it be freed from all constraints? capable of being delivered?</i>	These core principles have been ignored in both the consideration of candidate



Para 3.75 regarding new sites	<i>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</i>	There is an opportunity to include new sites at this stage.
Para 3.76 regarding reserve sites	<i>In preparation for the examination the LPA should have a prioritised list of potential reserve sites which it considers could be substituted as alternatives and added to the plan, should additional sites be required following consideration of the plan through the formal hearing sessions.</i>	FCC have not published any list of reserve sites and have no Plan B or contingency.
Para 6.58 regarding new sites	<i>the Inspector may recommendal resites</i>	



<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%,</p>
<p>Para 5.109 regarding infrastructure costs and impact upon site viability</p>	<p><i>Where there are costs associated with infrastructure requirements, fo</i></p>	<p><i>1.455c(P)-5.8c 0.003 Tw 11.04 -0 0 11.04 30.36 285.</i></p>



3.54 : new settlements

*New settlements should only be proposed where such development would offer significant environmental, social, cultural and economic advantages over the further expansion or regeneration of existing settlements and the potential delivery of a large number of homes is supported by all the facilities,*

*policy mechanisms, such as settlement boundaries, would not be sufficiently 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.*



*trajectory when they are due to come*

Para 4.2.12 : specialist housing

Para 4.2.19 :  
deliverability

*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'.*



## SOUNDNESS ASSESSMENT

The following