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Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

The Planning Inspectors
Flintshire LDP EiP

By email via Programme Officer

Your Ref/Eich Cyf

Our Ref/Ein Cyf AR/LDP/EiP

Date/Dyddiad 10th May 2021

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Dear Inspectors**Re: Additional submissions by NJL Consulting (OP001 & OP002)**

I refer to the additional submissions by NJL Consulting (OP001 & OP002) in response to the Council's Northern Gateway Position Statement (FCC007).

In the light of the content of NJL's submissions I considered it appropriate to write to you to provide clarification, as the Council is concerned that documents OP001 and OP002 incorrectly present the Council's position in respect of anticipated delivery rates on the Northern Gateway strategic site.

Documents OP001 & OP002 state (para 2) *'It is noted that the Position Statement projects a further increase in housing delivery on the Northern Gateway strategic allocation, with build out rates forecasted in excess of 180 dwellings per annum between 2022/23 to 2025/26'*. **For clarification the Council wishes to make clear that this is not the case.**

As agreed at the Matter 3 Hearing Session the Council's position Statement FCC007 was prepared simply to summarise factually the current situation regarding the ongoing site development and to illustrate how the delivery rates proposed by the Council in the Allocated Sites Trajectory (Appendix 3A of BP10A) (FCC002), compared to the rates submitted to the Examination by other parties directly involved in the development of the site.

The Council wishes to emphasise that Position Statement FCC007 therefore contains no new information which has not already been submitted to the Examination (and discussed at the Matter 3 Hearing Sessions). In particular the delivery rates contained in Table 1 in FCC007 are based on information provided in

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We welcome correspondence in Welsh. We will respond to correspondence received in Welsh without delay.

Rydym yn croesawu gohebiaeth Gymraeg. Ymatebwn yn ddi-oad i ohebiaeth a dderbynnir drwy gyfrwng y Gymraeg.



Statements M3.04 (submitted to the Examination by Spawforth's) and M3.16A (submitted to the Examination by Anwyl), and on actual completion rates provided by the developers already on site.

The figures in Table 1 are therefore **not figures proposed by the Council** and Table 2 in FCC007 actually compares the delivery rates in Table 1 with those contained in the Council's trajectory in FCC002, and illustrates that the Council's projected delivery rates are generally lower than those provided by the site developers. **Again for clarification, the Council wishes to make clear that it is not proposing that any changes be made to the delivery rates contained in the trajectory in BP10A (FCC002).**

The Council acknowledges that the trajectory in BP10A (which is based on a 1/4/20 base date) incorporates updated figures for Northern Gateway and other sites, compared to the trajectory in BP10, which has a 1/4/2018 base date. The updating of trajectories during the Plan preparation process and prior to Plan Adoption is acknowledged in para. 5.74 of Edition 3 of the Development Plans Manual.

The Council also notes that documents OP001 & OP002 contain information relating to site ownership, based on land registry searches carried out by NJL, where it and the additional commentary appear to go beyond a factual check of the accuracy of the summarized EiP evidence already submitted. As this is new information not previously provided to the Examination, the Council would wish to take this opportunity to briefly respond on just one point of relevance. By way of response the Council would not take issue that a number of developers may not yet own the parcels they will be developing and it is of course normal practice for developers to complete the purchase following the grant of detailed or full planning permission, to limit their financial exposure.

I trust the above is of assistance and helps clarify the situation re Northern Gateway.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andy Roberts', with a stylized flourish at the end.

Andy Roberts
Service Manager Strategy