M5.06

SUBMISSION STATEMENT

in respect of

Flintshire LDP (2015 to 2030) Examination

on behalf of

Castle Green Homes & N and P Jones (ID 1235341)

Matters 2, 3, 4 and 5

March 2021

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This representation is submitted on behalf of Castle Green Homes and N & P Jones.

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 a single parcel of greenfield land that benefits from direct access off Well Street, Buckley as illustrated on the plan below.

It is located in a highly sustainable and accessible position directly adjacent to the Mold settlement boundary and would offer an ideal residential extension being within easy walking distance of existing services and facilities.

The land to the north west was identified for release in the UDP for 162 units (ref. HSG1(3)) but never came forward. It has been "rolled forward" as a draft LDP allocation (HN1.1) for 159 dwellings. A pre-application consultation was submitted by CAHA in July 202 for 150 units.

Castel Green consider that both sites can come forward and indeed there would be highway access benefits in considering such an approach.

But it must also be noted that there is still no guarantee the Well Street West site will be delivered and that this site (Well Street East) must be considered favourably given its advanced position.

The promoters have investigated all technical aspects (highways, drainage, contamination, air quality, agricultural (it's Grade 3b), trees and ecology.

There is nothing to prevent this site from coming forward and it offers a natural and logical release and development extension to Buckley a Tier 1 settlement.

Highway access is available off Well Street.

It comprises an area extending to 12 ha and is considered to be capable of delivering up to 270 units – illustrated by the layout plan below and the accompanying **Vision Prospectus document dated March 2021** that is appended to this representation.

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

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.

Matter 2: Plan Strategy

Key issues, vision, objectives

Key Issue:

Is the overall strategy coherent and based on a clear and robust preparation process? Is the strategy realistic and appropriate in the light of relevant alternatives and is it based on robust and credible evidence?

The relevant (and reasonable) alternatives have been discounted without any due diligence and have been ignored in favour of sites with doubtful sustainability and deliverability credentials.

The plan has failed to follow the guidance in DPM3 or reflect the policies within NDP or PPW11 when it comes to making sure the plan is based upon a robust and credible evidence base.

The plan has failed to adhere and follow procedural plan making guidance (sic. releasing evidence base retrospectively).

The plan has failed to produce sound evidence base (sic. Green Wedge Review, Plan Viability and site allocation viability/deliverability).

The plan has failed to follow the principles of sustainable placemaking, accessible growth locations, or site selection procedures (sic. ignoring BMV).

The plan has failed to consider relevant or reasonable alternatives.

Please refer to **J10 POLICY FRAMEWORK Conformity and Consistency Checklist** and the **J10 SOUNDNESS Checklist** for more detail

a) Is the LDP's overall strategy consistent with those of neighbouring authorities? What are the main cross boundary issues and how have these been addressed?

The main cross-boundary issues include the delivery of viable levels of affordable housing and the Green Wedge boundary with Cheshire West.

The viability study underpinning affordable housing has been shared with Wrexham, but whilst Wrexham have revisited their original study as part of their Examination and subsequently re-aligned their affordable housing targets / aspirations Flintshire have failed to learn from this and made no changes.

No fundamental or robust Green Wedge Review has been undertaken despite the UDP Inspectors recommendation and despite what PPW11 states about undertaking such a review.

NDP Policy 19 states that plans must take account of cross-border relationships and issues. Additionally, Policy 23 identifies the need to ensure cross-border transport connections are strengthened in promoting the North Wales Metro; yet this isn't identified in the eLDP.

b) How have the key issues been selected? Are they all addressed directly and adequately by the vision and strategic objectives? What is the relationship between the Key Issues and Drivers (para. 3.30) and the challenges that must be planned for (para. 3.35)?

The Key Issues & Drivers are identified and include:

The job growth and economic development ambitions for the County should form the basis for identifying and delivering a supporting level of housing development : yet the connection is broken and the evidence does not follow, because had a connection been made then a higher housing target would have been set and a more sustainable set of draft housing allocations would have been identified.

UDP Housing under delivery is acknowledged : but rather than seeking to meet this shortfall the plan simply seeks to wipe the slate clean and proceed to include failed past allocations. This is contrary to DPM3 Para 5.62 Table 18 which recommends a non-delivery allowance to reflect past shortfalls. This is distinct from applying a flexibility allowance.

The UDP Inspector considered that the approach to defining settlement boundaries based on individual settlements rather than identifying urban areas was backward looking and also considered that the time was rapidly approaching whereby a fundamental review of open countryside and green barriers in parts of the County was needed : yet despite this, no robust or fundamental Green Wedge Review has been undertaken and the same approach to defining settlement boundaries taken in the UDP is being repeated again with the eLDP.

The need for new development to be in the most sustainable locations and bring with it necessary infrastructure improvements : yet the plan is not targeting the most sustainable locations and instead is identifying housing in very unsustainable locations. Moreover, contrary to all national policy the plan has identified the release of BMV land.

The need for new housing sites to be viable and deliverable in terms of contributing to housing land supply and other Plan objectives : yet once again the evidence with respect viability and deliverability is, at best, wafer thin and far from convincing.

These issues don't appear to have been directly or adequately addressed by either the vision or the strategic objectives.

There is some relationship between the key issues and drivers and the challenges; but the explicit link is not made very clearly.

Indeed, It appears that the plan process has been predicated upon simply rolling forward the failed UDP, including unimplemented UDP allocations and a settlement / development allocations strategy that does not reflect NDP or PPW11.

c) Is the vision appropriate and sufficiently detailed?

No comment.

d) What are the implications, both positive and negative, of Flintshire's gateway location on a national border? How are these accounted for in the LDP?

No comment.

e) Does the LDP address the physical and mental health of the population?

No, it fails to recognise these needs of older and more vulnerable people in providing for their residential needs.

There is just one mention in the text to Policy STR11 and the policy makes passing reference to making provision for specific housing needs, yet the plan fails to set out what this need might be and how it can be delivered.

f) What is the purpose of the strategic policies? Are they useful and useable in development control terms?

No comment at this stage as they are best addressed under the appropriate Examination sessions.

g) What is the policy position on Best and Most Versatile Agricultural Land?

The plan defers to what PPW might say, but there is not a single mention of BMV in the entire plan, which runs contrary to NDP Policy 1, the advice in BBP on "staying local" (pg 14) and PPW11 (Para 3.59).

The fact is that the debate about BMV is isolated and lost without addressing eth wider issue of Green Wedge Review, landscape character and sustainability. Whilst Matter 16 will discuss Green Barrier this issue should really be brought forward in eth Examination agenda much sooner as it has had a fundamental impact upon the plans spatial strategy and all matters associated with preferred housing sites.

h) Are the Proposals and Inset Maps accurate and user friendly?

No comment.

i) In the light of the time which will remain if the LDP is adopted in 2021/22, is the plan period (2015-2030) appropriate?

The Council's first Delivery Agreement (dated February 2014) suggested adoption by February 2018. The Authority have been consistent in missing targets and so whilst the July 2020 Delivery Agreement suggests the plan could be adopted by November 2021 we have little confidence that this will be met given the track record for slippage experienced thus far.

We are concerned that Welsh Ministers have signed off every Delivery Agreement since the first one in the knowledge that slippage has happened at every stage, yet they have allowed this to happen without any special measures being imposed for Flintshire failing to have a plan in place.

The plan period of 2015 to 2030 would have originally been considered appropriate, but the problem here is that even if the plan is adopted by the end of 2021 there will be just 9 years left for the plan and the DPM3 recommends (Para 7.4) that at least 10 years of the plan period should be left remaining.

DPM3 goes onto re-state (Para 8.1) that a Plan Review must commence no longer than 4 years from its adoption; so assuming an adoption by (say) Jan 2022 this would mean a review commencing by Jan 2026.

This might not, ordinarily, be an issue of soundness and prevent a plan from being adopted and indeed we note from the WG response in Nov 2019 they said as much, however, the fact is there are a series of significant fundamental flaws in the way this plan has been prepared which run to the core of the plan and its soundness and in our opinion the plan must either be withdrawn or be changed quite radically.

j) What will be the status of Place Plans, when prepared, and how will they relate to the LDP?

No comment.

Matter 3: Strategic Growth (inc Strategic Sites) (**STR1 + STR3**)

Key Issue:

Is the growth strategy coherent and based on a clear and robust preparation process? Is it realistic and appropriate in the light of relevant alternatives and is it based on robust and credible evidence?

The relevant (and reasonable) alternatives have been discounted without any due diligence and have been ignored in favour of

The plan has failed to follow the guidance in DPM3 or reflect the policies within NDP or PPW11 when it comes to making sure the plan is based upon a robust and credible evidence base.

The plan has failed to adhere and follow procedural plan making guidance (sic. releasing evidence base retrospectively).

The plan has failed to produce sound evidence base (sic. Green Wedge Review, Plan Viability and site allocation viability/deliverability).

The plan has failed to follow the principles of sustainable placemaking, accessible growth locations, or site selection procedures (sic. ignoring BMV).

The plan has failed to consider relevant or reasonable alternatives.

Please refer to **J10 POLICY FRAMEWORK Conformity and Consistency Checklist** and the **J10 SOUNDNESS Checklist** for more detail

a) What is the justification for adopting an aspirational growth strategy, led by an ambitious target for new jobs?

The strategy is unclear because the link between jobs and homes is lost by the very fact insufficient housing is being promoted and is also in the wrong places.

STR1 makes provision for 8 to 10,000 new jobs and 139.67 ha of employment land and suggests that there is a direct link between this and the housing growth figure of 6,950 dwellings; however, we cannot see this.

Based on 2014 projections, the County is forecast to increase in population from 154,088 in 2015 to 156,899 in 2030, whilst at the same time the County imports some 24,000 people travelling into the area every day to work. The aim of this plan should be to reduce in-commuting by providing housing not just for the increased 2,811 (natural growth) population, but also for a good proportion of the 24,000 incoming daily commuters.

Geographically, Deeside IE, Airbus and Broughton Retail Park are key employment receptors, yet despite this, housing growth is not being targeted correctly in a sustainable and spatial manner and despite the policy suggesting the focus of development will be located at sustainable employment locations many housing sites are not located to take advantage of this.

Simplistically, if there is already an over-dependence of inward migration it seems implausible that up to 10,000 new jobs will need just 6,950 new homes; particularly if you add in natural growth, household division and the need to reduce in-commuting by trying to satisfy at least some of the 24,000 daily commuters.

The planned housing growth suggests that there is no ambition to reduce in-commuting and that the aspiration is not to provide for anything more than natural growth and household formations.

The policy targets should be expressed as minimums.

b) When were i) the Northern Gateway site and ii) the Warren Hall site granted outline planning permission? Have circumstances changed significantly since then?

STR3A is a brave and pioneering attempt to launch a new settlement in a challenging location, where significant levels of new infrastructure are required. It is clear that the market housebuilders are wary of jumping in and that launching a product in an unknown territory takes a lot longer to establish.

Now that it is “off the ground” we support its inclusion in the LDP but are not convinced that the delivery rates are going to be anything like those that would be achieved in a more traditional sustainable urban extension destination where there is track record for sales, etc.

The original UDP allocation was for 650 units, but the eLDP allocation has increased this and we consider this is a mistake because doubling its capacity simply poses a greater risk to an already vulnerable deliverability rate and the lack of any community infrastructure is a poor reflection of sustainable placemaking.

STR3B, however, is an entirely different scenario. There has ,since the UDP, been a significant shift in planning policy now means that STR3B should never even be considered. It is a greenfield site that is isolated and detached from any settlement and is located in an entirely unsustainable location. It is seeking status as a new settlement and this runs contrary to every relevant policy in NDP and PPW11 and the guidance enshrined in DPM3.

Had this site been viable it would have come forward by now, but it clearly isn’t viable and should be removed.

c) How will their strategic allocation in the LDP improve their viability and deliverability? Are the rates forecast for their delivery in the LDP realistic and achievable?

These sites were allocated in the UDP which failed to deliver them.

STR3A has admittedly made some progress but it has been limited and is still constrained by significant infrastructure which will impact upon its planned trajectory. We don’t believe more than 650 units will be delivered from this site during the entire plan period.

Allocating a site should be directly linked to deliverability but it clearly has not been the case in the FCC UDP and we do not believe the LDP will work any better

STR3B should not be “rolled forward” as an allocation at all.

Please see additional comments on each site in the tables below.

Site Ref	STR3A
Name	Northern Gateway
Settlement	Garden City, Deeside
Site area (ha)	72.4
Draft allocation	1,325 (1,140 in plan period and 140 post-2030)
Actual number promoted	1,140
Developer	CPPLC / Keepmoat / CAHA
Owner	Goodman & Pochin + Praxis
Planning Status	056540 submitted 01/02/2017, approved 02/03/2018, 058990 submitted 18/09/2018, approved 25/10/2018, 059514 submitted 30/01/2019, resolve to approve subject to signing Legal Agreement - Target date was 05/04/2019 No update is provided by the Council or Promoters
UDP site	Yes – HSG2A for 650 dwellings (25% affordable)
Green Barrier	NO
BMV	YES : Grade 2 – but no reports are available
LDP Trajectory	At between 120 and 150 units per year the rate of delivery is overly ambitious
Actual Trajectory	We would halve the claimed trajectory given its location and complex infrastructure needs
Delivery	Very uncertain No SoCG No viability evidence
Other constraints	Not a desirable location, no extant community infrastructure, Phase 2 needs road and significant enabling works required

Site Ref	STR3B
Name	Warren Hall
Settlement	Higher Kinnerton / Broughton ? – but it's actually freestanding and isolated
Site area (ha)	27.7
Draft allocation	300
Actual number promoted	300
Developer	None
Owner	WG
Planning Status	038744 no info available except submission date - 24/12/2004 and approval date - 22/04/2008, 046962 submitted 19/11/2009, approved 04/02/2010; 048360 proposes to extend time for submission by 3 years - approved 21/07/2011 NOW EXPIRED; releasing just 2 conditions does not amount to commencement of development
UDP site	YES : EM2 for employment use only – residential is new
Green Barrier	Former Green Barrier
BMV	3a and 3b – although report fails to provide split across the whole 80 ha and, given the scale, it is not inconceivable that better management could improve pockets of 3b to 3a – however, we do not believe the land is of this quality Background Paper no 9 on BMV states that the whole site will result in an actual loss of 32.17ha grade 3a and predicted loss of 2.17ha grade 2 but that the bulk of this land already has planning permission for business park – this is significant and cannot be acceptable in PPW11 terms
LDP Trajectory	Assumes an almost immediate start with the site producing 30 units by 2023
Actual Trajectory	Construction needs spine road and residential is located to south, it would be unacceptable to have traffic emerging from south off rural lanes, and with no PP yet it is inconceivable that this site will start in 2 years time Our estimate is that development won't start (if at all) until 2027 at the earliest
Delivery	Very uncertain – if at all No site viability No meaningful deliverability evidence – no detailed programme other than to say that units will start in 2023/24 and build out at a rate of 30 to 45 units per annum for 7 years until the end of the plan period - this is fantasy given that no DMO , no EIA screening, no PA submitted, no development partner and no timescale for infrastructure No delivery trajectory is provided for the employment element – we assume because there is no market SoCG confirms an Outline PA would be submitted which suggests the intentional programme is at least 3 + years out of kilter.
Other constraints	WG apparently will insist on 30% Bungalows and higher than expected levels of affordable (at least 50%) and insist on zero carbon and will control and deliver – this will impact on viability and make it a difficult sell to market housebuilders, especially with the estimated £14m enabling infrastructure involved – the pure economics does not make any sense as you cannot expect a scheme for under 150 open market houses to support £14m worth of infrastructure An HMA will be required Significant ecology resources Quality landscape Sustainability is poor

	Aeronautical constraints – only 22% of the land is capable of 2-storey development which reduces development / building efficiency significantly This is not “mapped”, but the impact is significant. Spine road and infrastructure will be required – how can B1 and B2 be promoted here ? Market assessment is wrong – there is no office market; Warren Hall was promoted originally to satisfy Moneysupermarket and others – this never transpired and indeed all those linked with the site moved elsewhere and/or contracted – additionally, the market has itself changed and there is plenty of surplus and more mature ready to occupy stock available elsewhere Hotel/leisure use that is suggested is an out of town use and contrary to policy

d) How advanced is development on the Northern Gateway site? What is the reason for its allocation rather than recording it as a commitment?

There is no surety over it delivering its target either within this plan period or the next and we would recommend its numbers be reduced to 650 within this plan period and identified simply as a commitment. We are not convinced more than this number will/can come forward before 2030; if it can be proven then perhaps a balance can be allocated but identified as a future post-2030 allocation.

e) Is there enough site-specific guidance and information in the LDP to satisfactorily address the individual circumstances, including constraints, on the two strategic sites? Are there master plans or development briefs for them? How will the principles of placemaking be applied to these sites?

The eLDP is devoid of any detailed guidance on both sites.

Allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable.

Matter 4: Location of Development (STR2)

Settlement hierarchy, settlement limits.

Key Issue:

Is the spatial strategy coherent and based on a clear and robust preparation process? Are the spatial strategy and relevant strategic policies realistic, appropriate and logical in the light of relevant alternatives and are they based on robust and credible evidence?

The relevant (and reasonable) alternatives have been discounted without any due diligence and have been ignored in favour of

The plan has failed to follow the guidance in DPM3 or reflect the policies within NDP or PPW11 when it comes to making sure the plan is based upon a robust and credible evidence base.

The plan has failed to adhere and follow procedural plan making guidance (sic. releasing evidence base retrospectively).

The plan has failed to produce sound evidence base (sic. Green Wedge Review, Plan Viability and site allocation viability/deliverability).

The plan has failed to follow the principles of sustainable placemaking, accessible growth locations, or site selection procedures (sic. ignoring BMV).

The plan has failed to consider relevant or reasonable alternatives.

FCC's settlement strategy does not align with the National Plan as it promotes significant scale development in locations that are not sustainable

Please refer to **J10 POLICY FRAMEWORK Conformity and Consistency Checklist** and the **J10 SOUNDNESS Checklist** for more detail

a) What is the purpose of the settlement hierarchy? Will it guide new development to the most sustainable locations? Is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?

The settlement hierarchy does seek to assemble settlements into some form of hierarchical order, but clearly some within each category are more sustainable than others in the same category and more importantly the assemblage is devoid of any sustainability ranking as guided by DPM3, PPW11 and NDP.

Apart from housing, there is no clarity in STR2 as to what sort or scale of development is acceptable in any of the settlements.

We appreciate that the WG response (dated 4 November 2019) did not object to the principle of the spatial distribution approach set out in the Deposit Plan, however they did not say it was acceptable.

We would question whether the same position would now be taken and indeed, we would go so far as to say that whilst WG might be keen to see full plan coverage this should not be at all costs since the eLDP is clearly at odds with the messages in the DPM3, NDP and PPW11; particularly in respect of spatial distribution, sustainable access, placemaking and BMV.

Therefore, we don't believe that the WG letter of November 2019 holds anything but limited (credible) sanctioning.

Insufficient levels of housing are targeted for the Tier 1 settlements of Mold and Buckley and the Tier 2 settlement of Broughton.

b) What is the rationale for the proportions of development split across the tiers?

The rationale is unclear, as the spatial distribution has clearly ignored the UDP Inspectors recommendations and furthermore has also failed to take into account the DPM3 guidance and moreover failed to reflect what PPW11 and NDP states.

The fact that STR3B is not even within a settlement defies any rationale altogether.

c) Why is it necessary to assess the comments of the UDP inspector with regard to the definition of settlement boundaries?

In his covering letter of 12 May 2009 he recommended a comprehensive review of Green Wedge and settlement boundaries be undertaken.

The failure to undertake a full review is also contrary to PPW11 (Paras 3.64, 3.68 and 3.70).

d) Where is the methodology for the assessment of settlement boundaries described? Has it been applied consistently? Where are the results of the assessment set out?

There is none, but any claimed method has not been consistent since reasonable alternatives have been discounted out of hand for no apparent reason.

Any revisions to settlement boundaries (and freestanding allocations) have certainly not been derived or informed by any robust review of Green Wedge, or by any obvious sustainability criterion, or indeed by any sound assessment of BMV and neither has it been influenced by infrastructure appraisals or landscape character or greenspace assessments – this is wrong and the plan immediately fails since no methodology addressing these combined issues have informed the spatial strategy.

Instead, it appears that the Council have taken the decision to roll forward extant allocations and been seduced to accept the odd new site; this selection process has been far from transparent with candidate sites awarded AMBER status yet not taken forward.

For example, the Council initially published a document called “Consideration of Candidate Sites against the Preferred Strategy/Invitation for Alternative Sites” in November 2017 which classified candidate sites using a traffic light system (green, amber or red):

	2017 Report	**2017 FCC comments**	**J10 comments**
BROU010	Red	The site does not comply with the Council’s Preferred Strategy as it is divorced from the settlement and development of the site would result in urban sprawl in an area of open countryside	This was a fair assessment as it only involved the central part of the site (later to be called BROU017
BUC023 and BUC036	Amber	The site complies with the Council’s Preferred Strategy, however there are site constraints that would need to be overcome to allow the site to be developed	No detail of what the “constraints” might be are provided
MOL002	Amber	The site complies with the Council’s Preferred Strategy, however there are site constraints that would need to be overcome to allow the site to be developed	No detail of what the “constraints” might be are provided

How, therefore could a reasonable judgement be made at this stage to discount any of these sites ?

There is no rationale provided.

We then had to wait until September 2019 when Background Paper no 8 called "Assessment of Candidate Sites and Alternative Sites" was released to learn anymore. By which time of course the Council Officers had decided which draft allocations to promote; this paper revealed the following detail:

	2019 Report	2019 FCC comments	J10 comments
BROU010 (now BROU017)	Amber	The A5104 represents a strong physical edge to the settlement of Broughton. There is a distinct contrast between the estate type development on the south side of the A5104 and the ribbon development strong out along the Old Warren. In contrast to the frontage ribbon residential development, the proposal would result in a block of development which would harm the rural character of the locality and be poorly related to the settlement. Access / flight path. Small Site - The proposal also includes a small site adjoining the chapel at the junction of Old Warren and the A5104. This is too small to warrant allocation in the Plan and needs to be considered as a small site. The settlement boundary is presently well defined by the A5104 which represents a logical and defensible boundary to the estate type development. It would be inappropriate for the settlement boundary to extend onto the northern side of the A5104. Any development proposals relating to the site are more appropriately dealt with against the Plans suite of policies. **CONCLUSION** : That the large site is not considered appropriate as a housing allocation / that the small site is not considered appropriate for inclusion in the settlement boundary.	FCC entirely misinterpreted the "actual" site being promoted and provide no rationale why it what not taken forward despite its AMBER credentials.
BUC023 and BUC036	Amber	The site adjoins the settlement boundary and in terms of the settlement form, the site is built up along the north east side and the Well Street allocation is along the north west side. However there are highways concerns that there should be no further traffic on the road network, over and above the existing Well Street allocation, and that there is a need to avoid any increase in traffic southwards along Well Street. It could be considered as a ensible extension to the settlement but there are highways constraints. **CONCLUSION** : The site is not appropriate for a housing allocation.	Despite being classified as AMBER the Council assume hat highways is an issue, yet a pre-app on this site held in October 2018 clearly identified that highways was not a constraint and further work has established this to be the case.
MOL002	Amber	The site sits in a prominent location on Ruthin Rd which is a key route into the town. Development would extend built development south westwards from Mold and would significantly weaken the green barrier between Gwernynynydd and Mold. A further consideration is that there is land along the north	You cannot simply discount a site because of its green Wedge status – especially when

		western edge of the settlement which does not involve the loss of green barrier land. In sequential terms the land off Ruthin Rd is less preferable than the land outside the green barrier in the vicinity of Denbigh Rd and Gwernaffield Rd. A commentary on the green barrier is set out in the Green Barrier review but development of the site would clearly weaken the gap between Mold and Gwernymydd when it is presently not necessary to do so. In addition, a large housing development is presently taking place on land at Maes Gwern, only a short distance from the site. In this context it is considered unnecessary and inappropriate to utilise green barrier land for development. **CONCLUSION** : That the site is not suitable for consideration as a housing allocation.	the GB Review is tokenistic and there is no sequential guidance on GB land vs non- GB land, whereas there is with respect BMV land. The GB review is poor, contrived and deficient.

We contend that the Council had, at the point of selecting their preferred draft Housing allocations, insufficient evidence to justify supporting these sites and moreover made no attempt to consider any reasonable alternatives – of which all "AMBER" sites must be considered relevant.

There is no evidence that the candidate sites (including those selected through some opaque method as draft allocations) have been assessed against a sustainability checklist or indeed against criteria including BMV status, Green Wedge status, infrastructure issues or indeed viability and deliverability evidence.

Had this been done then it would have become clear that the site selection process would have unearthed a very different shortlist of allocations.

e) Are the settlement limits drawn sufficiently widely to enable the predicted amount of growth?

No, the boundaries are too tight to meet the housing requirement being delivered.

And moreover, this will prevent genuine windfalls which could assist the Authority in meeting its assumed trajectory, from coming forward since policy will be contrived against such sites being acceptable.

Moreover, the Urban Capacity Study found that between 1,389 and 1,481 units are potentially available but this then assumes all will come forward over the plan period in meeting the planned 1,080 windfall target. There is no evidence that any of these sites will come forward but if there is then the lagrer windfall sites should be identified as allocations anyway. Many are entirely unrealistic.

The fact is that there is insufficient brownfield (within settlement) land available and so greenfield land will be required to meet future housing need. The trouble is that the approach taken in considering how best to fulfil this need is flawed and runs directly contrary to the guidance in DPM3 and against policies in the NDP and PPW11.

f) Is it appropriate for there to be a green wedge designation within the Deeside Enterprise Zone? Will it be an unacceptable constraint on the ability to maximise economic opportunities in this area?

No comment other than to state that a comprehensive or robust Green Wedge Review has not been undertaken. It goes to the heart of the reason why this plan is flawed – unless a robust Green Wedge Review is undertaken you cannot devise a spatial strategy that has any credibility.

Matter 5: Principles of Sustainable Development, Design and Placemaking (**STR4**, inc Transport and Accessibility **STR5**; Services, Facilities and Infrastructure **STR6**)

Key Issue:

Do the policies and proposals on this matter fully achieve the sustainable development and placemaking objectives of the LDP consistent with national policy? Are they based on robust and credible evidence?

The policies are laudable but are undermined by the fact that the spatial strategy of the plan and the selected draft housing and strategic allocations have failed to have met or embrace the sustainability and placemaking objectives set out in national policy.

Please refer to **J10 POLICY FRAMEWORK Conformity and Consistency Checklist** and the **J10 SOUNDNESS Checklist** for more detail

a) Does the LDP place sufficient emphasis on the benefits to sustainability of the use of brownfield land for development? How does the LDP encourage this?

The PPW11 search sequence is clear that brownfield land should be maximised in the context of delivery.

However, the UCS study notes that there are actually fairly limited opportunities for brownfield use.

We support the need to identify the release of greenfield land but we have concerns that the wrong sites have been identified for development and faith has been misplaced for reasons associated with deliverability, viability, infrastructure, sustainability, BMV and Green Wedge.

b) Is the wording of Policy STR4 unduly onerous; should it be qualified by 'where appropriate'? Will it have a serious, detrimental effect on the viability of development proposals?

This policy, could (along with Policies STR5 and STR6) be used to refuse permission for any of the allocations.

c) Has sufficient consideration been given to the need for Flintshire's transport infrastructure to align with those of neighbouring authorities?

No, there is no mention of the North Wales Metro and no account has been given to the significant daily in-commuters and how this should be tackled / reduced.

d) Is it clear that there will be sufficient new facilities, for example for education, health, everyday shopping, public transport and so on, to meet the needs of future residents?

No, as the key infrastructure providers have not presented any detail on what level of capacity they have and might need to meet the levels of growth identified by the plan.

e) How will infrastructure for new development be provided and through what mechanisms? How will contributions be calculated? What is the position with regard to CIL?

This is unclear because not a single site benefits from a viability assessment, and this is despite known infrastructure constraints relating to a number of draft allocation sites.

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 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.

PLANNING POLICY FRAMEWORK : Conformity and Consistency Checklist		
FUTURE WALES (NDP)	**What the policy document says**	**J10 Comment**
Outcome 1	*Emphasis placed upon development being well located in relation to jobs, services and accessible green and open spaces*	eLDP has not made the most of the spatial connection between jobs and homes.
Outcome 5	*Development plans will enable and support aspirations for large towns and cities to grow, founded on sustainability and urban design principles.*	eLDP has not followed this in its hierarchy or site allocations; it has failed to consider the most sustainable places and locations.
Policy 1 : where Wales will grow	Deeside is designated as a National Growth Area, but even beyond this area *large scale growth should be focused on the urban areas and development pressures should be channelled away from the countryside and productive agricultural land can be protected.*	eLDP fails to protect BMV.
Policy 2 : strategic placemaking	*The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure. Urban growth and regeneration should be based on the following strategic placemaking principles: building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;*	There is nothing compactor walkable about locating development in places such as STR3B (Warren Hall) or indeed some of the other housing allocations (HN1.6 and HN1.7) where reasonable alternatives have not been considered and these will sites have limited credibility associated with sustainability and placemaking aspirations.
Policy 3 : public sector leadership	*The public sector's use of land, developments, investments and actions must build sustainable places that improve health and well-being.*	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	*Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing*	The evidence base is weak and flawed.
Policy 12 : regional connectivity	*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.*	Many of the housing allocations (in particular STR3B, HN1.6 and HN1.7) cannot justifiably meet sustainable travel aspirations.
Policy 19 : strategic policy	*Must take account of cross-border relationships and issues.*	eLDP fails to consider key cross-boundary issues (e.g. housing, Green Belt).
Policy 20 : national growth area	*Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth*	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	*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.*	This policy is not even registered in the eLDP and spatial growth has certainly not reflected such aspirations.
BUILDING BETTER PLACES (BBP)	**What the policy document says**	**J10 Comment**
Introduction	*Plans should not roll forward unsustainable spatial strategies or be identical to neighbouring authorities' plans, rather they should actively embrace the placemaking agenda set out in PPW."*	eLDP has "rolled forward" a number of failed UDP allocations and failed to question them or consider reasonable alternatives
On LDP's (pg 7)	*this does not mean that they should roll forward policies or proposals on sites which do not encourage good places*	As per above point
On Staying Local (pg 14)	*as well as protecting our Best and Most Versatile Agricultural (BMV) land from development.* *……* *We will expect proposals for new communities (in rural and urban areas) and housing sites to integrate with existing services and infrastructure*	Emphasis on protecting BMV is made New development should integrate with existing services, yet some sites (in particular STR3B (Warren Hall) this is freestanding and fails to offer this.

On Active Travel (pg	*The planning system must ensure the chosen locations and resulting design of new developments support sustainable travel modes and maximise accessibility by walking and cycling. New development should improve the quality of place and create safe, social, attractive neighbourhoods where people want to walk, cycle and enjoy. We should not be promoting sites which are unlikely to be well served by walking, cycling and public transport*	Again, some sites (in particular STR3B (Warren Hall) fails to meet this expectation.
DEVELOPMENT PLAN MANUAL (DPM3)	**What the policy document says**	**J10 Comment**
Para 3.30 regarding evidence base	*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.*	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	*The evidence must enable the LPA to assess the following:* *• Is the site in a sustainable location and can it be freed from all constraints?* *• Is the site capable of being delivered?* *• Is the site viable?*	These core principles have been ignored in both the consideration of candidate sites but also in selecting sites for draft allocations, many of which are not sustainable and have not proven to be deliverable or viable.
Paras 3.79 to 3.84 regarding evidence base		Evidence base must be relevant, proportionate and focussed. It must be fresh for a new LDP. It must respond to PPW (sic. BMV) and should not be sought after a policy choice has been made (as FCC have done by retrospectively publishing evidence base).
Para 3.43 regarding delivery	*The key objective an LPA should establish is whether a site promoter has a serious intention to develop the site and can do so within the timeframe of the plan …..*	This guidance has not been followed by FCC

	…. Candidate sites should be sustainable, deliverable and financially viable in order to be considered for inclusion in the plan by an LPA. All sites should satisfy the broad parameters and information emitted by the LPA and have sufficient financial headroom to accommodate all of the plan's policy requirements. For the purposes of this Manual ensuring sites in plans are deliverable means both in terms of deliverability and financial viability	
Para 3.44 regarding deliverability	*The site promoter (LPA, land owner and/or developer) must carry out an initial site viability assessment and provide evidence that sites can be delivered. As required by national policy, all candidate sites are subject to a viability assessment. However, the level of detail and information required for this assessment should be meaningful and proportionate to the site's significance in the development plan*	This guidance has not been followed by promoters or sought by FCC
Para 3.47 to 3.55 Regarding viability Para 5.87 Para 5.88	*Viability and deliverability starts at the candidate stage where all submitted sites should be accompanied by a viability assessment* *site specific viability appraisals should be undertaken for those sites which are key to delivering the plan*	FCC have failed to follow the procedures set out in the Manual and not requested such information; the bar being set higher for key strategic allocations. Retrospectively providing this is no substitute for what should have been done at the Candidate site stage where such evidence should have been publicly available. Sadly FCC have a track record in this eLDP in publishing evidence base to retro-fit their preferred strategy and site allocations; this includes seeking statutory consultee reviews at the 11th hour.
Para 3.69 regarding alternatives	*To demonstrate the plan is sound at examination, LPAs will need to justify their criteria and associated site assessments. The criteria must be in accordance with the principles of sustainable development and placemaking as set out in PPW. The SA must document the assessment and*	The identification of site allocations has not been done following the principles of sustainable development and reasonable alternatives have not been assessed

	provide a reasoned justification for the site status (rejected, reasonable alternative or preferred). Candidate sites should only be rejected outright if they have no potential to be either a proposed site, or a reasonable alternative. This can then inform the plan allocations needed to deliver the strategy. This must be a transparent process clearly documented in the final SA Report for the deposit plan.	and were discounted out of hand.
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 though the examination process*	There is an opportunity to include new sites at this stage.
Para 3.76 regarding reserve sites	*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.*	FCC have not published any list of reserve sites and have no Plan B or contingency.
Para 6.58 regarding new sites	*the Inspector may recommend the inclusion of a new or alternative site if it would be sound to do so*	The Inspector is invited to include new sites at Buckley, Mold and Broughton
Para 5.49 regarding the relationship between jobs and homes Para 5.50	*What is the relationship between the number of jobs generated and the economically active element of the projected population? Will a population provide sufficient homes so as not to import labour and hence increase in-commuting? ……* *This is a symbiotic relationship; it is important to evidence how the assumptions underpinning forecasting for jobs and homes broadly align, to reduce the need for commuting.*	There is a clear disconnect between the two in the eLDP and the ambition of reducing in-commuting has not been addressed.
Para 5.62 regarding components of housing supply	***Land Bank Commitments*** *- To be clear, a land bank non-delivery allowance is separate to the flexibility allowance (i.e. 10%) which is applied to the plan as a whole.* *Understanding the proportion of sites that did not come forward in the past can be a useful tool in this respect. Sites can be discounted individually, or applied as a percentage across the overall land bank. The latter is the simplest approach. Non-delivery allowances have ranged from 20-50% to date, dependent on local circumstances.*	The flexibility allowance is different from a non-delivery allowance and FCC must identify an NDA of 37% to address past UDP failed delivery rates, but also identify a 15% FA to reflect their own evidence base (Arcadis UCS study); by their own admission they estimate this should be 14.4%.

Para 5.62 regarding components of housing supply	***New housing allocations*** *- These should come forward through the candidate site process. They will need to be supported by robust evidence on delivery, phasing, infrastructure requirements and viability. Allocations should comply with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy (PPW)*	The evidence for site allocation delivery, as already intimated, is less than robust/convincing and has ignored sustainable placemaking and sustainable transport.
Para 5.62 regarding components of housing supply	***Rolling forward allocations*** *- Allocations 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 substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable.*	The eLDP has rolled forward failed UDP allocations without any substantial changes in circumstance; some cannot be considered as being sustainable (e.g. STR3B), whilst others (e.g. HN1.1) has not proven delivery or viability.
Para 5.62 regarding components of housing supply (replicated in Para 5.76 regarding economic components)	***Key Sites*** *– Sites key to the delivery of the plan will require greater evidence to support their delivery including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters (in order to support SPG/Development Briefs/Master plans), s106 requirements, infrastructure and costs. Requirements essential to deliver these key sites should be elevated into the policy, supported by a schematic framework.*	The bar is set higher for the STR3A and STR3B sites, yet neither the evidence or policy has followed this guidance
Para 5.62 regarding components of housing supply	***Viability appraisals*** *- Viability appraisals should be prepared by the LPA in conjunction with developers and site promoters for key sites prior to their allocation. SoCG will be prepared to show where there is agreement/disagreement.*	For all (non-strategic) allocations this level of information should be provided, but it has not been followed.
Para 5.107 regarding affordable targets	*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.*	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%).
Para 5.109 regarding infrastructure costs and impact upon site viability	*Where there are costs associated with infrastructure requirements, for example, access improvements or the provision of affordable housing, these should be factored into a viability assessment.*	Significant utility infrastructure has been identified on a number of key sites, yet no evidence is available to show that any viability has been

		produced to demonstrate deliverability is proven.
Para 5.111 regarding infrastructure partners		Identifies parties such as WG (LQAS – re. BMV); Local Health Boards (need for primary health care facilities), Welsh Water, NRW, etc all of whom should be engaged as early as possible to consider capacity and compliance – yet many have not been engaged at all or if so only at the 11th hour following Deposit and at the point of Submission.
Para 5.119 regarding when investment will happen	New development must bring with it the timely provision of infrastructure. The development plan strategy should identify the phasing of development throughout the plan period, linked directly to the delivery of infrastructure. Evidence needs to be in place to demonstrate how infrastructure supports the housing trajectory.	We can see no evidence of this link and consideration of the strategic and non-strategic housing sites and Promoters do not appear to have factored into account infrastructure either in terms of timing and delivery of the allocations or their viability.
PPW11	**What the policy document says**	**J10 Comment**
Para 1.18 : sustainable development	*Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise*	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	*Evidence is needed to support LDP policies which is tested through the Examination procedure.*	The eLDP evidence base is poor and at best falls woefully short of expectations (sic. BMV, Green Wedge, site, plan and affordable viability).
Para 2.15 : sustainable placemaking	*The national sustainable placemaking outcomes should be used to inform the preparation of development plans and the assessment of development proposals.*	Sustainable placemaking has been forgotten in this eLDP.
Para 3.44 : spatial strategy and search sequence *(see also Para 4.2.16)*	*Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional*	The search sequence has not been followed and BMV is used, Green Wedge is used and more sustainable locations have been discounted for no apparent reasoning.

	circumstances and subject to the considerations above and paragraph 3.50 below. The search process and identification of development land must be undertaken in a manner that fully complies with the requirements of all relevant national planning policy.	
Para 3.50 : accessibility	*A broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor's surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport.*	FCC generates significant level sof in-commuting bu this eLDP fasil to address this and then to compound matters seeks to identify new housing/employment sites (e.g. STR3B and others) in unsustainable and disconnected locations as opposed to considering reasonable alternatives.
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, jobs and services that people need in order to create a Sustainable Place. They need to be self-contained and not dormitory towns for overspill from larger urban areas and, before occupation, should be linked to high frequency public transport and include essential social infrastructure including primary and secondary schools, health care provision, retail and employment opportunities. This is necessary to ensure new settlements are not isolated housing estates which require car-based travel to access every day facilities.*	STR3B is effectively a new settlement yet alternatives exist and have been discounted for no valid reason.
3.59 : BMV	*When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in*	The eLDP has flouted this policy and identified BMV on several of its housing allocations, whilst at the same time having ignored all reasonable alternatives.

	lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.	
Para 3.64 : Green Belts and Wedges	*Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative 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.*	No demonstrable need has been provided to justify the Green Wedges and moreover, the review undertaken is unfit for purpose, yet Green Wedge is released to satisfy some housing allocations.
Para 3.68 : green wedge	*Green wedges are local designations which essentially have the same purpose as Green Belts. They may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. Green wedges should be proposed and be subject to review as part of the LDP process.*	The site located off Ruthin Road, Mold does not offer or serve the purposes of being designated as such. It has not been robustly reviewed as part of the eLDP and the review is flawed and unfit.
Para 3.70 : green wedge	*green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term.*	There is no justifiable need to keep the site located off Ruthin Road, Mold as open – it serves no purpose in protecting either statutory designations or providing a buffer.
Para 4.1.15 Para 4.1.31 Para 4.1.32 Para 4.1.37 : sustainable transport		FCC have patently failed to address this in identifying certain housing allocations (sic. STR3B and HN1.6), whilst at the same time ignoring and discounting reasonable alternatives.

Para 4.2.10 : deliverability, trajectory and flexibility allowance	*The supply of land to meet the housing requirement proposed in a development plan must be deliverable. To achieve this, development plans must include a supply of land which delivers the identified housing requirement figure and makes a locally appropriate additional flexibility allowance for sites not coming forward during the plan period. The ability to deliver requirements must be demonstrated through a housing trajectory. The trajectory should be prepared as part of the development plan process and form part of the plan. The trajectory will illustrate the expected rate of housing delivery for both market and affordable housing for the plan period. To be 'deliverable', sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development, in order to support the creation of sustainable communities.*	Few of the housing allocation sites have proven deliverability. Affordable tenure trajectory is unclear as it is not defined.
Para 4.2.12 : specialist housing	*Planning authorities should also identify where interventions may be required to deliver the housing supply, including for specific sites. There must be sufficient sites suitable for the full range of housing types to address the identified needs of communities, including the needs of older people and people with disabilities. In this respect, planning authorities should promote sustainable residential mixed tenure communities with 'barrier free' housing, for example built to Lifetime Homes standards to enable people to live independently and safely in their own homes for longer.*	There is no policy in the eLDP that supports specialist housing needs or indeed quantifies this.
Para 4.2.16 ; housing search	*When identifying sites to be allocated for housing in development plans, planning authorities must follow the search sequence set out in paragraphs 3.43-3.45, starting with the re-use of previously developed and/ or underutilised land within settlements, then land on the edge of settlements and then greenfield land within or on the edge of settlements.*	The eLDP has failed to follow this search sequence, because had it done so sites at Mold, Buckley and Broughton would not have been discounted in favour of sites that are clearly less sustainable, involve BMV and Green Wedge.
Para 4.1.18 : housing led regeneration sites	*Housing led regeneration sites can sometimes be difficult to deliver, making timescales for development hard to specify. Where deliverability is considered to be an issue, planning authorities should consider excluding such sites from their housing supply so*	STR3A should be excluded due to its clear deliverability constraints. As for STR3B this is not a regeneration site but masquerades to be one

	that achieving their development plan housing requirement is not dependent on their delivery. This approach requires planning authorities to put in place a strategy to support the delivery of these sites. The criteria for identifying housing led regeneration sites can include demonstrating the sites have high credentials in terms of sustainable development and placemaking, such as being aligned to transport hubs or addressing contamination or industrial legacy; proven need and demand for housing in that area; and that the proposed intervention is the best means of addressing a site's contamination and constraints.	whereas in actual fact is it a greenfield site in a wholly unsustainable location involving a new settlement.
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' 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.*	No financial viability is evidenced in support of the housing allocation sites.
Para 4.2.20 : affordable levy and viability	*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*	The affordable housing policy is itself unviable yet the housing allocations do not demonstrate that levels of affordable are viable.

	that the provision of community benefits would not be unrealistic or unreasonably impact on a site's delivery.	
Para 4.2.25 : affordable homes for all communities	*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 first occupation and for subsequent occupiers.*	The eLDP makes no clear provision for how need can be delivered on anything but a site located within defined settlement limits.
Para 4.2.32 : affordable led housing	*Planning authorities must make provision for affordable housing led housing sites in their development plans. Such sites will include at least 50% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities.*	The eLDP makes no provision.
Para 5.4.3 Para 5.4.4 : sufficient economic development land	Planning authorities should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level. Development plans should identify employment land requirements, allocate an appropriate mix of sites to meet need and provide a framework for the protection of existing employment sites of strategic and local importance. Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration.	The eLDP has no policy to enable the expansion of existing employment businesses and yet in certain locations the Green Wedge is a "choke" around existing employment sites.

SOUNDNESS ASSESSMENT

The following checklist table provides our assessment on the soundness of the LDP following the Par 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.

SOUNDNESS TEST : Checklist	J10 Response
TEST 1 : Does the plan fit ? (is it clear that the LDP is consistent with other plans?)	
Does it have regard to national policy PPW / NDF and in general conformity with the NDP?	No
Does it have regard to the Well-being Goals?	No comment
Does it have regard the Welsh National Marine Plan?	No comment
Does it have regard to the relevant Area Statement?	No comment
Is the plan in general conformity with the NDP?	No
Is the plan in general conformity with relevant SDP?	Not yet applicable
Is it consistent with regional plans, strategies and utility provider programmes?	No
Is it compatible with the plans of neighbouring LPA's?	No
Has the LPA demonstrated it has exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base?	No
TEST 2 : Is the Plan Appropriate ? (is the plan appropriate for the area in the light of the evidence ?)	
Is it locally specific?	No comment
Does it address the key issues?	No
Is it supported by robust, proportionate and credible evidence?	No
Can the rationale behind the plan's policies be demonstrated?	No
Does it seek to meet assessed needs and contribute to the achievement of sustainable development?	No
Are the vision and strategy positive and sufficiently aspirational?	No
Have the 'real' alternatives been properly considered?	No
Is it logical, reasonable and balanced?	No
Is it coherent and consistent?	No
Is it clear and focused?	No
TEST 3 : Will it Deliver ? (is it likely to be effective?)	
Will it be effective?	No
Can it be implemented?	No
Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?	No
Will development be viable?	No
Can the sites allocated be delivered?	No
Is the plan sufficiently flexible? Are there appropriate contingency provisions?	No
Is it monitored effectively?	No comment

Well Street East
Buckley

Masterplanning Prospectus
March 2021

Castle Green Homes

"Sustainable placemaking for Buckley."

1.0

INTRODUCTION

Introduction

1.1 About Castle Green

Castle Green is a homebuilder with a 35-year heritage and a forward-thinking vision whose base and core business is based in North Wales.

Formerly, MacBryde Homes the company rebranded in 2020 taking on the Castle Green Homes name. The name Castle Green encapsulates the core values behind our team and our homes. 'Castle' conveys the heritage that we have built up over the past three and a half decades; while 'Green' underpins our aspiration to deliver homes in line with the Welsh Government's Green Revolution pledge.

We continue to design and build exceptional homes, as well as deliver the professional and personal service to our customers that has made us one of the most recognised and well-respected housebuilders across North Wales, being active in Flintshire, Wrexham, Denbighshire, Conwy and Gwynedd with over a dozen active sites at any one time.

As one of a select number of homebuilders to hold a 5-star rating in the HBF's prestigious scheme, you can be assured that buying a home from us will be a positive experience and you will receive our support throughout your home buying journey and beyond. We combine a deep appreciation for what it takes to deliver quality homes across North Wales, with a vision to be the most innovative and forward-thinking housebuilder in the region. We're committed to successfully combining the most technologically advanced housebuilding approaches with traditional build methods, whilst utilising complimentary local materials to enhance the surrounding area and using a local workforce, suppliers and sub-contractors.

Our homes are aspirational, yet functional, and are located in areas of high-demand offered across a mix of tenures so that they appeal to a wide-range of purchasers and address the local need. We do this successfully because our team has grown from the very communities in which we develop – we don't simply pretend to understand the local need, we live as part of it and bring our own families up alongside many Castle Green purchasers. Indeed, with a diverse mix of skills and backgrounds, we believe that our team is the very best that exists within the housebuilding sector.

"It's all in the detail".

Introduction

1.2 The opportunity & Vision

This site provides the opportunity to create an attractive, well-placed, well-connected, high-quality residential neighbourhood that reinforces and complements the existing community and offers a mixture of housing types and tenures located on the edge of Buckley that is not only highly accessible to the realm of existing services and facilities in the town but will serve to maximise and deliver the principles of sustainable placemaking.

Locating housing growth on the south-western fringe of Buckley is a logical ambition for the emerging Local Development Plan (LDP) period and this site is capable of providing for **at least 270 new homes.**

Relative to NDP, PPW11 and emerging LDP ambitions, there are a host of key material considerations that reinforce the identification of land for a new residential neighbourhood in this location and there is a clear vision that this site offers, notably:

- The ability to locate development in a principal settlement;
- The benefit of avoiding the release and use of any more sensitive Green Barrier land than is proven necessary;
- Avoiding having to release BMV Grade 1, 2 and 3a land than is found to be necessary;
- Proximity to the town centre; local community facilities (e.g. education and leisure) and established residential neighbourhoods;
- Where managed and enhanced public access provides permeable links and connections through the site for the benefit of existing and future residents, with more than adequate levels of amenity provision on site;
- Key infrastructure links with the A549 (Mold Road), the A494 (Mold Bypass) and beyond to the A55 and its locational advantages close to key sources of major employment;
- The capacity to accommodate the scale proposed and provide sustainable transport links with the town centre;
- No significant environmental or engineering constraints (drainage, minerals, archaeology, ecology and landscape) ;
- Respecting the landscape setting of the locality and retaining key assets (e.g. ancient woodland and valued habitats) to be integrated into the layout, thereby respecting and enhancing the identity of Buckley and positively responding to Its landscape features;
- Sustainable growth point location with respect to accessibility, connectivity, community infrastructure and environment;
- The ability for new housing growth to be integrated into the existing community network and deliver higher quality, more accessible, more resilient and more sustainable community provision;
- The need to deliver a diverse range and portfolio of dwelling types, tenures and sizes;

Indeed, Castle Green consider that positive net gains and benefits can accrue from development and investment here

Flintshire needs to deliver good quality housing choices in order to retain and sustain its existing and new residential population and deliver economic growth. Without new housing in the right places investment will simply locate elsewhere.

Moreover, Flintshire needs to meet its target growth ambitions and to fulfil this they need “deliverable” sites and partners capable of meeting these needs.

2.0

SITE AND SURROUNDINGS

2.0 Site and Surroundings

2.1 The Site

Located on the south-western edge of Buckley this settlement is the second largest town in Flintshire, home to a population exceeding 15,000 residents (more than its neighbour Mold; its name is believed to be derived from the Anglo-Saxon “bok lee” meaning “meadow or clearing in a beech wood”.

The Buckley Bypass (A494) is the main arterial route running around the town and linking with the key routes into the town. Buckley has a railway station located to its east, which has connections to Wrexham and Liverpool.

Flint and Chester railway stations, to which Buckley is connected by regular bus services is not much further, and has direct trains to Cardiff, London and Manchester. Through the day there are frequent buses from Buckley to Mold, Chester and Wrexham as well as other nearby towns (including Denbigh, Holywell and Ruthin) and surrounding villages.

Figure 1 - The site location

2.0 Site and Surroundings

2.1 The Site

The site is located and benefits from direct vehicular access off the eastern side of Well Street. A Bus stop is located on Bryn Awelon and the 21/21A bus service route presently runs along Bryn Awelon and Well Street, connecting back into the town centre and railway station.

The site itself comprises a regularly shaped and generally topographically level field that is visually contained and enclosed by the existing Bryn Awelon housing estate to the north, some more challenging levels to its far east which are enclosed by dense tree cover with housing beyond, ancient woodland and a brook running along the southern perimeter and the existing farmstead of Bistre Cottage Farm and Well Street to the west. It therefore offers a very logical infill opportunity that would "round-off" the settlement.

The site extends to a little over 12 hectares (30 acres) and Castle Green Homes believes it has a capacity for at least **270 new residential dwellings**, supported by quality levels of meaningful POS, public accessibility connections and SUD's.

Figure 2 - The site location in wider context

2.0 Site and Surroundings

2.2 Local Facilities and Services

The site is highly accessible and within easy walking and cycling distance of Buckley town centre; it is well served by facilities available in Buckley including, inter alia:

- Library and Museum
- Police and Fire Station
- Hawkesbury and Nant Mawr Road community centres
- Several medical healthcare practices including Roseneath, Marches, Clwyd House and Bradleys
- Buckley Town Football club, Cricket club, Bowls Club
- The Buckley Leisure Centre located at the Elfed HS campus
- Various places of worship across religious denominations; including Bistre Emmanuel Parish Church, St Matthews, Our Lady of the Rosary and St John's

There are four primary schools in proximity to the site which include :

- Southdown Primary School on Linderick Avenue
- Westwood County Primary on Tabernacle Street
- Mountain Lane Primary School on Knowle Lane
- Drury Primary School on Beech Lane

Secondary education facilities are available at the Elfed High School on Mill Lane; whilst additional provision is also accessible at the Argoed High School in Bryn-y-Baal and the Alun School in Mold. A host of pre-school establishments are available.

Further facilities include several large supermarkets (Iceland, Aldi, Spar and a Home Bargains), a range of other independent convenience and comparison good retailer outlets, a Post Office, restaurants, bars and public houses. The Tivoli is a well-known music and dancing hall venue.

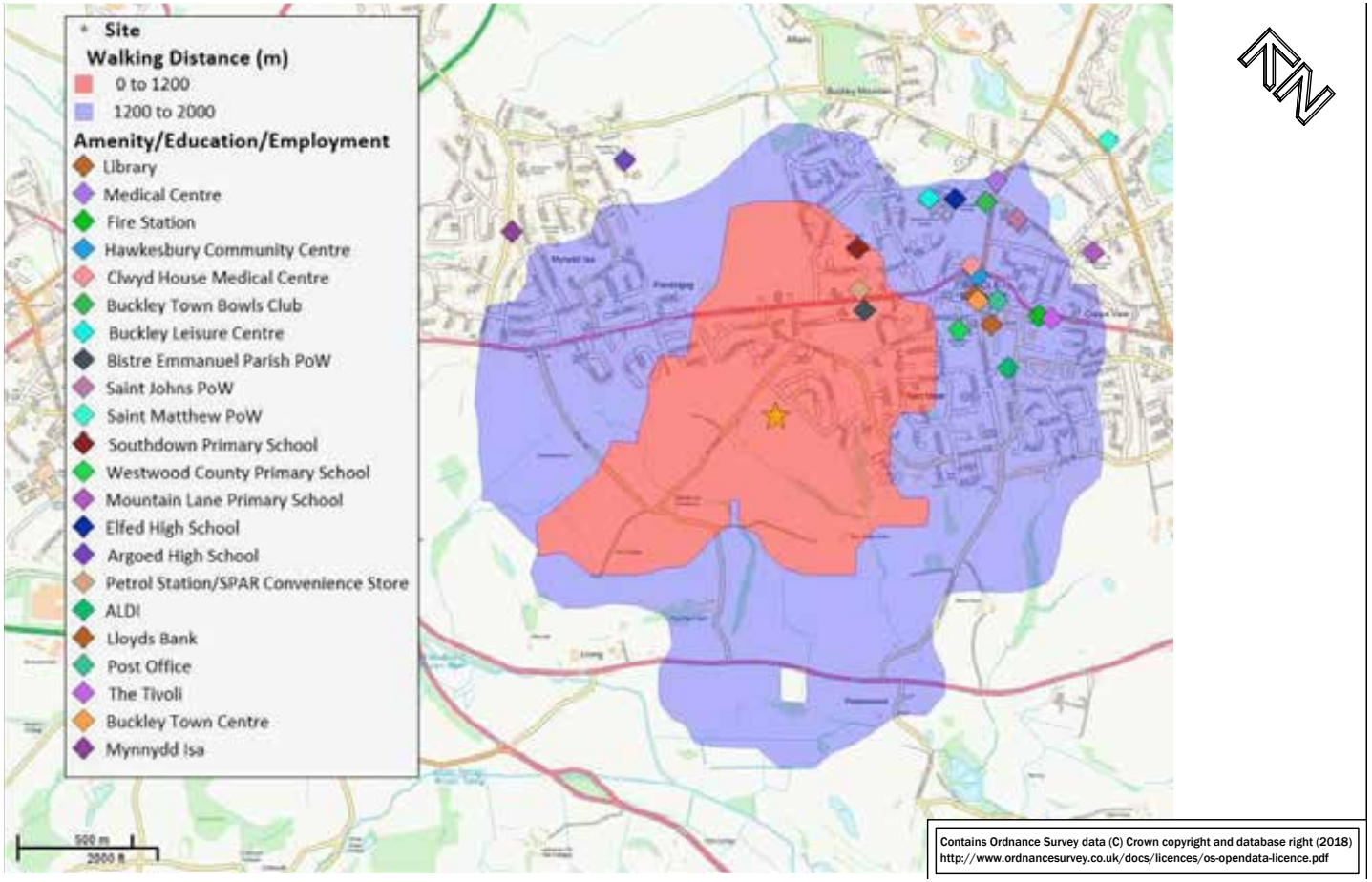


Figure 3 - Walking distances to existing Local Amenites

2.0 Site and Surroundings

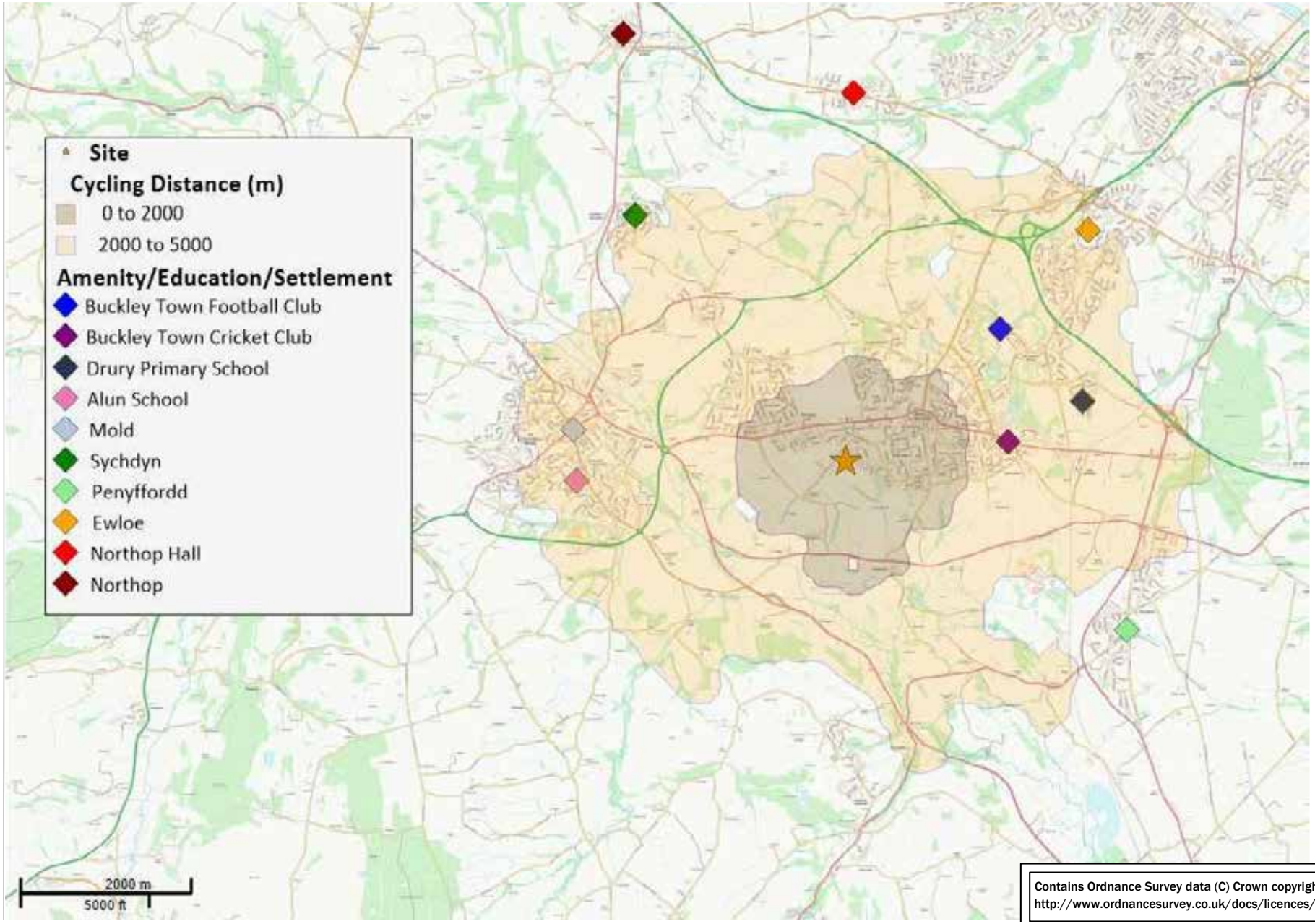


Figure 4 - Cycling distances to existing Local Amenites

2.0 Site and Surroundings

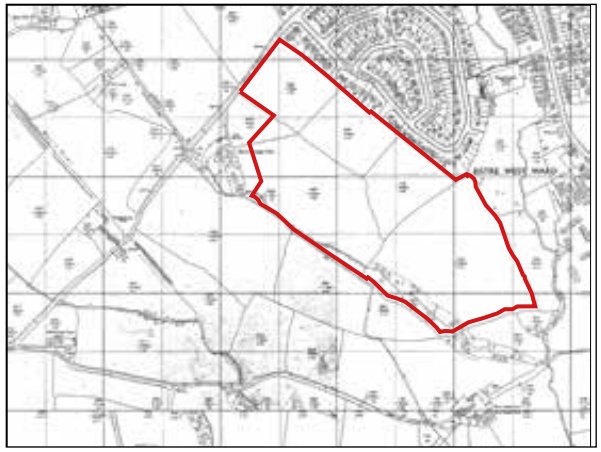
2.3 Historical Development

The sites immediate context has developed over the past 100 years in terms of housing.

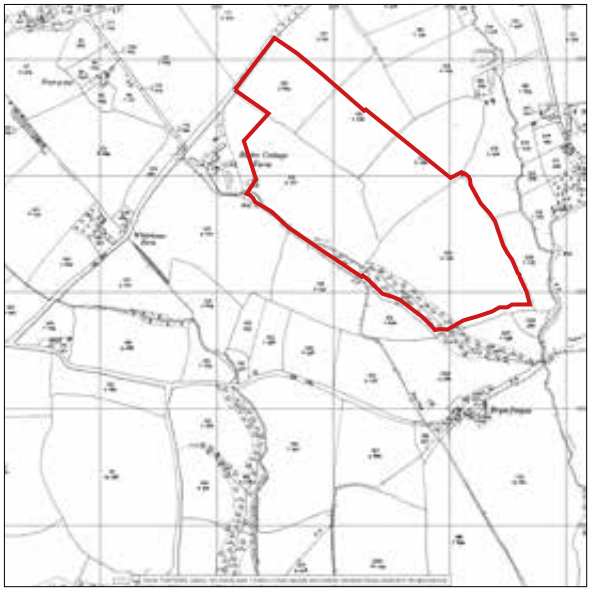
The map of 1912 shows the site as being divided into 5 field parcels. Bistre Farm Cottage is labelled to the boundary of the site and the ancient woodland is shown to the south. Individual properties are dotted around the immediate area for example Whitehouse Farm and Bryn-Faigas.

By 1961, there has been residential development to the north east of the area. The site itsellf appears unchanged in character. The surrounding road networks also appear to be unchanged from 1912 and the larger individual properties are still there.

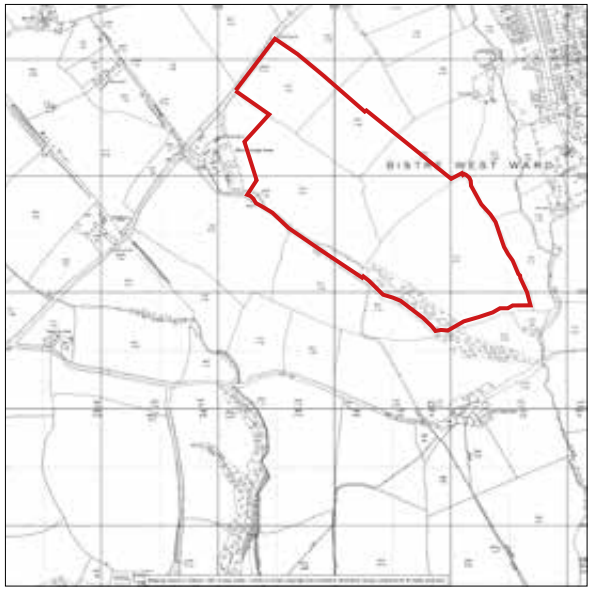
By 1977 a large amount of residential properties have been developed to the north east of the site labelled as Bistre West Ward. This expansion has moved across to the the north and north west by 1989. The site now is separated into 6 field parcels which seems to happened somewhere between 1961 an 1977. Since then no change appears.



1977

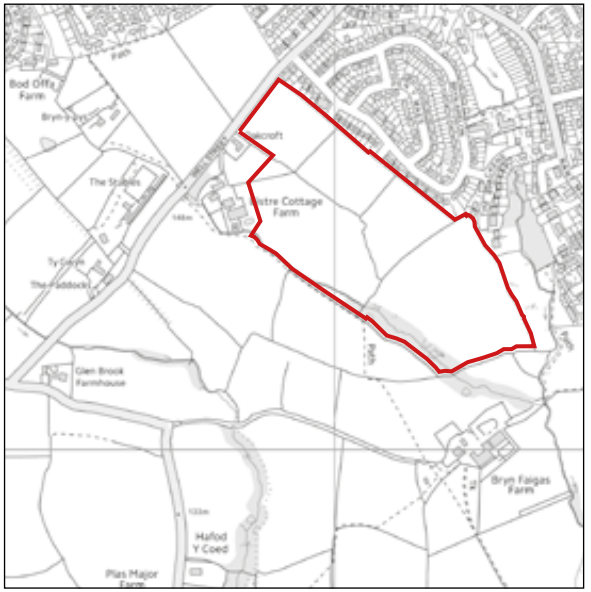


1912



1961

1989



Now

Figure 5 - Historical Development

3.0

POLICY CONTEXT

3.0 Policy Context

3.1 Flintshire County Council :Historical Policy Context

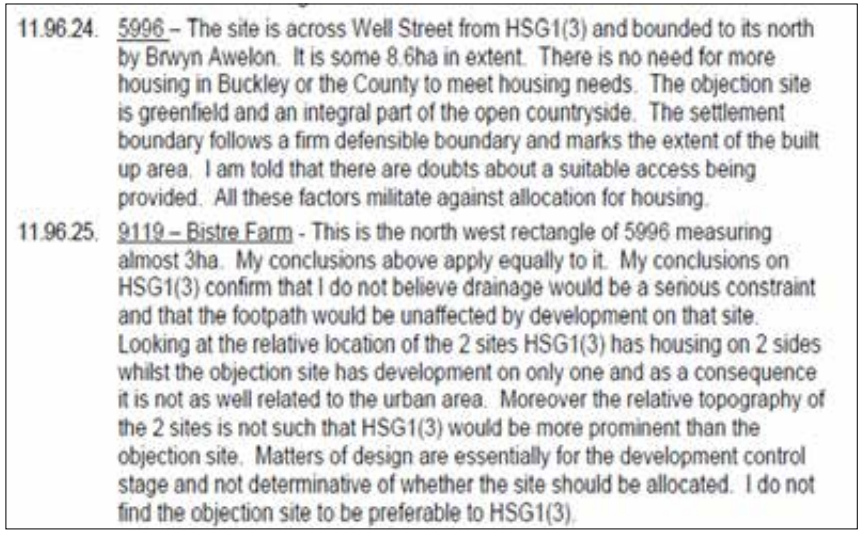
The planning system should contribute to building a strong economy, boost the supply of housing to meet present and future needs, whilst also protecting and enhancing the natural, built and historic environment.

Castle Green wish to explore the ambitions set out in this Prospectus with the Council and work in partnership with them, the local community and statutory stakeholders in delivering an exciting new residential development opportunity within the framework of the emerging development plan.

This means that not only should Flintshire Council be looking for the most sustainable locations for growth but those than can deliver social, environmental and economic benefits. Castle Green Homes consider that this site offers the opportunity to deliver not just much needed new housing, but community betterment and economic benefits that will sustain Buckley and its public services and facilities into and beyond the plan period for the next generation.

The Flintshire UDP was adopted in September 2011 and its plan period (for the purposes of housing and employment allocations) was 2000 through to 2015.

The pre-cursor to the UDP being adopted was a UDP Inquiry where the Inspector concluded (in his Report dated May 2009) the following in relation to the site:



11.96.24. 5996 – The site is across Well Street from HSG1(3) and bounded to its north by Brwyn Awelon. It is some 8.6ha in extent. There is no need for more housing in Buckley or the County to meet housing needs. The objection site is greenfield and an integral part of the open countryside. The settlement boundary follows a firm defensible boundary and marks the extent of the built up area. I am told that there are doubts about a suitable access being provided. All these factors militate against allocation for housing.

11.96.25. 9119 – Bistre Farm - This is the north west rectangle of 5996 measuring almost 3ha. My conclusions above apply equally to it. My conclusions on HSG1(3) confirm that I do not believe drainage would be a serious constraint and that the footpath would be unaffected by development on that site. Looking at the relative location of the 2 sites HSG1(3) has housing on 2 sides whilst the objection site has development on only one and as a consequence it is not as well related to the urban area. Moreover the relative topography of the 2 sites is not such that HSG1(3) would be more prominent than the objection site. Matters of design are essentially for the development control stage and not determinative of whether the site should be allocated. I do not find the objection site to be preferable to HSG1(3).

Figure 6 - Extract taken from Inspector's Report 2009

Thus, at that time, there were considered to be sufficient sites available for housing release in Buckley most notably the Welsh Government owned site (site HSG1(3)) being allocated.

The trouble is that this site has failed to come forward and Castle Green are of the opinion that the LDP now offers an opportunity for a "review and re-set"; the planning system has moved on and there is no reason why any extant UDP allocation is simply "rolled forward" and it is no longer a question of which site should be allocated first but about deliverability and sustainable housing need.

Castle Green Homes and the landowners have undertaken a series of assessments, including key highway access and junction capacity modelling, which demonstrates that access can be achieved and that even should the WG owned site come forward there is a junction solution to satisfy both sites and network capacity without any need for any significant off-site improvements.

3.0 Policy Context

3.2 Flintshire County Council UDP: Buckley

The Welsh Government site (HSG1(3) Well Street) was allocated in the UDP for 162 dwellings and the site extends to 5.2 ha. It has failed to come forward, but it is now being promoted by Clwyd Alyn Housing Association and a pre-application DMO consultation exercise was undertaken in July 2020 and an EIA Screening assessment in December 2020 for a scheme involving up to 150 dwellings. Given the topographical levels challenges that exist we would question the assumed density being proposed. Additionally, despite the recent promotional activity no formal planning application has been submitted and it is unclear whether CAHA have agreed formal terms with WG or indeed have managed to overcome and address other technical site constraints.

What is known is that the site generated significant local opposition during the consultation stage and that community support is not apparent. Furthermore, the deliverability credentials for the site have not been proven.

On the other hand, the Well Street East site being promoted here is subject of an exclusive legal option agreement between the owners (a single entity) and Castle Green Homes to bring this forward as soon as practicably possible.

This site is located on the very edge of Buckley's built-up settlement boundary and located beyond the more sensitive designations and strategic gaps located elsewhere around Buckley.

Indeed, the UDP Proposals Map extract illustrates this perfectly. There are Special Areas of Conservation/Sites of Special Scientific Interest located around the northern and eastern perimeters from Buckley Mountain around to Drury; strategic open spaces and common land areas off Alltami Road, at The Common and off Drury Road; Green Barrier to the east and south east around Drury, Lane End and Spon Green and a strategic open gap separating Buckley and Mynydd Issa at Prenbrigog.

It lies In a most logical and unencumbered location and there are no legal constraints or any technical impediments in bringing this site forward for development.

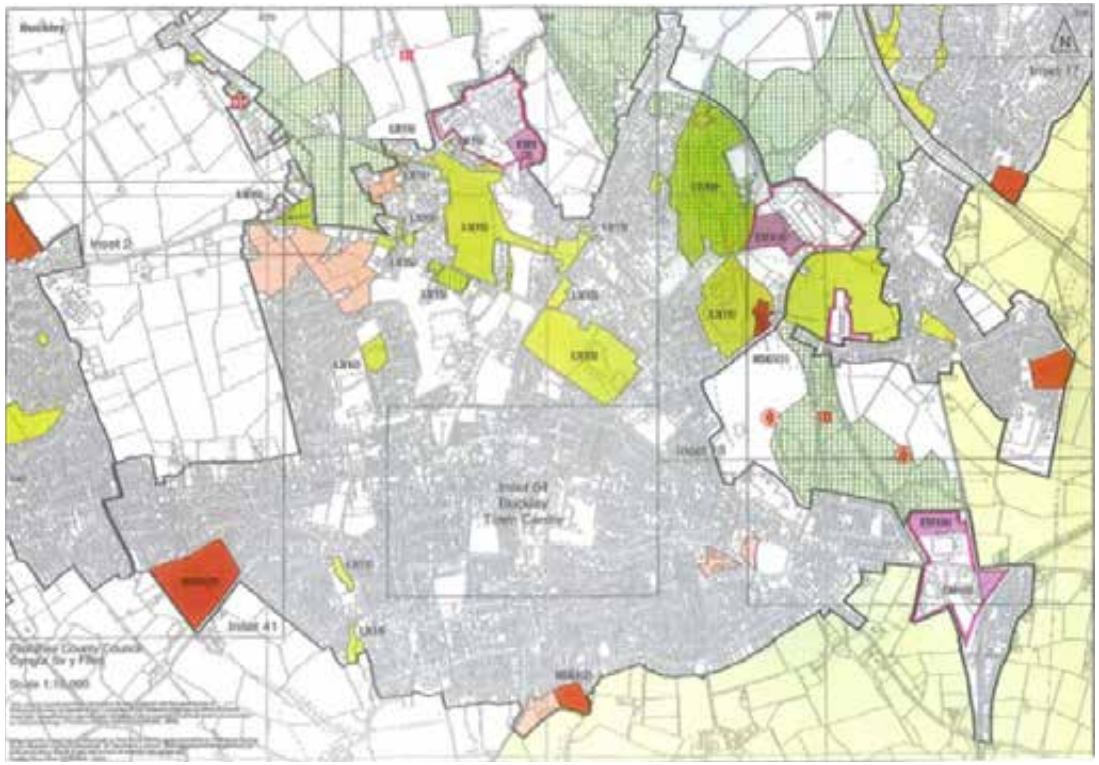


Figure 7 - Flintshire County Council UDP

3.0 Policy Context

3.3 Flintshire County Council Emerging LDP:Buckley and beyond

The Council have made reasonable progress in producing a replacement plan for the UDP and the emerging LDP proposes a plan period of 2015 to 2030.

The eLDP identifies Buckley as a Main Service Centre where new growth ought to be located.

The 2017 consultation document identified a series of "Candidate Sites" as the plan illustrates; this site was identified as a Candidate site (references BUC023 and BUC036) which might be an option and come forward for development.

The longstanding UDP Housing Allocation site (ref. BUC031) has, as we have already discussed above, yet to be realised, but Castle Green Homes believe that the Authority cannot wait for this site to be delivered and regardless of its current promotional status there is a complementary need to deliver housing in this most sustainable of locations, so there is an opportunity for more than one site.

Castle Green believes that whilst Green Barriers ought to have been reviewed, along with a BMV appraisal and strategic floodrisk assessment as part of the eLDP process it is important that realistic and sustainable alternatives are not discounted prior to releasing land that clearly might conflict with these over-arching principles and technical constraints.

Castle Green considers this site to be a perfect example of logically located land release which can meet sustainability objectives. It is physically and visually contained and enclosed on all sides by strong and permanent defensible boundaries. Thus, it removes the pressure in releasing Green Barrier, BMV and technically challenging and tricky to develop sites over the impending plan period.

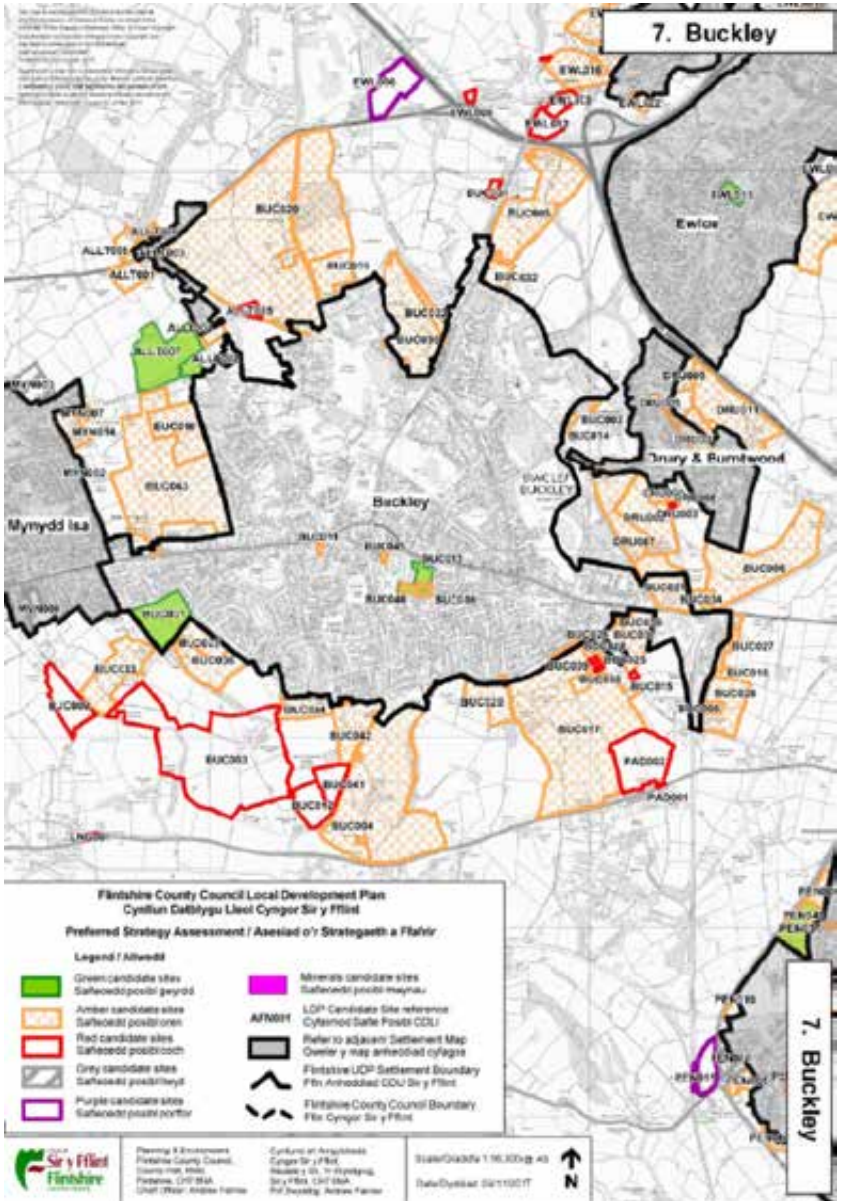


Figure 8 - Emerging Canditive Sites

The Welsh Planning system is all about deliverability of sites and a housing trajectory that, unlike previous plans, do not fail.

4.0

ENVIRONMENTAL & TECHNICAL APPRAISAL

4.0 Environmental & Technical Appraisal

4.1 Levels

The overall site area is just over 12 ha in size with a maximum level of approximately 156.75mAOD in the north corner generally sloping to the south east corner with a level of approximately 127.00mAOD, e.g. a total difference of 29.75m. The site is made up of five separate improved pasture fields separated by hedgerows, generally with associated ditches, which have been planted on top of a series of low elevated bunds. There is a watercourse running generally south west to north east along the southern boundary that lies within a steep sided wooded valley along the south east boundary.

For convenience the description of existing site levels has been split into individual field references as noted on the topographic survey. It Is clear that the most challenging and lowest points of the site comprise those within Field 4 and the lower southern perimeter of Field 5; which offer naturally formed surface water and SUDs drainage capabilities.

This has Informed the structural layout of the site as the concept layout illustrations show.

4.0 Environmental & Technical Appraisal

Field 1
The levels fall generally in a north east to south west direction from a maximum level of approximately 156.75mAOD to 150.75mAOD giving a total fall across the field of approximately 6m with an average gradient of approximately 1:17.

Field 2
The levels fall generally in a north east to south west direction from a maximum level of approximately 156.50mAOD to 149.75mAOD giving a total fall across the field of approximately 6.75m with an average gradient of approximately 1:15.

Field 3
The main area of the field falls generally in a north to south direction from a maximum level of approximately 154.00mAOD to 150.25m AOD at a mid-position along the south boundary. The total fall across the main field is approximately 3.75m with an average gradient of approximately 1:35. The steeper east area of the field generally falls from a north east to south west direction from a maximum level of approximately 150.25m AOD to 145.25 giving a total fall across this section of field of 5m with an average gradient of approximately 1:15.

Field 4
There is small reasonably level area mid-way along the north west boundary of the field, however the main area of the field falls steeply towards the south east corner of the site from a level of approximately 150.00m AOD to 127.00m AOD. The total fall is approximately 23m with an average gradient of 1:10. It is proposed locate the foul water pumping station and surface water storage structure in the steeper south area of the field.

Field 5
The levels fall generally in a north east to south west direction from a maximum level of approximately 152.00mAOD to 140.00m AOD giving a total fall across the field of approximately 12.00m with an average gradient of approximately 1:15. The lower south area of the field has an average fall of approximately 1:10, therefore it is proposed to construct a vertical retaining structure approximately 3.0m high along the boundary of the site to create a more level development area.

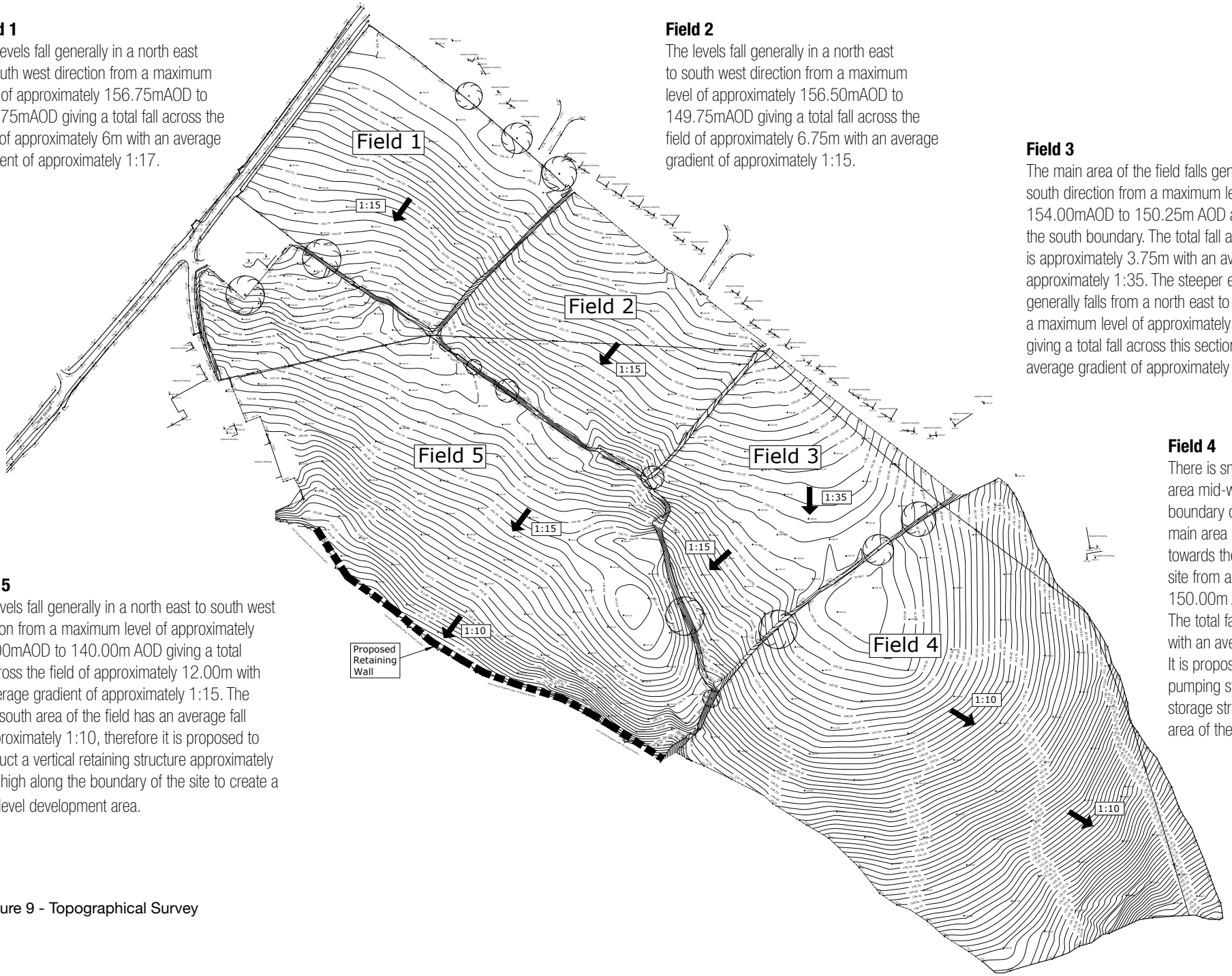


Figure 9 - Topographical Survey

4.0 Environmental & Technical Appraisal

4.2 Utilities

The immediate area to the site is well served with existing electric, gas, water and telecommunications main utility services and so it is not anticipated that there will be any issues with providing utility connections to serve the proposed development, be these new, enhanced or reinforced.

Electricity

The existing electricity network in the vicinity of the site is under the ownership of Scottish Power and they are referred to as the Distribution Network Operator (DNO). The local electricity distribution network in the immediate vicinity of the site comprises of underground LV (415 volts) and HV (11,000 volts) cables. There are HV underground cables entering the site off Bryn Awelon mid-way along the north site boundary. The underground HV cables become overhead HV cables via. a pole mounted transformer (Ref. 07/2763/008/P-Bistre West) that cross the site to Bistre Cottage Farm to the west and along the north east/ east boundary. The overhead HV cables crossing the site from east to west terminate at the pole mounted transformer (Ref. 07/26663/020/P-Bistre Cottage Farm) where underground and overhead LV cables provide electric services to Oakcroft and Bistre Cottage Farm.

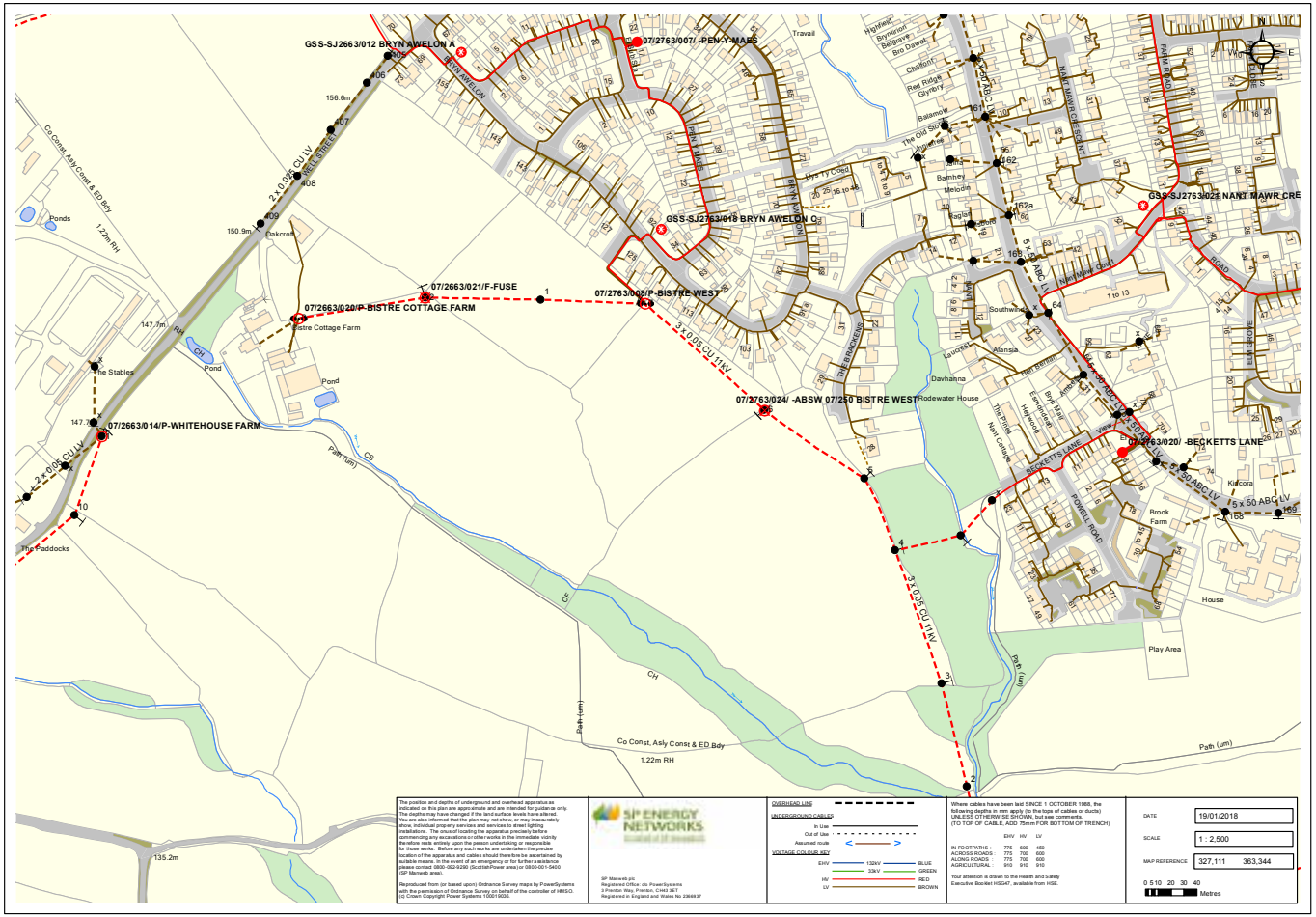


Figure 10 - Electricity search

4.0 Environmental & Technical Appraisal

4.2 Utilities

Gas

The existing gas network in the area is owned and operated by Wales and West under its Gas Transportation License. The Wales and West gas service records indicate that there is a 180mm PE LP (Low Pressure) gas main present in Well Street adjacent to the north corner of the site along with 180, 125, 90 & 63mm PE LP mains in the immediate vicinity of the site.

Water

The existing water network is owned and operated by Welsh Water and they have confirmed that there are distribution water mains located within the vicinity of the site. The water main records show that there is an existing 6" AC water main in the footpath of Well Street adjacent to the north corner of the site boundary. There are also 4" AC water mains serving the existing properties adjacent to the north boundary of the site.

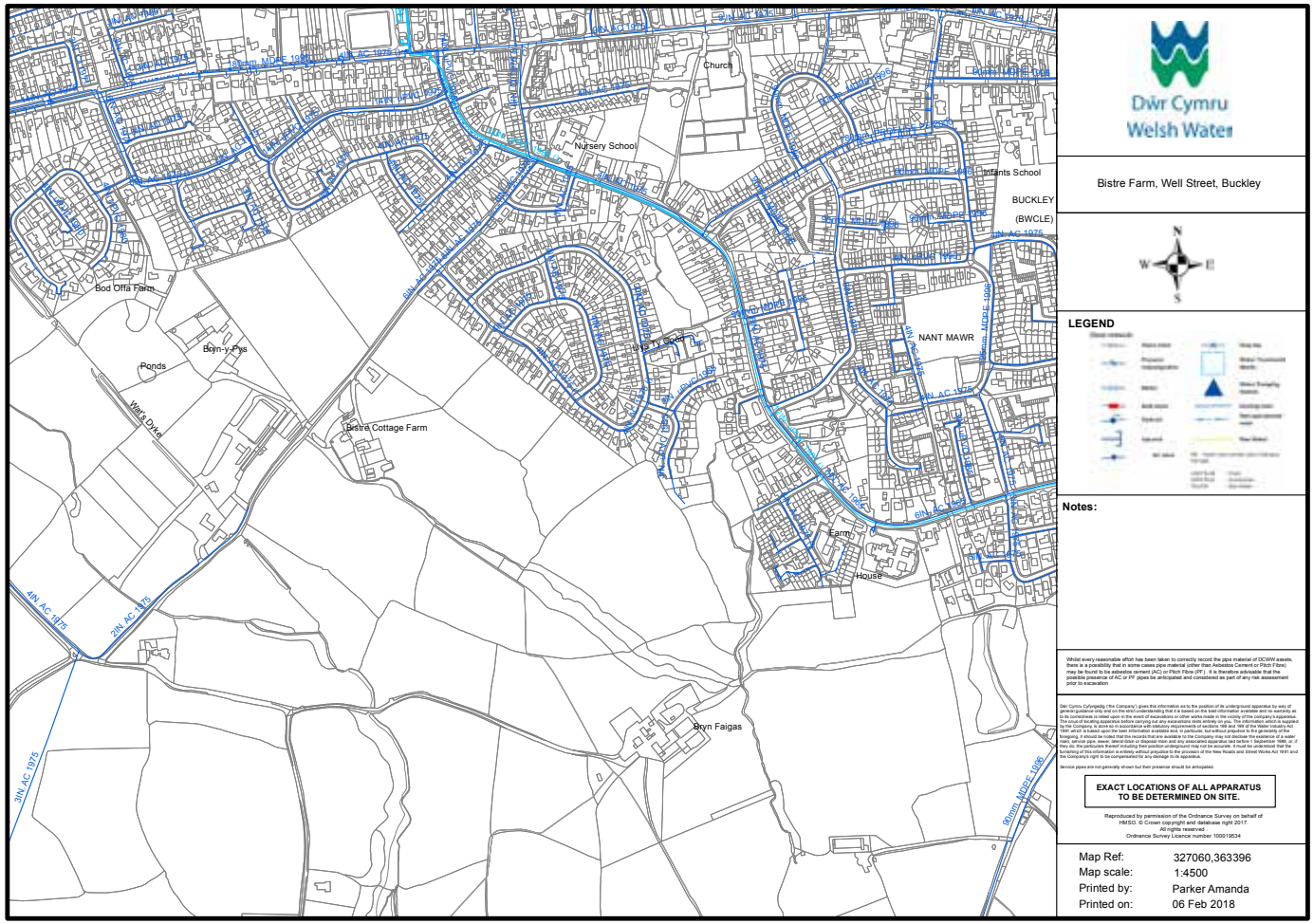


Figure 11 - Welsh Water search

4.0 Environmental & Technical Appraisal

4.2 Utilities

Telecommunications (BT)

The BT Openreach service plan shows that there are BT cables within Well Street along the frontage of the proposed development and within the adjacent area. BT are currently offering to provide new developments with ultrafast broadband speeds via. their Fibre to the Premise (FTTP) product. BT currently advise that they will provide FTTP to the site within 9 months of signing a supply agreement.

Conclusion

The immediate area to the site is well served with existing electric, gas, water and telecommunications main utility services and so it is not anticipated that there will be any issues with providing new utilities to serve the proposed development.

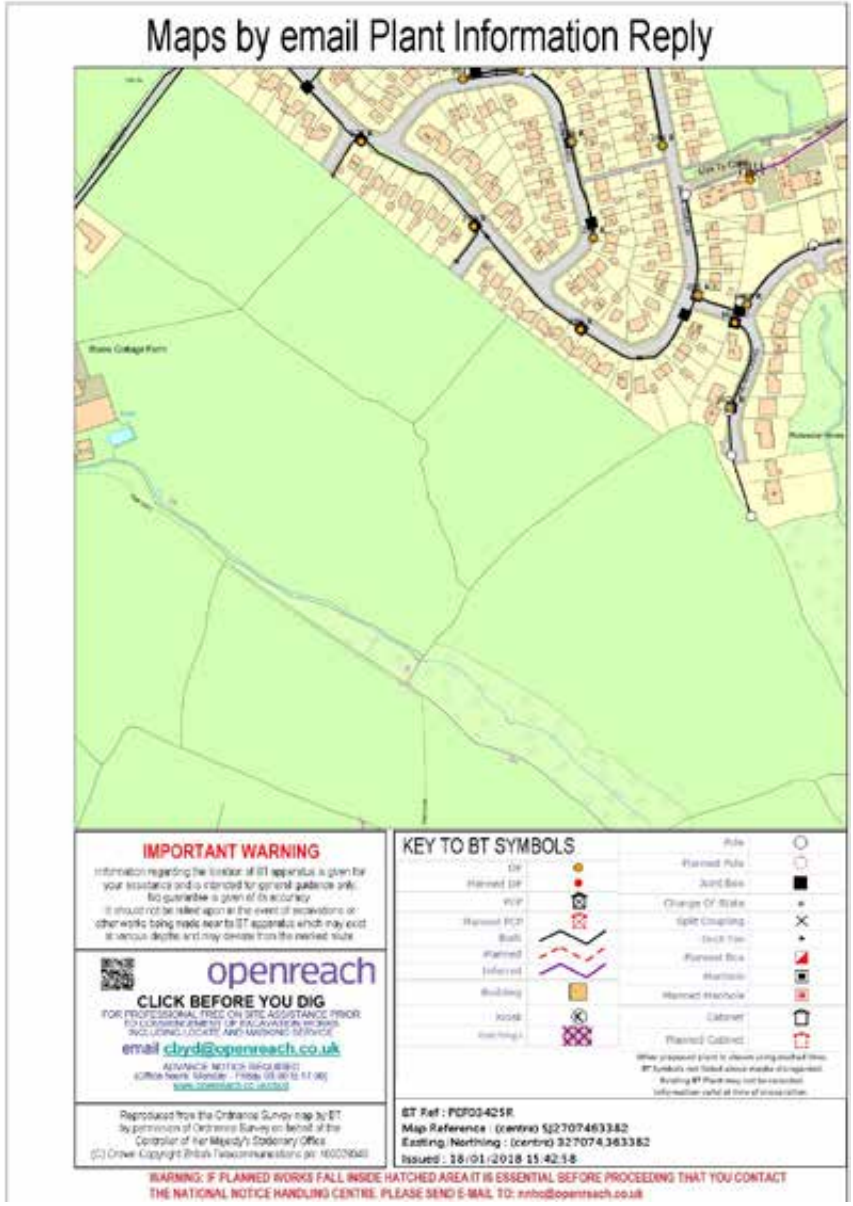


Figure 12 - Telecommunications search

4.0 Environmental & Technical Appraisal

4.3 Trees

Surrounding the boundaries and within the site are existing trees and hedgerows. Existing boundary trees and hedges of value will be retained where practicable. The illustrative masterplan has managed to take account of retention and opportunities to provide new features are clearly available within this mature landscaped setting, that provides strong defensible boundaries with the ancient woodland belt to the south and therefore visual containment which provides a sense of mature placemaking.

Photo 1 - T1 (Oak) located outside western boundary

Photo 3 - T3-T5 located within residential garden outside northern boundary

Photo 2 - T2 (Ash)

Figure 13 - Tree survey

4.0 Environmental & Technical Appraisal

Photo 4 - T6 & T7 - small hedgerow trees that appear stressed & in decline

Photo 5 - Partial root plate failure to T11 resulting in lean to east

Photo 6 - G2 -G5 - unmanaged Hazel & trees along southern boundary

Figure 14 - Identification of trees on and around the site

4.0 Environmental & Technical Appraisal

4.4 Ecology

An Ecological assessment has been carried out to identify any ecological constraints which should be considered during any future development of the site. These surveys aimed to identify habitats and species which are either of importance in terms of their conservation value and/or are afforded statutory legal protection.

Pasture and Hedgerows

The site principally comprises a series of sheep-grazed, improved pasture fields divided from one another by species-rich hawthorn hedgerows with occasional oak and ash standard trees. There is a block of semi-natural, ancient, broadleaved woodland located along the eastern half of the site's southern boundary (Target Note 6 on the adjacent Habitat Plan).

A further block of semi-natural ancient woodland is located to the northeast of the site (Target Note 7). A shallow brook flows along the southern boundary of the site. Well Lane runs along the western boundary of the site. The fields are divided from one another by a network of hedgerows, which offer species-rich conservation value.

The hedgerows are mostly intact and are located on small hedge banks. Several of the hedgerows support mature oak and ash standard trees. Some of these trees offer potential bat roosting habitat. Some short sections of hedgerow may need to be removed to provide site access. Where this is necessary, this can be kept to a minimum and new replacement planting can be introduced to compensate for any loss.

Pond and Stream

A small pond is located within a steep, scrubby depression immediately outside of the study area (Target Note 4), which measures approximately 5m x 9m in area. The scrub area comprises of dense bramble and common reed with tall willow and poplar. The pond is heavily shaded by the surrounding scrub and supports no aquatic vegetation. The edges of the scrub are stock fenced. A narrow stream flows along the southern boundary of the site. The stream is approximately 5cm deep and approximately 40cm wide. The steam has an earth substrate and supports no aquatic vegetation. The stream is located within a shallow ditch. Adjacent vegetation comprises of coarse grasses with nettle and creeping buttercup.

Ancient Broadleaved Woodland

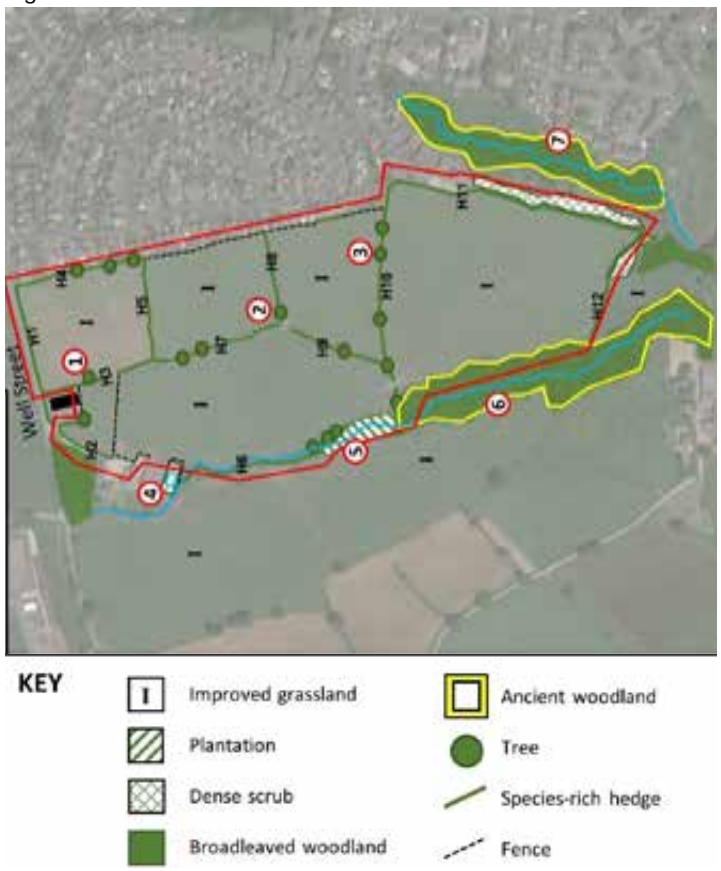
There is a block of broadleaved woodland located on the southern boundary of the site at Target Note 6. COFNOD identified the woodland as being of ancient origin. The woodland comprises of mature oak and ash trees with holly, hawthorn and sycamore. The woodland is located along the sides of a steep clough. The watercourse identified at Target Note 5 flows through the bottom of the clough. The woodland ground flora comprises of bramble and ivy with patches of dog's mercury, herb Robert and tufted hair-grass. Ferns present include broad buckler fern, male fern and hart's tongue fern.

Lighting proposals for the site should ensure that artificial light spill onto the woodland is kept to a minimum, ideally with a dark corridor retained along the woodland edge

Bats

The Survey also considered the site's suitability to support protected species. Species considered during the assessment included bats, badgers, breeding birds and great crested newt. The overall landscape is considered to support habitats of relatively high value to bats. The residential properties to the north and the nearby areas of mature woodland offer suitable roosting habitat; the network of intact, species-rich hedgerows provide good habitat linkages and offer suitable foraging habitat; and the presence of several large linear blocks of mature broadleaved woodland in the locality also offer good quality foraging opportunities. It is recommended that a bat box scheme is produced for the site. Bat boxes should be built

Figure 15 - Habitat Plan



Swift Bricks

Bat Bricks

4.0 Environmental & Technical Appraisal

into the south facing gable ends of new houses ideally adjoining the southern and eastern site boundaries.

Badgers

Badger field signs comprising of prints and badger latrines were identified within the woodland at Target Note 6 and within the adjacent pasture fields. No badger setts were identified along hedgerows within the site itself. Nor were any badger setts identified within the woodland block at Target Note 6.

Breeding Birds

The hedgerows, woodland and scrub habitats are likely to be used as nesting and foraging habitat by common woodland, farmland and garden bird species. A bird nest box scheme should be developed for the site. Nest boxes should offer suitable breeding habitat for a variety of bird species and can be built into new housing and fitted to retained mature trees.

Great Crested Newt (GCN)

GCN are widespread within Flintshire County and Wrexham County Borough and certain sites, have been designated Sites of Special Scientific Interest (SSSI) and Special Areas of Conservation (SAC) for their important GCN populations.

As the accompanying SAC plan illustrates, unlike many of the candidate sites being promoted through the eLDP (indeed almost all land to the north and east of Buckley), this site is not affected by GCN's.

A single pond is identified within 250m of the study site, but the study site itself offers terrestrial habitats of relatively low value for great crested comprising principally of intensively grazed pasture. Hedgerows at the site offer some suitable great crested newt habitat as do the blocks of broadleaved woodland which lie along the site's southern boundary. It is considered to be unlikely that great crested newt would be present at the proposed development site. Nevertheless, green corridors can be retained through the site via the retention of existing hedgerows and through the provision of additional hedgerow planting and the creation of new semi-natural habitats at the site (wildflower meadow, wildlife ponds, scrub and woodland planting etc).

Appendix I Relevant SAC boundaries

Map 1 Deeside & Buckley Newt Site SAC and 500m buffer – ***in addition wildlife corridors linking the compartments and buffer should also be considered as key habitats.***

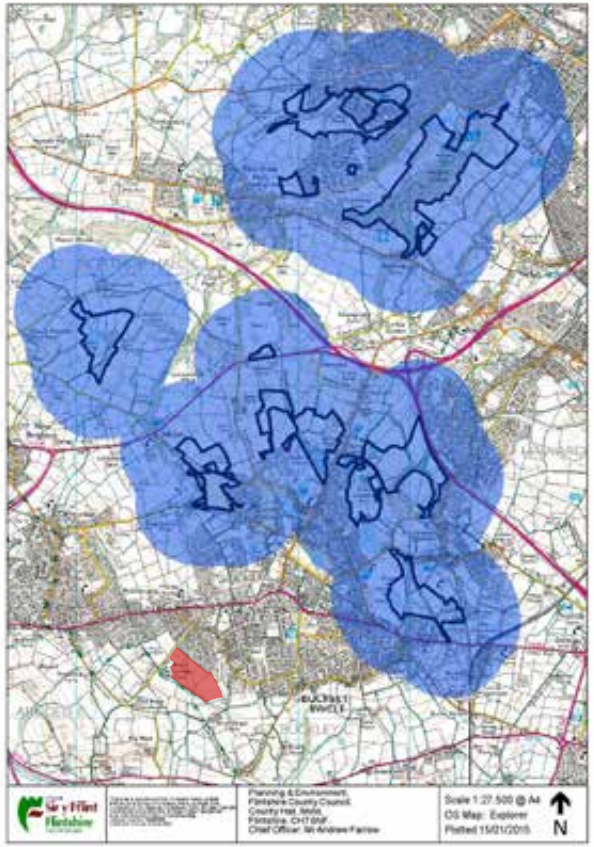


Figure 17 - Areas recorded with Great Crested Newts in comparison to our site

Photograph 7- Plantation woodland at Target Note 5

Figure 16 - Habitat identified on site

4.0 Environmental & Technical Appraisal

4.5 Drainage/Flood Risk

Surface Water Drainage

The hierarchy of surface water discharge has been followed in line with Part H3 of the Building Regulations in order to propose an 'in principle' viable and appropriate post-development surface water drainage solution for the subject site.

The issue of surface water drainage to the proposed development has been considered with reference to the hierarchy of surface water disposal as noted in Standard S1 of the Welsh Government publication 'Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems':

i) Sustainable Urban Drainage Systems (SUDS)
ii) Discharge of surface water off site direct to watercourse
iii) Discharge to adopted sewer

SUDS are made up of one or more structures built to manage surface water runoff. They are used in conjunction with good management of the site to prevent flooding and pollution. There are four general methods of control:

- Filter strips and swales
- Filter drains and permeable surfaces
- Infiltration devices
- Basins and Ponds

A study of the Wardell Armstrong Phase 1 desk study report for the site together with a review of the available BGS geological maps and local borehole records indicates that the site is underlain by relatively impermeable clay deposits to a depth of circa 5.5m. On this basis, the use of post-development surface water drainage via infiltration (soakaway) techniques appears unlikely.

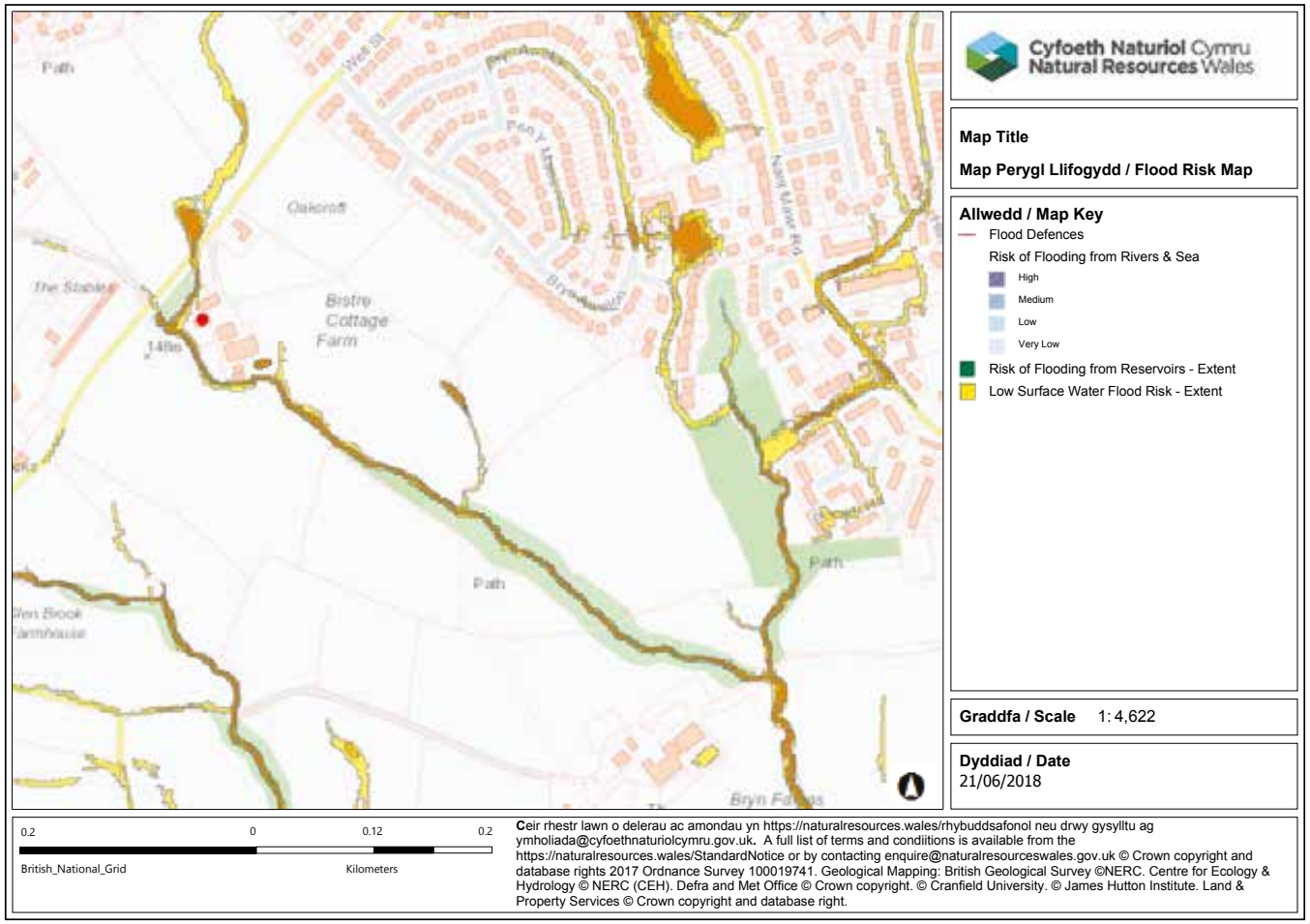


Figure 18 - Surface Water Flooding Map

4.5 Drainage/Flood Risk

It is therefore proposed that pre-planning submission discussions are held with the Lead Local Flood Authority (LLFA) and SuDS Approving Body to agree whether there is a requirement for trial pits excavations or soakaway tests to verify the relative impermeability of the shallow drift soils.

The outline proposals for post-development surface water drainage to the site are to connect to the existing on-site watercourse system – to work with the existing topography, this connection is likely to be towards the 'low point' of the site where the existing watercourse runs within an Ancient Woodland along the southern site boundary. A new headwall will be constructed on the northern bank of this section of watercourse which will require LLFA or National Resources Wales consent.

Post-development surface water would discharge to this watercourse at greenfield runoff rates in order to mimic current conditions with appropriate SuDS measures such as attenuation ponds being employed on the site. A hydro brake flow control device will be utilised upstream of the new headwall in order to restrict flows to greenfield runoff rates.

The post development surface water drainage system will be designed to ensure that:

- There is no surcharge in the 1 in 1 year event
- Surface water flows remain on site in up to a 1 in 100 year + 40% climate change storm event.

The post-development surface water management proposals will be subject to the approval of The SuDS Approving Body following the introduction of this approval process and associated standards in Wales in January 2019.

Foul Water Drainage

Preliminary advice received from Welsh Water through pre-application enquiries is that there may not be sufficient capacity in the existing adopted sewer system to accommodate foul flows from the post-development site.

Accordingly, we are currently in liaison with Welsh Water (WW) regarding potential hydraulic modelling assessment exercises in terms of the capacity of both the existing WW adopted sewer network and the Wastewater Treatment Works at Buckley to accommodate foul flows from the post-development site.

Subject to the outcome of the above exercises, the site topography lends itself to drainage of post-development foul water flows to a pumping station in the south east corner of the site from where foul flows can be pumped via a rising main to a new manhole allowing a short gravity connection to the agreed connection point to the WW adopted sewer network.

The detailed design of the on-site foul sewer network inclusive of pumping station and rising main will be subject to WW approval in due course.

Our findings would indicate that no one site (over another) will be able to prove they have an unfettered right to discharge and so from a deliverability point of view Welsh Water is unable to commit to either capacity or cost implications. What is clear is that a foul connection is likely to involve an abnormal development cost that only fully deliverable sites will be capable of satisfactorily addressing.

4.5 Drainage/Flood Risk

Flood Risk

Flood risk in assessed in relation to new residential development using Technical Advice Note (TAN) 15: Development and Flood Risk (2004). The Development Advice Map (DAM) is published by Natural Resources Wales and is used to assess whether the development site is at risk from flooding – this is also to be read in conjunction with TAN15. Referring to the DAM for the subject site, it is evident that it is not affected by flooding from rivers, seas or reservoirs i.e. the site lies in Zone A. As the entire site lies in Zone A, the requirements of the Justification Test are met in full.

The Flood Risk Assessment Wales map shows a localised medium surface water flood risk associated with the watercourse that extends along the southern site boundary and also an on-site drainage ditch and associated low-lying area in the central section of the site. The localised extent of surface water flood risk associated with the watercourse that extends along the southern site boundary lies outside the proposed residential development area. The on-site ditch and associated low-lying area will be re-graded as part of the overall earthworks strategy for the post-development site and will therefore also not form a residual flood risk at the site.

There are no groundwater protection zones in the vicinity of the site and there is negligible residual fluvial risk. The site is not noted to lie within a flood warning area.

Safe access / egress from the site in extreme conditions will be via the entrance on Well Street, with secondary routes via Bryn Awelon to the north.

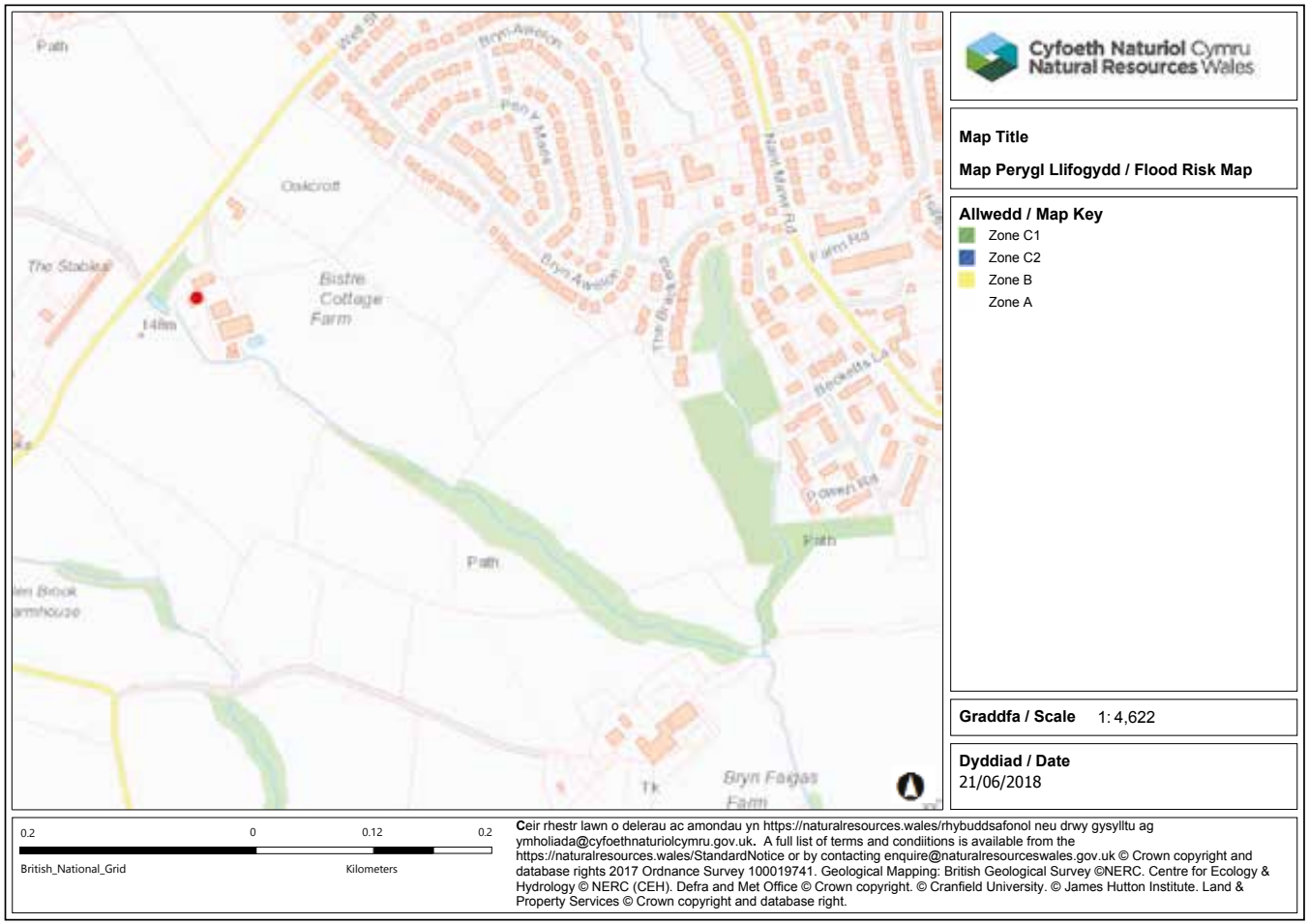


Figure 19 - Flood Zones

4.0 Environmental & Technical Appraisal

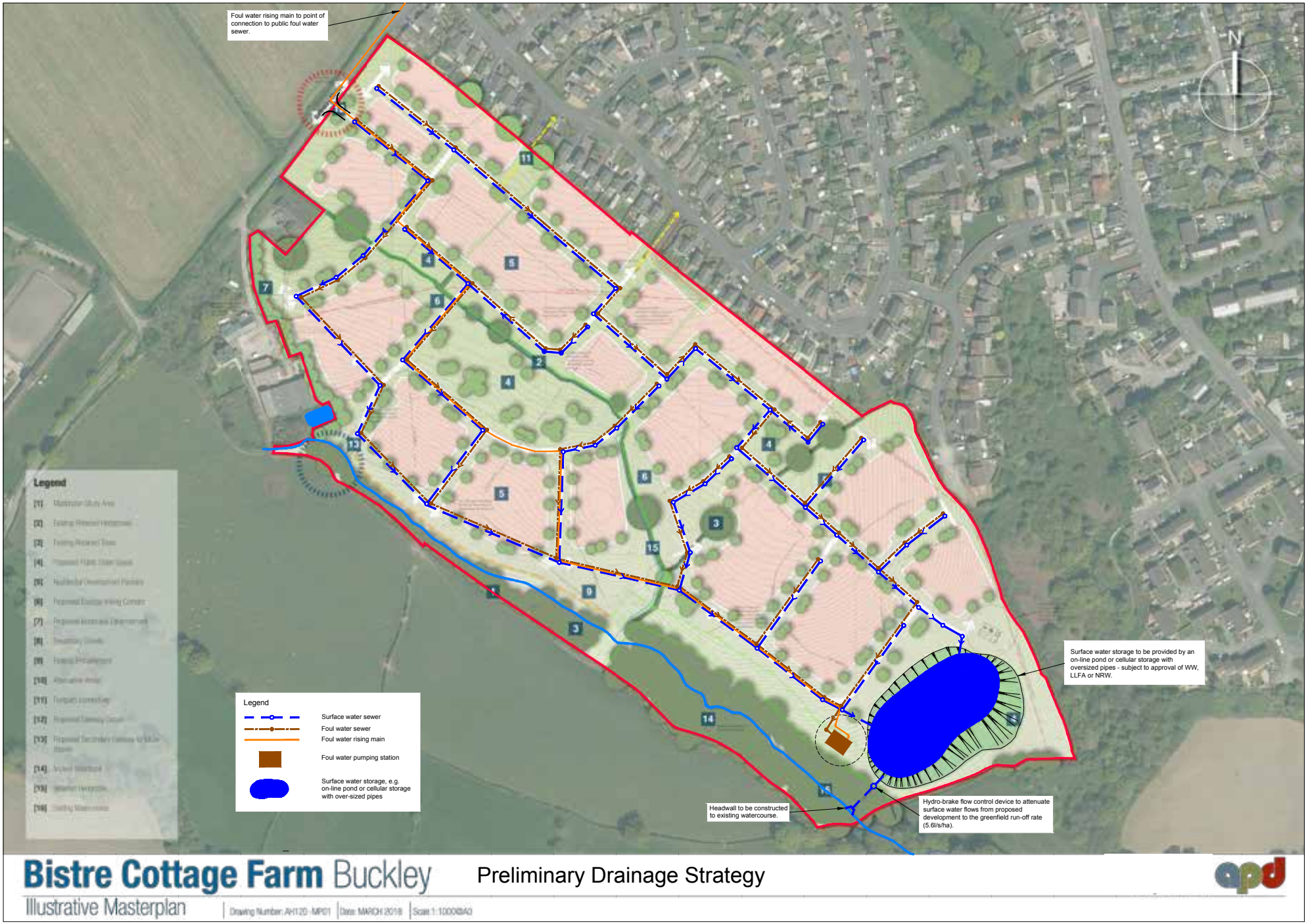


Figure 20 - Preliminary Drainage Strategy

4.6 Highways & Access

Site Access

It is envisaged that the principal site access will be via Well Street. The original thoughts were to provide a priority-controlled junction onto Well Street and widen the section of Well Street along site frontage between this access and the existing residential properties to the north. A footway was also proposed along the site frontage to connect into the existing pedestrian facilities to the north.

However, it is understood that the WG site being promoted by Clwyd Alyn Housing Association are looking to develop the site to the west for c. 150 dwellings. As such, and to future proof access to both sites coming forward, we consider that the provision of a new roundabout should be designed and subsequently introduced to allow access to both sites.

This arrangement is depicted in the drawing provided.

- An examination of this drawing shows a roundabout with a 28m diameter, this being the smallest roundabout which can accommodate articulated HGVs. Also shown on this drawing are 5.5m wide access roads to the south-east and north-west of the roundabout, providing access to Well Street East and Well Street West respectively.

- The remaining rural south-western end of Well Street can also be maintained, with the roundabout creating a natural and obvious separation between the proposed formal road network and the existing rural end of Well Street. Further measures can be added to the southern end of Well Street to discourage its use.

- The drawing also shows that 51m forward visibility can be achieved to the stop line, this being in accordance with the 33.6mph recorded speeds in the southbound direction on Well Street.

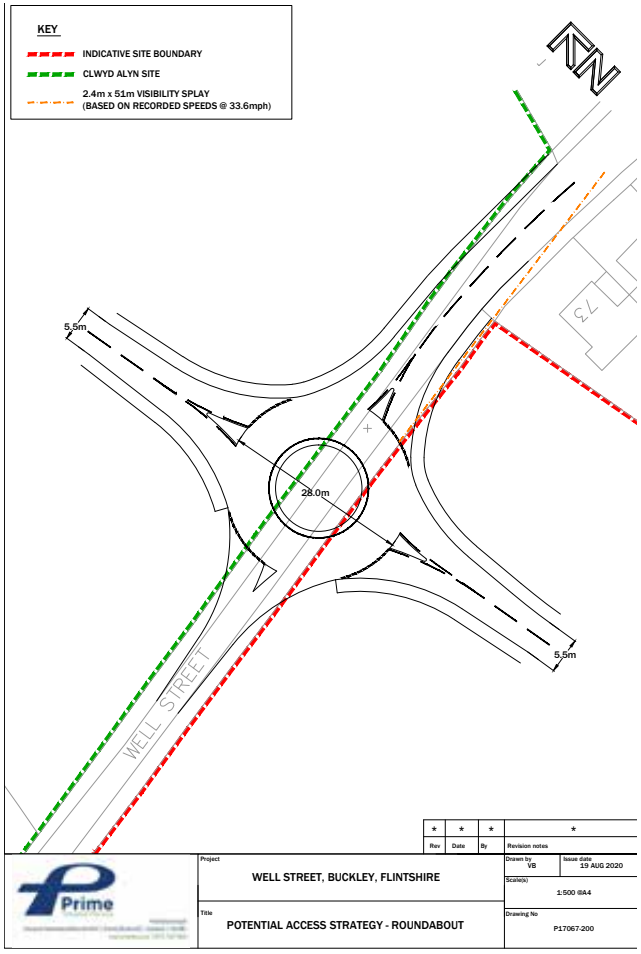


Figure 21 - access arrangement

4.0 Environmental & Technical Appraisal

Traffic Impact Assessment

Turning counts and queue length surveys have been undertaken at the following key junctions:

- A549 Mold Road/Springfield Drive (3 arm priority);
- A549 Mold Road/Elfed Drive/Bistre Avenue (4 arm staggered crossroads); and
- The Precinct Way/Padeswood Road South/Hillside Crescent (3 arm priority).

Assessment of the above junctions had been agreed with FCC Highways because they were seen as potential pinch points on the local highway network.

Minimal queues were observed at each of the junctions, with the highest queue being 3 vehicles on the Bistre Avenue arm of the staggered crossroads. The observed traffic flows have been growth-ed to 2030 using the DfT software TEMPro to take into account a prolonged build-out period, with the year 2030 also representing the existing year of assessment plus 10 years. The TEMPro factors have been modified by removing traffic associated with the consented Whitley's Depot development of 39 dwellings and has assumed the Well Street West site has come forward.

In order to estimate the traffic generation associated with the proposed developments, the TRICS industry standard database has been used. TRICS trip rates have been derived for houses privately owned and applied to the potential for 300 dwellings scheme on Well Street East and 150 dwellings on Well Street West.

Development traffic generated from both schemes has been distributed based on 2011 census method of travel to work data for local area.

The junctions assessed include two priority-controlled junctions and a staggered crossroads, as listed above, therefore the junctions have been modelled using Junctions 9 (PICADY) software. A worst-case method of assessment has also been used.

The model results show each junction will operate with a good level of spare capacity in 2030 with both developments in place. Therefore, off-site mitigation (improvements) should not be required to deliver the two schemes.

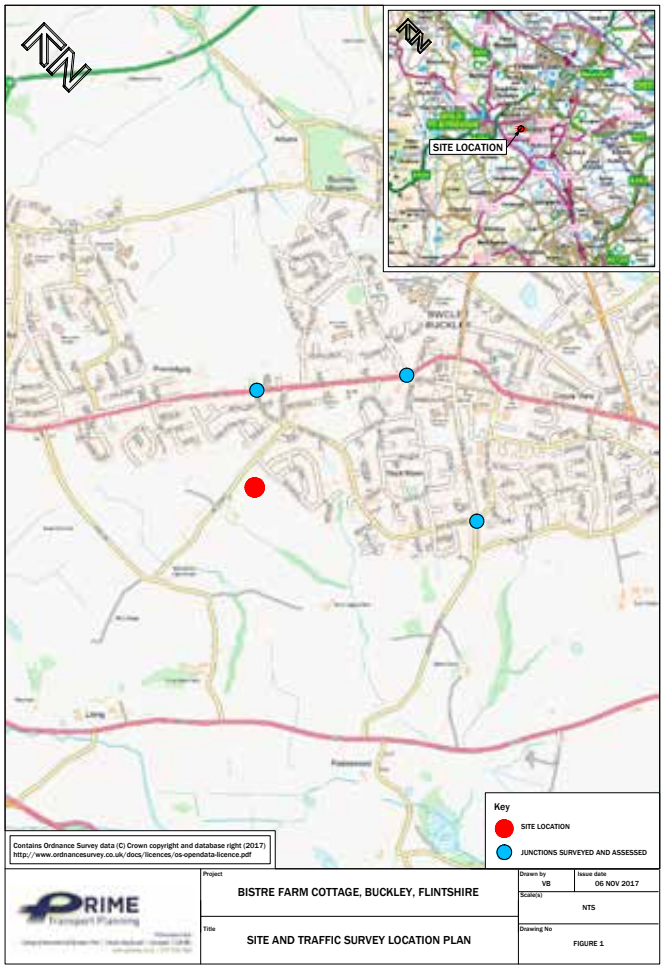


Figure 22 - Traffic survey

4.7 Air Quality

Pre-application guidance recommended that due to the scale of the potential development an AQA would need to be undertaken to establish whether any unintended consequences might occur as a result of additional traffic flows.

For the construction phase of the development, the risk of dust soiling effects is classed as low for earthworks and construction and medium for trackout; and the risk of human health effects is classed as low for earthworks, construction and trackout. Mitigation measures are proposed to further reduce any potential impacts based on best practice guidance.

For the operational phase assessment, annual mean NO2, PM10 and PM2.5 concentrations have been modelled at twenty-six existing receptor locations, using the most recent Emission Factor Toolkit available from DEFRA (v9).

A conservative approach has been adopted, whereby base year background pollutant concentrations and vehicle emission factors have been applied to the opening/future year. Predicted annual mean concentrations have been compared to the relevant air quality objectives and target level. The assessment concluded that the operational phase impact of the proposed development will be negligible and 'not significant'.

The assessment demonstrates that the proposed development will not lead to an unacceptable risk from air pollution, or to any breach in national objectives. Therefore, there are no material reasons in relation to air quality why the proposed schemes should not proceed, subject to appropriate planning conditions.

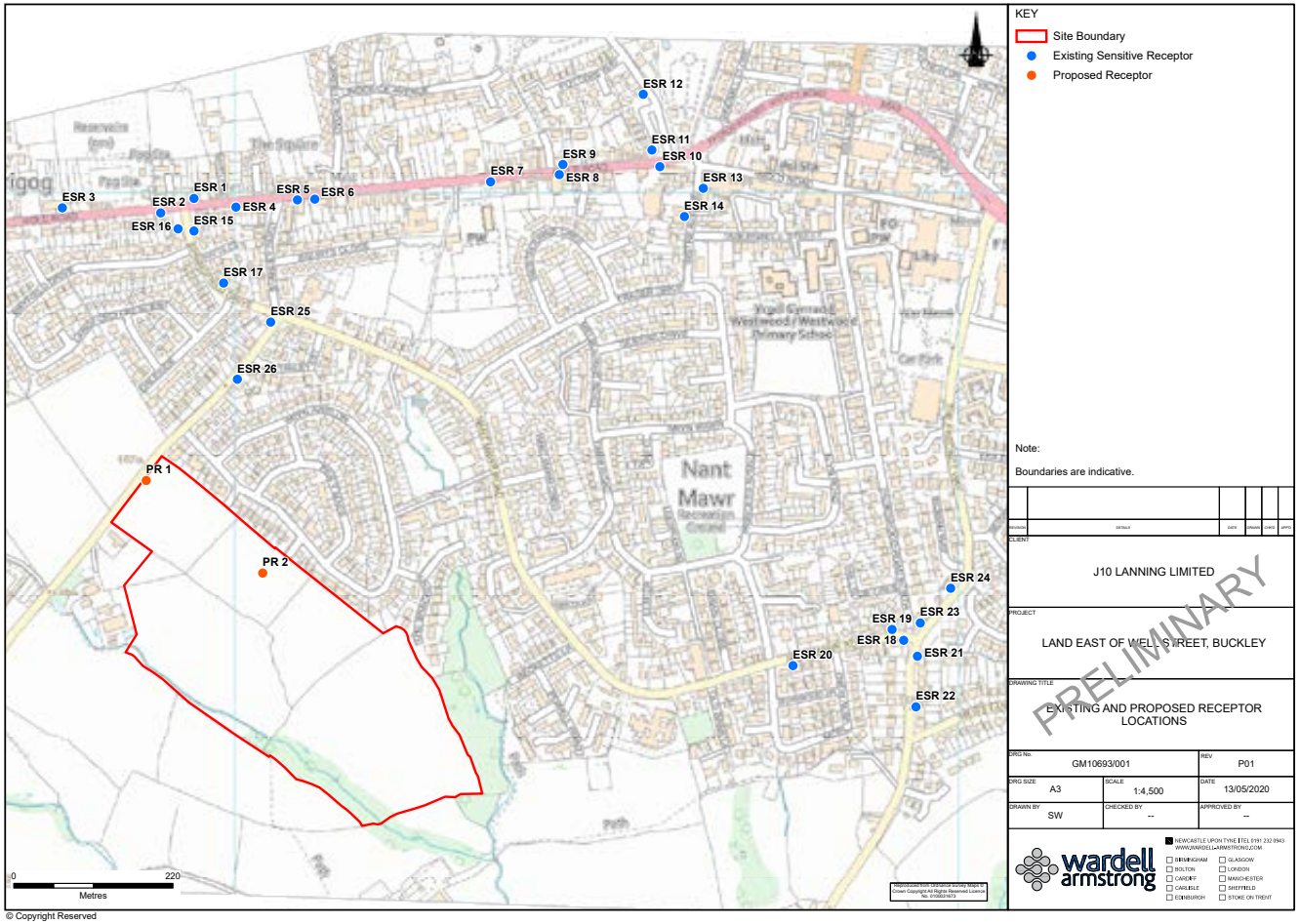


Figure 23 - Receptor locations

4.0 Environmental & Technical Appraisal

4.8 Ground conditions

Pre-application guidance recommended that due to the previous (current) agricultural use of the site that there might be a risk form the land being contaminated from the use of pesticides, fertilisers, burial of livestock, coal mining activity and/or fuel storage.

The majority of the site is underlain by Bowland Shale. Gwespyr Sandstone is located at the north western boundary of the site, and the southern area of the site is shown to be underlain by Pennine Coal Measures. In the immediate north west of the site, there is a possibility that Carboniferous Middle Coal Measures, including coal seams, sub-crop beneath the superficial deposits and may be present at shallow depth.

The site is located within a coal mining area as defined by the Coal Authority based on records. A Coal Mining Risk Assessment has been undertaken for the Site. In terms of the impact of coal mining legacy, the majority of the site is considered to have a low risk. Because of the conjectured position of the Main Coal seam sub-cropping across and potentially being at shallow depth beneath parts of the south eastern area of the site, this area is considered to represent a Low to Moderate Risk in terms of coal mining legacy issues; especially since this area is unlikely to offer any built development potential anyway due to Its “low topographical level point”.

The potential for significant contamination issues from the previous and current land use is considered low. The potential for made ground associated with Bistre Farm and stockpiles of unknown materials cannot be discounted. It is also considered likely that the farm buildings adjacent to the site contain ACMs. No agrochemicals have been applied in the last 12 years, although there are two known areas of animal burial (isolated pigs which were attributed to no known notifiable disease but just “fallen stock”.

Ground gas associated with on and off Site Made Ground and organic materials is a possibility. The potential for mine gas cannot be discounted.

Based on the information summarised within this report the site is considered to present a low to moderate geo-environmental risk.

4.9 Agricultural land quality

A key technical issue that Castle Green Homes considers is prescient in the determination of the assessment of alternatives and the selection of preferred housing allocation sites is the issue of understanding Best & Most Versatile agricultural land resource across the County Council area.

An agricultural land quality survey has therefore been undertaken, with a combination of trial pits and auger observations and has found that the land has fine and loamy soils that don't benefit from good drainage properties. This limits any arable to autumn sowings due to it being too wet to cultivate in Spring

The findings of the survey conclude that, at best, the land comprises Grade 3b in its entirety, so is not classified as BMV and must therefore offer a very logical option to consider In preference to higher quality grades.

With respect to other sites around Buckley the general WG ALQ mapping shows similar Grade 3b classification.

PPW11 clearly states (Para 3.59) that when considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.

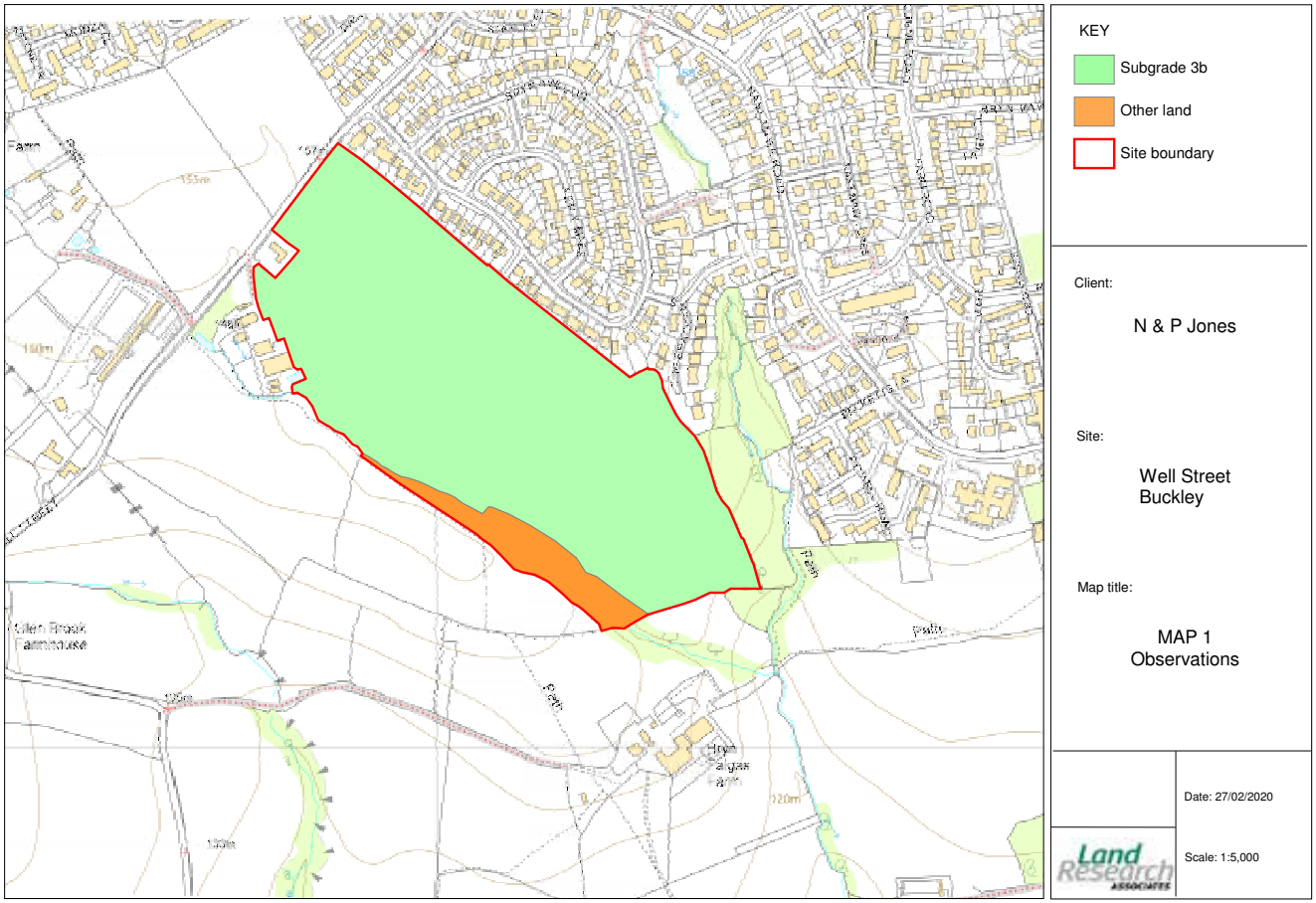


Figure 24 - Agricultural Land observations

5.0

MASTERPLAN

5.0 Masterplan

5.1 Opportunities & Constraints

Constraints

The site and its surroundings have been considered in relation to potential developmental constraints which will inform the future development of the site. The plan opposite illustrates any local constraints, none of which represent a significant limit to the capacity of the site. The site is not subject to any ecological, landscape, archaeological or geotechnical designations.

Opportunity

The proposal provides an opportunity to comprehensively plan the delivery of this site, presenting an opportunity to create a high-quality residential neighbourhood which responds to and accommodates any potential constraints. It will also result in numerous social, economic and environmental benefits which are discussed in greater detail later in this document.

Landscape

The established vegetated nature of the boundaries to the site means that it is visually well contained and enclosed and as such views are limited for the most part. This means the site would not have an overbearing impact on neighbouring and adjacent properties and would integrate with and form a logical extension to Buckley.

Figure 25 - Constraints and Opportunities

5.0 Masterplan

5.2 Masterplan

Legend

[1] Masterplan Study Area

[2] Existing Retained Hedgerows

[3] Existing Retained Trees

[4] Proposed Public Open Space

[5] Residential Development Parcel/s

[6] Proposed Ecology linking Corridor

[7] Proposed landscape Enhancement

[8] Secondary Streets

{9] Existing Embankment

[10] Attenuation Areas

[11] Footpath connectivity

[12] Proposed Gateway Circus

[13] Pedestrian footpath link

[14] Ancient Woodland

[15] Retained Hedgerow

[16] Existing Watercourse

[17] Gabion Baskets

Figure 26 - Illustrative Masterplan

5.0 Masterplan

5.3 Existing Local Vernacular







6.0

SCHEDULE DELIVERABLES

6.0 Scheme Deliverables

6.1 Deliverables

The development will achieve sustainable development in accordance with an emphasis on generating significant and mutually supportive economic, social and environmental benefits which collectively constitute sustainable development; the concept being driven by the placemaking agenda promoted by Planning Policy Wales. The benefits will go beyond simply delivering at least **270 new homes** and shall serve to deliver investment through the following roles and ways:

ECONOMIC DELIVERABLES & ROLE

- The total project contract value for this project is in the region of **£48 M** and this will help to secure existing construction jobs based locally and create new ones.

- In what are still tough economic times; skilled jobs in the locality that will help maintain employment and provide and contribute towards the ongoing economic investment in the locality is a significant bonus.

- It is estimated that the development would need a constant **50 direct operative jobs** a day to sustain the 3-year construction programme with another **70 supply chain jobs** indirectly supported.

- Significant **local spend and economic output** during the construction period of the development will represent a big boost to existing businesses. Indeed, construction industry bodies have found that for every £1 spent in the construction industry this generates £3 in the local economy so with a £48 M project this is an investment worth up to **£144 M** over the 3-year build period; spend that will lead to new services being offered locally.

- Post-completion, the spending power of another **270 households** into the local economy can also be expected to be significant; not only in first occupation expenditure (to make a house "feel like a home") of around £2,106,000 (based upon £7,800/home) but ongoing local expenditure in sustaining local services and facilities beyond just the construction cycle to the tune of **£7.42 M** per annum (based upon the average annual household expenditure of £27,502); this will serve to sustain around another **60 local jobs**.

- The completed development will also generate **Council Tax revenue** for the Authority and with an average £1,828 bill per Band E household this will generate up to **£576,720 per annum** in supporting and enhancing existing public services; with a **local Town Council precept** seeing new income being devoted to local initiatives to address any local expenditure needs at grass roots.

- This proposal seeks to deliver jobs, economic growth and prosperity into the local economy.

6.0 Scheme Deliverables

6.1 Deliverables

SOCIAL DELIVERABLES & ROLE

- This scheme will deliver a positive number and meaningful contribution of up to around **80 no. affordable housing** units that can be specifically targeted at **"families"** and meeting the known latent need and demand in this locality through the delivery of 30% affordable housing.

- Provision of new **Public Open Space (POS**) on site which is likely to easily exceed current POS standards with ready access to existing provision at The Flash, Buckley Leisure Centre and the possibility of an additional commuted sum to enhance existing provision elsewhere.

- Where there is a proven need to make a **commuted sum payment towards any Educational Supplement** this will be made in delivering school places.

- Providing safe **pedestrian highway crossings** and a **variety of new linkages and connections** into and around the development; with safe, permeable and connective access for all public transport, cycle and pedestrian users; ensuring that car borne traffic is disaggregated from those more vulnerable users. **Traffic calming measures** will also be delivered.

- The new housing will offer the opportunity to secure the future of all local public service and facility provision; be this health, education or retail; housing brings families, retains families; thus, providing future community sustainability.

- A range of house types and sizes will allow a balanced and mixed community.

- Providing access for all sectors of the community, particularly those with mobility difficulties – the design will incorporate future-proofed **DDA compliant** grade access into buildings and across the site.

- Accessible by foot/cycling to local amenities and facilities, and taking advantage of public transport interfaces (bus routes); thus, promoting sustainable travel choices and **reducing the need to travel** using private modes of transport.

- Additional **local "dividend"** and investment opportunity through community orchard and/or allotments which offers enhanced betterment. **S106 Commuted Sum Payments** may also be required to support educational, primary healthcare, public open space and infrastructure provision on a proportionate and proven basis.

- The development of the site for a use that meets Highway safety needs and will provide for sufficient off-street parking spaces, turning and access for all refuse, emergency and delivery vehicles.

6.0 Scheme Deliverables

6.1 Deliverables

ENVIRONMENTAL DELIVERABLES & ROLE

- Resulting in the **comprehensive development** of the site with a sympathetic and sensitive design taking account of the neighbouring rural and urban grain and its landscape setting and character.

- Delivering a mix and range of housing types and sizes in a way that reflects the existing urban grain of the settlement.

- The opportunity to respect the sites' landscape setting, ecological habitat and tree / hedgerow infrastructure and integrating these features to ensure maximum retention, mitigation and enhancement is enabled through new reinforced planting, buffer zones, dark corridor and managed biodiversity opportunities; thereby "Placemaking" new housing and community provision for Buckley shaped by its landscape character and greenspace biodiversity enhancement.

- Introducing **new connective, permeable and safe pedestrian links/routes** into and through the development site; thus, **enabling public access** throughout the site to the advantage of new and existing residents.

- This site is located to take advantage of the available public transport links, including **school bus routes.**

- The proposed layout offers the very highest **quality design solution** that could be expected for this site and the applicant has invested heavily in this to get it right.

- The proposed development will present a high-quality design solution and by investing heavily in this to get it right and it will serve to significantly enhance the design quality of the area; thus, benefiting the special character and appearance of the site in its rural / urban fringe setting.

WELL STREET EAST, BUCKLEY

CIRCA 270 DWELLINGS

CONSTRUCTION VALUE

NEW HOMES

"Promoting growth through improving quality of place"

Additional Households Expenditure (per annum)

AFFORDABLE HOMES

CONSTRUCTION SPEND

Spend in the local economy during the construction programme

EMPLOYMENT

Direct Employed: 50

Supported in the local supply chain: 70

PUBLIC SECTOR REVENUE IMPACTS

£576,720

Additional Council Tax Payments (per annum)

7.0

DELIVERABILITY

7.0 Deliverability

7.1 Deliverability

Castle Green can confirm that it is their intention to bring this site forward for a mixture of both residential and community focused development in a timely and expedient manner.

The delivery of the sites within the Local Development Plan (LDP) period will be governed by three factors:

1. The speed to which the LDP is adopted;
2. The speed to which a planning permission can be secured here and;
3. The speed to which the sites can be built out.

1. **The speed to which the Local Plan is adopted**

The fact is that the site is located outside of the Buckley settlement boundary of the UDP, so the eLDP must decide on where new boundaries are set having considered all sustainable alternatives; this being underpinned by robust assessments into Green Barrier, BMV, strategic floodrisk and other technical assessments. We are concerned that the evidence base underpinning the eLDP Is not sound and that the deliverability of draft eLDP housing allocations are vulnerable to failure.

Clearly, this is a County-wide matter which dictates when allocated sites can come forward for development in a controlled plan-led manner but to a degree it is also about appreciating that most growth ought to be targeted in a sustainable manner in and around the main key settlements and Buckley is at the very top of this hierarchy.

Castle Green believe this site offers a robust and deliverable option for growth and meeting housing and community needs and will promote this before the eLDP Examination and thereafter, with a view that It Is either allocated and/or progressed through and achieves approval through the Development Management planning system.

We understand that the Council's current LDP timetable is a target which involves a plan adoption by around the end of 2021, the current plan period timeframe is 2015 to 2030; this gives the Council just 8 years in which to deliver its total 15-year housing needs target (including an accumulated backlog) before the Plan expires.

Castle Green have already undertaken detailed site assessments to demonstrate the deliverability of this site through the eLDP. None of these will be wasted and will indeed be used to support a detailed planning application.

2. **The speed to which a planning permission can be secured**

Earlier pre-application discussions have already taken place and a further layers of technical assessments have been undertaken to "proof" the deliverability credentials of this site.

Hydraulic modelling is one area that remains outstanding, but this will not impede the submission of a planning application. Castle Green will be ready to launch the formal pre-consultation DMO stage during 2021 with a view to making an application submission by 2022. Were an appeal necessary this could also add in some delay, but either way Castle Green consider a determination timeframe of between 9 and 18 months would be reasonable.

The expectation of programme delivery is, to some degree, predicated by adoption of the eLDP (with this site ideally being identified as an allocation) by the end of 2021 is that planning approval (subject to a s106 legal agreement) would ideally take 12 months to obtain, taking us through to Q1 2023 to start delivering units on site.

3 **The speed to which the site can be built out**

The speed to which the site can be completed will be determined by several factors. However, it is important to recognise that Castle Green are motivated to deliver this site so that a comprehensive residential development use can come online over a defined investment period. The local residential market is presently strong. Not only is there an acute pent-up demand for new residential dwellings, but Buckley is particularly attractive as a destination for all types of tenure occupiers.

Accordingly, there is an aspiration to bring forward development here at the very earliest opportunity with a strong expectation for take-up.

Castle Green envisage that having assembled a collective and comprehensive set of site solutions this site could be brought online rapidly following the grant of any permission.

Site phasing will be important, as some sites can be delivered sooner than others, but it is expected that a site of this scale and number of potential units would take between 4 and 6 years to be built out; thus being completed anywhere between 2027 and 2029, which means full delivery before the plan period expires in 2030.

8.0

THE ASK

8.0 The Ask

8.1 The Ask

The key Ask in moving forward is for the eLDP Inspector and/or Local Authority to:

- Confirm the status of the site as a key location for release and development as a housing allocation; thereby removing policy restrictions and constraints to growth by accepting it has an active and positive development role to play;

- Recognise the ability for the site to come forward immediately and accelerate housing delivery in meeting the Flintshire Housing Trajectory;

- Work in partnership with Castle Green, other agencies and stakeholders to deliver new homes and community betterment ;

Castle Green will continue to develop the masterplan, engage with the Local Authority, key community and statutory stakeholders with a view to working towards assembling a “ready to go” planning application.

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