



## SUBMISSION STATEMENT

in respect of

Flintshire LDP (2015 to 2030)

This representation is submitted obehalf of Bartlett & Kitchen.

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

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

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

## Matter 7: Provision of Sustainable Housing Sites (incl. housing requirement) (STR1)

### Key Issue:

Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?

In summary, insufficient sites are identified and those that have been identified as draft allocations are far from being entirely credible or convincing in deliverability terms.

The housing trajectory needs certainty (not just through allocations but also the considered need for safeguarded land, alternatives and reserve sites) to provide for sustainable placemaking. The current trajectory fails to do this.

We also believe that sites of up to 100 units will take around 3 to 4 years to complete; larger sites will take a lot longer.

However, what is even more prescient is the fact that even with a draft allocation there is no guarantee permission will be forthcoming. Yes, it should and ought to make life easier for applicants but it would be a mistake to assume that the planning and democratic decision-making system is not broken.

b) Although neighbouring counties each provide for their own housing needs, does the differential in

e) Do rates of housing delivery over recent years indicate that the housing requirement firstly, could, or secondly, should, be increased?

The past delivery rates have been reliant upon windfall sites and a UDP that identified a host of sites which were doomed to fail; this led to significant (37% et d d 451592 T d [(i(- 11.001 T c 0.003 T 1 0 -24 T d d [(d

g) Is it likely that all the committed sites identified as contributing to the housing requirement (LDP Appendix 1), and allocations which are carried over as such from the UDP, will be delivered during the plan period? What is the evidence?

There is no guarantee that committed sites will all deliver (see above answer) where we recommend a non-delivery rate

There is no evidence of delivery for the UDP sites (STR Northern Gateway, STR3B Warren Hall, HN1(1) Well Street, Buckley or HN1 Highmere Drive, Connah's Quay.

The material provided by the Council/promoters (e.g. SoCG's) provide no credible delivery evidence and these sites should either not be allocated and/or not assumed to deliver.

h) How does the LDP avoid the issue of double counting in respect of large windfall sites?

It isn't entirely clear that double counting is avoided. The UCS identifies a number of sites that are commitments and has included them in the calculation.

i) What will be the implications for the delivery of the housing requirement of the comparatively short plan period remaining at adoption?

A significant strain upon meeting the housing trajectory and its AAARR result.

The UDP experience of under-delivery by 37% is testament to the fact that FCC have a poor track record in delivering.

Moreover, this will be further challenged by the dependence upon relatively few developers who between them control a substantial number of the draft allocation sites.

For instance, there is a significant over-reliance upon just two developers for 20% of the total allocations (sic. Anwyl Homes HN1.4, HN1.6, HN1.7 and HN1.8 - 1,002 units) which means that 4 of the 11 non-strategic allocations are in the hands of a single entity who, over a remaining 9 plan period might struggle to deliver them. This represents a potentially dangerous over-exposure and reliance upon a single developer and a risk to the delivery trajectory not performing.

j) |

**J10Housing Table**

ITEM	FCC FIGURES	J10 COMMENT	J10FIGURES
Assumed Requirement	6,950 is assumed	<p>Disputed : should be significantly greater to reflect overreliance upon in-migration and jobs ambition results in mismatch between employment and housing growth</p> <p>Also figure must be expressed as a "minimum"</p>	<p>MIN. of 6,950 (greater still if other indices are applied)</p>

Non-Delivery Allowance







	<p>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.</p>	<p>cannot be considered as being sustainable (e.g. STR3B), whilst others (e.g. HN1.1) has not proven delivery or viability.</p>
<p>Para5.62 regarding components of housing supply  (replicated in Para 5.76 regarding economic components)</p>	<p>Key Sites- Sites key to the delivery of the</p>	

	<p>trajectory when they are due to come forward for development, in order to support the creation of sustainable communities.</p>	
<p>Para 4.1.18 : housing led regeneration sites</p>	<p>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 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 regenera</p>	<p>0 scn 11.04 042c The cra0 5scn 0.0 11.04 042c Te8.792 0.6a1n 0</p>

## SOUNDNESS ASSESSMENT

The following checklist table provides our assessment on the soundness of the LDP following the Part 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 general conformity with the NDP?	