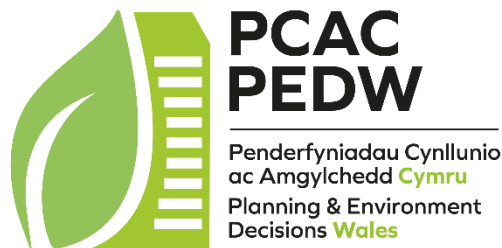


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Ein Cyf / Our Ref: CAS-02103-P2G8S8

Dyddiad / Date: 15/12/2022

To: The Chief Executive and the Chief Officer (Planning, Environment & Economy)  
Flintshire County Council

(via e-mail)

Dear Sirs

**Planning and Compulsory Purchase Act 2004  
Town and Country Planning (Local Development Plan) (Wales) Regulations 2005  
Flintshire Local Development Plan (LDP)**

I enclose the Inspectors' report on the soundness of the above Local Development Plan.

The Inspectors would like to thank Andy Roberts and his team for their cooperation, assistance and hard work during the examination. The calm and effective way in which they dealt with the matters that arose, some of which were exceptionally challenging, has contributed greatly to the efficient progress of the examination

The Inspectors are also grateful to Kerry Truman, the Programme Officer, for the efficient way in which she organised the administration of the examination and for her patience, support and good humour throughout the process.

A copy of the report has been sent to the Welsh Government.

Yours sincerely

*Vicky Robinson*

Vicky Robinson MRTPI  
Chief Planning Inspector

Rydym yn croesawu gohebiaeth Gymraeg. Cewch ateb Cymraeg i bob gohebiaeth  
Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome correspondence in Welsh. Correspondence received in Welsh will be  
answered in Welsh and corresponding in Welsh will not involve any delay.

**Adroddiad i Gyngor Sir y Fflint**

**gan Siân Worden BA MCD DipLH  
MRTPI**

**Claire MacFarlane BSc(Anrh) MSc  
MRTPI**

**Report to Flintshire County  
Council**

**by Siân Worden BA MCD DipLH  
MRTPI**

**Claire MacFarlane BSc(Hons) MSc  
MRTPI**

**Arolygydd a benodir gan Weinidogion  
Cymru**

**Inspectors appointed by the Welsh  
Ministers**

**Dyddiad: 15/12/2022**

**Date: 15/12/2022**

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 64

**REPORT ON THE EXAMINATION INTO THE FLINTSHIRE  
LOCAL DEVELOPMENT PLAN 2015-2030**

Plan submitted for examination on 06 November 2020

Examination hearings held between March and May 2021, and on 8 September and 23 November 2021.

Cyf ffeil / File ref: Flintshire LDP - CAS-02103-P2G8S8

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**Abbreviations used in this report**

AABR	Anticipated Annual Build Rate
AAR	Average Annual Requirement
AONB	Area of Outstanding Natural Beauty
AP	Action Point
BMV	Best and most versatile [agricultural land]
CIS	Community Involvement Scheme
The Council	Flintshire County Council
DA	Delivery Agreement
DAS	Design and Access Statements
dph	dwellings per hectare
DPM3	Development Plans Manual edition 3
DEZ	Deeside Enterprise Zone
ELR	Employment Land Review
FC	Focussed Change
GTAA	Gypsy and Travellers Accommodation Assessment
HRA	Habitats Regulations Assessment
IMAC	Inspector Change
IP	Infrastructure Plan
LDP	Local Development Plan
LDPM2	Local Development Plans Manual edition 2
LVIA	Landscape and Visual Impact Assessment
MAC	Matters Arising Change
NDF	National Development Framework
NRW	Natural Resources Wales
NWEAB	North Wales Economic Ambition Board
Para.	Paragraph
PEA	Prior Extraction Assessment
PPP	Planning Policy Panel
PPW	Planning Policy Wales

PS	Preferred Strategy
The Regulations	The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005
SA	Sustainability Appraisal
SAC	Special Area for Conservation
SAM	Scheduled Ancient Monument
SCG	Statement of Common Ground
SEA	Strategic Environmental Assessment
SFCA	Strategic Flood Consequences Assessment
SINC	Site of Interest for Nature Conservation
SLA	Special Landscape Area
SoCG	Statement of Common Ground
SPA	Special Protection Area
SPG	Supplementary Planning Guidance
SSA	Strategic Search Area
SSSI	Site of Special Scientific Interest
SuDS	sustainable drainage scheme
TA	Transport Assessment
TAN	Technical Advice Note
UDP	Flintshire Unitary Development Plan
WFG Act	Well-being of Future Generations (Wales) Act 2015
WG	Welsh Government
WSP	Wales Spatial Plan

## **Non-Technical Summary**

This report concludes that, subject to the recommended Matters Arising Changes (MACs) set out in Appendix A, the Flintshire Local Development Plan 2015 -2030 (LDP) provides an appropriate basis for the planning of the County up to 2030. The Council has sufficient evidence to support the strategy and has shown that it has a realistic prospect of being delivered.

A number of changes are needed to meet legal and statutory requirements and to ensure that the Plan is sound. These do not alter the thrust of the Council’s overall strategy and do not undermine the Sustainability Appraisal carried out by the Council/Authority. The main changes are summarised as:

- Rearrangement of the structure of the written statement to make the strategy clear and coherent;
- Amendments to Policy EN15 Water Resources to ensure no adverse effects on the River Dee and Bala Lake SAC resulting from phosphorus discharges;
- Deletion of the housing element of the allocation at Warren Hall in the interests of sustainable development;
- Renaming green barriers as green wedges for consistency with PPW;

With the recommended changes the Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness set out in Table 27 of DPM3.

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Appendix A: Schedule of Matters Arising Changes (MAC) recommended by the Inspectors

Appendix B: Schedule of Inspector proposed Matters Arising Changes (IMAC)

## 1 Introduction

- 1.1. Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004 (the 2004 Act), the purpose of the independent examination of a Local Development Plan is to determine:
  - a) whether it satisfies the requirements of sections 62 and 63 of the 2004 Act and of regulations under section 77, and
  - b) whether it is sound.
- 1.2. This report contains the assessment of the Flintshire Local Development Plan 2015 -2030 (from here referred to as “the LDP” or “the Plan”) in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the 2004 Act.
- 1.3. The submitted LDP has been prepared pursuant to the 2004 Act and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) (‘the LDP regs’). As well as ensuring that the preparation requirements have been met, we have considered the LDP against the tests of soundness set out in Table 27 of the Development Plans Manual (DPM3):
  1. Test 1: Does the plan fit? (Is it clear that the LDP is consistent with other plans?);
  2. Test 2: Is the plan appropriate? (Is the plan appropriate for the area in the light of the evidence?);
  3. Test 3: Will the plan deliver? (Is it likely to be effective?).
- 1.4. The starting point for the examination is that the Local Planning Authority has submitted what it considers to be a sound plan, together with the evidence base that supports its position.
- 1.5. Since the purpose of the examination is to determine whether the Plan is sound we recommend changes in this report only where there is a clear need to amend the Plan in the light of the legal requirements and/or the tests of soundness. These binding changes are numbered in **bold type** and are set out in Appendices A and B of this report, where they are highlighted. We are satisfied that these changes are in line with the substance of the overall Plan and its policies, and do not undermine the Sustainability Appraisal (SA) and participatory processes that have been undertaken.
- 1.6. All duly made representations and the matters raised at the examination Hearings have been considered. Given the focus of the examination on soundness, our report does not refer specifically to the individual representations made in each case. Matters raised by individual representations are referred to only where it is considered that they raise substantive issues concerning the Plan’s soundness. Plan changes sought by any representor are the subject of a recommended change only where we have found, on the basis of the evidence, that such a change is required to make the Plan sound.

- 1.7. A number of representors have proposed alternative sites to those allocated in the Plan, most notably for housing development. What is required of the Council is that it produces a strategy, policies and allocations that are sound. There are likely to be a number of ways that the Council/Authority could meet the needs of its community, each of which may be valid. Some may consider that the allocations in the Plan do not present the best solution, but our remit is only to recommend changes where required to make the Plan sound. It is not our role to seek to make a sound plan better. Our conclusions as to the submitted Plan’s soundness and the changes proposed by the Council in response to matters arising have thus guided how far we have needed to consider in detail other candidate sites for allocation. For this reason no specific reference is made to the majority of proposed alternative sites in this report.

#### *Changes arising during the course of the examination*

- 1.8. Prior to submission of the LDP for examination the Council considered the representations received and determined that no substantive changes to the deposit Plan were required. It did, however, identify minor changes which it wished to make to the deposit Plan. We have reviewed these minor changes and are satisfied that none would alter the Plan in any substantive manner and are not related to soundness. It is for the Council to determine whether or not to incorporate these changes into the final version of the Plan. This report does not consider these minor changes.
- 1.9. In May 2021 Natural Resources Wales (NRW) issued revised guidance on development that had the potential to increase phosphate levels in river Special Areas of Conservation (SACs). This had serious implications for the LDP. We therefore begin our reporting of the topics by dealing with this issue in detail.

#### *Recommended Changes*

- 1.10. The Council has prepared a range of Matters Arising Changes (MACs) following the discussions at the hearing sessions (June 2022). These MACs were publicised on the examination website and advertised to provide opportunity for comment. The responses have been taken into account in arriving at our final recommendations. At the same time the Council reassessed the SA of the Plan in the light of the changes.
- 1.11. The majority of the MACs are needed as the Plan would be unsound without them. The Council has also numbered the consequential changes resulting from a soundness change as MACs. These are necessary for the accuracy and precision of the document but we do not address each one in this report. The MACs numbered in **bold type** in Appendix A are the main changes put forward that are required to make the Plan sound. These are all addressed in this report. Any changes advanced by the Council which are not required to make the Plan sound are only mentioned in the report where relevant to our conclusions and recommendations.
- 1.12. Appendix B sets out the additional changes proposed by the Inspectors (IMACs) which we have concluded on the evidence are also needed to make the Plan



sound. None of the changes undermine the SA, Habitats Regulations Assessment or the overall strategy or policy thrust within the Plan.

- 1.13. The Council has also identified some outstanding typographical or factual errors, listed as minor editing changes, in the submitted Plan that it wishes to correct. We authorise any final editorial changes of this nature, together with any other presentational matters and consequential changes flowing from agreed MACs and the recommended ICs such as altered policy cross-references, site area or numerical changes and paragraph numberings.
- 1.14. Edition 11 of Planning Policy Wales (PPW) was published in February 2021, as was Future Wales, The National Plan 2040. The latter forms part of the Council's statutory development plan, with which this LDP needs to be in general conformity. The changes in national policy were discussed at the Hearings and are referred to under the relevant sections of the report. Consequently, some changes to the Plan have been proposed by the Council. Subject to these recommended changes, we are satisfied that the LDP accords with national policy. These changes are included in the appendices.

## **2 Implications of the phosphates constraint**

- 2.1. NRW’s guidance on development affecting phosphate levels in river Special Areas of Conservation (SACs) did not emerge until the LDP examination was at an advanced stage. This placed the Council in the difficult position of having to assess the situation; collect evidence; and establish the foundations of a complex strategy; all under substantial time pressure. It worked with Wrexham County Borough Council, NRW, and stakeholders such as Dŵr Cymru, and employed ecological consultants to advise and produce the strategy. The consultation draft of the Dee Catchment Phosphorus Reduction Strategy (DCPRS) was published in November 2021. It is the first of its kind in Wales and could assist every LDP review which follows; the absence of forerunners, however, has made the task all the more challenging.
- 2.2. Under the Habitats Regulations there is a need to first determine whether any of the LDP’s policies are likely to have a significant effect on the SAC. In addition, NRW’s guidance results in two essential requirements for us to consider in our examination of the LDP. These are (i) the need to ensure that the phosphorus sensitive River Dee and Bala Lake SAC is protected from any adverse effects from new development, whilst (ii) having a high degree of certainty that allocated sites will be delivered.  
  
*(i) Protection of SAC from phosphorus*
- 2.3. The main focus of the phosphates work carried out by the Councils and their consultants has been on the first of these. Policy EN15 has thus been strengthened and will only permit development which has no adverse effect on the integrity of the River Dee and Bala Lake SAC. In particular, development creating waste water discharges will have to demonstrate no increase in phosphorus levels in the SAC.
- 2.4. In accordance with the Habitats Directive (European Union Habitats Directive (92/43/EEC) a Habitats Regulations Assessment (HRA) of the Plan was undertaken, and reviewed as necessary, prior to the phosphates issue arising. We

were satisfied that the results of the HRA Screening demonstrated that an Appropriate Assessment was not required and concluded that no significant effects upon the integrity of the European sites within the plan area or in adjacent areas were likely to occur (either alone or in combination with other plans or projects) as a result of implementing the LDP.

- 2.5. As a result of the phosphates constraint, the Council commissioned an HRA addendum (FCC032), including an AA. This concluded that, subject to the revised Policy EN15 and the strategic approach to phosphorous reduction set out in the DCPRS, the LDP will have no adverse effect on the integrity of any European sites. As Policy EN15, amended by **MAC101**, will be a safeguard, preventing development where the strategy is at too early a stage to be relied on, we have no reason to disagree with this position.

*(ii) Delivery of allocated sites*

- 2.6. In Flintshire the three Wastewater Treatment Works (WwTW) at Mold, Buckley and Hope feed into the SAC through the River Alyn which has a Poor status for phosphorus. The waste water from four of the housing allocations would be treated at these. These are: HN1.1 Well Street, Buckley; HN1.6 Land between Denbigh Road and Gwernaffield Road, Mold; HN1.9 Wrexham Road HCAC; and HN1.10 Cae Isa, New Brighton. In total these four sites would provide in the region of 550 units,
- 2.7. Our concerns with delivery arise from two factors. The first of these is the timing of elements of the DCPRS and the production of essential supplementary documents. In our view, and taking account of the replies to questions asked at the hearing, the milestones set out in Table 5.1 of the DCPRS are overambitious and not realistically achievable.
- 2.8. The approach to a developer contribution scheme is described in detail in the DCPRS [para 5.1.1 on] and it is clear considerable thought has been given to its format. Much work will be required, however, to finalise and cost the package of mitigation measures. In order to be robust and reliable, the resulting contribution scheme should be the subject of a consultation exercise. We do not consider it likely, therefore, that the developer contributions mechanism will be finalised as forecast. The table states that this step will be necessary before applications for development are determined.
- 2.9. Timing in itself is not, however, a fatal issue. There is a healthy housing trajectory; not all of the county or allocations are affected; and site by site negotiations and implementation could be carried out in the absence of supplementary guidance.
- 2.10. The second factor, and the one which we are concerned could have a serious negative impact, is the cost of mitigation measures on the viability of sites. In order for development to be permitted on the four sites, mitigation measures must be in place to minimise their phosphorus loading to the sewerage system, existing watercourses and the SAC catchment. The DCPHS [Table 4.6, page 74] sets out an extensive list of intervention measures; developers are listed as delivery partners for the majority of these. There are also references to the Category 1 measures

being delivered by Dŵr Cymru, subject to extra developer funds being made available [para 4.4.20. page 82].

- 2.11. The measures themselves include surface water separation, enhancements to WwTW, SuDS and the provision of wetlands. The DCPRS states that the costs of mitigation set out in the developer contribution scheme will include the implementation of measures; the staff resource; compensation to land owners; land acquisition costs (if required); monitoring; and the long term maintenance and management of mitigation [para 5.1.34 page 112]. The cost of mitigation will be apportioned according to how much phosphorus the proposal generates. It seems to us that these costs, in terms of financial contributions and, potentially, land take, are likely to be significant. Our major concern is, therefore, that the necessary mitigation costs could reduce or prevent the provision of affordable housing; or indeed prevent the development of sites within the plan period.
- 2.12. All in all, the lack of clarity with regard to timing and viability shortcomings create an environment of considerable uncertainty. We cannot, therefore, be satisfied that development would be viable and that the allocated sites within the sensitive SAC catchment would be delivered as forecast or even within the plan period.
- 2.13. The amount of detail in the DCPRS and the high level of understanding of the issue give us confidence that it will provide a robust and reliable basis for a strategy which, eventually, will align the protection of the SAC from phosphates with the delivery of LDP allocations. Until that time, and depending upon the extent of the problem, there are potentially serious implications for the delivery of the LDP’s housing.
- 2.14. Not all of the county is within a sensitive catchment area, however. The delivery of large numbers of committed or windfall units, currently accounted for in the LDP housing balance, would not be hindered by the phosphorus constraint. The worst case scenario is that 550 units on four allocated sites would not be constructed during the plan period. This would have the effect of reducing the plan’s flexibility allowance from 13.2% to 5.2% and would not undermine the achievement of the plan’s housing requirement.
- 2.15. There is also realistic potential to improve delivery by bringing forward the delivery of units at Northern Gateway into the plan period. This and other adjustments would result in a flexibility allowance equivalent to 7.5%. Whilst that is lower than we would usually countenance, in these unexpected and difficult circumstances it would be an advantage to have any flexibility allowance at all. In our view that proposed would be consistent with the advice given in the Development Plans Manual (para 5.59) which is that the level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The Council has pointed out that the LDP is 5 years into its plan period, during which time housing delivery has been above the requirement.
- 2.16. In addition, there are other factors which are likely to alleviate the phosphorus mitigation needs. These include the 2.5% contingency allowance for abnormal costs built into the LDP viability study; the provision of wetland; and the funding of mitigation measures by developers.

- 2.17. All things considered, we are satisfied that, despite the uncertainties thrown up by the need for phosphorus mitigation, the LDP housing requirement will be delivered during the plan period.

### **3 Preparation Requirements**

- 3.1. The legal and regulatory preparation requirements are set out in the 2004 Act and the LDP Regs. Table 27 of Welsh Government’s (WG) Local Development Plan Manual (Edition 3) provides guidance as to these requirements.
- 3.2. The LDP has been prepared in accordance with the Delivery Agreement (DA) and the Community Involvement Scheme (CIS) as demonstrated in the Consultation Report. The DA has been revised several times as a result of various circumstances which are documented in detail in the Consultation Report (LDP-KPD-CR1 Consultation Report Oct 2020, paras 2.2-2.4). We have seen and heard references to the long time which it has taken to prepare the LDP. That is not a matter for our examination of the Plan; we note that all changes to the DA were agreed by WG as required. The most recent set backs were as a result of the Covid-19 pandemic. The Council deserves great credit for minimising that delay by hosting and arranging the virtual hearings, the first full series of LDP hearings to be held as such in Wales.
- 3.3. The Consultation Report also explains in detail the measures taken and events held at each stage. An additional ‘Key Messages’ document, which set out the vision, issues and objectives for the Plan, was produced and consulted on. All in all, as the Consultation Report explains, a considerable amount of effort went into organising the engagement events. Each was attended by officers from the policy team and other internal departments who acted as facilitators; Planning Aid Wales was also used. The Council states that the LDP consultation as a whole was a genuine attempt to engage with key stakeholders and Town and Community Councils as well as elected members. The engagement events were generally well received both by those acting as facilitators and by attendees.
- 3.4. Some criticism has been made of the Deposit LDP consultation exercise but it is not widespread or significant; in most cases it concerns the objector’s disagreement with the Council’s response to the points made. In one instance the Council is accused of not making a document, namely an assessment of agricultural land grade on one site (LDP-EBD-HN1.6.2), available for comments until too late in the process. This document was included in the submission of the LDP to the Planning Inspectorate (now Planning Environment Decisions Wales) giving all parties the opportunity to comment on it and its role in the selection of sites, as they have done. Overall, we are satisfied that the requirements of the CIS have been met.
- 3.5. All proposed changes made to the deposit LDP, as outlined in the above Introduction, have been advertised and consulted on. The Plan thus complies with the requirements of the LDP Regs in this respect, including in relation to consultation, advertisement and the publication and availability of prescribed documents.

- 3.6. The Plan has been subject to SA including Strategic Environmental Assessment (SEA). Further changes put forward by the Council as part of the examination process have likewise been tested where necessary for any impacts they have upon the SA and SEA. We are satisfied that the SA/SEA process undertaken is robust and satisfies procedural and legal requirements.
- 3.7. The Public Sector Equality Duty requires the Council to have due regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between different communities. The Council has undertaken and publicised an Equality Impact Assessment of the LDP to ensure that such issues have been taken into account throughout the Plan preparation process. We are satisfied that this process ensures that the LDP promotes equality and diversity and does not adversely affect or discriminate against any people who are protected under the Equality Act 2010.
- 3.8. The final version of Development Plan Manual edition 3 (DPM3) was published in March 2020. The LDP was prepared mainly using LDPM2. Many of the amendments and changes to the plan, for example housing tables, have been prepared in line with DPM3. We consider this to be a sensible and helpful approach. In a letter to local planning authorities (from the Minister for Housing and Local Government, 26.3.20) announcing the publication of DPM3, WG stated that transitional arrangements would apply to LDPs that were currently the subject of examination. In essence this means that Flintshire LDP will continue to follow the Anticipated Annual Build Rate (AABR) methodology rather than the Average Annual Requirement Rate (AAR) method now advised in DPM3.
- 3.9. The same WG letter sets out changes in the delivery of housing as put in place through revisions to PPW. These are explained in detail later in this report. A significant consequence of the changes to PPW is that Technical Advice Note 1: Joint Housing Land Availability Studies (TAN1) has been revoked in its entirety.
- 3.10. LDPM2 states that LDPs once adopted should have an operational life of at least 10 years (LDPM2, para 10.2.2) and this advice is repeated in DPM3 (para 7.4). In this case, the LDP would run until 2030. It has taken a number of years to get the plan to submission, with further delays having resulted from the unusual circumstances arising from the Covid-19 pandemic, as well as from the need to carry out further work with Airbus and on the phosphates issue. Bearing in mind the urgent need for an up-to-date development plan to facilitate and guide growth within the area, it makes no sense, in our view, to find the plan unsound on the basis that the remaining period falls short of that requirement.
- 3.11. The Well-Being of Future Generations (Wales) Act 2015 (WFG Act) sets out a duty to improve the economic, social, environmental and cultural well-being of Wales, in accordance with the sustainable development principle. The Council has demonstrated that the Plan aligns with the identified well-being goals and also that the five ways of working set out at section 5 of the WFG Act have been taken into account. Indeed the Plan, as modified, will contribute towards improving the economic, social, environmental and cultural well-being of Wales and, in this respect, we are satisfied that it complies with the overarching principle of the WFG Act.

- 3.12. Edition 11 of PPW was published in February 2021. It is very similar in form to edition 10 with the same structure and few material changes. The Council has confirmed that the LDP continues to be broadly consistent with PPW in most respects. Any instances where we do not consider that to be the case are covered in detail later in this report.
- 3.13. The Council confirmed at the pre hearing meeting that the LDP had regard to the Wales Spatial Plan (WSP) which had been in place for the majority of the plan preparation period. At the time of the pre hearing meeting in January 2021 the draft National Development Framework had been the subject of consultation and its publication was imminent; it was published as *Future Wales the National Plan 2040* in February 2021 and replaced the WSP. *Future Wales* is part of the statutory development plan, in line with S62 of PCPA 2004, the LDP must be in general conformity with it. We consider that it is and will explain how in the later sections of this document as necessary.

### *Conclusion*

- 3.1. Accordingly, the legal and regulatory preparation requirements set out in the Development Plans Manual (Table 27, page 116) have been satisfied.

## **4 Strategy**

### *Vision, objectives and principles of the development strategy*

- 4.1. In March 2016 the Council produced a ‘Key Messages’ document which set out the vision, issues and objectives for the Plan. It included an assessment of the sustainability of settlements and the settlement hierarchy which informed the growth and spatial options within the LDP. The intention of the consultation exercise on this was to ensure that a range of stakeholders, including the general public, were comfortable with the direction that the Plan was heading in. The vision, objectives and key issues which were formulated following consultation have not changed since the Preferred Strategy stage.
- 4.2. Having described the strategic and local policy context – the addition of a brief paragraph on the Deeside Plan is necessary to add clarity to this (**MAC7**) - and then described the main characteristics of the County, the Plan identifies the Key Issues and Drivers for change. They are followed a few paragraphs later by a list of similar needs and objectives. These are refinements and interpretations of the Key Issues and Drivers; broken down into their most important, composite parts; extraneous detail removed; and expressed concisely. They therefore constitute a step between the key issues and the objectives which will be made clear by entitling the list ‘Planning Challenges’ (**MAC9**).
- 4.3. One of the Key Issues and Drivers refers to the comments of the Inspector who held a public inquiry into the Unitary Development Plan (UDP), and to whom several other references have been made during the preparation of the LDP and its examination. The public inquiry into objections made to the UDP was held in 2007 with the inspector issuing her report to the Council in May 2009. This was a considerable time ago and the intervening period is one during which there has been significant change and movement in national planning policy, including with

regard to fundamental matters such as sustainable development and climate change. The Council used some of the UDP inspector’s findings and comments as starting points for their consideration of LDP matters including growth options and settlement boundaries. We can understand the rationale behind this but given the time that has elapsed, it is essential that the LDP is clear that it has not been constrained or overly influenced by the conclusions of the UDP inquiry.

- 4.4. The vision is succinct and, rightly, has the principle of sustainable development at its heart. It makes clear that the LDP is about people as well as places, and encapsulates the balance which will have to be struck in the County between growth and protection. It also captures Flintshire’s special location and character although this will be improved by a reference to its natural environment (**MAC10**).
- 4.5. There are nineteen objectives identified in the LDP, springing from the key issues and planning challenges, and enabling the vision to be fulfilled. They are arranged under three headings which align with the social, economic and environmental themes of sustainable development.
- 4.6. The overall structure of the LDP is based around these three components of sustainable development with an additional, discrete section for housing. This is a logical, consistent and helpful way to arrange the sections and policies. The sections are thus entitled ‘Creating Sustainable Places and Communities’, ‘Supporting a Prosperous Economy’, ‘Meeting Housing Needs’, and ‘Valuing the Environment’. The sixteen strategic policies are distributed between these headings, and the development management policies are arranged under the same headings in the following section of the LDP. A few other tweaks to section headings and the order of paragraphs are necessary to clarify and streamline the LDP structure. (**MACs22, 23 & 25**)
- 4.7. We maintained this order in the hearings programme and it thus carries over to the general structure of our report. The focus of the LDP has therefore been on sustainable development throughout its preparation and examination.
- 4.8. A healthier Wales is one of the seven Well-being Goals identified in the Well-being of Future Generations Act. Poor health is not a major issue in Flintshire although the opportunity for people to lead healthy lives is part of the final planning challenge. Nonetheless, the health and well being of all communities are important considerations upon which the LDP can have a significant, albeit indirect and difficult to measure, influence. This beneficial effect is described well in the Integrated Impact Assessment (Incorporating Sustainability Appraisal / Strategic Environmental Assessment) Environmental Report. A paragraph on the effect of the LDP is necessary to show that this important matter has been properly considered (**MAC19**). Another paragraph will be added to show that the Council has had regard to the statutory five Ways of Working during the LDP’s preparation. (**MAC24**).
- 4.9. A few minor wording changes are necessary for clarity. These include ‘repurposing’ rather than ‘redefining’ the role and function of town centres (objective 10); ensuring enough housing to meet a ‘full’ range of housing needs (objective 11); and removing the need to enhance as well as promote the rural economy (objective 13). The references to, and especially the heading, Preferred Strategy must be removed in

order to avoid confusion with the earlier stage of LDP preparation which goes by that title. **(MACs 11, 12, 13, 14)**

*Conclusion*

- 4.10. We thus find that, subject to the MACs, the overall strategy is coherent and based on a clear and robust preparation process. It is also realistic and appropriate in the light of relevant alternatives and based on robust and credible evidence.

## 5 Strategic Growth and Location of Development

### **Strategic Growth**

*Growth strategy*

- 5.1. The first three Key Issues in the LDP are, briefly; that the County is an economic driver for the sub-regional economy; that its job growth and economic development ambitions should be the basis for identifying the level of new housing; and that the 2011 WG household projections underestimated future housing requirements. Accordingly, the LDP’s growth strategy is led by the Council’s employment aspirations. The main LDP objectives relevant to this are:

8	To facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors.
9.	To support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region.
11	Ensuring that Flintshire has the right amount, size, and type of new housing to support economic development and to meet a range of housing needs.

- 5.2. As the LDP points out, there are no national figures for employment growth comparable with WG’s population and household projections which are the starting point for the calculation of housing requirements. The data and assessments provided by the County’s Employment Land Review (ELR), which dates from 2015 and was produced jointly with neighbouring authority, Wrexham, provide the basis for the decisions made with regard to employment land in the LDP.
- 5.3. We have referred to the ELR during our consideration of various matters and have found it to be a detailed, accurate and realistic assessment of sites and their potential, including for alternative uses. Having been produced in line with trends that occurred during a deep and prolonged recession, it did not, however, indicate a significant need for new employment land or much potential for job growth. It did not, therefore, support the Council’s, or indeed the sub-region’s, growth ambitions. The identification in Future Wales, published in February 2021, of a National Growth Area located broadly over much of Flintshire provided a further driver for growth alongside the Growth Vision and approved Growth Deal which are now in place, and the Deeside Enterprise Zone which was launched in 2012. **MAC60** will emphasise the importance of the latter in the County’s growth strategy.



- 5.4. The LDP’s target of 8 – 10,000 jobs is thus higher than the uppermost projection of 7,200 indicated in the ELR. Given the recessionary scenario on which the ELR is based, and the policy-led need for an ambitious, aspirational employment-based growth strategy, our view is that the LDP job target is appropriate.
- 5.5. In respect of housing growth, PPW (para 4.2.6) states that WG’s latest household projections will form a fundamental part of the evidence base for development plans. They should be considered together with other key evidence in relation to issues including what the plan is seeking to achieve, and links between homes and jobs, in order to identify an appropriate strategy for the delivery of housing.
- 5.6. As advised in DPM, the Council has based the proposed scale of future growth in population, housing and employment on an analysis of various growth options. Six options were considered, five population based and the sixth led by the jobs range informed by, and developed, from the ELR. The six options were consulted on. The feedback from events generally favoured Option 4, (population based resulting in 6,600 dwellings during the plan period at a rate of 440pa) and Option 6 (employment led projection 8,000-10,000 jobs – between 6,550 and 7,350 dwellings at a rate of from 440 to 490pa). Comments submitted as a result of the general consultation exercise included significant support for Option 1 (population based - 3,750 dwellings in total a rate of 250pa) as well as Option 6.
- 5.7. The population figures and household projections options, that is Options 1 to 5, generally indicated a low level of population and household growth. As is stated in the LDP, the Council recognised that relying on such figures would not provide a strong base from which to develop and support the LDP’s growth ambition. In the light of the County’s strong employment base and potential, and the need for economic growth, the Council therefore took the aspirational, jobs-led, approach to the housing requirement, consistent with PPW. WG in their formal comments on the deposit Plan support the level of housing growth in the Plan and the spatial strategy as being in general conformity with Future Wales.
- 5.8. When correlating jobs and dwellings, the DPM advises that the critical point is to ensure that economic and housing growth are broadly aligned, accepting there is no direct mathematical relationship. Forecasts and the scale of growth should be similar and should support each other. The LDP housing requirement is therefore the mid-range number of Option 6, that is 6,950 dwellings to be provided over the plan period. Once the flexibility allowance is added, the overall provision is 7,950 dwellings.

*Components of housing supply*

- 5.9. In its Background Paper 10: Housing Land Supply and Delivery (September 2019) the Council explains the mechanics of the LDP housing supply. It is a clear, detailed and helpful document which assures us that Flintshire’s housing provision has been calculated properly and is consistent with national policy and guidance.
- 5.10. A contingency of 1000 dwellings was added amounting to a flexibility allowance of 14.4 %. The DPM states that the level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The Council acknowledges that this is greater than the DPM 10% starting point, and also of several nearby authorities

and references, the high number of small and medium sized site allocated in the UDP did not come forward for development. As it has turned out, and as described earlier, the high flexibility allowance has proved to be a great benefit in the unforeseen circumstances arising from the phosphorus constraint.

- 5.11. As a consequence of updating the housing balance sheet and other housing tables, the flexibility allowance will be 13.2% and the total provision 7870 dwellings (including adjustments resulting from the removal of Warren Hall housing but not those arising from the phosphorus constraint) (**MAC16, MAC17**). LDP Policy STR1 deals with strategic growth. It will be amended by **MACs 26, 27 & 28** in the light of the deletion of some employment allocations, the Warren Hall housing and other updates.
- 5.12. Some objections stated that the amount of housing allocated in the UDP but not constructed should be added on to the LDP housing requirement. The DPM addresses in detail the components of housing supply and how they should be calculated; undelivered housing from a previous plan is not one. It is inevitable that the UDP is referred to in addressing these important matters but, as we have said elsewhere in this document, it was prepared and examined over ten years ago and much has changed since. The LDP must look to and plan for the future using the most up-to-date data and methodologies available, and in the light of current assumptions, guidance and policy.
- 5.13. Several sites now allocated in the LDP were allocated in the UDP and did not come forward. The DPM’s advice on this is that such rolled forward allocations require careful justification for inclusion in a new plan; there needs to be a substantial change in circumstances, and clear evidence, to demonstrate that sites can be delivered and to justify their inclusion again. We comment on this under our consideration of each allocation later on. Overall, however, we consider that the Council has explained the changes that have taken place and the ways in which delivery of the rolled over sites is significantly more assured.
- 5.14. Another component of the housing supply is large (10 units and above) and small (fewer than 10 units) windfall sites. The Council explains that it has analysed past trends, the results of the urban capacity study, and the spatial spread of previous windfalls. It explains that, whilst it anticipates that windfall sites will continue to make a significant contribution to the housing land supply, it was unreasonable to predict future rates based on the past, high, rates. It therefore took a cautious approach and applied a 50% discount to small and large windfall site contributions. We agree with this approach which is in line with the advice on windfalls provided in the DPM.
- 5.15. During the hearings those objecting to the allocation of various sites mentioned that County Hall may be an alternative site, and preferable in being brownfield land in a sustainable location. The Council has pointed out that whilst parts are to be demolished, redevelopment is complicated by the need to retain some of the buildings, and its challenging nature in terms of the presence of mature trees, a listed building, green space, protected species and topography. The site has the potential to deliver housing as a large windfall site which the plan’s housing balance sheet has made allowance for.

*Strategic sites*

5.16. There are two strategic sites allocated in the LDP. These are quite different from one another in most respects and, for clarity, Policy STR3 will be split into two new policies, one for each of the strategic sites (**MAC31**).

*Northern Gateway*

5.17. The Northern Gateway Strategic Site (STR3A) is in two parts. Outline planning permission for the northern part was first granted in 2013 for a mixed use development. Since then, considerable progress has been made across the whole site in delivering site enabling works, including the spine road which was largely completed in 2017, and on dwellings and employment facilities.

5.18. At our request, the Council provided us with a helpful update in June 2022. At that time, several reserved matters applications, covering over 1000 units, were in progress and either under consideration; with planning permission subject to S106 agreements; or granted outright. In addition, a scheme for 283 units was under construction. The development rates set out in the trajectory for the Northern Gateway site were conservative and lower than the figures provided by the developers and landowners themselves; future development rates anticipated by the developers were above those estimated by the Council and indicated that the site would be fully developed within the Plan period. Recent monitoring shows, therefore, that housing completions on the Northern Gateway site are higher than anticipated by the Council and more in line with the developers’ trajectory.

5.19. Employment development is also taking place with an Amazon distribution centre now in full operation. The Council has also resolved to grant planning permission (March 2022) for a large paper processing mill on part of the allocated site.

5.20. The developer of part of the Northern Gateway has objected to MAC58. The intention of this is to specify in Policy PE1, which deals with general employment land allocations, that the Northern Gateway site is not suitable for B1 uses. The objector states that such a change would not be consistent with the extant planning permission for the site or with the potential reuse of the listed John Summers Building. The position is further clouded by MAC61 which suggests amending the explanatory text to Policy PE1, including that the Warren Hall site would be unsuitable for B8 uses but with no reference to the restriction of B1 at Northern Gateway.

5.21. The policies that developers and decision-makers will turn to first when considering what is appropriate for the strategic sites are those that deal explicitly and solely with those sites, namely the new Policies STR3A and STR3B. Apart from being separated, these have changed very little; Policy STR3A will continue to state that the Northern Gateway strategic site will contribute 72.4ha of B2/B8 employment land. In addition, the comment in the explanation that ‘...the site will deliver some 72.4ha of B2 and B8 employment land, which reflects the general nature of employment development in the locality and the fact that B1 high quality employment land is available elsewhere in the County’ will be retained.

5.22. It is important that policies within an LDP are consistent with one another. Although Policy PE1 says that the employment sites listed are allocated for B1, B2 and B8 uses, this is by way of an introductory comment which does not specify that all uses

are suitable at all sites. In a general policy covering all employment land allocations we do not consider that this is wrong or inaccurate. The potential of conflict with the strategic sites’ policies has not been raised and, as sufficient detail is rightly provided in those, we do not consider that MAC58 is necessary. We are content with **MAC61** subject to the deletion of the final sentence which refers only to the use restriction at Warren Hall.

*Warren Hall strategic site*

- 5.23. The Warren Hall site was first granted outline planning permission for a business park in 1989. It has been the subject of planning applications since including in 2008 an outline consent (Council ref. 038744) for a business park, hotel and associated leisure facilities. A large part of the site, that part now earmarked for the employment development, is allocated in the Flintshire Unitary Development Plan (UDP) under Policy EM2 as a high quality employment site for the location of B1 uses. The adjacent junction onto the A55 has been upgraded to facilitate full access but the site no longer has an extant planning permission. The Council considers that the principle of a business park at this location is well established through the previous allocation and permissions.
- 5.24. The site is now allocated in the LDP for:
- 300 new homes, including affordable;
  - 22.7ha of B1 and high quality B2 employment land;
  - A commercial hub including hotel, leisure, local centre and retail uses;
  - Strategic landscaping and green infrastructure network;
  - Sustainable transport links with nearby settlements and a link with the Mold – Deeside Active Travel route.
- 5.25. The proposals have been refined over time, most notably by the addition of an element of housing. The scheme now identified in the LDP is intended to be a sustainable mixed use development in close proximity to a number of settlements, particularly the employment and economic facilities of Broughton. The location of housing in close proximity to employment provision, all within a quality environment and easily accessible on foot and by cycle, is considered by the Council to have benefits for sustainability. The proposal’s strategic importance springs from the guidance and context provided initially by the WSP, now superseded by Future Wales which enshrines that guidance in policy, and the North Wales Growth Deal.
- 5.26. Despite the allocations and permissions, and unlike its sister strategic site at Northern Gateway, there has been no development whatsoever at Warren Hall. It is still a greenfield site with a number of constraints including the presence of some Grade 3a agricultural land (ie BMV) and ecological interests. Not least amongst constraints is the site’s proximity to Hawarden Airport which could restrict two storey development to just under a quarter of the overall site area. These considerations raise concerns as to the likelihood of full delivery of the employment, housing and other elements of the allocation. We go on to consider these matters in the following sub-sections.

*Growth Deal*

- 5.27. The DPM3 advises that allocations rolled forward from a previous plan, which would be the case with the employment part of the Warren Hall site, 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 that sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. Sites should be subject to the same candidate site process requirements as new sites, that is, they must be demonstrated to be sustainable and deliverable. In addition, the DPM3 says that sites key to the delivery of the plan will require greater evidence to support their delivery.

- 5.28. The North Wales Economic Ambition Board (NWEAB) produced a Growth Vision consisting of nine programmes. These will be long-term, broad based, and will provide a clear framework by which private and public resources will be integrated to deliver positive outcomes for the economy. The Land and Property Development Programme addresses the shortage of suitable land and properties for business growth and aims to bring forward sites for housing development. The North Wales Growth Deal was completed by all the NWEAB partners and UK and WG on 18th December 2020.
- 5.29. Warren Hall is identified as one of the first six priority projects within the Land and Property Programme of the Growth Deal. While there is clear evidence of demand from the private sector, private investment cannot be secured and interest cannot proceed unless the primary infrastructure is provided. The Growth Deal thus identifies funding of up to £15M to meet primary services and infrastructure costs at the Warren Hall site. WG will provide the land and work with the NWEAB to deliver the necessary planning consents and enable the site for development subject to all necessary approvals.
- 5.30. The Growth Deal funding is clearly a significant advantage for the Warren Hall site and thus for the Flintshire communities as a whole. Our concern in examining the LDP was that it should not provide undue influence and result in the allocation of a site which was otherwise intrinsically unsuitable for development.

#### *Employment allocation*

- 5.31. Justification for the allocation of each of the components of the Warren Hall site is provided in the market assessment provided on behalf of WG [LDP-EBD-STR3B.2]. In respect of the employment uses proposed, this sets the scene by pointing out that Flintshire has developed as a major economic centre throughout the last 20 years. Just over a third of all jobs are in manufacturing, well over twice as many as the UK average of 13%. High value manufacturing, such as aerospace, automotive components and speciality chemicals, is an important sector with the Airbus UK plant at Broughton employing 7,000 people and being amongst the largest manufacturing plants in the UK.
- 5.32. The Deeside Enterprise Zone (DEZ), designated in 2012, makes a significant contribution to Flintshire’s economy and to that of the wider region. It has the highest concentration of manufacturing jobs in the UK and is renowned for the highly skilled advanced manufacturing industries there as well as the Advanced Manufacturing Research Centre. With a total area of 2000ha, it includes several individual development areas, such as Deeside Industrial Park, Northern Gateway Strategic Development Site, the Renewable Energy Park, and the Toyota Lean Manufacturing Centre. Specific sectors of the industrial market, such as advanced manufacturing, research and development, renewable energy, are targeted for inclusion in the Zone.

- 5.33. As the ELR points out, modern businesses and developers want easily developable, accessible and prominent sites for their premises. The provision of employment land at Warren Hall, including for generic, less specialist manufacturing uses, would provide such and would complement the DEZ. It would also provide the design and build opportunities, where a single contractor is responsible for the planning, design, and construction of a unit to the client's requirements, which are currently somewhat restricted in Deeside.
- 5.34. The market assessment also concluded that, at least at the time it was published in 2019, there was strong investment activity in Flintshire’s industrial market with good levels of growth, increasing numbers of transactions, falling yields and increasing prices. Despite the large employment land surplus, or perhaps because of it, the site at Warren Hall could facilitate employment diversification and growth during the plan period.
- 5.35. As a result of further work carried out to demonstrate to Airbus the developable area in relation to building heights, the area of employment land would be reduced from 22.70ha to 19.1ha. This is a slight reduction which does not affect the strategic purpose or viability of the allocation. **(MAC59)**
- 5.36. Having been allocated in the UDP and not been developed, this rolled over allocation requires a substantial change in circumstances to justify its inclusion in the LDP. The Growth Deal funding of over £15 million is a substantial sum which fully provides that justification.

*Commercial hub*

- 5.37. The strategic policy refers to the provision of a commercial hub on the Warren Hall site involving hotel, leisure, local centre and retail facilities. These would be helpful adjuncts to the new employment uses on the site. In this easily accessible location adjacent to the A55, they would also be beneficial to the wider area in terms of the services provided and jobs created. The market assessment notes that there has been interest in a hotel and pub in the Broughton area from national providers. We are thus confident that there is a realistic prospect of these being delivered within the plan period.

*Housing*

- 5.38. The residential element at Warren Hall is not necessary to cross subsidise or enable the employment development. The objective behind providing up to 300 homes is, therefore, to contribute to the creation of a sustainable, mixed-use development which would be of high quality and consistent with placemaking ideals. Whilst this is a commendable aim, which accords with the LDP’s objectives, we have significant concerns that the strategic site at Warren Hall would not meet these aspirations in every respect; we have seen little evidence to assuage our concerns.
- 5.39. Throughout the submitted documents, for example the Masterplan and Delivery Statement [LDP-EBD-STRB.1], the placemaking appraisal, the Council’s statements and other responses to us, and the Transport Feasibility Study, the site is described as being in a sustainable location in proximity to neighbouring settlements. We question the accuracy of this assessment.

- 5.40. Two isochrones in the Transport Feasibility Study (LDP-EBD-STR3B.8.1, Figs 5.1 & 5.2) show the areas that can be reached within a 30 minute (broken down into five minute stages) walk or cycle ride from the site. The timings seem to start from the site boundary. The nearest services to the proposed housing are those in Higher Kinnerton, including the primary school and convenience store, which are within 10 and 20 minutes’ walk from the site. Penymynydd and Penyffordd to the west, are further from the site than Higher Kinnerton and their services would be a 20 to 30 minute walk away. There is a railway station at Penyffordd but this is beyond the 30 minute walk isochrone. Higher Kinnerton and Penymynydd/Penyffordd are classified in the settlement hierarchy as Sustainable Settlements defined as benefitting from some services and facilities and being sustainably located.
- 5.41. Broughton, which is to the north east of the site, is classified as a Local Service Centre and therefore has a local role in the delivery of services and facilities. There is a convenience store in Broughton within a 10-15 minute walk whilst the primary school and library are within the 20-25 minute walk range. In practice walking to these services from the proposed housing, which would be located on the furthest part of the site from Broughton, would take a good five minutes longer.
- 5.42. Walking distances to services from the site for people with full mobility would therefore be reasonable, at least occasionally. They would be far more challenging for those travelling with children including in prams or pushchairs, those carrying shopping or other bags, anyone who is less efficient at walking, and in poor weather. We consider therefore, that the likelihood of many or most future occupiers walking such distances on a daily basis is remote. The placemaking appraisal considers that the proposal would encourage walking and cycling, and the use of public transport, rather than reliance upon the private car. The evidence submitted does not, however, lead us to the same conclusion.
- 5.43. The delivery of groceries and a wide range of other products purchased online is now commonplace but not everyone subscribes to this, nor should they have to. Despite the proposed amendment to criterion iii referring specifically to a local convenience shop, there is no certainty that this would be provided on the site or when. Unlike the hotel and pub elements of the commercial hub, we have no evidence that there have been enquiries about the site from convenience store operators.
- 5.44. The intention to provide up to 300 homes at Warren Hall is a significant addition to previous schemes and allocations. This is a substantial change in circumstances as required for rolled forward allocations by the DPM. On this pleasant, green field site, in a rural and attractive setting, we have no doubt that the housing itself would be provided within the plan period. There is little evidence, however, that the housing element of the proposal would be beneficial in attracting employment development to the site. The addition of the housing is not necessary, therefore, to demonstrate that the site will be delivered as a whole or to justify its continued inclusion in line with the requirements of the DPM. That justification is provided by the financial contribution of the Growth Deal towards infrastructure and it assures us that the employment allocation will be delivered during the plan period.

5.45. All things considered, the housing element of the allocation is not justified and would lead to the creation of a sizeable residential development in an unsustainable location, outside of a settlement boundary and thus in the open countryside. It would lead to an increase in car-borne journeys and would be contrary to the objectives and policies of the LDP. **IMAC1** will therefore delete the housing element of the Warren Hall allocation.

**Conclusion**

5.46. Our conclusion is, therefore, that subject to the MACs including the deletion of the housing from the Warren Hall site, the LDP growth strategy is coherent and based on a clear and robust preparation process. It is realistic and appropriate in the light of relevant alternatives and based on robust and credible evidence. In addition, it will address the Key Issues and Strategic Objectives effectively and efficiently. The amount of housing provision set out in the LDP is also realistic, appropriate and based on a robust and credible evidence base.

**Location of development**

*Settlement hierarchy*

5.47. The settlement hierarchy is the development framework on which the spatial strategy can be hung. Settlement audits were carried out leading to the identification of five tiers and their functions as follows:

Main Service Centres	Strategic role in delivery of services and facilities. Inc. Holywell, Mold, Saltney
Local Service Centres	Local role in the delivery of services and facilities. Inc. Ewloe, Hawarden, HCAC (Hope, Caergwrle, Abermorddu & Cefn y Bedd)
Sustainable Village	Benefit from some services and facilities and are sustainably located. Inc. Higher Kinnerton, New Brighton, Penyffordd / Penymynydd
Defined Village	Benefit from some facilities and facilities with which to sustain local needs. Inc. Cilcain, Nercwys, Talacre
Undefined Village	Have few or no services and facilities and which are not of a size or character to warrant a settlement boundary. Inc. Ffrith, Dobshell, Halkyn

5.48. Objections to the settlement hierarchy generally questioned its accuracy and judgement in certain respects. Errors or anomalies in the settlement audits were not widespread, however, and our conclusion is that they do not undermine the hierarchy as a whole.



5.49. One of the main concerns was in respect of the amalgamation of the four settlements of Hope, Caergwrle, Abermorddu and Cefn y Bedd into one settlement with a single settlement boundary. The Council’s response is that this would not detract from the character and identity and community spirit of any of the settlements. The four settlements all physically adjoin each other, share facilities and services and are located on a sustainable transport corridor. Combined, the four settlements have a good range of services and facilities and perform the function of a Local Service Centre in supporting the local area; together they are comparable in size, character and services with other such centres. We therefore consider that considering the four settlements together as a Local Service Centre is appropriate.

*Spatial strategy*

5.50. The way that the identified growth should be distributed around the County was arrived at in a similar way as the growth strategy. Five options informed by such factors as the LDP Vision and Objectives; sustainability objectives; and development potential of the County were prepared and consulted on. The spatial options were:

1.	Proportional Distribution	Utilising the settlement hierarchy to allow for a proportional distribution of development based on sustainability principles
2.	Focussed Urban Growth	Directing all development to urban centres i.e. the upper two tiers of the settlement hierarchy
3.	Growth Area	Development would be focused by directing all development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan.
4.	Hubs and Corridors, Settlements along Transport Routes	Development would be distributed based on a strict interpretation of key road and rail transport hubs and routes.
5.	Sustainable Distribution plus Refined Approach to Rural Settlements	Development would be focused on the first three tiers of the settlement hierarchy, based on identifying the most sustainable settlements and sites. In the rural settlements a more refined policy approach would be developed to ensure that a more flexible approach is taken to bringing about and delivering local needs housing.

5.51. As it had done with the growth options, the Council’s Preferred Strategy Consultation Document Background Paper analysed fully the results of the consultation on the spatial options. The results, however, were far less equivocal than those on the growth options with a significant majority favouring Option 5. This was therefore the strategy carried forward in the LDP.

5.52. In Option 5, development is focussed on the top three tiers of the settlement hierarchy whilst in the lower two tiers the priority will be to deliver for local needs housing in sustainable rural settlements. The option is not based on numerical

controls or parameters, but on the broad position within the settlement hierarchy and on identifying the most sustainable settlements. **MAC30** will add Table 4A from Background Paper 10A Housing Land Supply to the explanation to Policy STR2 to demonstrate the spatial distribution of the housing supply.

5.53. We have noted that WG supported the level of housing growth and the spatial strategy in the LDP in its formal comments. We agree that the proposed distribution of development would be consistent with Future Wales and national policy objectives. It is therefore appropriate and justified.

#### *Settlement limits*

5.54. The settlement boundaries are an essential part of the growth and spatial strategies as they provide the instrument by which to control development and direct it to sustainable locations. The Council points out in the Candidate Sites Assessment Methodology, which also describes the review of settlement boundaries, that there is no correlation between the LDP settlement boundaries and other boundaries, such as administrative, or with other factors and considerations such as the ownership of land.

5.55. Settlement boundaries designated in the LDP are based on a review and updating of those included in the UDP. To do this the small (9 units or fewer) candidate sites adjacent or in close proximity to the existing settlement boundaries were considered against a number of criteria including:

- The LDP strategy - how much development is needed, is the settlement a sustainable location for further development?
- Whether the inclusion of the site would represent a natural and logical extension to a settlement with firm and defensible boundaries;
- Existing commitments and new allocations;
- Any constraints such as Conservation Areas, listed buildings, access, flooding or nature conservation interests
- Whether the site is brownfield and, if so, any insurmountable constraints;
- Would development be an unacceptable intrusion into the countryside, ribbon development, or a fragmented or sporadic pattern of development?
- Does the site fulfil an important community function such as playing fields or other amenity land.

5.56. The LDP settlement boundaries have been formulated as the result of a comprehensive and consistent review based on a robust methodology. The criteria against which potential sites for inclusion were considered focussed on the LDP strategy and objectives, and on sustainable locations.

5.57. With regard to housing allocation HN1.8, it is apparent that Hawarden and Mancot are already conjoined to the north of the site, forming a continuous developed area linked by roads and footpaths, and lacking any clear separation between the two settlements. As such, although the site allocation increases the length of the shared settlement boundary, we consider that in actuality this would result in little alteration to the existing function and identity of Mancot and the adjoining area of Hawarden.

## **Conclusion**

- 5.58. Our overall conclusion on this matter is that the spatial strategy is coherent, is in general conformity with Future Wales and is based on a clear and robust preparation process which accords with the strategic placemaking approach set out in PPW. The settlement hierarchy, spatial strategy, settlement boundaries and relevant strategic policies are realistic, appropriate and logical in the light of relevant alternatives and are based on robust and credible evidence.

## **6 Principles of Sustainable Development**

- 6.1. This chapter, which is the first in the development management section, contains several policies essential to ensuring that the principles of sustainability permeate all development. They begin with Policy PC1 which deals with the relationship of development to settlement boundaries. As pointed out earlier, these are the basic tool for locating development in sustainable locations. The policy sets out clearly where development will be permitted and, by reference to the Proposals Map, allocations, Principal Employment Areas and other plan policies, the types of development which will be acceptable within the settlement boundaries.
- 6.2. The areas outside of settlement boundaries are classed as open countryside where, as PPW (para. 3.60) requires, new building away from existing settlements or areas allocated for development must continue to be strictly controlled. Policy PC1 covers the open countryside in both the policy itself and its explanatory text, setting out the limited range of development which will be permitted there. It is clear and helpful to have the areas within settlement boundaries and outside of them, that is the open countryside, juxtaposed in the same policy. **MAC48** will delete the word ‘generally’ from the policy as it introduces a level of unwanted uncertainty to it. **MAC49** is a correction which is necessary for clarity.
- 6.3. Policy PC2 sets out criteria for all development and PC3 with design. Whilst not all criteria apply to every proposal, the requirements of these policies are absolute. It is not necessary to include the proviso ‘where appropriate’ which, in our view, reduces somewhat the intention of these policies. **MACs 50 & 51** will delete that phrase from both. The important matter of the living conditions of nearby residents and other land users is included in Policy PC2 as a general development requirement. As it is also a crucial consideration in the design process, **MAC52** will add a criterion to Policy PC3 to protect nearby occupiers from any harmful effects of new development including from overlooking and harm to outlook which are not referred to in Policy PC2.
- 6.4. Policy PC4 encapsulates the most effective measures which can be taken to address and adapt to climate change and is thus important in enforcing the overall principles of the LDP. The slight rewording of **MAC53** is more direct and will strengthen its provisions. **MAC54** will update criterion c) with a reference to Sustainable Management of Natural Resources (SMNR), in line with current PPW.

### *Transport and accessibility*

- 6.5. Policy PC5 is an important policy addressing the accessibility of new development and building upon it to enable a more sustainable, multi-mode, transport network. **MAC55** will reword the policy in places to clarify its meaning and thus emphasise its intention. Another cornerstone policy is PC6 on Active Travel. As with PC5, some rewording is necessary to express the policy’s requirements more directly and clearly (**MAC56**). **MAC57** will update and improve the accuracy of the explanatory text to Policy PC8 which protects Hawarden Airport from development which would compromise its operation.
- 6.6. The North Wales Metro is the subject of Policy 23 in Future Wales and will include existing public transport routes in Flintshire. **MAC32** will add a paragraph about the North Wales Metro to the explanation of Policy STR5 for completeness and consistency.
- 6.7. Candidate site GRE004 was proposed as a site for a railway station at Greenfield but no such allocation is included in the LDP. A local business, Kingspan Insulated Panels, which has premises very close to the proposed site and employs 500 people, provides wholehearted support for the proposal. A substantial majority of those replying to a questionnaire on the matter stated that they would consider using a new station linked with other transport facilities which would be of particular benefit to young people living in Holywell and Greenfield. In addition, there are letters of support from Mark Isherwood MS and Rob Roberts MP.
- 6.8. The County Council made a successful funding application to Welsh Government’s Local Transport Fund (LTF) for a North Flintshire Transport Study. The aim of the study was to produce a document which would support future bids for feasibility studies, amongst other things, including for a new station. Holywell Town Council has also made a case for a new railway station to serve Holywell and North Flintshire (Doc. M10.121).
- 6.9. LDP Policy PC10, dealing with identified new transport schemes, safeguards land along the route of potential improvements so that they can be implemented when final decisions on them are made. The schemes covered by Policy PC10, currently all highway enhancements, are either within WG’s National Transport Finance Plan and the Regional Transport Plan for North Wales or the Council’s Capital Programme. Proposals for a new station at Greenfield have not yet reached that stage and there are questions as to the suitability of the site for a station.
- 6.10. There is not, therefore, sufficient justification for protecting or allocating the potential site; prospects for its delivery within the plan period are tenuous. Moreover, and reassuringly in the light of the high level of support for this project, there is nothing in the LDP, including the absence of a specific allocation for such, which would prevent proposals for a new station at Greenfield being progressed to fruition by the Town Council and other parties including the Council.
- 6.11. The route of a proposed new road is safeguarded in the LDP but unless it becomes certain, the sites for potential service areas cannot be allocated. In any event, PPW provides that some other forms of development including local transport infrastructure may be appropriate in a green wedge.

## **Conclusion**

- 6.12. We find, therefore, that subject to the MACs the policies and proposals on this matter fully achieve the sustainable development and placemaking objectives of the LDP consistent with national policy. We also consider that they are based on robust and credible evidence.

## **7 Economy and Employment**

- 7.1. PPW’s position on economic development is that the planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses (PPW para. 5.4.1). To that end it goes on to state that LPAs should support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level, and that 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.
- 7.2. The ELR provides a detailed audit and commentary on the employment land in Flintshire and Wrexham and is the main source of employment land data and evidence for the LDP.
- 7.3. The general employment land allocations are set out in Policy PE1. During the preparation of the LDP, NRW expressed concerns in respect of flood risk and several of the employment sites. A flood risk appraisal was carried out (Flintshire LDP Primary Employment Sites Flood Risk Appraisal, Draft Report, November 2020) and incorporated into the SoCG with NRW (SOCG006). NRW found that there was a lack of evidence at some sites to demonstrate that the effects of flooding could be acceptably managed. Due to the amount of employment land available in the county, the Council can afford to delete the affected allocations without causing a harmful reduction in the overall amount available (**MAC59**). Planning applications could still come forward on the deleted sites subject to being accompanied by a satisfactorily detailed FCA.
- 7.4. **MACs 62, 64 & 65** will amend Policies PE1 and PE2 and their explanatory text to clarify how proposals for new development within employment allocations will deal with flood risk in accordance with national policy. Policy PE6 provides general protection to existing or allocated employment land from other development. **MAC66** recognises that ancillary, complementary uses may be appropriate and will be considered on their merits and amends the explanation to Policy PE6 accordingly.
- 7.5. As well as the traditional employment land uses, such as offices, industry and warehousing, economic land uses include a variety of others such as retail and tourism, and sectors such as construction, energy, minerals, waste and telecommunications.
- 7.6. **MAC34** will provide updated commentary on the need for retail floorspace and the reasons for not allocating retail sites to the explanation to Policy STR9. Policy STR10 is the strategic policy dealing with tourism, culture and leisure and is titled

accordingly. **MAC35** will amend the policy wording by adding the latter two to criterion i). This is for accuracy and to make it completely clear that all three types of development are supported.

- 7.7. **MAC67** adds the provision of local convenience stores to Policy PE10 which, at the moment, deals only with district and local centres. It will support the provision of local stores in settlements without a district or local centre. Although a modest addition, it is a valuable one which could reduce the number of car journeys and which therefore contributes to the sustainability objectives of the LDP.
- 7.8. Tourism is an important economic activity throughout the county and especially along the coast. **MAC69** will amend Policy PE13 to clarify that new static caravan development should not take place in Talacre, Gronant or Gwespyr area because of the existing concentration of such which has harmed the undeveloped character of the coast. This approach is carried over from the UDP and, having regard to the evidence, remains appropriate and justified.
- 7.9. **MAC71** amends the wording and sense of PE14, which covers the Greenfield Valley tourist attraction, to make it more restrictive; it will rightly clarify that it is not the policy’s aim to promote development at Greenfield Valley.
- 7.10. Recognising that affordable, secure electronic communications infrastructure is essential to people and businesses, **MAC73** will add a new telecommunications policy, Policy PE15, to the Supporting a Prosperous Economy chapter. This is line with PPW which states that development plans should set out policies for telecommunications development, including criteria-based policies to guide development to suitable locations.

## **Conclusion**

- 7.11. Our conclusion on this matter is that the strategy for the economy and employment is coherent and based on a clear and robust preparation process. It will conform with Future Wales Policy 20 which states that LDPs must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; and advanced manufacturing and transport infrastructure. Subject to the relevant MACs, the policies are realistic and appropriate and based on robust evidence.

## **8 Housing**

### **Site selection process**

- 8.1. Even though the LDP is based on jobs-led growth figures, the delivery of sufficient housing on the most suitable sites is, of course, fundamental to the success or otherwise of the plan. The site selection process was set out at an early stage in the Candidate Sites Assessment Methodology which was published in May 2015.
- 8.2. The sites that were initially assessed were; those promoted by landowners and developers; those identified by Council officers from a number of studies and sources as having development potential; and undeveloped existing UDP allocations. These went through four assessment stages which were:

- i. Initial filtering by size and proposed land use;
  - ii. Detailed appraisal;
  - iii. Assessment against the preferred strategy i.e. level and distribution of growth and need for development;
  - iv. Assessment of sites against other studies e.g. housing, retail or town centre opportunity sites, SEA/SA and HRA
- 8.3. The criteria used by officers in assessing the candidate sites covered a wide range of pertinent features relating to its location, whether it was brownfield, BMV land, accessible to vehicles, accessible to facilities, services, utilities, its biodiversity status, its landscape quality, whether heritage assets would be affected, flood risk, ground conditions and viability. These are generally consistent with the information DPM now advises should be sought and also accord with PPW 4.2.19 which says that there must also be an initial site viability assessment at candidate site stage.
- 8.4. Existing commitments and recent completions were also taken into account. These include two large sites in Holywell and one in Caerwys which counter the lack of allocations in the west of Flintshire.
- 8.5. There have, naturally, been objections to the site selection process and the fact that certain sites have been omitted or included. In our examination of the LDP, we have not, however, come across any striking anomalies or assessments which did not accord with national policy or guidance (with the exception of the Warren Hall housing component discussed above). We are satisfied, therefore, that the site selection process was robust, thorough and well audited; and that it was consistent with national policy and guidance.

*Other housing policies*

- 8.6. Policy STR11 is the strategic policy which deals specifically with housing growth and the components of the LDP’s housing provision. The policy and its supporting text will be amended by **MACs 37 & 38** to revise the figures, including as a result of the deletion of the element of housing at Warren Hall, and to update the position following the revocation of TAN1. Policy HN1 lists the individual housing allocations. In line with the DPM3, **MAC74** will add a new table showing them together with the projected timescale for the delivery of each.

***Housing allocations***

***Common issues with allocations***

- 8.7. Several concerns and matters are common to more than one allocation and we deal with these first. Significant issues with individual allocations these are addressed later in our report.

*Previously developed land*

- 8.8. It is a well-established principle in national policy that previously developed, or brownfield, land should be used in preference to greenfield sites; an objective of the LDP is to promote the development of brownfield land. Policy STR14 which deals with climate change and environmental protection includes a criterion to support the use and development of appropriate or suitable brownfield land.

8.9. A key issue and driver of the Plan identifies, however, that whilst the County has extensive areas of brownfield land these tend to be located close to the River Dee and estuary where they are at high risk of flooding and/or of international nature conservation importance. PPW (para 3.55) recognises that not all previously developed land is suitable for development. In order to accommodate the projected household and economic growth it has therefore been necessary to allocate greenfield sites.

*Green wedge*

8.10. The UDP designated several areas of green barrier, which PPW now refers to as green wedge. The purposes of these are the same as those of Green Belts and include preventing the coalescence of settlements with one another and safeguarding the countryside from encroachment. The difference between Green Belts and green wedges is the permanence of the former; green wedges are local designations which should be subject to review as part of the LDP process (PPW para 3.64).

8.11. In accordance with PPW, the Council has carried out a review of the County Borough’s green wedges (EBNB01) which is covered elsewhere in this document. The protection of land and settlements with a green wedge designation must be balanced against the need to provide sufficient, suitable sites for development. That a site was formerly in a UDP green barrier is not, therefore, a compelling reason for it not being allocated in the LDP.

*Best and most versatile (BMV) agricultural land*

8.12. Many of the Plan’s Tier 1, 2 and 3 settlements have BMV agricultural land around them. This combined with the lack of available and suitable brownfield sites in sustainable locations justifies the loss of some BMV land. During plan preparation, the Council worked with the relevant department of WG and site proposers to establish the likely loss of BMV agricultural land on potential allocations. Background Paper 09 on Agricultural Land explains that the Council then sought to minimise the loss of BMV throughout the process of assessing sites and identifying potential allocations. In assessing the presence of BMV during the site selection process, the Council did not rely on reducing the grade of areas of BMV.

8.13. Although the aim of safeguarding BMV land is important, however, it is not the only factor when identifying housing allocations but is just one amongst a wide range of, sometimes competing, planning considerations. PPW states (paras. 3.58 & 3.59) that BMV should be conserved as a finite resource for the future; when considering the search sequence and in development plan policies considerable weight should be given to protecting such land from development because of its special importance.

8.14. PPW adds that 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. In Flintshire there is a pressing need for housing, infrastructure and other development in sustainable locations. As the presence of BMV land was a key consideration throughout the site selection process, we are satisfied that allocations on it have only been made where the



exceptions listed in PPW, that is an overriding need and no alternative sites, exist. With regard to BMV, the allocations are therefore consistent with PPW.

*Drainage*

- 8.15. Since January 2019, all new developments of more than one dwelling house, or where the construction area is 100sqm or more, require sustainable drainage systems (SuDS) for surface water. These must be designed and built in accordance with statutory standards and approved by the local authority before construction work begins. SuDS have a number of benefits over traditional drainage systems such as improving the resilience of development to climate change, reducing the risk of localised surface water flooding, mitigating pollution that may arise from surface water runoff and helping to safeguard water supplies. We are satisfied that all allocations have demonstrated the feasibility of SUDS schemes and that, as a result, development on allocations would not be subject to flooding itself or create flooding elsewhere.

*Environmental interests*

- 8.16. Environmental interests such as habitats, woodland and trees, local and national designations have been recorded and appropriately considered in allocating sites for development. The majority of the guidance for each allocation in Policy HN1 rightly refers to the need to retain hedgerows or to implement other ecological mitigation. In addition, LDP PC3 and Policies EN2 to EN7 would afford suitable protection to various elements of the natural environment from inappropriate or harmful development in accordance with national policy including PPW (6.4.3).

*Landscape quality*

- 8.17. No matter how well-designed, well-landscaped and attractive a development is, one of the most difficult things for local residents to witness is the loss of pleasant, undeveloped land. In a county such as Flintshire, where there is pressing need for housing and insufficient, suitable brownfield land in the right locations, it is inevitable that some greenfield sites will be allocated.
- 8.18. In assessing the potential site allocations, landscape value was taken into account with the LANDMAP evaluation being one of the assessed criteria. The Candidate Site process (LDP-KPD-CS1.2) also drew attention to new sites to be protected from development, for example with a green wedge or green space designation. The document stressed, however, that land should only be protected from development where necessary and appropriate to do so based on sound planning principles; it should not be protected for the sole purpose of preventing development from taking place.
- 8.19. We are satisfied that, where greenfield sites are developed, LDP policies would afford adequate protection to the landscape of the site and surrounding area. These include: EN2 which ensures the enhancement of the green infrastructure network including the creation of new links to it; EN4 which requires landscaping and other mitigation measures; and EN7 which protects trees, woodlands and hedgerows from the impact of development.

*Insufficient infrastructure such as education and health facilities.*

- 8.20. It is a frequent concern that the facilities available in settlements will not have the capacity to accommodate any pressure put on them by new housing development. It is always a requirement for developers to make provision, through planning obligations and commensurate with the scale of development, for infrastructure to be provided where existing capacity would not meet the additional demands. This can be contributions to: improvements to highways, cycleways and pedestrian routes; facilities at schools to increase capacity; the provision of public open space and new recreational facilities. LDP Policy STR6 would facilitate the implementation of such arrangements and would provide an appropriate framework for more detailed advice provided in Supplementary Planning Guidance.
- 8.21. The current legislative framework inhibits the ability for LPAs to secure financial contributions for increasing or improving health care facilities. In any case, we have been informed that Flintshire has a number of relatively new Primary Health Care Centres and the issue is one of a lack of sufficient staff including GPs, rather than a lack of premises or facilities.
- 8.22. The Betsi Cadwaladr University Health Board and Local Education Authority have been consulted on the LDP from the earliest stages its preparation. Both have provided position statements (SOCG008 and SOCG009) and neither has made any objections to the LDP or its allocations.
- 8.23. The Council also points out that the allocations will be delivered across the County and throughout the plan period so there will not be a sudden, large increase in dwellings in one place. This will give sufficient time for the Heath Board and the Education Authority to plan for and support the delivery of growth that is identified in the LDP.

*Living conditions*

- 8.24. The amenity of the occupiers of existing homes neighbouring allocated sites, and indeed, of the newly constructed dwellings within the allocations, is a consideration for the detailed planning application stage. Such matters as noise, outlook, loss of light, shading, overlooking and loss of privacy will be dealt with at that time. LDP Policy PC2 sets out the general requirements for development including that it must not have a significant adverse impact on the safety and living conditions of nearby residents.
- 8.25. The construction of a substantial allocation will inevitably bring noise, traffic including large, heavy vehicles, and other disruption to the surrounding area. It is also likely to continue for several years in the case of the larger sites. Whilst not a good reason to delete an allocation, the LPA would have the ability to impose conditions on the relevant planning permissions to minimise the nuisance, where necessary. These could cover the times at which work may take place, and arrangements for the construction period such as where construction vehicles and workers will park, how and where materials will be stored, the enclosure of the site, measures to reduce vibration, dust and the spread of mud, and so on.

*Inconsistent with UDP*

- 8.26. Several objections refer to allocations being inconsistent with the UDP and the conclusions of the UDP inspector as set out in her report. The UDP inquiry closed in 2008 and the inspector’s report was published in 2009, well over a decade ago.

Circumstances and national planning policies have altered significantly in the intervening period. In addition, the UDP is well past its end date of 2015. It is thus out of date in many regards as it was not prepared to apply beyond that time or with the needs and impacts of future growth in mind. It is consequently of little relevance to our deliberations on the LDP.

## **Individual Allocations**

### **Well Street, Buckley**

- 8.27. The majority of the objections to the Well Street allocation are from housebuilders who question the site’s deliverability; it was an allocation in the UDP but has failed to come forward or gain planning permission since, despite there being no abnormal constraints. The site was owned by WG but has changed hands and been acquired by a local housing association. This acquisition was followed by pre-application consultation and an outline planning application (Council ref: 062458) was made for residential development. At the time of writing, the Council’s website indicates that the application was registered in February 2021 and is still under consideration. Although planning permission has not yet been granted – in this location the phosphates complication will, no doubt, have contributed to the delay – these are significant changes providing a sufficient degree of certainty that the proposal will be implemented during the plan period. They justify the continued allocation of the site in line with the guidance set out in the DPM3 (Table 18). Previous planning refusals are not necessarily a bar to a site being developed or allocated.
- 8.28. Policy HN1 indicates that the site would accommodate 159 dwellings. The current planning application, however, is for up to 140 dwellings, the reduction in numbers reflecting a variety of matters including consultation responses, detailed assessments, footpath links, SUDS and open space. The developer anticipates that build rates for the site would be 53 dwellings per year for three years. The Council considers this forecast to be realistic and achievable as the housing association developer is experienced in using WG housing funding to progress schemes promptly and efficiently. The potential reduction in units does not jeopardise the site’s allocation or significantly affect delivery of the LDP housing requirement.
- 8.29. In order to be assured of the site’s delivery, it is important that the landowner is committed to its development. Apart from that, neither the allocation of the land nor the grant of planning permission are dependent upon its ownership. As is necessary for its allocation, the site is within the settlement boundary.

### **Highmere Drive, Connah’s Quay**

- 8.30. This site has also been rolled forward from the UDP. It has thus attracted objections on similar grounds to those made on Well Street, namely that having been undeveloped for so long its delivery during the plan period is unlikely. The site owner, however, has now entered into an agreement with a preferred developer. The SoGG for the site (SOCG001) confirms that Edwards Homes Ltd has entered into a contractual agreement with the landowner for the acquisition and development of the site. This substantial change in circumstances justifies the rolling forward of the allocation into the LDP.
- 8.31. The site is allocated for 150 units, a density of 30 dph, which would be constructed at a rate of 30 pa over five years. The SoCG pushes back the forecast for completion in 2026/27. Nonetheless, there would still be three years of the plan period remaining to absorb any slippage in completions.
- 8.32. There are no abnormal constraints to the development of this site which is in a sustainable location on the western edge of Connah’s Quay, a Tier 1 Main

Settlement. The disagreement noted by the Council in its hearing statement, in respect of the opportunity to provide a pedestrian and cycling link from the site, which could also be used as an emergency access, does not prevent the site’s allocation. Neither does the need to undertake further work on ecological matters; we note that there is no objection from NRW or the Council’s Ecologist and the SoCG contains a commitment from the developer to commission this work. There is little evidence that these matters could not be satisfactorily resolved at the application stage.

***Northop Road, Flint***

- 8.33. Flint is identified as a Main Service Centre and therefore is one of the main locations for new development including residential. The site is now within the settlement boundary, which has been relocated from its position in the UDP to accommodate potential development; it was not within the UDP green barrier.
- 8.34. The site, which is allocated for 170 units, is at the southern edge of the town. Whilst about 1200 m of Flint town centre, there are some local shops, including a convenience store, less than 500m from the site. The site is also adequately served by public transport with the nearest bus stop being approximately 120 m from the site. Buses from this run to Flint town centre and provide access to the facilities there including rail and bus services to locations which are further afield. Primary schools and the local high school are also within a reasonable walking distance from the site. Residents of the site would not be completely reliant upon private cars and we find, therefore, that the site is in a sustainable location.
- 8.35. Two developers are working together to bring the site forward. As planning applications have previously been submitted, several background studies have already been carried out demonstrating that there are no insurmountable or unusual constraints. Responding to consultation, the Council’s highways department have been consulted and have not objected to the allocation of this site stating that, subject to careful consideration being given to the existing petrol filling station, it would be possible to construct a junction on Northop Road appropriate for a development of this size. The highways department did not object to the allocation of the site. We have no reason to disagree with that assessment.

***Land between Denbigh Rd & Gwernaffield Rd, Mold***

- 8.36. Although Mold has no railway station or line, it has a wealth of other facilities and provides many services, including sources for a variety of employment opportunities and good links to surrounding settlements by bus. It is identified accordingly as a Main Service Centre in the LDP and is thus an appropriate location for new housing development of this size. The site, which is to the north west of the town centre, would deliver approximately 246 units. There were a large number of objections to this site including a petition with just over 100 signatures.
- 8.37. There are relatively narrow gaps between Mold and some of its neighbouring settlements, particularly Mynydd Isa to the north east and Gwernymynydd to the south west. The Green Barrier Review assesses that these areas should, therefore, continue to be protected by a green wedge designation which is a constraint to development. The risk of flooding along the valley of the River Alyn, which is to the north and east of the town, is a further constraint. To the south, Mold is bypassed by the A494(T) which provides an obvious and strong barrier to further expansion.

The area around the proposed allocation is the only part of the town that is relatively unconstrained and, in those terms at least, a suitable location for new development. The proposed allocation is also roughly consistent with the Mold Town Plan in its location although not its extent.

- 8.38. As the site is on the edge of the town it is some distance from the centre; the Council puts it at approximately 1200m from The Cross. Nevertheless, there are also local shops, including a convenience store, about 700m away and the health centre at a slightly further distance. In addition, there are bus services along Gwernaffield and Denbigh Roads into Mold centre from where it is possible to get buses to a range of destinations including Deeside Industrial Park, Wrexham, Ellesmere Port and Chester. The Council considers that residents of the new development would be able to access facilities and services without being wholly dependent on a private car for all journeys. We agree with that assessment.
- 8.39. Areas in the north and east of Mold are constrained by the flood zone associated with the River Alyn. The allocated site is not in a flood risk area and this is one of the reasons for it being assessed as suitable for residential development. NRW has not objected to the allocation with regard to flood risk. Whilst subject to a separate consenting process, there is evidence that SuDS would have the potential to address existing surface water flooding on the site and limit surface water run-off from the development to the same rate as from a greenfield site. The Council is aware of the high pressure water pipes across the site. The precise location of these will be taken into account when the layout of the site is designed. This will include the provision of the easements necessary to ensure appropriate access for repair and maintenance.
- 8.40. The main access into the site would be via a new entrance directly from Denbigh Road which is an A road (A541). This would direct traffic from the site along the most convenient and safe routes, and away from Gwernaffield Road and existing residential streets. We have no evidence that the amount of traffic generated by the scheme would not be absorbed safely into the local road network and note that the Council’s highways department did not object to either the impact of traffic generated from the development or to the creation of a new access.
- 8.41. Although the site is in an area of Physical Environment Deprivation this does not prevent new development. There is no identified Air Quality Management Area here and additional traffic to and from the site would not be so heavy as to significantly increase pollution, noise, or the amount of dust in the area. The site is not in a hazard consultation zone and there was no objection to its development from the HSE.
- 8.42. Residential development on the site would not harm any of the historic assets in the surrounding area or their settings. There have been no objections on these grounds from Cadw.
- 8.43. The site is one of those most affected by NRW’s guidance on SACs and phosphorus. This is likely to have affected the planning application for 238 dwellings which was submitted in 2020. We are confident, however, that the site is available and viable, and that once the phosphorus constraint is mitigated that it stands a reasonable prospect of being delivered.

**Holywell Rd/Green Lane, Ewloe**

- 8.44. Ewloe, which is rightly classed as including Ewloe Green, is categorised as a Local Service Centre, a Tier 2 settlement. Policy STR2 states that Tier 2 settlements will be the location for more modest levels of new housing development. The site is nearly 10ha in area, and the third largest of the allocations. At an indicative number of 298 units, it has more dwellings than any other single allocation in the LDP.
- 8.45. There are a significant number of objections to this site. One of the objectors’ main concerns is its scale, particularly as the site is not located in a Tier 1 settlement. The Council has pointed out that, although the site is large, it is the only one in Ewloe as a whole. The Tier 1 town of Mold has two allocations which could provide over 400 dwellings. There are also two allocations in Tier 1 Connah’s Quay although they would only result in around 180 units together.
- 8.46. In its response to the objections to this site, the Council provided figures detailing the growth of Ewloe during the UDP period and since. When the units from the allocated site are included, the growth of Ewloe during the LDP period would be broadly in line with the actual growth that took place during the UDP period. We agree that this amount of growth is acceptable for a Tier 2 settlement which has a local role in the delivery of services and facilities and is capable of sustaining further growth.
- 8.47. There is a convenience store in Ewloe Green, some hot food takeaways and a social club, and there are further facilities and services in Ewloe. Ewloe Green School is within easy walking distance. Neither is Ewloe remote or disconnected. Tier 1 settlements such as Buckley and Connah’s Quay are nearby and accessible by bus, as are Deeside Industrial Park and Hawarden railway station. Future occupiers of the site would not, therefore, be completely reliant on the private car.
- 8.48. With regard to traffic, the submitted transport assessment confirms that the road network has the capacity to accommodate the vehicles generated from the development. The site developer would need to carry out works to improve the capacity of the nearby junction so that it functions effectively for new and existing traffic. It would be possible to improve the Green Lane/Mold Road junction through the provision of the vehicular access to the smaller part of the site off Green Lane. There would be two access points to the site, in the north and site, but no through route between them.
- 8.49. Welsh Water identified the presence of the sewer across the site during the LDP preparation process. This does not prevent the allocation of the site but its layout will be designed around its route and the easements necessary for maintenance. Such easements are often used to provide pleasant areas of public open space in residential development.
- 8.50. The site does not have high ecological value but the indicative site capacity would allow the majority of trees and hedgerows to be retained in its layout, as required by Policy EN7 and referenced in Policy HN1. In addition, prior to development taking place, an Ecological Impact Assessment, including appropriate avoidance and mitigation measures, would need to be carried out. As a result of the proximity of the SAC, indirect impacts of the residential development on this would have to be

considered. Measures to mitigate these could include directing recreational pressure away from the SAC and wildlife site via the public right of way, or through commuted sums to be used for management works. We are content with these arrangements and note that NRW have not objected to the allocation.

- 8.51. We are satisfied that the existing public right of way through the site could be retained and maintained as an attractive, usable route. Apart from that, there is no formal public access to the site and it does not have the function of public open space. LDP policies would ensure that adequate recreational open space is provided within the new development. Policy EN1 requires all new residential development to provide public open space or sports and recreational facilities in accordance with Council open space standards, whilst Policy EN2 requires development proposals to protect, maintain and enhance the green infrastructure network.
- 8.52. When we visited the site ourselves, we saw that it is a pleasant area comprising several fields of grassland divided by hedgerows. The site is partially contained by existing residential development along the eastern boundary and has the strong boundaries of Green Lane and Holywell Road to the south and north. The western boundary follows the existing field boundary which is marked by a well-established hedgerow. We noted earlier that it is difficult for local residents to see greenfield sites being developed. Nonetheless, subject to the implementation of mitigation measures and the scheme being well designed, we consider that the allocation is in an appropriate location and of a suitable scale which would not harm the character of the settlement.
- 8.53. As the site is in an area where mining has previously been carried out a geo-environmental study has been undertaken by the site promoter. This has not identified any issues and there is no objection to the allocation from the Coal Authority. There is no landfill site within the allocation.
- 8.54. The Council’s response to the objections addresses the matter of air pollution in relation to this allocation in detail. In summary it notes that monitoring has demonstrated that there are no air pollution issues within the County or locally, and that it has not been necessary to make any Air Quality Management Areas in Flintshire. In addition, since 2017 air pollution has reduced at roadside locations and is likely to continue to do so. The Council considers it unlikely that the allocation would significantly increase pollution levels but Noise and Air Quality assessments would be likely to be needed in support of future planning applications. LDP Policy EN18 would ensure that the development is designed to minimise light pollution.
- 8.55. The site is not within a C1 or C2 flood risk zone, where residential development would not be permitted, but there are pockets of surface water flood risk. NRW have not objected to the allocation. Whilst subject to a separate consenting process, there is evidence that SuDS, would have the potential to ensure that surface water run-off from the development is no greater than the run-off from a greenfield site.

### ***Ash Lane, Hawarden***

- 8.56. Located adjoining the Tier 2 settlement of Hawarden, and the Tier 3 settlement of Mancot, this greenfield site is identified in Policy HN1 as providing 288 dwellings. Although representing a substantial housing allocation, this is justified given the



site’s location within the surrounding developed area, and proximity to several key employment areas, settlements with various services and facilities, and transport links.

- 8.57. The site was previously part of the Green Barrier designation within the UDP and, along with all other areas of Green Barrier, this has been re-assessed through the Council’s Green Barrier Review (LDP-EBD-BP1). Given the contained nature of the site, being bordered by built development on three sides, the allocation represents an infilling of the surrounding development pattern, rather than a strategically open area where unchecked urban sprawl could occur. The issue of coalescence between Hawarden and Mancot is addressed earlier in this report, as part of settlement limits considerations.
- 8.58. Concerns have been raised in relation to highway matters and surface water run-off. A Transport Assessment and Surface Water Drainage Strategy have been prepared by the site promoters. We note there is no objection from the Highway Authority in respect of highway safety and network capacity, and the proposal will be required to secure separate consent for SuDS. Updates to these documents, along with other technical and background studies, can be addressed at the planning application stage, as can detailed matters of internal roads, walking/cycling links, layout and design. The Statement of Common Ground (SOCG003) indicates a willingness by the site promoter to meet the Plan’s requirements in respect of education contributions and, notwithstanding a wider objection in respect of affordable housing, a commitment to deliver the Plan’s eventual policy requirements.
- 8.59. As is usual, various technical reports and studies have been prepared by the site promoter, and identified in the SoCG, and this gives confidence that the site is not subject to constraints that would prevent its delivery. Policy HN1 identifies the site as delivering 63 units within Years 6-10 of the Plan and the remaining 225 units in Years 11-15 at a rate of 45 units per annum. Given the lack of significant constraints and that the site owner is actively negotiating with a preferred developer, this is considered to be an achievable rate of delivery.
- 8.60. Objections have been made in relation to engagement and consultation in connection with allocation of the site. As addressed in earlier sections of this report, the Plan preparation process has fulfilled the statutory requirements, with a range of engagement methods and means of communication being utilised throughout. This has been borne out in the substantial level of responses received at public consultation stages and attendance at events. We therefore consider the allocation process to be robust in respect of this site.

### ***Cae Isa, New Brighton***

- 8.61. New Brighton is a Tier 3 Sustainable Settlement; Policy STR2 describes these as the locations for housing development related to the scale, character and role of the settlement. The site is 3.5ha in area and identified for just over 100 units. The UDP settlement boundary has been relocated in this area in order to accommodate the site. Although New Brighton was surrounded by green barrier in the UDP, this site was excluded from it.
- 8.62. Although there is no longer a post office or pub in New Brighton there are several useful facilities providing for everyday needs including a large hotel with bar, a

village hall, and a petrol filling station and convenience store. There are schools nearby including a primary school approximately 1200m from the site and the local high school which is within 1500m. Mold and Buckley are also close by and easily accessible by bus. They are both Tier 1 Main Service Centres and can provide most of the services and facilities which are not available in New Brighton. There are also bus services to Connah’s Quay and Flint, the railway station at the latter provides access to mainline rail services.

- 8.63. We acknowledge that the development of the allocation would result in a high level of growth for New Brighton in comparison with the number of dwellings constructed there in recent years. We take the Council’s point, however, that this in itself is not a good reason to resist development. The facilities in the settlement, the reasonable public transport connections, and the proximity to Tier 1 Mold mean that New Brighton is a sustainable location for growth.
- 8.64. In respect of flooding and drainage matters, a Flood Consequence Assessment (FCA) has been undertaken by a developer. This found that the site is not at risk of tidal or fluvial flooding, with a less than 1 in 1000 (0.1%) annual probability of flooding in any given year. Its overall conclusion was that the site was at low risk of flooding, and that with the implementation of SuDS there would be no increased flood risk beyond the site as a consequence of the development.
- 8.65. Dŵr Cymru has not objected to the allocation of the site and has confirmed that it could be connected to the public sewerage system. In addition, Mold Wastewater Treatment Works could accommodate the foul flows from the proposed development site, subject to resolution of the phosphates issue.
- 8.66. A geo-environmental assessment for the site has been submitted and concludes that the overall risk from coal mining is considered low. The Coal Authority has not objected to the allocation. There are small landfill sites to the north of New Brighton Road. The above assessment concludes, however, that there are no elevated contaminants present within the shallow soils on the site, and that no evidence was found for the historic landfill which had been identified in a desk study.
- 8.67. New Brighton Road has no continuous pavement and so is currently a hazardous route for pedestrians; it is certainly not safe for school pupils to use. The Council has stated that mitigation measures, such as a footway and pedestrian crossing provided by the developer, would make the route safe. Such measures are commonly provided by developers with the details normally addressed at the planning application stage. We are satisfied, therefore, that a Safe Route to School would be provided and that the lack of one at this stage is not a deterrent to the allocation of the site for residential development.
- 8.68. A planning application (Council ref: 060220) has been submitted for this site which demonstrates that there is commitment to the delivery of this site. The site is also located in a strong housing market area where there is a good demand for new homes.

***Wrexham Road, HCAC***

- 8.69. This site is on the edge of Abermorddu, one of the constituent parts of HCAC which has a single settlement boundary and is classified as a Tier 2 Local Service Centre.

It is 3.5 ha in area and identified for 80 dwellings. It is adjacent to a school and within walking distance of the services available in Caergwle and two railway stations. There is another station in Hope as well as further services and a high school. Public transport services run frequently along the nearby main Mold to Wrexham Road.

- 8.70. The site is greenfield but has not been assessed as having significant landscape quality. Nevertheless, its loss as a pleasant area of open land will change the landscape. The retention of the existing hedgerows and trees around the boundaries, together with landscaping and the provision of green infrastructure links, would be possible and would soften the appearance of the development and help it to integrate into its surroundings.
- 8.71. The allocation is adjacent to the Caeau Abermorddu Local Wildlife Site and, as well as assessing the ecology of the site itself, the Council has considered potential impacts on the adjacent Local Wildlife Site. Ecological surveys were carried out in 2016 and 2019 finding no protected species on the site. Most of the birds recorded were commonly occurring woodland and garden bird species. There were also, however, birds which are listed as being Birds of Conservation Concern. These included house sparrow, starling and song thrush on the red list (conservation status of high concern) and dunnock, mallard, swift and tree creeper recorded from the amber list (conservation status of moderate concern). The grassland habitat was considered to be relatively species-rich.
- 8.72. Mitigation measures recommended as a result of the surveys included the provision of bat and bird boxes at the site, the timing of vegetation clearance works to avoid the nesting bird season, the retention of appropriate buffers around boundary features, the production of a bat friendly lighting plan and a requirement to undertake further bat assessments of any mature trees as necessary. These findings provide a basis on which to inform further planning applications and the development of the site.
- 8.73. The site is privately owned and there is no public right of way across or approved access onto it, although it seems that people do use it as a route to the neighbouring hillside. It is not designated green space nor useable for formal recreation.
- 8.74. As mentioned in connection with another site, there are no Air Quality Management Areas in the County. We therefore find it unlikely that the development of the site would significantly affect air quality.
- 8.75. As at several other sites, the allocation is not within the C1 or C2 flood risk zone, which would be contrary to TAN 15, but there is some surface water flooding. Any future proposal would be required to secure separate consent for SuDS intended to manage surface water run-off from the development. NRW has not objected to the allocation although the site is affected by the phosphates issue.
- 8.76. A transport assessment was carried out to support an earlier planning application for the site. This shows that the road network would be capable of accommodating the additional traffic generated by the development proposed for the site with no detriment to highway safety. There is sufficient space to create the splays required

to provide adequate visibility at the access to the site. For the safety of pedestrians, a footway along the frontage of the site could also be secured at the planning application stage.

### **Conclusion on housing allocations**

8.77. We have found that, in allocating the proposed sites relevant alternatives have been considered the housing sites have been identified through the consistent use of a robust and rational site selection process. The allocated sites are deliverable within the plan period and would make an appropriate contribution towards the housing requirement. The policies for the housing sites are clear and reasonable.

### **Affordable housing**

- 8.78. PPW 11 (para 4.2.28) requires LDPs to include a target figure for the number of affordable homes to be provided, which should be based on the Local Housing Market Assessment (LHMA) and take account of deliverability and viability. The Council’s LHMA was produced in 2015, with an update in 2018 used to inform the LDP. The LHMA has been further amended in February 2020 to provide clarification on the required tenure split for homes meeting the TAN 2 definition of ‘affordable housing’ (i.e. 40% Low Cost Home Ownership, 30% Intermediate Rent and 30% Social Rent), which accords with the assumptions used in the Viability Study carried out by District Valuer Services (DVS).
- 8.79. The 2018 LHMA identifies a need for 1,190 affordable homes over the lifetime of the study (2018-2023), which is approximately 238 homes per annum. Given the lifetime of the LDP will extend beyond this date (i.e. 2030) it is reasonable to assume there will be a greater need for affordable homes than identified in the LHMA.
- 8.80. The LDP makes provision for 2,265 affordable homes over the plan period, through the delivery of site allocations, committed planning permissions, windfall sites and those already built since the start of the Plan period. This is explained through **MAC77** and included in Policy STR 1 through **MAC28**. This figure is informed by the findings of the DVS Viability Study, which considers the financial viability of sites, as a key component of deliverability.
- 8.81. Policy HN3 sets differing affordable housing quotas, expressed as a percentage of the number of units proposed, for housing developments in each of the LHMA sub-market areas. In the interests of clarity, and to reflect the Council’s viability evidence, **MAC75** amends the policy wording by replacing ‘starting point’ with ‘target’. Further explanation with regard to viability and voluntary higher levels of affordable housing will assist the understanding of the policy wording and provide some flexibility, and this is set out in **IMAC2**. This will also clarify that affordable housing-led developments, which it is acknowledged are not specifically identified in the Plan, can be supported. **MAC78** and **MAC116** insert a map showing the sub-market boundaries to the supporting text, which will improve ease of use for policy application. Additional explanation and reference to Supplementary Planning Guidance through **MAC76** will also assist policy application.
- 8.82. In accordance with the guidance provided within DPM3, the Viability Study provides a high-level assessment of anticipated viability across each of the LHMA sub-market areas, and uses of a range of site typologies as its basis. The process and

assumptions included also reflect the guidance set out in the DPM3 and provide a broad assessment of financial viability, including an allowance for some flexibility, having appropriate regard to other financial burdens placed on development by planning policy and other regulatory regimes. Whilst some of the values included or omitted from the site assessments have been disputed, given the high-level nature of the assessment and general compliance with national guidance, we are satisfied that the study provides a sufficiently robust basis to support the Plan’s policy approach to affordable housing.

- 8.83. The Council’s approach to securing affordable housing through new developments is based on the maximum amount demonstrated to be financially viable. The Council has also offered convincing evidence of other initiatives which will deliver affordable homes in addition to the Plan target, along with demonstration of previous high rates of delivery. Whilst allocating a greater number of housing sites may result in increased numbers of affordable homes, this must be balanced against the other considerations and constraints the Plan seeks to address, not least the need to ensure sustainable development. We therefore consider this approach and the overall provision figure, whilst it may be below the level of actual need that may occur, to be justified and soundly based.

#### ***Housing outside settlement boundaries***

- 8.84. The LDP contains a suite of policies setting out the instances in which housing proposals outside defined settlement boundaries will be permitted. With the exception of replacement dwellings, sub-division of existing dwellings, rural enterprise dwellings and One Planet Developments, such proposals will be restricted to the development of affordable housing. **MAC79** and **MAC80** amend policies HN4, HN4-D and its supporting text by removing references to ‘rural’ exception sites and widening the scope of such proposals to all tiers in the Plan’s settlement hierarchy, which will broaden the opportunities for 100% affordable housing proposals and reflect national policy as set out in PPW (paragraph 4.2.34). **MAC29** is necessary to ensure consistency of policy STR2 with the amended policies.
- 8.85. It is recognised that the delivery of affordable housing through previous similar policy approaches, particularly in relation to conversions of rural buildings and infill development, has been minimal. However, the requirements of policies HN4-B and HN4-C reflect the generally restrictive approach towards development in the countryside set out in PPW 11 and the Plan strategy, and seek to ensure opportunities exist in rural areas of employment uses and affordable housing. Whilst these may be very small in number, the Plan’s approach ensures that such opportunities are safeguarded whilst protecting the countryside.

#### ***Annex accommodation***

- 8.86. Policy HN6 sets out criteria for annex accommodation proposals, in recognition of the need to control the creation of new independent dwellings. Given the fundamental ancillary nature of annex accommodation, and the need to ensure sustainable growth, we consider this policy approach to be robust and reasonable.

#### ***Houses in Multiple Occupation (HMO)***

- 8.87. Policy HN7 provides criteria for assessing proposals for the conversion of existing buildings into self-contained accommodation, bedsits or HMOs. This includes a

requirement that the cumulative impact of development must not lead to the over concentration of HMOs in the locality to the detriment of community cohesion or residential living standards.

- 8.88. The Council currently does not have a comprehensive register of HMOs and acknowledges therefore it is not possible to accurately quantify the number of such properties in any given area. As a result, any ‘over concentration’ cannot be identified, meaning this policy requirement could not be implemented. **MAC81** therefore amends the wording of criterion e) to remove reference to an over concentration of HMOs in the locality, in order to ensure the policy is operable whilst achieving the aims of preventing harm to the character of the locality or residential amenity. The amended wording allows sufficient flexibility for any comprehensive evidence that may emerge on HMO registrations to be considered in the future.

### ***Gypsy and Traveller accommodation***

- 8.89. In accordance with the requirements of PPW 11 (paragraph 4.2.35), the Council has carried out an assessment of the accommodation needs of the Gypsy and Traveller community in their area. As per the requirements of the Housing (Wales) Act 2014, the Council’s Gypsy and Traveller Accommodation Assessment (GTAA) carried out in 2016 was submitted to, and approved by, Welsh Ministers. An update to the assessment was carried out in 2018 but, due to this not being a full assessment, could not be formally approved. Welsh Government has confirmed that the 2016 GTAA remains valid and we are satisfied that it provides a robust evidence base for the Plan’s approach to Gypsy and Traveller accommodation. **MAC83** clarifies this position by amending the supporting text to Policy HN8.
- 8.90. The GTAA concludes there is a need for 19 pitches for permanent accommodation to be provided across the Plan period, in addition to a small transit site. Policy HN8 allocates 3 sites for permanent occupation plus one site for transit use in order to meet this requirement. **MAC82** and **MAC84** update the policy and supporting text to reflect the latest position, which makes provision for 23 pitches through the extension or remodelling of existing sites, plus 6 transit pitches on an entirely new site.
- 8.91. Allocations HN8-1 and HN8-2 represent proposals to extend or remodel two small sites that are within private ownership, in order to provide additional pitches for extended families. The evidence provided through written statements and at the hearing sessions indicates that these sites are relatively free of constraints and planning applications are being progressed, with approval recently given for the 9 pitches identified for site HN8-1 and 4 pitches for site HN8-2, which gives adequate reassurance of their likely delivery.
- 8.92. Allocation HN8-3 will extend a well-established Council-owned site and the evidence provided states that a planning application is being actively progressed. Whilst concerns have been raised regarding existing living conditions, the intended proposals provide an opportunity to address most of the issues raised through improved access, layout and provision of facilities on site. Although located within C1 flood zone, based on the evidence provided relating to the nature and importance of the site, and NRW’s acceptance of the Flood Consequences Assessment, we are satisfied that it meets the requirements of Welsh Government’s Technical Advice Note 15.

- 8.93. Allocation HN8-4 is for a new transit site on Council-owned land previously in use as a civic amenity site. Regardless of the Council’s internal arrangements, the allocation was included within the Deposit LDP and subject to the statutory consultation that followed. As such, we do not have any procedural concerns relating to the inclusion of the site within the LDP. Although an area close to the site is identified as potential green space, along with nearby footpaths, in the Flint Strategy and Masterplan, there is little to suggest that the allocation could not be developed or would preclude the implementation of any of the actions in this non-statutory document. Matters relating to possible contamination and remediation of the site, as well as any access improvements and noise attenuation measures that may be required, could be addressed as part of any eventual planning permission. Any necessary improvements to services and facilities would be addressed through the application of Policy STR6. We are therefore satisfied that the constraints are not such as to prevent the site being developed.
- 8.94. Policy HN9 sets out criteria for proposals for Gypsy and Traveller sites and is amended by **MAC85** and **MAC86** in order to ensure compliance with the guidance set out in Welsh Government Circular 005/2018 ‘Planning for Gypsy, Traveller and Showpeople Sites’ regarding unmet need, alternative sites and a sequential approach. **MAC87** and **MAC88** are necessary to amend the supporting text to provide clarification and to ensure consistency with the policy wording.

### **Conclusion**

- 8.95. The Plan’s approach to Gypsy and Traveller accommodation is consistent with national policy and is based on robust evidence, with sufficient provision being made to meet the identified need, through allocations capable of being developed, along with a clear policy approach to assess future proposals.

## **9 Natural and Built Environment**

- 9.1. Strategic Policy STR13 establishes the basic requirements for protecting and enhancing all elements of the natural and built environment. In replacing ‘will’ with the unambiguous command ‘should’, **MAC41** strengthens the wording of the policy.
- 9.2. There was little objection to the majority of the development management policies in the Valuing the Environment chapter. A few changes are necessary, mainly to improve clarity. **MAC89** will add the amount of the adopted open space standard to the policy as this is an essential requirement. **MACs 90 & 91** will add wording to Policy EN2 and its explanation to clarify that the green infrastructure policy does not only protect identified green spaces. **MAC92** will clarify that the policy only requires links between new development and the green infrastructure network local to it.
- 9.3. **MAC93** will clarify that development within the setting of the AONB, as well as the area itself, must conserve or enhance its natural beauty. **MAC94** removes a reference to possible exceptions to the policy restriction complying with relevant legislation. This is as agreed in the SoCG with NRW; we consider it to be a sensible and necessary change.
- 9.4. Policy EN6 deals with Sites of Biodiversity and Geodiversity Importance and **MAC95** will reflect that. In Policy EN7, the word ‘gain’ will be replaced with ‘benefit’,

consistent with the terminology of PPW and the requirements of Future Wales, including Policy 9 (**MAC96**).

- 9.5. In response to consultation responses from NRW, **MACs 63, 70 & 72** will incorporate wording into Policies PE2, PE13 and PE14 to clarify that development on employment sites, in connection with caravan sites, or within or adjoining the Greenfield Valley, must not have adverse effects on European Sites.

### *Green wedges*

- 9.6. Green Belts and green wedges are tools to manage the form of settlements by protecting the open land around towns and villages from development. The purposes of the two are the same, namely to:
- prevent the coalescence of large towns and cities with other settlements;
  - manage urban form through controlled expansion of urban areas;
  - assist in safeguarding the countryside from encroachment;
  - protect the setting of an urban area; and
  - assist in urban regeneration by encouraging the recycling of derelict and other urban land.
- 9.7. The essential difference between the two designations is the durability of Green Belts. These should be protected beyond the development plan period whereas green wedges should be reviewed as part of the development plan process. PPW also states that, when considering Green Belt designations, a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available. That this specification does not apply to green wedges is consistent with their review through the LDP process, in tandem with the search for new development sites.
- 9.8. Green barriers have previously been employed in Flintshire, and its predecessor Clwyd. The greater flexibility of green wedges, in comparison with Green Belt, allows areas for new development to be identified on the edge of settlements. Flintshire has no single large town but a number of medium sized settlements. These contain negligible amounts of brownfield land appropriate for redevelopment and greenfield sites on their edges are needed to sustain the necessary growth.
- 9.9. We are content that this continues to be the correct approach. Our only recommendation is that their name be changed from the current ‘green barriers’ to ‘green wedges’ for complete consistency with PPW. Although PPW is not explicit that other names should not be used, the change of name will ensure the LDP is rightly perceived as up-to-date and consistent with current national policy. (**MAC40**).
- 9.10. The methodology of the Council’s Green Barrier Review (LDP-EBD-BP1), which was published in September 2020, was to assess the UDP green barrier designations against the PPW purposes of green wedges. The particular function of these, compared with the Green Belt, was taken into account by also considering whether the sites, including UDP omission sites, LDP candidate sites and alternative sites, had been the subject of on-going development pressure such as planning applications or pre-application enquiries. Additional considerations reflected other PPW advice such as not being designated where normal open countryside policies would be sufficient. The results, a detailed assessment, and a



recommendation for each site were set out in Appendix A of the review document. We are confident that the review of the green barrier is consistent with national policy, robust and appropriate.

- 9.11. The majority of objections to the green barriers were from landowners wishing their sites to be taken out in order to have the option of developing them in the future; many had also been submitted as omission sites. A few objections were made where the green barrier had been amended to allow the allocation of a site. The Council’s response was that the green barrier had been drawn back in some locations where considered appropriate but retained for key areas of land where it was essential to retain its open character and appearance. We agree with that approach and find that the review document provided a suitable and thorough assessment on which to base those decisions.
- 9.12. Some objections request that sites around Penyffordd, Penymynydd and Sychdyn should be included within the green wedge in order to prevent the allocation of candidate sites and protect the villages from further residential development. These sites were also assessed in the review document concluding with the recommendation that the land in question should not be included within a green wedge. We understand the reasons for these requests; the Council accepts in its assessment of the Penyffordd / Penymynydd (East) area that this area has been subject to significant development pressure. Nonetheless, as the settlement boundaries are drawn tightly around the three settlements and as, with the exception of the H1.11 site which is under construction, no candidate or omission sites have been included as allocations, there is insufficient justification for designating these sites as green wedge.

### **Conclusion**

- 9.13. All in all, the natural and built environment policies and proposals, subject to the identified MACs, achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy, and are based on robust and credible evidence.

## **10 Climate Change and Environmental Protection**

- 10.1. As with the other strategic policies for a topic, Policy STR14 summarises all the measures which will contribute to mitigating the effects of climate change. This comprehensive approach emphasises the importance of the subject and the LDP’s commitment to it. In our view changing ‘supporting’ to ‘encouraging’ in connection with the use of brownfield land will strengthen the wording (**MAC44**).
- 10.2. With regard to flood risk, the biggest effect has been on employment allocations as explained above in the Economy and Employment section. Flood risk is dealt with thoroughly, and in line with current national policy, in Policy EN14. **MAC100** will add a paragraph to its explanatory text to provide updated information on the Mold Flood Alleviation Scheme.
- 10.3. The development of renewable energy facilities is fundamental to tackling climate change. It is encouraged in the strategic policy on climate change, STR14. Policy EN13 sets out the detailed development management position on the topic.

**MAC98** will amend Policy EN13 and update it to accord with policy in Future Wales, and reflect national guidance and the grant of planning permission on the two solar allocations.

- 10.4. At the hearings we were impressed by the innovative technology and schemes described to us which could come forward in the near future. There is insufficient certainty to allocate for such now but **MAC99** will add supportive text on the topic to the explanatory text of Policy EN13.

### **Conclusion**

- 10.5. We also find that, subject to the identified MACs, the climate change and environmental protection policies will help to achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy. They are based on robust and credible evidence.

## **11 Minerals**

- 11.1. The Regional Technical Statement first review (RTS1) for North Wales informed the preparation of the LDP with regard to minerals. This ensured that the LDP complied with PPW and MTAN1 but the apportionment figures from the RTS1 quoted in Policy STR16 are now out of date. RTS2 records that there are significant increases in the apportionments for crushed rock and for sand and gravel. **MACs 45, 46 & 47** will amend Policy STR16 and its explanation to ensure a sustainable and steady supply of minerals during the LDP period, consistent with the requirements of PPW and MTAN1. It will also continue to be locally specific. In addition, the amended policy would contribute towards achieving the aims of LDP Objective 19 by supporting the sustainable use of natural resources.
- 11.2. **MACs 103, 104 & 105** will make the consequent changes to Policy EN25 to ensure it is consistent with the strategic policy and up to date. **MAC102** will add references to Mostyn Docks and Padeswood Cement Works to ensure that potential minerals infrastructure is appropriately safeguarded. In order to clarify the types of uses which take place in respect of secondary and recycled aggregates, **MAC105** will explain this briefly at the end of the explanatory text.

### **Conclusion**

- 11.3. Our conclusion on this matter is that the policies and proposals achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy and are based on robust and credible evidence. Alternative strategies have been considered and the identification of sites based on a robust and rational site selection process. Subject to the MACs identified, the policies and requirements themselves are clear, reasonable and sufficient.

## **12 Plan monitoring and review**

- 12.1. The Council is proposing a number of MACs which will update and fine tune the monitoring process (**MACs 106 to 112**). We therefore consider that, subject to the MACs, the monitoring framework will enable adequate monitoring of the LDP’s effectiveness.

### **13 Overall Conclusions**

13.1. We conclude that, with the binding recommended changes identified in this report and set out in Appendices A and B, the Local Development Plan satisfies the requirements of section 64(5) of the 2004 Act and meets the tests of soundness in PPW. In reaching this conclusion, we have taken into account the ways of working set out at section 5 of the WFG Act and are satisfied that the Local Development Plan as modified will guide the development and use of land in a way that contributes towards improving the economic, social, environmental and cultural well-being of Wales and complies with the WFG Act.

*Siân Worden* and *Claire MacFarlane*

Inspectors

**Appendix A: Schedule of Matters Arising Changes (MAC) recommended by the Inspectors**

**Appendix B: Schedule of Inspector proposed Matters Arising Changes (IMAC) and consequential changes (CC)**

## Appendix A

### Flintshire Local Development Plan – Schedule of Matters Arising Changes (MACs) and Inspector Changes (IMACs)

MACs in **bold type** are required to make the Plan sound and are binding on Flintshire County Council. Where changes consequential to a soundness change are listed as MACs, only the main, substantive MAC is in bold type and referred to in the report. Other MACs are included because they improve clarity, precision, coherence and consistency. The alterations will result in the re numbering of paragraphs. The MAC references and chapters in the following table relate to the paragraph numbers set out in the submitted plan. The changes to the Plan as amended by the Focused Changes and Minor Changes are indicated in the form of underlined text for additions and ~~strike throughs~~ for deletions. The Council can make consequential changes arising from MACs and they are not included in this schedule.

The MACs prefixed with an 'I' are Inspector changes (IMAC). Listed after these are the consequential changes (prefixed CC) to STR3B arising from these which include some changes the Council is proposing in response to INSP010, our letter to the Council outlining our concerns about the Warren Hall site.

MAC Number	Section/policy/paragraph in LDP	Details of Change
MAC1	Contents Section 4	Remove Section 4 and re-number subsequent Section numbers. Amend subsequent paragraph references throughout the Plan accordingly.
MAC2	Appendices	Add a new appendix as section 16 'Appendix 3 - Housing Tables'.
MAC3	Appendices	Add a new appendix as section 17 'Appendix 4 – Housing Sub Market Area Maps'.
MAC4	Policy Index	Amend EN11 Green Barriers to 'EN11 Green Wedges'
MAC5	Policy Index	Amend 'STR3 Strategic Sites' into two separate policies as follows: • STR3A Strategic Site: Northern Gateway • STR3B Strategic Site: Warren Hall
MAC6	Para. 3.21	Amend 7th bullet point from 'Green Barriers' to 'Green Wedges'
<b>MAC7</b>	3.25	Following para 3.25, at the end of the 3rd bullet point under c) 'Local Context' which relates to 'The Deeside Plan (2017)' add the following text ' <u>The Deeside Plan provides an overarching framework to guide actions over the next thirty years and pulls together a wide variety of objectives, plans and strategies grouped according to the key themes of economic growth, transport, housing, skills and employment and the environment.</u> '

MAC Number	Section/policy/ paragraph in LDP	Details of Change
MAC8	3.30 Table	In 11th point replace 'green barriers' with 'green wedges'
<b>MAC9</b>	3.35	3.35 In the table following para 3.35 replace 'In Flintshire, we need to plan for' with 'Planning Challenges'.
<b>MAC10</b>	3.38	Amend the LDP Vision in para 3.38 by replacing 'balance which provides for' with 'balance between'. Include 'and natural environment' after 'heritage'. The vision reads as follows: "The LDP is about people and places. It seeks to achieve a sustainable and lasting balance <del>which provides for balance</del> between the economic, social, and environmental needs of Flintshire and its residents, through realising its unique position as a regional gateway and area for economic investment, whilst protecting its strong historic and cultural heritage and natural environment".
<b>MAC11</b>	3.41	In Objective 10 following para 3.41 replace 'Redefine' with 'Repurpose'. The revised Objective reads ' <del>Redefine</del> Repurpose the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport.'
<b>MAC12</b>	3.41	In Objective 11 following para 3.41 add 'full' before 'range of housing needs'. The revised Objective reads 'Ensuring that Flintshire has the right amount, size, and type of new housing to support economic development and to meet a <u>full</u> range of housing needs'
<b>MAC13</b>	3.41	In Objective 13 following para 3.41 delete the words 'and enhance'. The revised Objective reads 'Promote <del>and enhance</del> a diverse and sustainable rural economy'
<b>MAC14</b>	3.64	Amend the section heading prior to para 3.64 by deleting 'Preferred' and in the opening wording of para 3.64 delete 'Preferred'. The revised title is 'The <del>Preferred</del> Strategy' The revised opening wording of 3.64 is 'The Plan's <del>Preferred</del> Strategy...'
MAC15	3.65	Add the title 'Key elements of LDP Strategy' after paragraph 3.65, before the table.
<b>MAC16</b>	3.65 Table	Update the Housing Growth section as follows: <ul style="list-style-type: none"> <li>• <u>Ensuring a housing land supply to provide for 7,950 7870 dwellings to meet an LDP housing requirement of 6,950 dwellings</u></li> <li>• <u>This equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 420 427, and 573 over the last 5 years. Completions in the first three five years of the Plan period have averaged 563 521 (1,694 2609 in total), showing that the Plan is on track in terms of enabling delivery.</u></li> </ul>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<ul style="list-style-type: none"> <li>• There is capacity for a further <del>1774</del> <u>1221</u> dwellings on sites with planning permission (commitments) which are either under construction or expected to be delivered within 5 years the Plan period.</li> <li>• Whilst the residual requirement for new sites is <del>879</del> <u>855</u> the Plan has allocated <del>4874</del> <u>1775</u> dwellings on sustainable new sites, providing as a consequence for an overall flexibility of <del>14.4%</del> <u>13.2%</u>. This is a generous over-provision and will help ensure the overall deliverability of the Plan's housing requirement</li> </ul>
<b>MAC17</b>	3.65 Table	In the 2nd bullet point of the spatial strategy section, amend the last sentence as follows: 'The Plan's aim of a <del>15%</del> <u>13%</u> flexibility allowance will also help balance this strategic commitment.'
MAC18	3.65 Table	In the 'Managing Growth' section replace 'Green barriers (wedges)' with 'Green Wedges'.
<b>MAC19</b>	3.72	<p>Add the following new paragraphs after paragraph 3.72 and re-number subsequent paragraph: <u>PPW11 highlights that 'the built and natural environment is a key determinant of health and well-being' (para 3.19). The LDP is important to the health and well-being of Flintshire's residents as it directly shapes the natural and built environment which subsequently influences the social, economic, environmental and cultural factors which impact on health and well-being. The LDP seeks to promote sustainable development which enhances the health and well-being of Flintshire's residents through the creation of new employment opportunities, affordable housing options and the provision of high quality open spaces and green infrastructure. All of these elements combined can positively influence the health and well-being of communities. The LDP will achieve this by ensuring that the right type of developments take place in the most sustainable locations with the necessary infrastructure in place to support the new and existing community. In addition to this, the LDP can protect communities from inappropriate developments that would have a detrimental impact upon the health and well-being of residents.</u></p> <p><u>As part of the process of preparing the LDP a Health Impact Assessment (HIA) has been carried out in partnership with Betsi Cadwaladr Public Health Team. A HIA is not a statutory part of plan preparation but can have a positive effect in shaping the strategy and policies within an LDP which reduce health inequalities. The purpose of the HIA is to consult with health and planning professionals on the potential wider impact of the LDP on the health and well-being of Flintshire's population. The HIA process highlighted the importance of the LDP in protecting and promoting the health and well-being of Flintshire's residents and identified areas where the plan can ensure that this is maximized. Overall the HIA highlighted</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<u>that the promotion of active travel and the accessibility of new development have a significant impact upon health and well-being, in addition the integration of existing communities and the provision of key infrastructure such as education and health centres should also be given very careful consideration. The requirements of Gypsies and Travellers was also identified as a key area for attention that could impact upon health and well-being'</u>
MAC20	3.73	In para 3.73 delete 'Preferred'. The revised wording is 'The Key Diagram below helps to demonstrate the Council's Preferred Strategy'.
MAC21	3.73	Add the title 'The Plan Strategy' to the diagram following para 3.73 on page 36
<b>MAC22</b>	Para 4.1 / 4.2	Move paras 4.1 and 4.2 to the beginning of section 5 with a heading 'Introduction – Strategic Policies' to provide a general introduction before each of the 4 groups of strategic policies.
<b>MAC23</b>	Para 4.3 to 4.7	Move paras 4.3 to 4.7 to the end of section 3 with a new heading ' <u>Wellbeing and Ways of Working</u> '.
<b>MAC24</b>	Para 4.4	<p>Include the following new paragraph after para 4.4:</p> <p><u>'In preparing the Plan the Council has had regard to the Ways of Working and each is considered in turn:</u></p> <ul style="list-style-type: none"> <li><u>• Collaboration – throughout the Plan's preparation the Council has collaborated with a wide variety of stakeholders particularly through the Key Stakeholder Forum who have a shared responsibility and intention to help meet well-being objectives. The Council has worked in a collaborative manner in terms of establishing joint evidence bases (Employment Land Review and Local Housing Market Assessment) and more recently establishing a common approach to viability assessment. Flintshire also provides a Minerals and Waste planning service to North Wales authorities.</u></li> <li><u>• Prevention – The Plan has had regard to existing problems and sought to prevent new problems from occurring whether in respect of the economy, the environment, infrastructure and people's health and well-being. The Plans framework of policies and proposals provide the basis with which to achieve the Wellbeing goals.</u></li> <li><u>• Involvement – In addition to the Key Stakeholder Forum, the Council have also sought to involve a large number of local and specific interest groups, as identified in the appendices to the Delivery Agreement. As the Plan has progressed the emphasis changed from engagement to participation, as explained in detail in the Consultation Report. The additional engagement exercise which comprised the Key Messages</u></li> </ul>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p><u>document was intended to ensure a firm basis with which to shape the plan’s vision, issues and objectives which acted as a platform for formation of strategic options. The Council has also worked with groups such as Flintshire 50+ Action Group, Flintshire Youth Forum, Public Health Wales and the Gypsy and Traveller Community, amongst others. Town and Community Councils have been closely involved throughout all stages of Plan preparing. This ongoing process of engagement has helped inform and refine the Plan as it has progressed, as explained in the Consultation Report.</u></p> <ul style="list-style-type: none"> <li>• <u>Long term – Although the Plan is directly concerned with planning for the present Plan period, its preparation has regard to the long term in ensuring that patterns of development are both sustainable and resilient in the long term.</u></li> <li>• <u>Integration – The preparation of the Plan has sought to draw upon a large number and variety of guidance, plans and strategies at the international, national and local levels, including the Council’s Well-being Plan. The Plan’s strategy, policy and proposals are considered to sit comfortably within this wider context. For instance, each of the strategic policies is referenced to the wellbeing goals. The preparation of the Plan has been the subject of a continuous process of independent assessment through the Integrated Impact Assessment which itself was re-scoped in order to ensure it incorporated and worked towards achieving the Wellbeing goals and Ways of Working’.</u></li> </ul>
<b>MAC25</b>	5.1	Amend the ‘Introduction’ heading prior to para 5.1 to ‘Introduction – Creating Sustainable Places and Communities’
<b>MAC26</b>	STR1	In criteria ii amend 139.67 hectares to 124.97 hectares
<b>MAC27</b>	STR1	In criteria iii amend ‘7,950’ to 7870
<b>MAC28</b>	STR1	In criteria iii add at end of present wording ‘of which 2265 will be affordable’.
<b>MAC29</b>	STR2	<p>In policy STR2 make the following changes:</p> <ul style="list-style-type: none"> <li>• In criteria a) regarding Tier 1 settlements add a new criterion ‘<u>iv. Exceptions Schemes for affordable housing adjoining settlement boundaries</u>’</li> <li>• In criteria b iv, c iv and d ii delete the word ‘<del>small scale</del>’</li> </ul>



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MAC30	STR2 5.13	<p>Insert DPM Table 16 (Background Paper 10A – Table 4A) as part of explanation to policy STR2.</p> <ul style="list-style-type: none"> <li>• Reword the last two sentences of para 5.13 as follows: ‘The Preferred Strategy detailed a broad brush distribution of housing, based on the settlement and spatial strategy, <del>and is set out below</del>. This compares well with the actual apportionment of growth in the <u>Deposit Plan and in the adopted Plan</u> as set out in the <u>first table below, taking into account completions during the first three years of the LDP period, commitments as at April 2018, the housing allocations and anticipated windfalls. A more detailed breakdown is set out in the Housing Land Supply Background Paper. The second table below, in line with the Development Plans Manual 3, shows a more detailed spatial breakdown of supply.</u>’</li> <li>• Amend the table by adding a third column ‘<u>Adopted Plan</u>’ with figures of <u>Tier 1 – 47%, Tier 2 35%, Tier 3 – 15%, Tier 4 – 2%, Tier 5 – 1%</u>’</li> <li>• Add a further table below the above table to give a detailed breakdown</li> </ul> <p>Summary of Spatial Distribution of Housing as at 1.4.20</p> <table border="1" data-bbox="638 906 2107 1321"> <thead> <tr> <th colspan="2"></th> <th colspan="5">Settlement Hierarchy</th> <th></th> </tr> <tr> <th></th> <th>Components of Housing Supply</th> <th>Tier 1</th> <th>Tier 2</th> <th>Tier 3</th> <th>Tier 4</th> <th>Tier 5</th> <th>Totals</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Total completions (small &amp; large)</td> <td>1489</td> <td>579</td> <td>433</td> <td>67</td> <td>41</td> <td>2609</td> </tr> <tr> <td>B</td> <td>*Units under construction</td> <td>162</td> <td>71</td> <td>19</td> <td>2</td> <td>0</td> <td>**254</td> </tr> <tr> <td>C</td> <td>*Units with Planning permission</td> <td>535</td> <td>108</td> <td>255</td> <td>43</td> <td>26</td> <td>967</td> </tr> <tr> <td>D</td> <td>New Housing Allocations</td> <td>863</td> <td>1851</td> <td>246</td> <td>0</td> <td>0</td> <td>2960</td> </tr> <tr> <td>E</td> <td>Windfall sites (large &amp; small)</td> <td>702</td> <td>173</td> <td>173</td> <td>21</td> <td>11</td> <td>1080</td> </tr> <tr> <td>F</td> <td>Total Housing Provision</td> <td><u>3751</u></td> <td><u>2782</u></td> <td><u>1126</u></td> <td><u>133</u></td> <td><u>78</u></td> <td><u>7870</u></td> </tr> </tbody> </table> <p>* Relates to large sites of 10 or more units only  **Excludes units under construction on Allocated sites (which are included in the row D figures)</p>			Settlement Hierarchy							Components of Housing Supply	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Totals	A	Total completions (small & large)	1489	579	433	67	41	2609	B	*Units under construction	162	71	19	2	0	**254	C	*Units with Planning permission	535	108	255	43	26	967	D	New Housing Allocations	863	1851	246	0	0	2960	E	Windfall sites (large & small)	702	173	173	21	11	1080	F	Total Housing Provision	<u>3751</u>	<u>2782</u>	<u>1126</u>	<u>133</u>	<u>78</u>	<u>7870</u>
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<b>MAC31</b>	STR3	<p>Split policy STR3 into two separate policies and amend Policy Index:  For STR3A Northern Gateway:</p> <ul style="list-style-type: none"> <li>• In second sentence of opening part of policy wording replace ‘Two’ with ‘The following’ and replace ‘sites’ with ‘site’.</li> <li>• Delete the policy wording relating to STR3B Warren Hall</li> <li>• Amend para 5.19 as follows:</li> <li>• Replace ‘The two strategic allocations are both sites’ with ‘This strategic allocation is a site’</li> <li>• Replace ‘but where it is vital to revisit both sites in different ways’ with ‘but where it is vital to revisit the site’ Replace ‘ensure that they come forward’ with ‘ensure that it comes forward’</li> <li>• Delete para 5.20</li> <li>• Delete para 5.23</li> <li>• Delete para 5.24</li> <li>• Delete ‘Warren Hall Masterplan and Delivery Statement’ in the Policy Context Table</li> <li>• Re-number paragraphs</li> <li>• Include an Indicative Masterplan as part of the explanation for the site (illustrative masterplan diagrams in LDP-EBD-STR3A.1 and LDP-EBDSTR3A.2).</li> <li>• Add a reference at the end of para 5.19 ‘The Council produced early planning guidance in respect of the Northern Gateway site and this assisted in working proactively with the two developers in bringing forward subsequent development proposals. The comprehensive framework of planning outline permissions supported by applications for discharges of conditions and reserved matters provides the basis for guiding and determining subsequent planning applications on remaining phases of the strategic site.</li> </ul> <p>NB For STR3B Warren Hall the changes are set out in IMAC01.</p>
<b>MAC32</b>	STR5	<p>Add the following wording at the end of para 5.36 <u>Future Wales The National Plan 2040 sets out in Policy 23 –</u>“ North Wales Metro: The Welsh Government supports the development of the North Wales Metro and</p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p>will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities.” This will involve:-</p> <ul style="list-style-type: none"> <li>• <u>Enhanced and integrated rail and bus services across North Wales/Cheshire</u></li> <li>• <u>Enhanced Borderlands line with direct and faster services between Wrexham and Liverpool and integration with Merseyrail services</u></li> <li>• <u>Additional stations and potential extensions</u></li> <li>• <u>Upgrades of Wrexham General and Shotton stations</u></li> <li>• <u>Further rail extension and/or re-openings to be considered</u></li> </ul> <p>(Source: A Railway for Wales – Meeting the Needs of Future Generations, 2019)</p>
MAC33	6.1	Amend the ‘Introduction’ heading prior to para 6.1 to ‘Introduction – Supporting a Prosperous Economy’.
<b>MAC34</b>	STR9 6.24	<p>Amend para 6.24 accompanying policy STR9 to read as follows:  ... The Retail Study identifies that there is only a small need for further comparison retail floorspace (<u>508 sq m net</u>) over the Plan period and a negative need for convenience retail floorspace. <u>Following the expiry of one of the retail commitments in the Retail Study at Saltney retail park, the comparison need has increased to 4028 sq m net.</u> However changes to the retail industry in recent years have made it difficult to predict the most appropriate areas to allocate for retail uses, <u>particularly given the large number of centres within the County.</u> Since there are options for comparison retail sites within the plan area, the council is also working to encouraging appropriate retail uses and the plan has a flexible approach to retail windfall sites it is considered that no retail allocation is <del>needed</del> <u>necessary or appropriate.</u> The implementation of the Plan’s retail policies will be informed by its evidence base for example health checks, and existing town centre masterplans and the up to date Retail Study.</p>
<b>MAC35</b>	STR10	Amend criteria i by adding after ‘tourism’ the words ‘, <u>cultural and leisure</u> ’.
MAC36	7.1	Amend the ‘Introduction’ heading prior to para 7.1 with ‘Introduction – Meeting Housing Needs’.
<b>MAC37</b>	STR11 and 7.8	<p>Amend policy STR11 as follows:</p> <p>In introductory policy wording beginning ‘The delivery of....’ replace ‘<del>will be expected to</del>’ with ‘<u>should</u>’.</p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change		
		<p>In criteria ii) replace 'Making' with 'Make'</p> <p>Remove the final paragraph of the policy and relocate in the explanatory text at the end of para 7.8.</p> <p>.</p>		
MAC38	STR11 Housing Balance Sheet	Update Housing Balance Sheet as below		
		Element	Amount	Notes
		<b>REQUIREMENT</b>	<b>6,950</b>	
		Less completions 15-16	662	Includes large and small site completions.
		Less completions 16-17	421	Includes large and small site completions.
		Less completions 17-18	608	Includes large and small site completions.
		Less completions 18-19	454	Includes large and small site completions.
		Less completions 19-20	464	Includes large and small site completions.
		<b>Revised Requirement</b>	<b>5259</b> <b>4341</b>	
		Less commitments	1774 1221	This reflects a review of large sites whereby only sites with planning permission as at 01/04/20 which are considered to be realistically capable of development, are included. The figures do not include the 1,325 consented units at Northern Gateway, nor the consented units on the allocated sites at Broad Oak Holding, Connah's Quay, Chester Road Penymynydd as these are included in the strategic sites and allocations figures. Housing commitments are detailed in Appendix 1.and shown on the proposals map.

MAC Number	Section/policy/paragraph in LDP	Details of Change		
		<b>Revised Requirement</b>	3488 3120	
		Less future small sites allowance 600 (<10 units) 60 pa	720 600	Small sites allowance represents a conservative but realistic allowance of 60 units per annum (as per UDP) over the remaining Plan period.
		Less future Windfall allowance (>10 units)	600 480*	<del>Windfalls allowance (large sites) represents a conservative but realistic allowance of 50 units per annum (as per UDP) over the remaining Plan period.</del> Windfalls allowance (large sites) represents a conservative but realistic allowance. The Housing balance sheet at Deposit included an allowance of 600 units over the remaining 12 yr Plan period, equating to an average of 50 pa or 60 per annum assuming no completions in the first year & reduced completions in the second & third years. The figure of 480 is based on this same figure of 60 per annum over the remaining 8 years (assuming no completions in the first two years as now advised in Ed. 3 of the Manual)
		<b>Residual Requirement</b>	<b>2,168</b> <b>2,040</b>	
		Less LDP Strategic Allocations	1294 1185	<del>Includes Northern Gateway 1,325 units and Warren Hall 300. However Northern Gateway discounted by 331 units which may be delivered beyond the Plan end date 131 units on Praxis and 200 units on Pochin. Comprises Northern Gateway Strategic site of 1325 units, discounted</del>

MAC Number	Section/policy/ paragraph in LDP	Details of Change		
				by 140 units which may be delivered beyond the Plan end date.
		<u>New allocations Requirement</u>	874 855	
		<u>LDP Allocations</u>	1874 1775	See Policy HN1 (3014 less 54 completions, less 1185 on Strategic allocation) See Site Allocations Policy Table
		<u>Overallocation / flexibility</u>	1000 920	This equates to a flexibility allowance of 13.2% based on the overall housing requirement of 6,950
MAC39	8.1	Amend the 'Introduction' heading prior to para 8.1 with 'Introduction – Valuing the Environment'.		
MAC40	8.7	Replace 'EN11 Green Barriers' with 'EN11 Green Wedges'		
<b>MAC41</b>	STR13	In the second paragraph of the STR13 policy wording replace 'will' with 'should'.  In the third paragraph of the introductory wording replace 'To achieve this all development will' with 'development should'.		
MAC42	STR13	In criteria ii. replace 'green-barriers' with 'green-wedges'		
MAC43	STR13	In the 'detailed policies' section replace 'green barriers' with 'green wedges'.		
<b>MAC44</b>	STR14	Change criteria ii in policy STR14 by replacing 'Supporting' with 'Encouraging'.		
<b>MAC45</b>	STR16	Amend Policy STR16 as follows:  Add the wording 'in accordance with the criteria set out in Policy EN23' at the end of criterion i. Add the wording 'as identified on the constraints map and applied through Policy EN24' at the end of criterion ii.		

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p>Delete existing wording of criterion iii and replace with '<u>Contributing towards the regional supply of mineral through the allocation of at least 3.543 million tonnes of sand &amp; gravel, and at least 35.928 million tonnes of crushed rock through the extensions to existing quarries as set out in Policy EN25, new sites and in collaboration with Denbighshire County Council and Wrexham County Borough Council</u>'.</p> <p>In criterion iv. Insert 'to' between 'as' and 'minimise'.</p> <p>Add at the end of criterion vi. '<u>in accordance with the criteria set out in Policy EN27</u>'.</p>
<b>MAC46</b>	STR16 Policy context table	<p>Add the following documents to the Key Evidence section:</p> <ul style="list-style-type: none"> <li>• North Wales Regional Aggregates Working Party Report</li> <li>• Regional Technical Statement second review and accompanying appendix for North Wales</li> <li>• Minerals Technical Advice Note 1 (MTAN1)</li> </ul>
<b>MAC47</b>	STR16 Para 8.27	<p>Amend para 8.27 as follows:</p> <p><del>The North Wales Regional Technical Statement and accompanying appendix for North Wales identifies the level of need for mineral at the regional level and then apportions this to individual local authorities. A need for additional sand and gravel as well as crushed rock has been identified in Flintshire as well as a need for crushed rock shared between Flintshire and Wrexham (see Statement of Common Ground – Crushed Rock) within the Regional Technical Statement Second Review. It is proposed to meet the shared need for crushed rock within Flintshire through the extension of existing quarries. rather than through the allocation of a new site, since the tonnage required would not support the creation of a new quarry site and this has been formally agreed with Wrexham, forming part of their LDP Strategy.</del></p> <p><u>Detailed allocations are identified within the Plan in policy EN25 and shown on the proposals map. In addition to this, new site development will also be required to meet future demand in addition to the extensions proposed as allocations. Further allocations may be proposed on subsequent reviews of the LDP to meet the identified need of the RTS, and to work in collaboration with neighbouring authorities Denbighshire County Council and Wrexham County Borough Council within the sub-region.</u></p>
<b>MAC48</b>	PC1	<p>In opening part of the policy wording of PC1 delete 'generally'.</p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
MAC49	PC1	In criteria a. of PC1 replace 'policy HN4-A/B/C/D' with 'policies HN4 / HN4A / HN4B / HN4C / HN4D'. The amended wording of criteria a. is 'the specific forms of housing development as set out in <del>policy</del> policies <del>HN4-A/B/C/D</del> HN4 / HN4-A / HN4-B / HN4-C / HN4-D'
MAC50	PC2	In opening wording of Policy PC2 delete ', where appropriate'. The revised introductory policy wording is 'All development should, <del>where appropriate:</del> '
MAC51	PC3	In opening wording of policy PC3 delete ", where appropriate'. The revised introductory policy wording is 'All new development should, <del>where appropriate</del> '.
MAC52	PC3	In PC3 include a new criteria 'h. protect the living conditions of nearby occupiers from any harmful effects of new development including overlooking, harm to outlook, increased activity/disturbance/noise'.
MAC53	PC4	In introductory wording of PC4 delete ' <del>ensure that</del> '. Amend each criteria as follows: a. Replace ' <del>it is</del> ' with ' <u>be</u> ' b. Replace ' <del>it is</del> ' with ' <u>be</u> ' c. Replace ' <del>it incorporates</del> ' with ' <u>incorporate</u> ' d. Replace ' <del>it makes</del> ' with ' <u>make</u> ' e. Replace ' <del>it incorporates</del> ' with ' <u>incorporate</u> '
MAC54		Amend criteria c as follows: ' <u>it incorporates planting, landscaping and design features within a Sustainable Management of Natural Resources (SMNR) approach which mitigate the effects of climate change such as increased rainfall events and high temperatures;</u> ' Amend the 4th sentence of paragraph 9.11 to read "It would be expected that developments use the Design and Access Statements (DAS) <u>and within those a Sustainable Management of Natural Resources (SMNR) approach, accompanying relevant applications to demonstrate how proposals deliver the intentions of this policy by explaining how the design of the proposal responds to environmental sustainability. "</u> Add to the end of paragraph 9.13 ' <u>A Sustainable Management of Natural Resources (SMNR) approach should also include setting out a comprehensive integrated landscape scheme for the development</u> '
MAC55	PC5	In policy PC5 amend the following criteria:



MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p>In criterion a) delete '<del>reduce reliance on the car by incorporating</del>' and replace with '<u>incorporate good access to the more sustainable modes of travel, firstly by walking and cycling, secondly by public transport, then by low emission private vehicle and finally by other private motor vehicle;</u>'</p> <p>In criterion b) replace the existing policy wording with '<u>not compromise the safe, effective and efficient use of the highway network and not have an adverse impact on highway safety or create unacceptable levels of traffic generation;</u>'</p> <p>In criterion c) replace existing wording with '<u>where significant adverse effects upon the transport network arising from the proposed development are unavoidable, they must be mitigated by, for example, improvements to transport infrastructure and traffic management</u>'.</p>
<b>MAC56</b>		<p>In opening part of policy wording of PC6 delete first '<del>proposals</del>'.</p> <p>Put a full stop after facilities and follow with '<u>Proposals should wherever possible;</u>'.</p> <p>Amend each criterion as follows:</p> <ul style="list-style-type: none"> <li>a. replace '<del>the provision of</del>' with '<u>provide</u>'</li> <li>b. replace '<del>the provision of</del>' with '<u>provide</u>'</li> <li>c. replace '<del>the provision of</del>' with '<u>provide</u>'</li> <li>d. replace '<del>the incorporation of</del>' with '<u>incorporate</u>'.</li> <li>e. replace '<del>the development and enhancement of</del>' with '<u>develop and enhance</u>'</li> <li>f. replace '<del>the incorporation of</del>' with '<u>incorporate</u>'.</li> </ul>
<b>MAC57</b>		<p>In para 9.24 remove capital letters from 'police', 'air ambulance', 'military', 'military training jets', 'private business jets' or 'aircraft'.</p> <p>Further revise the explanation to policy PC8 to read:</p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p>9.24 Airbus <u>currently</u> owns the airport and is the main user. However, other uses include police, air ambulance and military helicopters, military training jets and private business jets, as well as flight training. Alongside Airbus other companies based at Hawarden include Aerocare, Raytheon UK and NWMAS all of whom provide aircraft maintenance facilities on site. Aviation Park Group offer a range of services including Aircraft handling, overnight parking, hangarage and passenger services. <del>There is a need to control the location and scale of development in the vicinity of the flightpaths of aircraft in order to prevent physical obstacles or distraction. A Safeguarding Zone has been identified for Hawarden Airport within which development proposals will be closely scrutinised to ensure that they would not affect the safe and efficient operation of the airport and airfield. Consultation will be carried out with the Civil Aviation Authority.</del></p> <p><u>9.25 The safeguarding zone for Hawarden Airport is defined on a safeguarding map issued by the Civil Aviation Authority. This defines certain types of development that, by reason of their height, attraction to birds or inclusion of or effect upon aviation activity, require prior consultation with the Airport owner or operator. Government advice in OPDM Circular 1/2003 'Advice to Local Planning Authorities on Safeguarding Aerodromes and Military Explosives Storage Areas' sets out the detailed guidance on how safe and efficient operations can be secured.</u></p> <p><u>9.26 In accordance with this Circular, the owner or operator of Hawarden Airport is a statutory consultee for certain planning applications for developments that require safeguarding to protect the safety of the airport's operation.</u></p> <p><u>9.27 The owner or operator of Hawarden Airport will assess planning applications and consider their potential impact on whether the development causes: an obstacle; an attraction to birds; any light or reflection that might be confused with or interfere with aerodrome lighting or present a visual hazard; interference with communication systems including radar systems and ground to air communication and whether its construction will present any hazard to flight safety.</u></p>
MAC58	PE1	Not accepted as described in report. The suggested additional wording 'with the exception of the Northern Gateway site which is allocated for B2 and B8 uses and the Warren Hall site which is suitable for B1 and B2 uses' should not be added at the end of the introductory wording of PE1.

MAC Number	Section/policy/paragraph in LDP	Details of Change																																																					
MAC59	PE1	<p>In the table accompanying policy PE1 delete the following sites:</p> <ul style="list-style-type: none"> <li>• PE1.4 Greenfield Business Park Phase II</li> <li>• PE1.5 Greenfield Business Park Phase III</li> <li>• PE1.6 Broncoed Industrial Estate</li> <li>• PE1.8 Adjacent Mostyn Docks</li> <li>• PE1.10 Antelope Industrial Estate</li> <li>• PE1.12 Rowley's Drive</li> </ul> <p>The table of allocations will be revised as follows:</p> <table border="1" data-bbox="638 687 2018 1372"> <thead> <tr> <th data-bbox="638 687 846 727">Ref. No.</th> <th data-bbox="846 687 1776 727">Site</th> <th data-bbox="1776 687 2018 727">Area (ha,)</th> </tr> </thead> <tbody> <tr> <td data-bbox="638 727 846 767">STR3A</td> <td data-bbox="846 727 1776 767">Northern Gateway Mixed Use Development Site</td> <td data-bbox="1776 727 2018 767">72.40</td> </tr> <tr> <td data-bbox="638 767 846 839">STR3B</td> <td data-bbox="846 767 1776 839">Warren Hall Mixed Use Development Site</td> <td data-bbox="1776 767 2018 839">19.1</td> </tr> <tr> <th data-bbox="638 839 846 879">Ref No.</th> <th data-bbox="846 839 1301 879">Settlement / Location</th> <th data-bbox="1301 839 1776 879">Site</th> <th data-bbox="1776 839 2018 879">Area (ha,)</th> </tr> <tr> <td data-bbox="638 879 846 919">1</td> <td data-bbox="846 879 1301 919">Broughton</td> <td data-bbox="1301 879 1776 919">Chester Aerospace Park</td> <td data-bbox="1776 879 2018 919">5.72</td> </tr> <tr> <td data-bbox="638 919 846 991">2</td> <td data-bbox="846 919 1301 991">Broughton</td> <td data-bbox="1301 919 1776 991">Manor Lane/Hawarden Park Extension</td> <td data-bbox="1776 919 2018 991">18.2</td> </tr> <tr> <td data-bbox="638 991 846 1031">3</td> <td data-bbox="846 991 1301 1031">Buckley</td> <td data-bbox="1301 991 1776 1031">Drury New Road</td> <td data-bbox="1776 991 2018 1031">1.4</td> </tr> <tr> <td data-bbox="638 1031 846 1102">4</td> <td data-bbox="846 1031 1301 1102">Greenfield</td> <td data-bbox="1301 1031 1776 1102">Greenfield Business Park, Phase II</td> <td data-bbox="1776 1031 2018 1102">4.2</td> </tr> <tr> <td data-bbox="638 1102 846 1174">5</td> <td data-bbox="846 1102 1301 1174">Greenfield</td> <td data-bbox="1301 1102 1776 1174">Greenfield Business Park, Phase III</td> <td data-bbox="1776 1102 2018 1174">4.4</td> </tr> <tr> <td data-bbox="638 1174 846 1214">6</td> <td data-bbox="846 1174 1301 1214">Mold</td> <td data-bbox="1301 1174 1776 1214">Broncoed Industrial Estate</td> <td data-bbox="1776 1174 2018 1214">0.7</td> </tr> <tr> <td data-bbox="638 1214 846 1254">7 4</td> <td data-bbox="846 1214 1301 1254">Mold</td> <td data-bbox="1301 1214 1776 1254">Mold Business Park</td> <td data-bbox="1776 1214 2018 1254">3.90</td> </tr> <tr> <td data-bbox="638 1254 846 1294">8</td> <td data-bbox="846 1254 1301 1294">Mostyn</td> <td data-bbox="1301 1254 1776 1294">Adjacent Mostyn Docks</td> <td data-bbox="1776 1254 2018 1294">3.0</td> </tr> <tr> <td data-bbox="638 1294 846 1334">9 5</td> <td data-bbox="846 1294 1301 1334">Queensferry</td> <td data-bbox="1301 1294 1776 1334">Chester Road East</td> <td data-bbox="1776 1294 2018 1334">3.15</td> </tr> <tr> <td data-bbox="638 1334 846 1372">10</td> <td data-bbox="846 1334 1301 1372">Rhydymwyn</td> <td data-bbox="1301 1334 1776 1372">Antelope Industrial Estate</td> <td data-bbox="1776 1334 2018 1372">1.10</td> </tr> </tbody> </table>	Ref. No.	Site	Area (ha,)	STR3A	Northern Gateway Mixed Use Development Site	72.40	STR3B	Warren Hall Mixed Use Development Site	19.1	Ref No.	Settlement / Location	Site	Area (ha,)	1	Broughton	Chester Aerospace Park	5.72	2	Broughton	Manor Lane/Hawarden Park Extension	18.2	3	Buckley	Drury New Road	1.4	4	Greenfield	Greenfield Business Park, Phase II	4.2	5	Greenfield	Greenfield Business Park, Phase III	4.4	6	Mold	Broncoed Industrial Estate	0.7	7 4	Mold	Mold Business Park	3.90	8	Mostyn	Adjacent Mostyn Docks	3.0	9 5	Queensferry	Chester Road East	3.15	10	Rhydymwyn	Antelope Industrial Estate	1.10
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MAC Number	Section/policy/ paragraph in LDP	Details of Change			
		11 <del>6</del>	Saltney	River Lane	1.10
		12	Shotton	Rowley's Drive	0.70
		Total			139.67
		<b>124.97</b>			
<b>MAC60</b>	PE1/para 10.1	<p>Add at the end of paragraph 10.1 in the plan:  <u>'The Deeside Enterprise Zone is vitally important to the employment aspirations of the plan. The DEZ has been designated by Welsh Government to continue to develop as a major centre for advanced manufacturing on an international scale by ensuring that the Zone builds on its strengths in key sectors, encourages investment and re-investment in order to compete with locations on a global scale. Further information on the Deeside Enterprise Zone can be found here.'</u></p> <p>Within the table under PE1 add a column at the right hand edge of the table with the title 'Location with Deeside Enterprise Zone?' Add a '✓' for the following sites to explain that they are within the Deeside Enterprise Zone:</p> <ul style="list-style-type: none"> <li>• STR3A Northern Gateway</li> <li>• PE1.1 Chester Aerospace Park</li> <li>• PE1.2 Manor Lane / Hawarden Park, Broughton</li> <li>• PE1.9 Chester Road East, Queensferry</li> </ul>			
<b>MAC61</b>	PE1/para 10.1	<p>Delete para 10.1 and the accompanying table and replace with <u>'The Plan allocates 124.97ha of land for employment development. This comprises the two strategic mixed use sites at Northern Gateway and Warren Hall and several other more local allocations. The Plan provides a range of employment sites in terms of location, size and type to suit a variety of investments needs.'</u></p>			
<b>MAC61</b>		<p>The following sentence suggested at the end of MAC61 is not accepted.  All sites are intended to accommodate B1, B2 and B8 employment development with the exception of Warren Hall which is B1 and B2 only.</p>			

MAC Number	Section/policy/ paragraph in LDP	Details of Change
MAC62	PE1	<p>Include an additional paragraph at the end of the reasoned justification to PE1 with the wording ‘Any development proposals on sites that may be located within a flood risk zone causing constraint will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage. The SFCA undertaken in respect of employment allocations and areas does not assess each allocation in detail as this can only be done as part of the project design and development management stages. This seeks to ensure that flood risk areas can be avoided and mitigation measures can be put in place to address flood risk and comply with the relevant national flood risk policy and policy EN14’</p>
MAC63	PE2	<p>Add to the policy wording ‘<u>Within these areas development must also avoid adverse effects on European Sites.</u>’</p>
MAC64	PE2	<p>Add to policy wording after ‘surroundings’, ‘<u>and satisfies other Plan policies</u>’</p> <p>Add the following policy wording ‘<u>Any development proposals on sites that may be located within a flood risk zone causing constraint will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage</u>’.</p> <p>The final policy wording combining both the MAC changes is as follows:</p> <p><b>Policy PE2: Principal Employment Areas</b>  Within principal employment areas, as defined on the proposals map and listed below, the following types of employment development will be permitted:</p> <ol style="list-style-type: none"> <li>a. B1 business use;</li> <li>b. B2 general industry;</li> <li>c. B8 storage and distribution</li> </ol> <p>provided that the proposal is of an appropriate type and scale for both the site and its surroundings <u>and satisfies other Plan policies. Within these areas, development must also avoid adverse effects on European Sites. Any development proposals on sites that may be located within a flood risk zone causing constraint</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<u>will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage.</u>
<b>MAC65</b>	PE2 Para 10.3	<p>Replace the present wording of para 10.3 with</p> <p><u>'Through policy PE2 it is considered that by identifying key areas where primarily existing employment development can be safeguarded and where new employment development in relation to this will generally be acceptable, the Plan aims to provide a greater degree of certainty and consistency and avoid the need to identify numerous small allocations or commitments. The policy is applicable to the use of land, new build, conversion, redevelopment and extension or expansion. Within these areas, employment development will generally be acceptable, unless it is allocated for a specific use by virtue of another policy. However, it will still be necessary for proposals to be of a type and scale which respects the local environment and amenity of other land uses and residents and satisfies other policies throughout the Plan. In particular, development proposals must demonstrate at planning application stage how flood risk considerations can be fully assessed through further detailed assessment. The SFCA undertaken in respect of Principal Employment Areas is a high level assessment and does not assess each area in detail as this can only be done as part of considering individual development proposals as part of the specific project design and development management stages. This seeks to ensure that flood risk areas can preferably be avoided and mitigation measures can be put in place to address flood risk and the consequences of flooding, comply with the relevant national flood risk policy and policy EN14'.</u></p>
<b>MAC66</b>	PE6 Para 10.13	<p>Add at the end of para 10.13 accompanying policy PE6, the following text:</p> <p><u>'It is recognised that there may be ancillary uses such as a convenience store, café, gym or other uses which are complementary to employment development and these will considered on their individual merits'.</u></p>
<b>MAC67</b>	PE10	<p>Add at the end of the Policy Title <u>'and Local Convenience Shops'</u> and add at the end of the second policy paragraph <u>'In settlements without a defined district or local centre, or where there is no opportunity within a</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<u>defined local or district centre, local convenience shops will be supported elsewhere within settlement boundaries provided that proposals are appropriate in scale to the locality</u> '.
MAC68	PE10 Para 10.25	Amend the second sentence of para 10.25 as follows: As a consequence proposals <del>other than A1</del> <u>for retail and non-retail commercial uses</u> may be more difficult to satisfactorily accommodate in such Local Centres, and the importance of safeguarding residential amenity will be a key consideration.
<b>MAC69</b>	PE13	The opening part of criterion a. to be reworded to read 'The development of static caravan accommodation will <u>not</u> be permitted <del>outside</del> in the Talacre, Gronant and Gwespyr area (as defined on the proposals map). <u>Elsewhere in the County proposals will be permitted where:</u> '
<b>MAC70</b>	PE13	Amend the wording of criteria a.i. and add a new criteria c.vi as follows:  a.i. 'there would be no material harm to the landscape character and environmental quality of the surrounding area <u>and no adverse effects on European Sites</u> , either individually or cumulatively with other sites in the vicinity; and'  c vi. ' <u>the proposal has no adverse effects on European sites</u> '.
<b>MAC71</b>	PE14	Amend the policy wording as follows 'Development proposals within or adjoining the Greenfield Valley, as designated on the proposals map, <del>will be permitted where they do</del> <u>should</u> not detract from the tourism potential of the Valley or harm areas or features of landscape, nature conservation or historic value'.
<b>MAC72</b>	PE14	Add at end of policy wording ' <u>Within or adjoining the Greenfield Valley, development must also avoid adverse effects on European Sites.</u> '
<b>MAC73</b>		Add a new Telecommunications Policy located in the Supporting a Prosperous Economy section under reference PE15 as follows:  <u>PE15: Telecommunications and Digital Technology Infrastructure</u>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p><u>Proposals for telecommunications and digital technology infrastructure will be assessed in the context of technical and operational requirements and permitted where:</u></p> <ol style="list-style-type: none"> <li data-bbox="685 424 2024 491">i. <u>The development contributes towards the objectives of future proofing development and regeneration proposals or forms part of the planned development of a wider network;</u></li> <li data-bbox="685 496 2092 600">ii. <u>The development incorporates all reasonable measures to minimise any significant adverse impact due to the siting and external appearance of the apparatus, and the design minimises impact caused by its visual appearance;</u></li> <li data-bbox="685 604 2085 671">iii. <u>There would be no significant adverse effect on natural heritage, the historic environment, or amenity of neighbouring residents;</u></li> <li data-bbox="685 676 2063 743">iv. <u>The application is accompanied by evidence of compliance with Government guidelines on health impacts of telecommunications infrastructure.</u></li> </ol> <p><u>Facilitating digital communications is key to Flintshire's plans to accelerate growth in the County in the context of the Growth Deal which recognizes the need to 'Upgrade digital networks and infrastructure across the region to support the functionality, competitiveness and growth of the indigenous business sector.' Modern, fast, affordable and secure telecommunications and future proofed digital connectivity infrastructure can stimulate business innovation, enable high-value economic activity and drive-up productivity. For residents, it can transform their communications, home computing, on-line shopping, entertainment facilities, as well as enable effective home working. The potential benefits that telecommunications and digital communications can offer individuals and organisations are recognised, for example in terms of working from home, which can assist in creating a sustainable future by reducing the need to travel.</u></p> <p><u>Telecommunication facilities may have special needs and technical considerations, which require them to be installed in particular locations to work effectively. However in sensitive locations the erection of telecommunication towers and antennae can have a significant adverse effect on the quality of the urban and rural environment. Clear guidance with respect to the development of telecoms infrastructure is contained within section 5.2 of PPW11 and TAN19 Telecommunications, which is not repeated in this</u></p>



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		<p><u>policy. Applications for telecoms and digital infrastructure developments will therefore be assessed against National Planning Policy and Guidance. In accordance with national planning policy, the Council encourages operators to share telecoms masts. Operators will be required to submit evidence that opportunities for mast sharing and alternative sites have been fully explored. Careful siting, design and disguise, including landscaping and screening, can make developments less obtrusive and enable them to blend in with their surroundings.</u></p>																																																						
MAC74	HN1 Para 11.2	<p>Add at the end of para 11.2</p> <p><u>'The following table shows a summary of the Plan's housing allocations in line with the advice in Development Plans Manual 3'.</u></p> <table border="1" data-bbox="640 751 2154 1388"> <thead> <tr> <th data-bbox="640 751 909 975" rowspan="3"><u>Site Name</u></th> <th data-bbox="909 751 1207 975" rowspan="3"><u>Settlement Tier</u></th> <th data-bbox="1207 751 1357 975" rowspan="3"><u>Total Units in plan period</u></th> <th data-bbox="1357 751 1491 975" rowspan="3"><u>Total Affordable Units in plan period</u></th> <th colspan="3" data-bbox="1491 751 1966 791"><u>Delivery timescale</u></th> <th data-bbox="1966 751 2154 900" rowspan="3"><u>Units Beyond the plan period</u></th> </tr> <tr> <th colspan="3" data-bbox="1491 900 1966 940"><u>Years</u></th> </tr> <tr> <th data-bbox="1491 940 1641 975"><u>1-5</u></th> <th data-bbox="1641 940 1792 975"><u>6-10</u></th> <th data-bbox="1792 940 1966 975"><u>11-15</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="640 975 909 1051"><u>Northern Gateway</u></td> <td data-bbox="909 975 1207 1051"><u>Garden City Tier 2</u></td> <td data-bbox="1207 975 1357 1051"><u>1185</u></td> <td data-bbox="1357 975 1491 1051"><u>237</u></td> <td data-bbox="1491 975 1641 1051"></td> <td data-bbox="1641 975 1792 1051"><u>620</u></td> <td data-bbox="1792 975 1966 1051"><u>565</u></td> <td data-bbox="1966 975 2154 1051"><u>140</u></td> </tr> <tr> <td data-bbox="640 1051 909 1128"><u>Well Street</u></td> <td data-bbox="909 1051 1207 1128"><u>Buckley Tier 1</u></td> <td data-bbox="1207 1051 1357 1128"><u>140</u></td> <td data-bbox="1357 1051 1491 1128"><u>56</u></td> <td data-bbox="1491 1051 1641 1128"></td> <td data-bbox="1641 1051 1792 1128"><u>93</u></td> <td data-bbox="1792 1051 1966 1128"><u>47</u></td> <td data-bbox="1966 1051 2154 1128"></td> </tr> <tr> <td data-bbox="640 1128 909 1241"><u>Broad Oak Holding, Mold Road</u></td> <td data-bbox="909 1128 1207 1241"><u>Connah's Quay Tier 1</u></td> <td data-bbox="1207 1128 1357 1241"><u>32</u></td> <td data-bbox="1357 1128 1491 1241"><u>9</u></td> <td data-bbox="1491 1128 1641 1241"></td> <td data-bbox="1641 1128 1792 1241"><u>32</u></td> <td data-bbox="1792 1128 1966 1241"></td> <td data-bbox="1966 1128 2154 1241"></td> </tr> <tr> <td data-bbox="640 1241 909 1318"><u>Highmere Drive</u></td> <td data-bbox="909 1241 1207 1318"><u>Connah's Quay Tier 1</u></td> <td data-bbox="1207 1241 1357 1318"><u>150</u></td> <td data-bbox="1357 1241 1491 1318"><u>53</u></td> <td data-bbox="1491 1241 1641 1318"></td> <td data-bbox="1641 1241 1792 1318"><u>60</u></td> <td data-bbox="1792 1241 1966 1318"><u>90</u></td> <td data-bbox="1966 1241 2154 1318"></td> </tr> <tr> <td data-bbox="640 1318 909 1388"><u>Northop Road</u></td> <td data-bbox="909 1318 1207 1388"><u>Flint Tier 1</u></td> <td data-bbox="1207 1318 1357 1388"><u>170</u></td> <td data-bbox="1357 1318 1491 1388"><u>26</u></td> <td data-bbox="1491 1318 1641 1388"></td> <td data-bbox="1641 1318 1792 1388"><u>60</u></td> <td data-bbox="1792 1318 1966 1388"><u>110</u></td> <td data-bbox="1966 1318 2154 1388"></td> </tr> </tbody> </table>	<u>Site Name</u>	<u>Settlement Tier</u>	<u>Total Units in plan period</u>	<u>Total Affordable Units in plan period</u>	<u>Delivery timescale</u>			<u>Units Beyond the plan period</u>	<u>Years</u>			<u>1-5</u>	<u>6-10</u>	<u>11-15</u>	<u>Northern Gateway</u>	<u>Garden City Tier 2</u>	<u>1185</u>	<u>237</u>		<u>620</u>	<u>565</u>	<u>140</u>	<u>Well Street</u>	<u>Buckley Tier 1</u>	<u>140</u>	<u>56</u>		<u>93</u>	<u>47</u>		<u>Broad Oak Holding, Mold Road</u>	<u>Connah's Quay Tier 1</u>	<u>32</u>	<u>9</u>		<u>32</u>			<u>Highmere Drive</u>	<u>Connah's Quay Tier 1</u>	<u>150</u>	<u>53</u>		<u>60</u>	<u>90</u>		<u>Northop Road</u>	<u>Flint Tier 1</u>	<u>170</u>	<u>26</u>		<u>60</u>	<u>110</u>	
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		<u>Maes Gwern</u>	<u>Mold Tier 1</u>	<u>160</u>	<u>48</u>	<u>27</u>	<u>133</u>		
		<u>Land between Denbigh Rd &amp; Gwernaffield Rd.</u>	<u>Mold Tier 1</u>	<u>238</u>	<u>95</u>		<u>118</u>	<u>120</u>	
		<u>Holywell Road /Green Lane</u>	<u>Ewloe Tier 2</u>	<u>298</u>	<u>119</u>		<u>73</u>	<u>225</u>	
		<u>Ash Lane</u>	<u>Hawarden Tier 2</u>	<u>288</u>	<u>101</u>		<u>63</u>	<u>225</u>	
		<u>Wrexham Road</u>	<u>HCAC Tier 2</u>	<u>80</u>	<u>24</u>		<u>50</u>	<u>30</u>	
		<u>Cae Isa, A5119</u>	<u>New Brighton Tier 3</u>	<u>92</u>	<u>37</u>		<u>75</u>	<u>17</u>	
		<u>Chester Road</u>	<u>Penymynydd Tier 3</u>	<u>181</u>	<u>27</u>	<u>27</u>	<u>154</u>		
		<b>Totals</b>		<b>3014</b>	<b>832</b>	<b>54</b>	<b>1531</b>	<b>1429</b>	<b>140</b>
<b>MAC75</b>	HN3	In introductory policy wording replace ' <del>starting point</del> ' with ' <u>target</u> '.							
<b>MAC76</b>	HN3	<p>Add following new paragraph after para 11.9 and renumber subsequent paragraphs:</p> <p><u>11.10 As outlined in policy HN3 affordable housing will be expected to be delivered on site in the first instance. Where it can clearly be evidenced by the developer that on site provision is not appropriate then off-site contributions towards affordable housing will be accepted and secured with a S106 legal agreement. An updated affordable housing SPG will set out the formula for calculating off site commuted sums for affordable housing, this formula will ensure that the commuted sum received is equivalent to the</u></p>							

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		percentage of affordable housing that should have been delivered on site. It will also set out how commuted sum payments will be used where the development results in the requirement to provide a part unit.																																																	
<b>MAC77</b>	HN3	<p>Insert table showing the components of affordable housing supply (Table 3 in BP7 October 2020 version) into the written statement after policy HN3 as follows:</p> <table border="1" data-bbox="651 568 2145 1251"> <thead> <tr> <th data-bbox="651 568 1014 722"></th> <th data-bbox="1014 568 1205 722"><u>Tier 1 - Main Service Centres</u></th> <th data-bbox="1205 568 1395 722"><u>Tier 2 - Local Service Centres</u></th> <th data-bbox="1395 568 1599 722"><u>Tier 3 - Sustainable Settlements</u></th> <th data-bbox="1599 568 1771 722"><u>Tier 4 - Defined Villages</u></th> <th data-bbox="1771 568 1957 722"><u>Tier 5 - Undefined Villages</u></th> <th data-bbox="1957 568 2145 722"><u>Total Affordable Housing Provision</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="651 722 1014 799"><u>Affordable Housing on Allocated Sites</u></td> <td data-bbox="1014 722 1205 799"><u>287</u></td> <td data-bbox="1205 722 1395 799"><u>481</u></td> <td data-bbox="1395 722 1599 799"><u>64</u></td> <td data-bbox="1599 722 1771 799"><u>0</u></td> <td data-bbox="1771 722 1957 799"><u>0</u></td> <td data-bbox="1957 722 2145 799"><u>832</u></td> </tr> <tr> <td data-bbox="651 799 1014 911"><u>Affordable Housing on Large &amp; Small Windfall Sites</u></td> <td data-bbox="1014 799 1205 911"><u>197</u></td> <td data-bbox="1205 799 1395 911"><u>48</u></td> <td data-bbox="1395 799 1599 911"><u>48</u></td> <td data-bbox="1599 799 1771 911"><u>21</u></td> <td data-bbox="1771 799 1957 911"><u>11</u></td> <td data-bbox="1957 799 2145 911"><u>325</u></td> </tr> <tr> <td data-bbox="651 911 1014 987"><u>Affordable Housing on Committed Sites</u></td> <td data-bbox="1014 911 1205 987"><u>212</u></td> <td data-bbox="1205 911 1395 987"><u>118</u></td> <td data-bbox="1395 911 1599 987"><u>119</u></td> <td data-bbox="1599 911 1771 987"><u>9</u></td> <td data-bbox="1771 911 1957 987"><u>15</u></td> <td data-bbox="1957 911 2145 987"><u>473</u></td> </tr> <tr> <td data-bbox="651 987 1014 1099"><u>Completions 01/04/2015 to 01/04/2020</u></td> <td data-bbox="1014 987 1205 1099"><u>-</u></td> <td data-bbox="1205 987 1395 1099"><u>-</u></td> <td data-bbox="1395 987 1599 1099"><u>-</u></td> <td data-bbox="1599 987 1771 1099"><u>-</u></td> <td data-bbox="1771 987 1957 1099"><u>-</u></td> <td data-bbox="1957 987 2145 1099"><u>635</u></td> </tr> <tr> <td data-bbox="651 1099 1014 1176"><u>Total Affordable Housing Provision</u></td> <td data-bbox="1014 1099 1205 1176"><u>696</u></td> <td data-bbox="1205 1099 1395 1176"><u>647</u></td> <td data-bbox="1395 1099 1599 1176"><u>231</u></td> <td data-bbox="1599 1099 1771 1176"><u>30</u></td> <td data-bbox="1771 1099 1957 1176"><u>26</u></td> <td data-bbox="1957 1099 2145 1176"><u>2265</u></td> </tr> <tr> <td colspan="6" data-bbox="651 1176 1957 1251"><u>Average annual delivery rate per annum over LDP period (2015-2030)</u></td> <td data-bbox="1957 1176 2145 1251"><u>151</u></td> </tr> </tbody> </table>		<u>Tier 1 - Main Service Centres</u>	<u>Tier 2 - Local Service Centres</u>	<u>Tier 3 - Sustainable Settlements</u>	<u>Tier 4 - Defined Villages</u>	<u>Tier 5 - Undefined Villages</u>	<u>Total Affordable Housing Provision</u>	<u>Affordable Housing on Allocated Sites</u>	<u>287</u>	<u>481</u>	<u>64</u>	<u>0</u>	<u>0</u>	<u>832</u>	<u>Affordable Housing on Large &amp; Small Windfall Sites</u>	<u>197</u>	<u>48</u>	<u>48</u>	<u>21</u>	<u>11</u>	<u>325</u>	<u>Affordable Housing on Committed Sites</u>	<u>212</u>	<u>118</u>	<u>119</u>	<u>9</u>	<u>15</u>	<u>473</u>	<u>Completions 01/04/2015 to 01/04/2020</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>635</u>	<u>Total Affordable Housing Provision</u>	<u>696</u>	<u>647</u>	<u>231</u>	<u>30</u>	<u>26</u>	<u>2265</u>	<u>Average annual delivery rate per annum over LDP period (2015-2030)</u>						<u>151</u>
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MAC78	HN3	Add at end of second sentence of para 11.9 'The sub market areas are illustrated in the maps in Appendix 4'
MAC79	HN4	In criteria 'f' delete 'rural'.
MAC80	HN4-D	In opening policy wording delete 'for tier 2, 3 and 4 settlements,' and 'in rural areas'.
MAC81	HN7	Delete present wording of criteria e) of HN7 and replace with ' <u>the cumulative impact of development would not adversely affect the character of the locality or residential amenity</u> '.
MAC82	HN8	Amend table accompanying policy HN8 as follows <ul style="list-style-type: none"> <li>• HN8.1 Magazine Lane, Ewloe – replace 'extension' with '<u>remodelling</u>' and replace '6-8' with '<u>9</u>'</li> <li>• HN8.2 Gwern Lane, Cae Estyn, Hope – replace '6-8' with '<u>4</u>'</li> </ul>
MAC83	HN8 11.33	In para 11.33 delete all the text after '... for a small transit site'.  The revised wording of para 11.33 is: 11.33 The GTAA (2016) for Flintshire covers the 5 year period 2015-2020 as well as the 15 year Plan period 2015 to 2030 and was approved by the Welsh Government in accordance with Section 102 of the Housing (Wales) Act 2014) on 28/03/17. The approved GTAA identified a need for -5 pitches over the over the 5 year period and 19 pitches over the Plan period, plus a need for a small transit site. <del>However, at the time the original GTAA was prepared, the position was complicated by a number of temporary permissions and undetermined planning applications. In order to provide greater clarity an update of the GTAA was commissioned in June 2018. This update has identified:</del> <ul style="list-style-type: none"> <li>• <del>A need over the 5 year period for 8 pitches</del></li> <li>• <del>A need over the 15 year Plan period for 26 pitches</del></li> <li>• <del>A need over the 15 year Plan period for a small transit site</del></li> </ul>
MAC84	HN8 11.34	In para 11.34 delete 'updated' in the first and second sentence. In para 11.34 in the 3rd sentence add after 'extend' the words ' <u>or remodel</u> '.

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		At the end of para 11.34 add <u>'The allocation at Magazine Lane, Ewloe is for the reconfiguration of the existing consented site and will provide for an additional 9 pitches and the allocation at Gwern Lane, Ewloe is for the extension of the site for an additional 4 pitches. In conjunction with the 10 pitches at the Riverside site this will provide for a total of 23 pitches which slightly exceeds the GTAA need of 19 pitches. A transit site for 6 pitches has also been allocated at Castle Park, Flint to meet the identified need for a small transit site'</u> .
<b>MAC85</b>	HN9	In policy HN9 delete criteria 'a' and 'b' and renumber the remaining criteria.
<b>MAC86</b>	HN9	In the opening part of wording of HN9 delete the wording <del>'or the extension of existing sites, including land outside of defined settlement limits, will be permitted provided'</del> and replace with <u>'will be preferred within settlements, or adjoining settlement boundaries where the resulting development would represent a logical extension to the settlement. Where there are no suitable locations within or adjacent to existing settlements, open countryside locations will then be considered. In all instances the proposal should satisfy the following criteria:'</u>
<b>MAC87</b>	HN9 11.37 11.38	In para 11.37 delete the last sentence <del>It will be necessary for each applicant to demonstrate that there is a specific need which cannot be met on existing sites or sites with planning permission to ensure consistency with the deletion of criteria 'a' and 'b'.</del>
<b>MAC88</b>	HN9 11.38	Delete in first sentence of para 11.38 <del>'be located on or close to main travelling routes for ease of access, and' as this is more applicable to transit sites,</del> and replace with <u>'The preference will be for sites within settlements but consideration will be given to edge of settlement sites, where the proposed development would represent a logical extension to the form and pattern of built development within the settlement boundary. Only when there are no suitable sites within or on the edge of settlements will sites in open countryside be considered subject to meeting the policy criteria. Sites...'</u>
<b>MAC89</b>	EN1	In the penultimate paragraph of the policy wording add after <u>'... Council's adopted standards'</u> the words <u>'of 2.4 Hectares per 1,000 population'</u> and amend 'standards' to read 'standard'.

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MAC90	EN2	In opening part of policy wording after 'including designated' add ' <u>and non-designated</u> ' and then after '... proposals maps' add ' <u>and listed in the table below</u> '.
MAC91	EN2	<p>Add a title '<u>Designated Green Spaces</u>' before the table accompanying Policy EN2.</p> <p>Add the following explanatory text:</p> <p><u>The following table details the designated green spaces throughout Flintshire. This list is not exhaustive and the non-designation of a green space does not mean that it is not protected from development under policy EN2 or EN1. Green spaces are areas of open land identified as being of value to a local community in terms of adding to the character of towns and villages and to the enjoyment of local residents. Such areas can be important for wildlife or general recreational value, or simply as the only green area in an otherwise urbanised environment. The designated green spaces may have a number of benefits:</u></p> <ul style="list-style-type: none"> <li><u>• for their landscape quality;</u></li> <li><u>• for their value as a character feature in a locality;</u></li> <li><u>• as a visual break in a developed area;</u></li> <li><u>• as a buffer between incompatible uses;</u></li> <li><u>• for their importance as part of an existing or proposed network of open areas, or as a link to open countryside.</u></li> </ul> <p><u>The Open Space Assessment (OSA) records all green spaces in the County including children's play space, playing fields, outdoor sports facilities, cemeteries and amenity space. It also records School facilities that are unavailable for public use. The OSA will be continually monitored and added to as new green spaces are developed, this will ensure that all green spaces are afforded protection under policies within the LDP.</u></p>
MAC92	EN2	In criteria a add 'local' before 'network'.

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MAC93	EN5	In the first sentence of EN5 policy wording add after 'AONB' the words 'and its setting'.
MAC94	EN6	Replace the first paragraph of the policy wording with the following: 'Development will not be permitted that would result in an adverse effect on the integrity of sites of international nature conservation importance, <del>except in the circumstances specified in relevant legislation.</del> Proposals where adverse effects on site integrity cannot be ruled out would not be supported'
MAC95	EN6	Amend Policy Title as follows: EN6: Sites of Biodiversity and Geodiversity Importance
MAC96	EN7	In criteria c) replace 'gain' with 'benefit'. The revised wording is 'it results in a net <del>gain</del> benefit in biodiversity'.
MAC97	EN11	<p>Reword policy EN11 and explanatory text to refer to green wedges as follows:</p> <p><b>EN11: Green <del>Barriers</del> <u>Wedges</u></b></p> <p>The following areas have been designated as green <del>barriers</del> <u>wedges</u> on the proposals map: [insert table]</p> <p>Within the designated green <del>barriers</del> <u>wedges</u> development will only be permitted for:</p> <ol style="list-style-type: none"> <li>a. justified rural enterprise needs;</li> <li>b. essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the green <del>barrier</del> <u>wedge</u> and which do not conflict with the purpose of including land within it;</li> <li>c. limited extension, alteration or replacement of existing dwellings;</li> <li>d. small scale diversification within farm complexes where this is run as part of the farm business; or</li> <li>e. the re-use of buildings provided that: <ol style="list-style-type: none"> <li>i. the original building is substantial, permanent and capable of conversion without major reconstruction;</li> <li>ii. the new use will not have a greater impact on the openness of the green <del>barrier</del> <u>wedge</u> and the purposes of including land within it; and</li> <li>iii. the building is in keeping with its surroundings.</li> </ol> </li> </ol>

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		<p>Certain other forms of development may be appropriate in the green <u>barrier wedge</u> provided they preserve its openness and do not conflict with the purposes of including land within it. These are: mineral extraction; renewable and low carbon energy generation; engineering operations; and local transport infrastructure. Other forms of development would be inappropriate development unless they maintain the openness of the green <u>barrier wedge</u> and do not conflict with the purposes of including land within it.</p> <p>12.40 Green <u>barrier wedge</u> designations are drawn to ensure protection of the openness of key areas of land in strategic or key locations over the Plan period. Whilst there are other policies in the Plan to control development in the countryside, it is considered important to give added protection to some areas via designation as green <u>barriers wedges</u> as they protect key areas of open countryside between and around settlements.</p> <p>12.41 The green barriers designated in the UDP have been the subject of a robust review as to their fitness for purpose, details of which can be found in a Background Paper: Green Barrier Review. The review involved each green barrier being assessed against the criteria within Planning Policy Wales i.e. that the purpose of a green <u>barrier wedge</u> is to:</p> <ul style="list-style-type: none"> <li>• prevent the coalescence of large towns and cities with other settlements;</li> <li>• manage urban form through controlled expansion of urban areas;</li> <li>• assist in safeguarding the countryside from encroachment;</li> <li>• protect the setting of an urban area; and</li> <li>• assist in urban regeneration by encouraging the recycling of derelict and other urban land.</li> </ul> <p>12.42 The review has also had regard to whether each existing green barrier has been the subject of previous or current development pressure. Proposals for new green barriers or extensions to existing green barriers which were put forward as part of Candidate Site submissions have also been assessed in the same manner. The objective is to ensure that in each case a green <u>barrier wedge</u> designation is necessary and justifiable over and above settlement boundary and open countryside policies and fulfils the purpose of green barriers wedges in PPW. The approach to the review and designation of green <u>barriers wedges</u> is in line with guidance with Planning Policy Wales. Although PPW uses the term 'green wedges' rather than</p>



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		<p><del>'green barriers', para 3.60 of PPW10 advises 'Local planning authorities need to consider establishing Green Belts and making local designations, such as green wedges'. The term green barrier is therefore appropriate and in line with national guidance.</del></p> <p>12.43 Planning Policy Wales provides specific guidance on the consideration of planning applications within green <del>barrier</del> <u>wedge</u> designated areas. It emphasizes the importance of maintaining the openness of the land, provides a presumption against inappropriate development and outlines the very exceptional circumstances when other considerations outweigh the importance of protecting the openness of the land. Given that PPW provides such clear and detailed advice it is not considered necessary for it to be repeated within this policy. Any proposals for inappropriate development in a green <del>barrier</del> <u>wedge</u> will be treated as a departure from the Plan.</p>
MAC98	EN13	<p>In policy wording make the following changes:</p> <ul style="list-style-type: none"> <li>• In criteria a) delete '<del>For large scale</del>', replace '<del>solar</del>' with '<u>Solar</u>' and in brackets delete '<del>5</del>', add '<u>Less than 10</u>' and delete '<del>and above</del>'</li> <li>• In criteria b delete '<del>For</del>'</li> <li>• Delete the policy wording '<del>Land is specifically allocated... proposals maps</del>'</li> <li>• Amend the proposals maps by deleting the two solar allocations</li> <li>• Amend the explanatory text as follows:</li> </ul> <p>12.47 In relation to the development of wind farms, the County does not fall within one of the <del>Strategic Search Areas (SSAs)</del> '<u>Pre-Assessed Areas for Wind Energy</u>' identified by Welsh Government in <u>Future Wales on the basis of substantial empirical research</u> and considered to be the most appropriate locations <u>with a presumption in favour of large scale for strategic scale</u> on-shore wind farm development (over <del>25</del><u>10</u>MW (megawatts). The REA ...</p> <p>12.48 In relation to solar, the County has seen in recent years a number of proposals for <del>large scale</del> solar farm developments. The REA has focused on the potential for identifying ILSAs which are suitable to accommodate solar farms of <u>up to 510MW</u> <del>and above</del>. The REA has adopted the same Toolkit based GIS mapping assessment as for wind. From this assessment, 18 initial ILSAs <del>have been</del> <u>were</u> identified for</p>

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		<p>solar potential <u>which have then been refined via a Landscape Sensitivity Assessment to 11 sites shown in the table below, and are shown on the proposals map. Although the REA has focused on wind and solar as the two primary technologies with the greatest spatial impacts, it will <u>has also considered</u> the potential from other sources of energy, such as energy from waste and heat, particularly considering the industrial activity in parts of the County, and the potential from all of the assessed sources is shown in the subsequent table below.</u></p> <p><u>Indicative Solar Areas of Search</u></p> <table border="1" data-bbox="640 639 1756 1214"> <thead> <tr> <th data-bbox="640 639 831 751"><u>ILSA Ref</u></th> <th data-bbox="831 639 1397 751"><u>ISLA Name</u></th> <th data-bbox="1397 639 1527 751"><u>Size (ha)</u></th> <th data-bbox="1527 639 1756 751"><u>Potential Capacity (MW)</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="640 751 831 791">1</td> <td data-bbox="831 751 1397 791"><u>Buckley 2 (west)</u></td> <td data-bbox="1397 751 1527 791"><u>39</u></td> <td data-bbox="1527 751 1756 791"><u>5</u></td> </tr> <tr> <td data-bbox="640 791 831 831">2</td> <td data-bbox="831 791 1397 831"><u>Buckley 2 (south)</u></td> <td data-bbox="1397 791 1527 831"><u>117</u></td> <td data-bbox="1527 791 1756 831"><u>10</u></td> </tr> <tr> <td data-bbox="640 831 831 871">3</td> <td data-bbox="831 831 1397 871"><u>Buckley 4 (SE Lane End)</u></td> <td data-bbox="1397 831 1527 871"><u>28</u></td> <td data-bbox="1527 831 1756 871"><u>5</u></td> </tr> <tr> <td data-bbox="640 871 831 911">4</td> <td data-bbox="831 871 1397 911"><u>Coed Talon &amp; Pontybodkin</u></td> <td data-bbox="1397 871 1527 911"><u>65</u></td> <td data-bbox="1527 871 1756 911"><u>10</u></td> </tr> <tr> <td data-bbox="640 911 831 951">5</td> <td data-bbox="831 911 1397 951"><u>Connah's Quay</u></td> <td data-bbox="1397 911 1527 951"><u>83</u></td> <td data-bbox="1527 911 1756 951"><u>5</u></td> </tr> <tr> <td data-bbox="640 951 831 991">6</td> <td data-bbox="831 951 1397 991"><u>Holywell</u></td> <td data-bbox="1397 951 1527 991"><u>35</u></td> <td data-bbox="1527 951 1756 991"><u>5</u></td> </tr> <tr> <td data-bbox="640 991 831 1031">7</td> <td data-bbox="831 991 1397 1031"><u>Leeswood</u></td> <td data-bbox="1397 991 1527 1031"><u>27</u></td> <td data-bbox="1527 991 1756 1031"><u>5</u></td> </tr> <tr> <td data-bbox="640 1031 831 1070">8</td> <td data-bbox="831 1031 1397 1070"><u>Llanfynydd NW</u></td> <td data-bbox="1397 1031 1527 1070"><u>52</u></td> <td data-bbox="1527 1031 1756 1070"><u>5</u></td> </tr> <tr> <td data-bbox="640 1070 831 1110">9</td> <td data-bbox="831 1070 1397 1110"><u>Mynydd Isa</u></td> <td data-bbox="1397 1070 1527 1110"><u>120</u></td> <td data-bbox="1527 1070 1756 1110"><u>5</u></td> </tr> <tr> <td data-bbox="640 1110 831 1150">10</td> <td data-bbox="831 1110 1397 1150"><u>New Brighton</u></td> <td data-bbox="1397 1110 1527 1150"><u>217</u></td> <td data-bbox="1527 1110 1756 1150"><u>5</u></td> </tr> <tr> <td data-bbox="640 1150 831 1190">11</td> <td data-bbox="831 1150 1397 1190"><u>Penyffordd &amp; Penymynydd</u></td> <td data-bbox="1397 1150 1527 1190"><u>89</u></td> <td data-bbox="1527 1150 1756 1190"><u>10</u></td> </tr> <tr> <td data-bbox="640 1190 831 1214"><u>ISLA total</u></td> <td data-bbox="831 1190 1397 1214"></td> <td data-bbox="1397 1190 1527 1214"></td> <td data-bbox="1527 1190 1756 1214"><u>70</u></td> </tr> </tbody> </table> <p>12.49 The Council has adopted a pro-active approach in respect of its own land assets and has developed two solar farms on former landfill sites. Two further proposals are being developed at Crumps Yard, Connah's Quay and Castle Park, Flint <del>and these are allocated in the Plan.</del> This is directly in line with the</p>	<u>ILSA Ref</u>	<u>ISLA Name</u>	<u>Size (ha)</u>	<u>Potential Capacity (MW)</u>	1	<u>Buckley 2 (west)</u>	<u>39</u>	<u>5</u>	2	<u>Buckley 2 (south)</u>	<u>117</u>	<u>10</u>	3	<u>Buckley 4 (SE Lane End)</u>	<u>28</u>	<u>5</u>	4	<u>Coed Talon &amp; Pontybodkin</u>	<u>65</u>	<u>10</u>	5	<u>Connah's Quay</u>	<u>83</u>	<u>5</u>	6	<u>Holywell</u>	<u>35</u>	<u>5</u>	7	<u>Leeswood</u>	<u>27</u>	<u>5</u>	8	<u>Llanfynydd NW</u>	<u>52</u>	<u>5</u>	9	<u>Mynydd Isa</u>	<u>120</u>	<u>5</u>	10	<u>New Brighton</u>	<u>217</u>	<u>5</u>	11	<u>Penyffordd &amp; Penymynydd</u>	<u>89</u>	<u>10</u>	<u>ISLA total</u>			<u>70</u>
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9	<u>Mynydd Isa</u>	<u>120</u>	<u>5</u>																																																			
10	<u>New Brighton</u>	<u>217</u>	<u>5</u>																																																			
11	<u>Penyffordd &amp; Penymynydd</u>	<u>89</u>	<u>10</u>																																																			
<u>ISLA total</u>			<u>70</u>																																																			

MAC Number	Section/policy/ paragraph in LDP	Details of Change																																																				
		<p>targets for renewable electricity generation set by the Welsh Government and the requirement for local ownership of a proportion of this generation.</p> <p>12.50 The policy also sets out a criteria based approach which will enable detailed development proposals to be assessed against a robust set of criteria. This will be particularly useful to enable the assessment of smaller or community based renewable energy proposals of less than 5 MW which may arise over the Plan period, as well as larger schemes that may arise that are not within an ILSA but may still be appropriate subject to assessment against the criteria- and provision of suitable mitigation. It is also relevant to note that for proposals of 10 MW or more, the determination of these will be made by the Welsh Ministers <u>against policy 18 of Future Wales</u>, under the Development of National Significance (DNS) process and not by the Local Planning Authority.</p> <table border="1" data-bbox="638 746 1883 1334"> <thead> <tr> <th rowspan="2"><u>Energy Technology</u></th> <th rowspan="2"><u>Capacity Factor Assumed</u></th> <th colspan="2"><u>Existing</u></th> <th colspan="2"><u>Additional Potential 2030</u></th> <th rowspan="2"><u>Total Installed Capacity 2030 (MW)</u></th> <th rowspan="2"><u>Total Energy Generated 2030 (MWh)</u></th> </tr> <tr> <th><u>Installed Capacity (MW)</u></th> <th><u>Energy Generated (MWh)</u></th> <th><u>Installed Capacity (MW)</u></th> <th><u>Energy Generated (MWh)</u></th> </tr> </thead> <tbody> <tr> <td>Wind Power (existing includes SSAs)</td> <td>0.27</td> <td>2.3</td> <td>5,440</td> <td>=</td> <td>=</td> <td>2.3</td> <td>5,440</td> </tr> <tr> <td>Biomass Energy Crop (CHP)</td> <td>0.9</td> <td>0.5</td> <td>3,942</td> <td>=</td> <td>=</td> <td>0.5</td> <td>3,942</td> </tr> <tr> <td>Energy from Waste with CHP</td> <td>0.9</td> <td>26.5</td> <td>208,926</td> <td>=</td> <td>=</td> <td>26.5</td> <td>208,926</td> </tr> <tr> <td>Hydropower</td> <td>0.37</td> <td>0.005</td> <td>16</td> <td>0.03</td> <td>62</td> <td>0.03</td> <td>78</td> </tr> <tr> <td>Landfill Gas</td> <td>0.6</td> <td>1.9</td> <td>9,986</td> <td>=</td> <td>=</td> <td>1.9</td> <td>9,986</td> </tr> </tbody> </table>	<u>Energy Technology</u>	<u>Capacity Factor Assumed</u>	<u>Existing</u>		<u>Additional Potential 2030</u>		<u>Total Installed Capacity 2030 (MW)</u>	<u>Total Energy Generated 2030 (MWh)</u>	<u>Installed Capacity (MW)</u>	<u>Energy Generated (MWh)</u>	<u>Installed Capacity (MW)</u>	<u>Energy Generated (MWh)</u>	Wind Power (existing includes SSAs)	0.27	2.3	5,440	=	=	2.3	5,440	Biomass Energy Crop (CHP)	0.9	0.5	3,942	=	=	0.5	3,942	Energy from Waste with CHP	0.9	26.5	208,926	=	=	26.5	208,926	Hydropower	0.37	0.005	16	0.03	62	0.03	78	Landfill Gas	0.6	1.9	9,986	=	=	1.9	9,986
<u>Energy Technology</u>	<u>Capacity Factor Assumed</u>	<u>Existing</u>			<u>Additional Potential 2030</u>		<u>Total Installed Capacity 2030 (MW)</u>	<u>Total Energy Generated 2030 (MWh)</u>																																														
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		Solar PV Farms	0.1	56.5	49,494	70	61,320	126.5	110,814
		Other including food waste, animal slurry, poultry litter, sewage sludge and sewage gas. (AD with CHP)	0.42	0.2	699	0.2	662	0.4	1,361
		BIR	0.1	19.1	16,712	46.2	40,471	65.3	57,183
		<b>Total</b>		<b>107.0</b>	<b>295,215</b>	<b>116.5</b>	<b>102,515</b>	<b>223.4</b>	<b>397,730</b>
		Electrical energy demand 2008			1,100,419	Projected electrical energy demand			1,094,375
		<b>Percentage electricity demand met by renewable energy</b>			<b>27%</b>				<b>36%</b>
		<b>Energy Technology</b>	<b>Capacity Factor Assumed</b>	<b>Existing</b>		<b>Additional Potential 2030</b>		<b>Total Installed Capacity 2030 (MW)</b>	<b>Total Energy Generated 2030 (MWh)</b>
				<b>Installed Capacity (MW)</b>	<b>Energy Generated (MWh)</b>	<b>Installed Capacity (MW)</b>	<b>Energy Generated (MWh)</b>		
		Existing Biomass (CHP)	0.5	1.0	4,380	=	=	1	4,380
		Biomass Boilers, Wood	0.5	22.2	97,236	=	=	22.2	97,236
		Energy from Waste with CHP	0.5	53.0	232,140	=	=	53.0	232,140

MAC Number	Section/policy/ paragraph in LDP	Details of Change								
		Other including animal slurry, poultry litter and sewage gas. (AD with CHP)	0.5	0.4	1,752	0.4	1,150	0.8	2,902	
		Landfill Gas (with CHP)	0.5	3.8	16,644	=	=	3.8	16,644	
		BIR	0.2	12.2	21,374	47.0	82,344	59.2	103,718	
		<b>Total</b>	-	<b>92.6</b>	<b>373,526</b>	<b>47.4</b>	<b>83,494</b>	<b>140.0</b>	<b>457,020</b>	
		Thermal energy demand 2008			3,200,023	Projected electrical energy demand			2,339,654	
		<b>Percentage thermal demand met by renewable energy resource</b>			<b>12%</b>				<b>20%</b>	
<b>MAC99</b>	EN13 12.50	<p>Add the following text at the end of para 12.50 of the explanation to policy EN13 'Renewable and Low Carbon Energy Development':</p> <p><u>The Council is aware that the energy sector is going through significant changes in the light of the need to de-carbonise energy production. Innovative new energy sources such as hydrogen are being developed and there may be opportunities for such development within the County given its long standing energy production role'</u></p>								
<b>MAC100</b>	EN14 New para	<p>Add a new paragraph at the end of the explanation to policy EN14 as follows:</p> <p><u>'A Flood alleviation scheme for Mold was granted planning permission in 2015. This scheme sought to primarily divert key watercourses in the catchment above Mold to alleviate the existing issues with flooding in parts of the town. When evaluated further on the basis of viability and deliverability, the approved scheme was not capable of being implemented and a review of the options was undertaken for the Council</u></p>								

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p><u>by consultants. A Feasibility study and options map was produced in 2017 and this made a series of recommendations, some of which are currently being taken forward to an advanced business case stage to test feasibility, design and cost.'</u></p>
<p><b>MAC101</b></p>	<p>EN15</p>	<p>Policy wording of EN15 to be amended as follows:</p> <p><b>EN15: Water Resources</b></p> <p>Development affecting water resources will only be permitted if:</p> <ol style="list-style-type: none"> <li>a. it would not have a significant adverse impact on the capacity and flow of groundwater, surface water, or coastal water systems;</li> <li>b. it would not pose an unacceptable risk to the quality of groundwater, surface water, or coastal water;</li> <li>c. it would have access to adequate water supply, sewerage and sewage treatment facilities which either already exist, or will be provided in time to serve the development, without detriment to existing abstractions, water quality, fisheries, amenity or nature conservation; <u>and</u></li> <li>d. <u>there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through the treatment of waste water.</u></li> </ol> <p><u>To ensure no adverse effect on the integrity of the River Dee and Bala Lake SAC, development creating waste water discharges will be required to demonstrate there is no increase in phosphorus levels in the SAC.</u></p> <p><u>This can be achieved through implementation of mitigation measures via compliance with the Dee Catchment Phosphorus Reduction Strategy (DCPRS) and associated supplementary planning guidance. Mitigation will involve, either:</u></p> <ol style="list-style-type: none"> <li>1. <u>Delivery of measures specified in the Dee Catchment Phosphorus Reduction Strategy (DCPRS), which will require:</u> <ol style="list-style-type: none"> <li>i) <u>Developer contributions / community infrastructure levy funds to deliver measures identified within the DCPRS to reduce phosphorus levels within the catchment.</u></li> </ol> </li> </ol>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p>ii) <u>Phasing of development to meet the delivery milestones within the DCPRS, and delaying development if milestones have not been met;</u></p> <p><u>OR</u></p> <p>2. <u>Using alternative mitigation approaches to those mentioned in 1. above. Where further evidence demonstrates that adverse effects on the integrity of the River Dee and Bala Lake SAC can be avoided using alternative mitigation approaches, these must be agreed with the Council, in consultation with Natural Resources Wales.</u></p> <p>The revised explanatory text is as follows:</p> <p><u>12.56 Developers should contact the Council at an early stage in relation to development proposals which have the potential to adversely affect the flow and/or quality of water to avoid potential delay and/or refusal of a planning application. Developers proposing planning applications should also contact NRW for pre-application advice where appropriate.</u></p> <p><u>12.57 Climate change is likely to have a significant impact on Wales' climate with longer periods of warm dry weather with less frequent rainfall but more intense rainfall events. The likelihood of declining rainfall during the summer months is a significant issue and will place greater pressure on existing water supplies, particularly during long dry summers. To ensure security for the future water supply the development plan should consider proposals in light of the existing hydrological system, and future potential changes.</u></p> <p><u>12.58 In the first instance all development should seek to connect to the existing mains waste water infrastructure network. Exceptionally, for development where it is not feasible to connect to public waste water treatment works, any such proposals will need to justify why connection is not feasible and demonstrate compliance with Welsh Government Circular 008/2018 and Natural Resources Wales guidance for connections to private treatment works/septic tanks. New development proposals which place pressure on the capacity of the existing water supply and the water and sewerage treatment infrastructure</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p><u>must ensure the necessary infrastructure is in place, or will be provided to serve them within an appropriate AMP programme. The increasing pressure on the infrastructure and on nature is an important consideration and new development will be expected to demonstrate that adequate consideration is given to the conservation of water resources and the protection of water quality.</u></p> <p><u>12.59 In addition to improving waste water infrastructure provision, water quality can be improved through a number of measures including: effective design; the use of wetlands/greenspace for flood alleviation; the use of SuDS; sustainable water use in design; the planting of native species; the removal of invasive non-native species; and good agricultural practice. Some of these measures can be taken forward through the planning system whereby other policies in the Plan work in combination with the protection of water resources policy to contribute to managing the water quality issues.</u></p> <p><u>12.60 Additional considerations apply to new development where there is the potential for increases in phosphorus, particularly as a result of waste water discharges, to have an adverse effect on the integrity of the RiverDee and Bala Lake Special Area of Conservation (SAC), in line with the Habitats Regulations.</u></p> <p><u>12.61 Increases in flows to mains waste water treatment works can lead to increases in nutrients in watercourses as a result of discharges from the works. This policy seeks to manage waste water discharges arising from new development to ensure compliance with the Habitats Regulations 2017 (as amended) and known waste water treatment works constraints. It applies to the River Dee and Bala Lake SAC including its tributaries.</u></p> <p><u>12.62 In January 2021, Natural Resources Wales (NRW) set new phosphorus standards for riverine Special Areas of Conservation (SACs) with targets 50-80% tighter than previously and gave Local Authorities new advice. In respect of Flintshire, a compliance test undertaken by NRW found failure to meet these new standards in the River Dee and Bala Lake SAC. The three waste water treatment works which serve the LDP allocations all discharge into the R. Alyn which flows into the Dee. Following advice from NRW, the Council's view is that it would not be appropriate for the LDP to rely on Habitats Regulations Assessments (HRAs) supporting existing phosphorus permits at waste water treatment works to conclude</u></p>



MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p><u>there would be no adverse effect on the integrity of the River Dee and Bala Lake SAC from LDP development.</u></p> <p><u>12.63 The addendum Habitats Regulations Assessment 2021 which followed the new standards confirmed impacts on water quality as an issue for the River Dee and Bala Lake SAC, and improvements to the management of waste water will be required to ensure no adverse effect on the integrity of the River Dee and Bala Lake SAC and the ability to deliver the scale of growth set out in the LDP is maintained.</u></p> <p><u>12.64 To avoid an adverse effect, Flintshire County Council, Welsh Water and NRW have worked closely together identifying the circumstances in which water discharges and waste water treatment works need to be managed. Consequently the Council will expect developments to connect to existing sewage infrastructure. The waste water treatment works (Mold, Buckley and Hope) serving four of the LDP allocations have phosphorus stripping and a phosphorus Permit limit from NRW for waste water discharges. However, these phosphorus Permit limits were set prior to the new standards and condition report for the River Dee and Bala Lake SAC, and for the purposes of the LDP the HRAs supporting the discharge Permit at the treatment works cannot be relied upon to conclude no adverse effect on site integrity so mitigation would still be required. The remaining housing allocations are served by waste water treatment works which drain to the tidal sections of the R. Dee. Tidal sections of the SAC have been excluded, as the evidence base underpinning the new targets applies to freshwaters only.</u></p> <p><u>12.65 To facilitate delivery of development which may be affected by this policy, the Council have prepared 'the 'Dee Catchment Phosphorus Reduction Strategy' (DCPRS). The document sets out the strategic approach for delivering phosphorus reductions in the Dee catchment while also facilitating LDP growth and demonstrating that mitigation can be delivered in practice. The document sets out a range of measures, which have been agreed in consultation with NRW. Category 1 measures are for the Council to deliver to comply with the Habitats Regulations and avoid adverse effects from the development provided for within the plan. It also sets out key milestones, responsibility for delivery for the milestones, how development is phased in relation to the milestones, and how constraints to delivery can be addressed. The DCPRS also sets out a range of other Category 2 measures to deliver wider reductions across the catchment the</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p><u>responsibility for delivery of which is outside the scope of the LDP. The DCPRS is a living document that will develop during the lifetime of the LDP, in consultation with NRW.</u></p> <p><u>12.66 The DCPRS details, in a Developer Contribution Scheme (DCS), how measures would be funded, charges calculated and planning obligations / Community Infrastructure Levy used to deliver mitigation measures. When the DCPRS is updated with detailed mitigation measures the DCS will also be updated. Developers may wish to pursue their own approach to mitigation, they are not compelled to use the mitigation provided in the DCS/DCPRS, but these must be agreed with the Council, in consultation with NRW.</u></p> <p><u>12.67 The DCPRS will be supported by the establishment of a Nutrient Management Board which will have wider duties with a broader aim to deliver the long term solutions, category 2 measures, to address the issue of excessive phosphorus in rivers, generated from existing activities and land uses in the wider catchment. Potential category 2 measures which might be relied upon to deliver wider benefits and net reductions across the catchment (i.e. over and above the category 1 measures) are included in the DCPRS. These measures are outside the scope of the LDP and planning but are important for a robust approach to reducing phosphorus in the River Dee and Bala Lake SAC.</u></p> <p><u>12.68 Ultimately, development can only be supported where it would not lead to increased phosphorus in the SAC through delivering mitigation, but it may also be necessary to delay development where milestones in the DCPRS have not been met.</u></p> <p><u>12.69 Local water companies are responsible for providing and maintaining waste water treatment works at a standard to meet permitted conditions. Their asset management programmes will set out capital works to ensure compliance with discharge licenses. In the future should the discharge Permits for treatment works be updated and such works be required, then it may be necessary to update the DCPRS, the mitigation measures and SPG.</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
MAC102	EN23	In criteria e) add after 'minerals' the text ' <u>, including Mostyn Docks and Padeswood Cement Works (as shown on the proposals maps),</u> '.
MAC103	EN25	Update the table accompanying policy EN25 as follows: <ul style="list-style-type: none"> <li>• Ddol Uchaf Quarry – replace '1.4 million' with '900,000'.</li> <li>• Fron Haul Quarry – replace '900,000' with '500,000'.</li> </ul>
MAC104	Para 12.84	<p><del>The North Wales Regional Technical Statement (RTS second review) and accompanying appendix for North Wales 1st Review has identified a requirement for Flintshire to allocate at least 1.4 <u>3.543</u> million tonnes of sand and gravel and at least <del>3.84</del> <u>35.928</u> million tonnes of crushed rock. The allocations identified <u>within</u> Policy EN25 are <u>not</u> sufficient to meet the identified need over the Plan Period. <del>In relation to crushed rock, the allocations could each, in isolation, meet the requirement identified in the RTS. The decision to allocate both sites has been made in recognition of the economic importance of these sites to Flintshire and the region and to help support their viability over the longer term. In both cases, the mineral would be extracted over a period beyond the LDP and would release mineral which, although currently consented, is currently unavailable due to the practicalities of removing it. Therefore, the council will work in collaboration with Denbighshire County Council and Wrexham County Borough Councils in order to provide the apportionments identified. A Statement of Sub-Regional Collaboration has been entered into in order to provide certainty that the identified need will be met over the plan period.</del></del></p>
MAC105	EN27 Para 12.9	Add at the end of para 12.90 'The management of secondary and recycled aggregate includes a wide range of processes including crushing, sorting, screening, stockpiling, storage and transfer'.
<b>Monitoring Framework MACs</b>		
MAC 106	Para 13.8	<p>Amend para 13.8 and the accompanying action bullet points as follows:</p> <p><u>13.8 If trigger points are hit then it will be necessary to investigate the reasons why policies or proposals are not being implemented as intended or objectives not being met. The process of reflection will help determine what action might be necessary to take. Consideration will need to be given to the delivery of all of the indicators collectively, their interrelationship, and the magnitude of any under delivery. It is</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change
		<p><u>acknowledged that some indicators may be more significant than others in terms of delivering the Plan's Strategy and this will be reflected in any future actions. The specific actions that might need to be taken will be dependent on the magnitude of any variance. The Monitoring Framework <del>seeks to include</del> sets out the options for what actions which might be taken, as stated in Development Plans Manual 3. These include:</u></p> <ul style="list-style-type: none"> <li>• <u>Continue monitoring (if development plan policies are being implemented effectively)</u></li> <li>• <u>Training required for Officers / Members (if development plan policies are not being implemented as intended and further training is required)</u></li> <li>• <u>Further supplementary planning guidance required (if development plan policies are not being implemented as intended and further guidance is required)</u></li> <li>• <u>Policy Review required (if development plan policies are not being implemented and are failing to deliver)</u></li> <li>• <u>Plan Review required (if development plan policies are not being implemented and the plan's strategy is not being delivered, this could trigger a formal review in advance of the statutory 4- year review).</u></li> </ul>
<b>MAC107</b>	Monitoring Table	Update the monitoring table as set out in accompanying document
<b>MAC108</b>	Monitoring Table	<p>Amend the existing Monitoring Indicator MI17 by adding a Monitoring Indicator for each of the four G&amp;T allocations:</p> <p>MI17.1 Magazine Lane, Ewloe  <u>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 9 pitches to be provided by 01.04.25</u>  <u>Trigger Point - 1. No planning permission on allocated site by 01.04.23 - 2. No pitches delivered by 01.04.25</u></p> <p>MI17.2 Gwern Lane, Cae Estyn, Hope  <u>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 4 pitches to be provided by 01.04.25</u></p>

MAC Number	Section/policy/ paragraph in LDP	Details of Change						
		<p><u>Trigger Point - 1. No planning permission on allocated site by 01.04.23 - 2. No pitches delivered by 1.4.25</u></p> <p>MI17.3 Riverside, Queensferry  <u>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 10 pitches to be provided by 01.04.26</u></p> <p><u>Trigger Point -1. No planning permission on allocated site by 01.04.23 - 2. No pitches provided by 01.04.26</u></p> <p>MI17.4 Castle Park, Flint  <u>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 6 pitches to be provided by 01.04.26</u></p> <p><u>Trigger Point - 1. No planning permission on allocated site by 01.04.23- 2. No pitches provided by 01.04.26</u></p>						
<b>MAC109</b>	Monitoring Table	<p>For MI26 and MI27 make the following changes:</p> <ul style="list-style-type: none"> <li>• Replace '<del>Review of RTS</del>' with '<u>Regional Technical Statement 2nd review &amp; accompanying appendix North Wales</u>'</li> <li>• Replace '<del>RAWP Reports</del>' with '<u>North Wales Regional Aggregate Working Party</u>'</li> </ul>						
<b>MAC110</b>	Monitoring Table	In MI19 replace 'green barriers' with 'green <u>wedges</u> '						
<b>MAC111</b>	Monitoring Table	In M1 do not include 'over 10%' as is shown in Council Hearing Statement Appendix 1 - revised monitoring table (M20.01)						
<b>MAC112</b>	Monitoring Table	Include monitoring indicators for SPG preparation as detailed below:						
		<table border="1"> <thead> <tr> <th data-bbox="633 1238 1144 1278">SPG Topic</th> <th data-bbox="1144 1238 1648 1278">Status</th> <th data-bbox="1648 1238 2157 1278">Timescale</th> </tr> </thead> <tbody> <tr> <td data-bbox="633 1278 1144 1353">New SPG 'Services, Facilities &amp; Infrastructure'</td> <td data-bbox="1144 1278 1648 1353">New SPG to be prepared and to include review of the existing</td> <td data-bbox="1648 1278 2157 1353">Within 1 year of the LDP adoption date.</td> </tr> </tbody> </table>	SPG Topic	Status	Timescale	New SPG 'Services, Facilities & Infrastructure'	New SPG to be prepared and to include review of the existing	Within 1 year of the LDP adoption date.
SPG Topic	Status	Timescale						
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MAC Number	Section/policy/paragraph in LDP	Details of Change		
			Developer Contributions to Education SPG No 23	
		Extensions and Alterations to Dwellings	Existing SPG No.1 to be reviewed and updated	Within 2 years of the LDP adoption date.
		Space Around Dwellings	Existing SPG No.2 to be reviewed and updated	Within 2 years of the LDP adoption date.
		Trees and Development	Existing SPG No.4 to be reviewed and updated	Within 2 years of the LDP adoption date.
		Conversion of Rural Buildings	Existing SPG No.1 to be reviewed and updated	Within 2 years of the LDP adoption date.
		Nature Conservation and Development / Great Crested Newt Mitigation Requirements	Existing SPG No.8 & 8a to be reviewed and updated	Within 2 years of the LDP adoption date.
		Affordable Housing	Existing SPG No.9 to be reviewed and updated	Within 1 year of the LDP adoption date.
		New Housing in the Open Countryside, Re: Infill Development in Groups of Housing	Relevant part of SPG No.10 to be reviewed and updated	Within 2 years of the LDP adoption date.
		Parking Standards	Existing SPG No.11 to be reviewed and updated	Within 2 years of the LDP adoption date.
		Retention of Local Facilities	Existing SPG No.24 to be reviewed and updated.	Within 2 years of the LDP adoption date.
		SuDS and the Management of Surface Water in New Development	Existing SPG No.29 to be reviewed and updated	Within 2 years of the LDP adoption date.
		Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)	Recently prepared and adopted jointly by Flintshire, Denbighshire	N/A

MAC Number	Section/policy/paragraph in LDP	Details of Change																																						
			and Wrexham – no intention to review or update																																					
		Outdoor Playing Space and New Development	Existing draft SPG No.13 to be reviewed and updated	Within 1 year of the LDP adoption date.																																				
		Houses in Multiple Occupation	Existing draft Advice Note to be reviewed and updated within 1 year of the LDP adoption date	Within 2 years of the LDP adoption date.																																				
		Warren Hall	New SPG to be produced	Within 1 year of the LDP adoption date.																																				
		Phosphates Developer Contributions	New SPG to be produced in conjunction with the Dee Catchment Phosphorous Reduction Strategy	Within 1 year of the LDP adoption date.																																				
Appendices																																								
<b>MAC113</b>	Appendix 1 – Housing commitments	Update the list of housing commitments as follows:																																						
		<table border="1"> <thead> <tr> <th data-bbox="633 906 891 978">Map Ref</th> <th data-bbox="891 906 1503 978">Site</th> <th data-bbox="1503 906 1877 978">Units remaining at 01 April 2020</th> </tr> </thead> <tbody> <tr> <td colspan="3" data-bbox="633 978 1877 1018">Afonwen</td> </tr> <tr> <td data-bbox="633 1018 891 1050">HC.1</td> <td data-bbox="891 1018 1503 1050">Wilcox Coach Works</td> <td data-bbox="1503 1018 1877 1050">19</td> </tr> <tr> <td colspan="3" data-bbox="633 1050 1877 1090">Bagillt</td> </tr> <tr> <td data-bbox="633 1090 891 1121">HC.2</td> <td data-bbox="891 1090 1503 1121">Central Garage</td> <td data-bbox="1503 1090 1877 1121">2</td> </tr> <tr> <td data-bbox="633 1121 891 1153">HC.3</td> <td data-bbox="891 1121 1503 1153">Former British Legion Club</td> <td data-bbox="1503 1121 1877 1153"><del>40</del> 6</td> </tr> <tr> <td colspan="3" data-bbox="633 1153 1877 1193">Buckley</td> </tr> <tr> <td data-bbox="633 1193 891 1225">HC.4</td> <td data-bbox="891 1193 1503 1225">Land at Brook Farm</td> <td data-bbox="1503 1193 1877 1225">16</td> </tr> <tr> <td data-bbox="633 1225 891 1257">HC.5</td> <td data-bbox="891 1225 1503 1257">Mount Pool (rear of Hillcrest)</td> <td data-bbox="1503 1225 1877 1257"><del>15</del> 20</td> </tr> <tr> <td data-bbox="633 1257 891 1289">HC.6</td> <td data-bbox="891 1257 1503 1289">F G Whitley's Depot</td> <td data-bbox="1503 1257 1877 1289"><del>39</del> 34</td> </tr> <tr> <td data-bbox="633 1289 891 1321"><del>HC.7</del></td> <td data-bbox="891 1289 1503 1321"><del>Adj Aldans and Langdale</del></td> <td data-bbox="1503 1289 1877 1321"><del>3</del></td> </tr> <tr> <td data-bbox="633 1321 891 1361">HC.8</td> <td data-bbox="891 1321 1503 1361">Side of 61 Brunswick Road</td> <td data-bbox="1503 1321 1877 1361">10</td> </tr> </tbody> </table>			Map Ref	Site	Units remaining at 01 April 2020	Afonwen			HC.1	Wilcox Coach Works	19	Bagillt			HC.2	Central Garage	2	HC.3	Former British Legion Club	<del>40</del> 6	Buckley			HC.4	Land at Brook Farm	16	HC.5	Mount Pool (rear of Hillcrest)	<del>15</del> 20	HC.6	F G Whitley's Depot	<del>39</del> 34	<del>HC.7</del>	<del>Adj Aldans and Langdale</del>	<del>3</del>	HC.8	Side of 61 Brunswick Road	10
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MAC Number	Section/policy/ paragraph in LDP	Details of Change		
		HC.9	Jubilee Rd./West of Manor Drive	14
			<u>Adj Mill Lodge</u>	<u>19</u>
		<u>Caerwys</u>		
			Summerhill Farm	<u>67 59</u>
		<u>Coed Talon / Pontybodkin</u>		
			Station Yard / Depot	49
		<u>Connah's Quay</u>		
			Adj Fair Oaks Drive	<u>46 16</u>
			Territorial House, High Street	11
			<u>Albion Social Club</u>	<u>30</u>
		<u>Drury</u>		
			<u>Woodside Cottages</u>	<u>23</u>
		<u>Ewloe</u>		
			South of the Larches	<u>3 2</u>
			<u>Greenhill Ave / Springdale</u>	15
			Boar's Head Inn, Holywell Rd	<u>13 31</u>
		<u>Ffynnongroyw</u>		
			Crown Inn, Main Road	11
		<u>Flint</u>		
			Croes Atti	<u>378 220</u>
			Flint Working Men's Club	<u>15 11</u>
			Earl Lea Site	73
			<u>Pandy Grange, Oakenholt</u>	<u>16</u>
		<u>Garden City</u>		
			<u>Rear of St Andrews Church</u>	<u>12</u>
		<u>Gronant</u>		
			East of Gronant Hill	41
		<u>Gwernymynydd</u>		
			Rainbow Inn, Ruthin Road	<u>11 4</u>
			<u>Land adj Siglen Uchaf</u>	<u>10</u>
		<u>Hawarden</u>		



MAC Number	Section/policy/paragraph in LDP	Details of Change		
			Land at Friar's Gap	4-2
		Higher Kinnerton		
			Land at Kinnerton Lane	56 12
		Holywell		
			Lluesty Hospital	89
			East of Halkyn Rd	44
		HCAC		
			Ty Carreg, Stryt Isa	49 15
		Mold		
			Former Bromfield Timber Yard	122
			Former Broncoed Works	48 9
			94 Wrexham Road	2
			Bryn Awel Hotel	23
		Mostyn		
			Ffordd Hiraethog, Maes Pennant	10
		Mynydd Isa		
			Issa Farm	59
			Rose Lane / Sunnyside	58
		<del>New Brighton</del>		
			<del>New Brighton Service Station</del>	23
		<del>Northop Hall</del>		
			<del>Cae Eithin, Village Rd</del>	9
		Penyffordd		
			Llys Dewi	27
			Off Rhewl Fawr Road	8
			Land north of Coed Mor	23
		Penyffordd / Penymynydd		
			Rhos Road, Penyffordd	40
			Hawarden Rd., Penyffordd	32
		Queensferry		
			1-3 Pierce Street	16

MAC Number	Section/policy/ paragraph in LDP	Details of Change		
		Rhes y Cae,		
			The Stores House	7
		Saltney		
			Allied Bakeries	71
		Sychdyn		
			Sewage Works, Wats Dyke Way	43
		Whitford		
			Altbridge House	41
		Public Sector		
		Buckley		
			Buckley Health Centre, Padeswood Rd North	24
		Flint		
			Ystrad Goffa Court	19
		Holywell		
			East of Halkyn Rd	45
			Ysgol Fabanod, Perth y Terfyn	55
		Mynydd Isa		
			Rose Lane / Sunnyside	58
			Total Commitments	1774 1221
<b>MAC114</b>	Appendix 2	Update list of SPGs, add 'Services, Facilities and Infrastructure' to list of SPGs and add timescales for each, as shown in MAC112.		
<b>MAC115</b>	Appendix 3	<p>Add a new appendix as section 16 'Appendix 3 – Housing Tables' with the following tables as set out below:</p> <ul style="list-style-type: none"> <li>a) The timing &amp; phasing of allocations</li> <li>b) The timing &amp; phasing of sites with planning permission</li> <li>c) Updated AABR trajectory</li> <li>d) Trajectory graph</li> </ul> <p>Re-number '16 - Technical Terms and Glossary' as section 18.</p>		

**MAC 115 Appendix 3 a) The timing & phasing of allocations (as at 1.4.20)**

Site name	Units	Built 2018 -20	2020 -21	2021 -22	2022 -23	2023 -24	2024 -25	2025 -26	2026 -27	2027 -28	2028 -29	2029 -30	30+	Comments
*Warren Hall, Broughton	300					30	45	45	45	45	45	45		WG site – interchange constructed, see masterplan & delivery statement
Well St., Buckley	<del>150</del> 140				53	<del>53</del> 46	<del>53</del> 47	47						Planning application submitted
Higmere Drive, Connah's Quay	150				<del>30</del>	30	30	30	30	30				UDP allocation-Edwards Homes
Broad Oak Holding, Connah's Quay	32		32											Site Under Construction
Holywell Rd./Green Lane, Ewloe	298					28	45	45	45	45	45	45		Owners in discussion with developers
Northop Rd., Flint	170				<del>20</del>	<del>40</del> 20	40	40	<del>30</del> 40	30				Planning applications submitted
*North West of Garden City	1185 (1325 less 140 outside period)		100	120	150	150	100	100	120	120	120	105	140	Site Under Construction
Ash Lane, Hawarden	288					18	45	45	45	45	45	45		Owners in discussion with developers
Wrexham Rd., Abermorddu	80					20	30	30						Discussions with preferred developer.

Maes Gwern, Mold	160	27	35	35	35	28								Site Under Construction
Denbigh Rd. & Gwernaffield Rd., Mold	<del>246</del> <u>238</u>				<del>40</del> <u>38</u>	40	40	40	<del>43</del> <u>40</u>	<del>43</del> <u>40</u>				Planning application submitted
Cae Isa, A5119, New Brighton	<del>405</del> <u>92</u>			<del>25</del>	<del>40</del> <u>15</u>	<del>40</del> <u>30</u>	30	17						Planning app. refused. New app. pending
Chester Rd., Penymynydd	181 (was 186)	27	39	40	40	35								Site Under Construction
<b>TOTAL</b>	<del>3354</del> <b><u>3014</u></b>	<b>54</b>	<del>196</del> <b><u>206</u></b>	<del>190</del> <b><u>195</u></b>	<del>408</del> <b><u>278</u></b>	<del>512</del> <b><u>445</u></b>	<del>448</del> <b><u>407</u></b>	<del>395</del> <b><u>394</u></b>	<del>358</del> <b><u>320</u></b>	<del>298</del> <b><u>310</u></b>	<del>255</del> <b><u>210</u></b>	<del>240</del> <b><u>195</u></b>	140	

**MAC115** Appendix 3 b) The timing & phasing of sites with planning permission (as at 1.4.20)

Site & ref.	Built 2018-19	Built 2019-20	Site capacity	Units Rmng 1.4.20	U/C	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Comments
Wilcox Coach Works, Afonwen (AFN006)			19	19						6	6	7				RM granted 16/11/18. & site sold Oct. 2019
Central garage, Bagillt (BAG034)			11	2	2											UC- nearing completion
Former British Legion, Bagillt (BAG038)		4	10	6	3	3										UC-Revelation properties/Quatref oil Homes
Brook Farm, Buckley (BUC065)			16	16					8	8						Renewal granted & site to be marketed.
Mount Pool, Buckley (BUC079)			20	20		5	15									Acquired by Thompson Devs. Est. start on site Autumn 2020
F G Whitley Depot, Buckley (BUC080)		5	39	34	6	0	10	10	8							Under Construction
Adj. Mill Lodge, Buckley (BUC220)			19	19			19									Site works commenced
Adj. Alders & Langdale, Buckley (BUC179)	3		20													COMPLETED
Side of 61, Brunswick Rd., Buckley (BUC202)			10	10			10									WWHA RM app & expected start on site March 2021
Jubilee Rd./Manor Drive, Buckley (BUC206)	14		14													COMPLETED
Buckley Health Centre, Padeswood Rd., Buckley (BUC204)	24		24													COMPLETED
Summerhill Farm, Caerwys (CAE007)		8	67	59		5	18	18	18							Under construction
Station Yard/Depot, Coed Talon (COE007)			49	49				9	20	20						Reserved matters approved & owner in discussion with developer
Adj. Fairoaks Drive, Connah's Quay (CON036)	4	8	46	16	13		3									Under construction
Territorial House, High St., Connah's Quay (CON111)	11		11													COMPLETED
Albion Social Club (CON 123)			30	30	30											Under construction- -Clwyd Alyn HA

Site & ref.	Built 2018-19	Built 2019-20		Units Rmng 1.4.20	U/C	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Comments
West of Greenwood Grange, Chester Rd.(DOB005)		24	24													COMPLETED
Woodside Cottages, Drury (DRU021)			23	23				8	8	7						Site clearance commenced
Side of 59, Wood Lane, Hawarden (EWL019)		23	23													COMPLETED
South of the Larches, Ewloe (EWL043)	1		10	2	1	1										Under construction
Greenhill Ave., Ewloe (EWL044)	15		41													COMPLETED
Boar's Head Inn, Ewloe (EWL059)			<b>31</b>	<b>31</b>	<b>31</b>											Under Construction-Pennaf
Croes Atti, Flint (FLI002)	70	91	644	220	60		40	40	40	40						Persimmons site now completed. .Anwyl Ph 4- Under const.
Flint working men's club (FLI048)	4		15	11			4	4	3							4 uc last yr now demolished & no activity.
Flint Sports & Social Club (FLI 066)		12	12													Wales & West-COMPLETED
Earl Lea site, Flint (FLI070)	73		73													COMPLETED
Ystrad Goffa Court, Flint (FLI077)	19		19													COMPLETED
Pandy Garage, Oakenholt (FLI089)			16	16		4	12									New site-acquired by developer
Rear St Andrews Church, Garden City (GAR012)			12	12	12											Under Construction-Wates
Nant Y Gro, East of Gronant Hill (GRO011)			41	41			20	21								PP granted 3/8/18 (Wates)- Awaiting discharge of condition.
Rainbow Inn, Ruthin Rd. Gwernymynydd (GYM013)	3	4	17	4	2		2									Under construction
Land adj. Siglen Uchaf, Gwerymynydd (GYM019)			10	10				5	5							Land sold & further application in preparation

Site & ref.	Built 2018-19	Built 2019-20	Site capacity	Units Rmng	U/C	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	Comments
Land at Friar's Gap, Hawarden (HAW013)	1	1	31	2		1	1									Under construction
Land at Kinnerton Lane, Higher Kinnerton (HIG022)	31	13	56	12	12											Under construction
Llesty Hospital, Holywell (HOL028)			89	89	42		20	27								Under construction
East of Halkyn Rd., Holywell (HOL015)			44	44			24	20								WWHA – expected start now Autumn 2020
Ysgol Fabanod, Perth Y Trefyn, Holywell (HOL098)		55	55													Completed(WWHA)
Ty Carreg, Stryt Isa, Hope (HCA071)			15	15		6	9									Reserved matters granted – Revelation properties Ltd. Start in Oct./ Nov 2020
Bromfield Timber Yard, Mold (MOL020)			122	122							30	30	30	32		Unlikely to be developed within next 5 years
Former Broncoed Works (MOL045)	3	6	88	9	9											Under construction
94 Wrexham Rd., Mold (MOL100)			11	2	2											
Bryn Awel Hotel, Mold (MOL120 )			23	23			23									New site (WWHA)
Issa Farm, Mynydd Issa (MYN033)			59	59	27	5	27									Under construction - <del>Machbryde Homes</del> Castlegreen.
Rose Lane/ Synnyside, Mynydd Isa (MYN028)			58	58			25	25	8							Clwyd Alyn-start on site est. Nov. 2020
Ffordd Hiraethog, Maes Pennant, Mostyn (MOS012 )			10	10					10							New site-SHARP scheme, Wates
New Brighton Service Station (NEW005)	21	2	24													COMPLETED
Cae Eithin, Village Rd., Northop Hall (NOH001)	9		94													COMPLETED

Llys Dewi, Penyffordd (PFD002)	6	21	27														COMPLETED
<b>Site &amp; ref.</b>	<b>Built 2018-19</b>	<b>Built 2019-20</b>	<b>Site capacity</b>	<b>Units Rmng</b>	<b>U/C</b>	<b>2020 -21</b>	<b>2021 -22</b>	<b>2022 -23</b>	<b>2023 -24</b>	<b>2024 -25</b>	<b>2025 -26</b>	<b>2026 -27</b>	<b>2027 -28</b>	<b>2028 -29</b>	<b>2029 -30</b>	<b>Comments</b>	
Off Rhewl Fawr Rd., Penyffordd (PFD001)	1		18	8			8										Balance is Grwp Cynefin scheme - est. start Dec. 2020
North of Coed Mor, Penyffordd (PFD020)			23	23				7	8	8							Site recently sold
Rhos Road, Penyffordd (PYF039)			40	40		10	20	10									<del>Hilbre</del> Castlegreen homes site
Hawarden Rd., Penyffordd (PYF042)			32	32	2	10	20										Under construction <del>Macbride Homes</del> Castlegreen
1-3 Pierce St., Queensferry (QUE013)			16	16				16									Info. from developer (Vivio devs.)
The Stores House, Rhes Y Cae (RHE002)			10	7			3	2	2								Under construction
Allied Bakeries, Saltney (SAL018)	35	36	74														COMPLETED
Sewage Works, Wats Dyke Way, Sychdyn (SYC001)	33	10	43														COMPLETED
<b>TOTAL</b>	<b>381</b>	<b>323</b>	<b>2478</b>	<b>1221</b>	<b>254</b>	<b>50</b>	<b>333</b>	<b>222</b>	<b>138</b>	<b>89</b>	<b>36</b>	<b>37</b>	<b>30</b>	<b>32</b>	<b>0</b>		

[Sites shown in blue are 'windfall sites' \(ie sites granted pp after 1/4/18 but not allocated sites\)](#)

2020 completions above exclude 27 completions on allocated sites at Maes Gwern, Mold, and 27 completions on allocated site at Chester Road, Penymynydd (see allocated sites table)

Loss from 2018 committed sites:

Crown Inn Ffynnongroyw 11 units

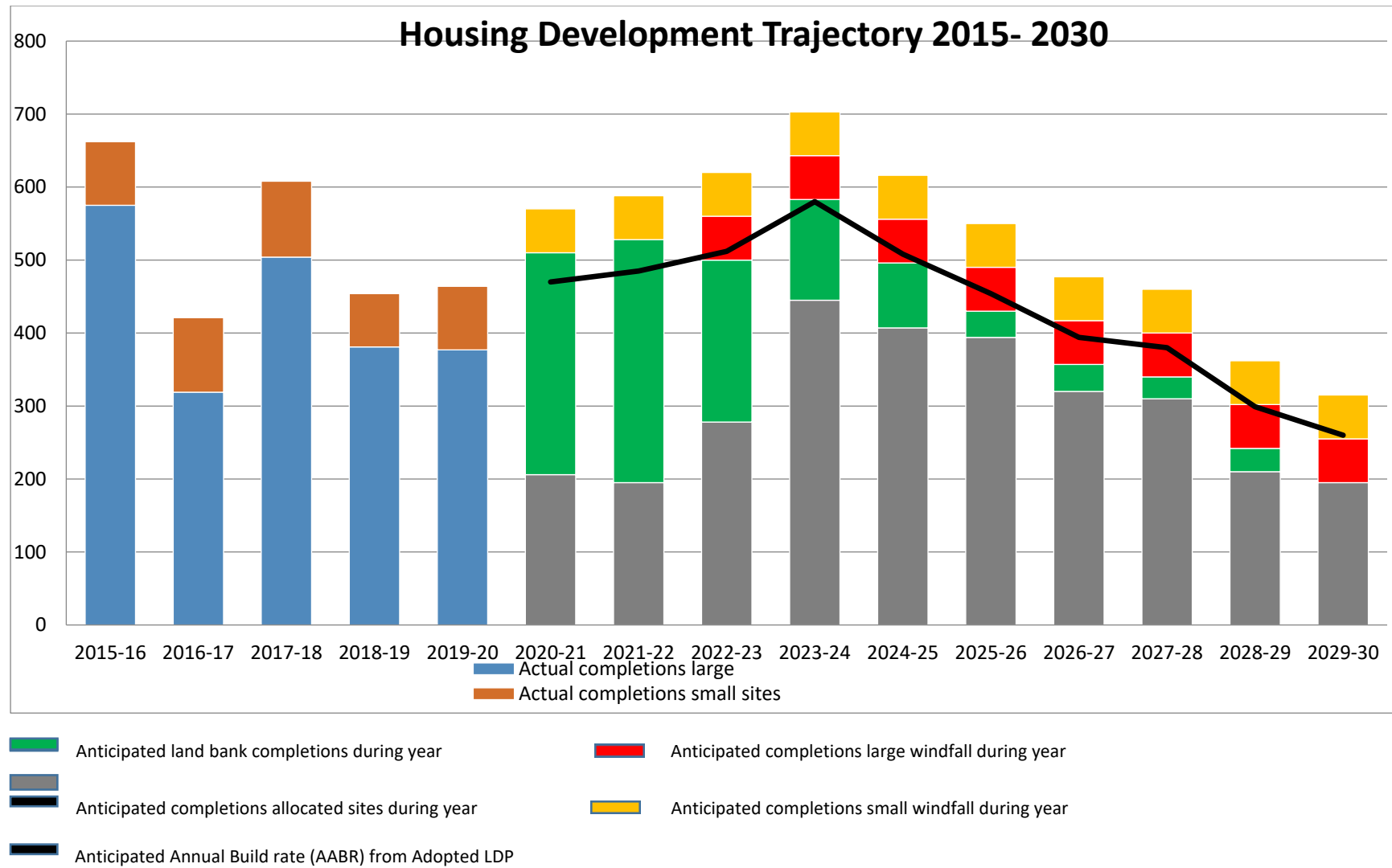
Altbridge House, Whitford 41 units



**MAC115 Appendix 3 c) Calculation of Anticipated Annual Build Rate – 1.4.20 base**

	<b>LDP Year</b>	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
A	<b>Year</b>	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30
B	<b>Remaining years</b>	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
C	<b>Total housing provision</b>	7950	7950	7950	7950	7950	7870	7870	7870	7870	7870	7870	7870	7870	7870	7870
D	<b>Total LDP housing requirement</b>	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950	6950
E	Actual recorded completions on large sites during year	575	319	504	381	377										
F	Actual recorded completions on small sites during year	87	102	104	73	87										
G	Anticipated completions on allocated sites during year						196 206	190 195	408 278	512 445	448 407	395 394	358 320	298 310	255 210	240 195
H	Anticipated land bank completions during year						304	333	222	138	89	36	37	30	32	0
I	Anticipated completions large windfall during year						0*	0*	60	60	60	60	60	60	60	60
J	Anticipated completions small windfall during year						60	60	60	60	60	60	60	60	60	60
K	Total completions (E+F+G+H+I+J)	662	421	608	454	464	570	588	620	703	616	550	477	460	362	315
L	<b>Anticipated Annual Build Rate</b> -Total anticipated annual completions (G+H+I+J) adjusted with x% adjustment factor to future completions.						470	485	512	580	508	454	394	380	299	260
M	Total projected cumulative completions					2609	3079	3564	4076	4656	5164	5618	6012	6392	6691	6951**
N	Remaining housing completions (housing requirement minus projected completions by year)						3871	3386	2874	2294	1786	1332	938	558	279	-1**

MAC115 Appendix 3 d) Trajectory graph



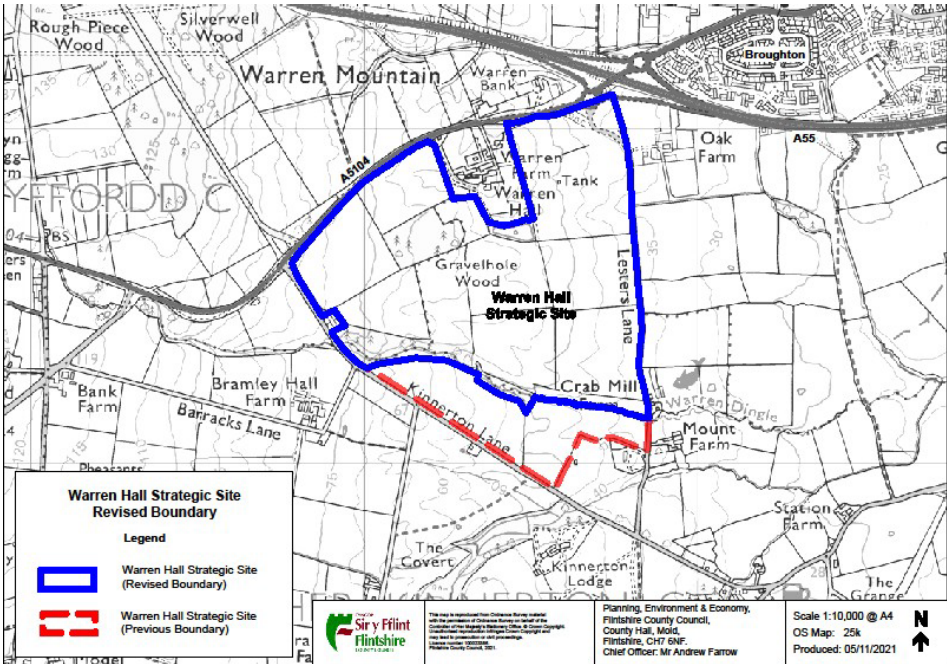
MAC Number	Section/policy/ paragraph in LDP	Details of Change
MAC116	Appendix 4	Add a new Appendix 4 – ‘Housing Sub Market Areas’ to include map set out in the Council’s MAC consultation document.  Renumber ‘16 – Technical Terms and Glossary’ as section 18.
<b>Proposals maps</b>		
All changes relating to proposals maps and other plans should be as set out in the Council’s MAC consultation document.		

#### Appendix B: Schedule of Inspector proposed Matters Arising Changes (IMAC)

IMAC Number	Section in LDP	Details of Change
IMAC1	STR3B Warren Hall	Deletion of housing element (300 units) from the strategic site.  A number of consequential changes to the LDP arise from this Inspector change as set out below.
IMAC2	Para 11.9	After the second sentence, insert ‘That said it is clearly recognised that viability can go up or down over time and in turn this may provide opportunities to vary the level of provision in relation to the target thresholds. Equally it is acceptable in principle for an applicant to voluntarily seek to exceed the target thresholds in the policy or to propose an affordable led scheme.’
<b>Consequential changes arising from IMAC1 and other changes to Policy STR3B and explanatory text.</b>		
CC1.1		Amend title of STR3B by deleting ‘Mixed Use and ‘and housing’. The policy title reads ‘STR3B Warren Hall Mixed Use Development Site: Employment and Housing’.
CC1.2		In second sentence of opening part of policy wording replace ‘Two’ with ‘The following’ and replace ‘sites’ with ‘site’.
CC1.3		Retain policy wording relating to STR3B Warren Hall from subdivision of original policy STR3 under MAC031

IMAC Number	Section in LDP	Details of Change
CC1.4		Delete criteria i) '300 new homes, including affordable' and renumber subsequent criteria
CC1.5		Amend criteria ii to read ' <del>22.7</del> 19.1ha of B1 and high quality B2 employment land'
CC1.6		Amend criteria iii to read '1.3ha commercial hub involving comprising hotel, / leisure, local centre and retail and local convenience shop, with high quality public realm as a focal point for the development'
CC1.7		Amend criteria iv to read 'Strategic landscaping and multi-functional green infrastructure network'
CC1.8		Amend criteria v as follows 'Sustainable transport links within the site in terms of walking and cycling and provision for bus service and links with nearby settlements and a link with the section of the Mold – Deeside Active Travel route between Penymynydd and Broughton...'
CC1.9		Include a new criterion 'safeguarding built heritage assets within and adjoining the site'
CC1.10		Include a new criterion 'ecological avoidance and mitigation measures'
CC1.11		Include a new criterion 'employment development not to exceed 12m in height'
CC1.12		Include a new criterion 'Appropriately designed SuDs, landscaping, waste management and lighting as part of a scheme of aerodrome safeguarding measures'
CC1.13		Delete para 5.17
CC1.14		Delete para 5.18
CC1.15	Para. 5.19	In para 5.19 delete the text 'The Northern Gateway .... infrastructure investment' and incorporate the wording from para 5.20.
CC1.16	Para. 5.19	Amend para 5.19 as follows: <ul style="list-style-type: none"> <li>• Replace '<del>The two strategic allocations are both sites</del>' with '<u>This strategic allocation is a site</u>'</li> <li>• Replace '<del>has been secured through outline planning consents</del>' with '<u>has previously been secured through planning consents</u>'</li> <li>• Replace '<del>but where it is vital to revisit both sites in different ways</del>' with '<u>but where it is vital to revisit the site</u>'</li> <li>• Replace '<del>to ensure they come forward</del>' with '<u>it comes forward</u>'</li> <li>• In second sentence add after 'has' the word '<u>previously</u>'.</li> </ul>
CC1.17	Para. 5.20	Delete last sentence ' <del>In order to improve the viability and deliverability of the development, the site is being re-presented as an allocation for mixed use development comprising employment, housing and commercial hub as well as an extension to the site area.'</del>

IMAC Number	Section in LDP	Details of Change
CC1.18	Para. 5.21	Delete para 5.21
CC1.19	Para. 5.22	Delete para 5.22
CC1.20	Para. 5.23	Amend para 5.23 as follows: <ul style="list-style-type: none"> <li>• In third sentence redraft 'As part of this allocation the mix of land uses has been amended and site area extended to 74 <u>63ha</u> to also include housing development and a broader range of supporting uses including <u>convenience</u> retail as part of a commercial hub.</li> <li>• Delete the fourth sentence 'The mixed use element will improve the viability and deliverability of the site'.</li> </ul>
CC1.21	Para. 5.24	Reword para 5.24 and add a reference to the preparation of a Supplementary Planning Guidance Note so as to read 'The Warren Hall strategic site provides a unique opportunity to embody placemaking principles in creating a large scale, high quality <del>mixed-use</del> development. <u>The Council will, after the adoption of the Plan prepare a Supplementary Planning Guidance Note to provide further details to guide the formulation of detailed development proposals</u> '.  Renumber paragraphs accordingly.
CC1.22	Policy Explanation	Include an amended Masterplan as part of the reasoned justification to the policy.
CC1.23	Policy Context Table	In 'LDP Objectives' delete 'objective 10'
CC1.24	Policy Context Table	In 'Key Evidence' delete 'Topic Paper 10'
CC1.25	Policy Context Table	In 'Key Evidence' delete "Northern Gateway Masterplan and Delivery Statement" in the Policy Context Table'
CC1.26	STR11 / 7.11 Housing Balance Sheet	In Housing Balance Sheet: <ul style="list-style-type: none"> <li>• amend 'Less LDP Strategic Allocations' to read 'Less LDP Strategic Allocation'</li> <li>• amend the 'Notes' section by deleting reference to 300 units at Warren Hall.</li> </ul>

IMAC Number	Section in LDP	Details of Change
		[For amended Housing Balance Sheet see MAC038]
CC1.27	Ch13 Monitoring Table	Remove Monitoring Indicator MI16 relating to Warren Hall and re-number subsequent Monitoring Indicators.
CC1.28	Proposals Maps	<p>Amend Proposals Map 02 Front and Proposals Map 03 Front by drawing back the strategic site boundary to exclude the housing element. See map below:</p>  <p>The map displays the Warren Hall Strategic Site with two boundary lines: a blue line for the revised boundary and a red dashed line for the previous boundary. The revised boundary is significantly smaller, excluding a large housing element. The map includes labels for various locations such as Warren Mountain, Warren Bank, Warren Farm, Warren Tank, Warren Hill, Gravelhole Wood, Warren Dingle, Mount Farm, Station Farm, The Covert, Kinnerton Lodge, The Grange, Bank Farm, Barracks Lane, Bramley Hall, Crab Mill, Lesters Lane, Oak Farm, Broughton, Silverwell Wood, and Rough Piece Wood. A legend in the bottom left corner identifies the boundary types. The map also features the Flintshire County Council logo, a scale of 1:10,000 @ A4, OS Map 25K, and a production date of 05/11/2021.</p>

