

Flintshire LDP Consultation Report October 2020

Appendices 21a to 24 Redacted Version

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Appendix 21a Main Issues Schedule Foreword / Introduction
Main Issues – Foreword / Introduction

Policy / page / Para / Map		Plan Title				
Relevant Content of Plan		n/a				
Representations		Total 7 representations: 1 objection 1 support 5 not specified				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
20	1229112				Support	Not Stated
86	1230328					Not Stated
243	1230721				Object	Not Stated
384	1231128		1231126			Not Stated
520	1231100					Not Stated
744	1233633					Not Stated
982	1149823		1149800			Not Stated
Summary of representations		<p>Objection to settlement boundary in Holywell.</p> <p>One objection is in the context of the housing allocation HN1.6 and considers that the Plan is excessively aspirational in terms of growth and also raises concerns about document availability and decision making.</p> <p>One objection relates to the promotion of a large mixed use site 'Watersmeet' on the edge of Chester. The substance of the representation is set out in id 755 and 383 re policy HN1.</p> <p>One objection relates to the Plans treatment of agricultural land.</p>				
Changes sought						
Summary of Council Response		<p>The Council has commented on the settlement boundary in Holywell in its detailed response to this objection.</p> <p>The Plan is not considered excessively aspirational and the Council has commented further in the detailed response to this objection and to similar responses in respect of policy STR1.</p> <p>The Council has commented in detail in its response to the objection regarding 'Watersmeet'.</p>				

	The Council considers that the matter of agricultural land is clearly set out in PPW10.					
Minor Change proposed	No					
Policy / page / Para / Map	Foreword					
Relevant Content of Plan	Foreword by Cllr Chris Bithell, Portfolio Holder for Planning and Public Protection					
Representations	Total 5 representations - objections					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
32	1229807				Object	Not Stated
124	1142217				Object	Not Stated
224	1230955				Object	Not Stated
225	1230955				Object	Not Stated
357	1228787				Object	Not Stated
Summary of representations	<p>These objections were submitted under the 'label' of the Foreword and comprise a variety of objections:</p> <p>Objection to the HN1.8 Ash Lane, Hawarden allocation</p> <p>Objection to the Northern Gateway allocation in the light of climate change and flood risk concerns</p> <p>Objections raising concerns about the Council's consultation documentation, methods and procedures particularly the on-line consultation portal.</p>					
Changes sought	Deletion of HN1.8 Ash Lane Hawarden and Northern Gateway Strategic Site allocations					
Summary of Council Response	<p>Detailed response to the HN1.8 Ash Lane allocation is given in response to this representation and also in the Council's summary of representations and responses to this site.</p> <p>The Northern Gateway strategic site has two outline planning permissions and has been informed by FCA and flood defence works as part of a flood management strategy for the site and locality.</p> <p>The Council went above and beyond both legislative requirements in undertaking consultation on the Deposit Plan. A combination of advance notice, publicity, and availability of documentation on the Council's website and at consultation venues, permanent exhibitions and drop-in</p>					

	sessions and a variety of means of making representations was put in place.																																															
Minor Change proposed	No																																															
Policy / page / Para / Map	Introduction P12 Deposit Plan written statement																																															
Relevant Content of Plan	Introduction Chapter																																															
Representations	Total 5 representations: 4 objections 1 support																																															
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>346</td><td>1232503</td><td></td><td>1233580</td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>540</td><td>1232267</td><td></td><td></td><td></td><td>Support</td><td>Not Stated</td></tr><tr><td>1120</td><td>1236829</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>1168</td><td>1232503</td><td></td><td>1233580</td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>1169</td><td>1232503</td><td></td><td>1233580</td><td></td><td>Object</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	346	1232503		1233580		Object	Not Stated	540	1232267				Support	Not Stated	1120	1236829				Object	Not Stated	1168	1232503		1233580		Object	Not Stated	1169	1232503		1233580		Object	Not Stated
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346	1232503		1233580		Object	Not Stated																																										
540	1232267				Support	Not Stated																																										
1120	1236829				Object	Not Stated																																										
1168	1232503		1233580		Object	Not Stated																																										
1169	1232503		1233580		Object	Not Stated																																										
Summary of representations	<p>These objections were submitted under the 'label' of the Introduction chapter generally.</p> <p>One objector made three objections referencing: The 'vision' for the Plan is lacking in detail Objective 11 should be amended Plan period should be amended to 2019 to 2034 and housing shortfall from 2000-2019 included in Plan. The remaining objection seemingly objected to the opportunity to comment on only a draft Plan, preferring instead to comment on the final Plan.</p>																																															
Changes sought	Amendments to vision, objective 11 and Plan period																																															
Summary of Council Response	<p>Each objection is responded to in detail but in summary The vision is in line with WG advice regarding 'a concise, focused and positive statement' The wording of objective 11 already references the need to meet a range of housing needs'. The amendment of the Plan period would have profound implications for the timetable for progressing the Plan to adoption. There is no requirement for an LDP to add an alleged shortfall in housing both during the UDP and in the early years of the Plan period.</p> <p>The Council is required to consult on the Deposit Plan before the Plan is examined and then adopted.</p>																																															

Minor Change proposed	No																																								
Policy / page / Para / Map	How to View and Comment on the Deposit Local Development Plan P12 para 3.1-3.9 Deposit Plan written statement																																								
Relevant Content of Plan	Explains how to view and comment on the Plan and references the tests of soundness.																																								
Representations	Total 5 representations; 4 objections 1 support																																								
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>267</td><td>1230933</td><td></td><td></td><td></td><td>Support</td><td>Not Stated</td></tr><tr><td>318</td><td>1231111</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>1125</td><td>1236754</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>1127</td><td>1231096</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	267	1230933				Support	Not Stated	318	1231111				Object	Not Stated	1125	1236754				Object	Not Stated	1127	1231096				Object	Not Stated
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267	1230933				Support	Not Stated																																			
318	1231111				Object	Not Stated																																			
1125	1236754				Object	Not Stated																																			
1127	1231096				Object	Not Stated																																			
Summary of representations	<p>One objection to the HN1.8 Ash Lane, Hawarden site submitted under the 'label' of 'How to view...'. Objection that the Plan fails all soundness tests as supporting information is impenetrable, not transparent and designed to mislead readers. Objection in the context of HN1.7 Holywell Rd / Green Lane Ewloe allocation, expressing concern about i) the timing and restricted scope of site notices, ii) the lack of a scoring system for housing sites when this was done in Employment Land Review iii) the accessibility of the consultation portal iv) the restricted 6 week period for the public to consider and make representations v) reference to alternative suggested sites. The Plan fails soundness tests as the evidence base is lacking in terms of addressing any housing shortfall from the UDP, the continued reliance on some previous UDP housing allocations, reliance on windfalls, not meeting the need identified in LHMA, the lack of detail in the vision and the lack of provision in Tier 3 settlements.</p>																																								
Changes sought	Seek deletion of HN1.8																																								
Summary of Council Response	Detailed response to the HN1.8 Ash Lane allocation is given in response to this representation and also in the Councils summary of representations and responses to this site.																																								

	<p>The Plan has to be prepared in accordance with legislation and national guidance and has to include a wide range of supporting documents as part of the required evidence base. The consultation was clearly explained and does not fail the soundness tests.</p> <p>The Council responds on the multiple points, i) the posting of site notices at key locations is over and above statutory requirements and although this was on the first day of the consultation, the Plan had been in the public domain for over over two months, ii) The scoring system in the Employment Land Review is a completely different context to the assessment of several hundred candidate and alternative sites. The selection of sites is based on planning judgement and not just a mathematical points system, iii) the Council used an industry leading consultation software provider and the on-line consultation portal was only one means of making representations, iv) a Deposit LDP is required to be accompanied by a supporting evidence base and some of this is of a technical nature, v) the suggested sites are commented on in the detailed response to this objection.</p> <p>The wide ranging objections to the Plans soundness are responded to in detail in the response to this objection. The Plan is not considered unsound.</p>																																	
Minor Change proposed	No																																	
Policy / page / Para / Map	How Have We Arrived at the Deposit Plan P14 para 3.10 Deposit Plan written statement																																	
Relevant Content of Plan	Explains how the Council has prepared the Deposit Plan and references the Preferred Strategy previously consulted upon.																																	
Representations	Total 3 representations - objections																																	
	<table border="1"> <thead> <tr> <th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr> </thead> <tbody> <tr> <td>728</td><td>1233583</td><td></td><td>1233580</td><td></td><td>Object</td><td>Not Stated</td></tr> <tr> <td>1128</td><td>1231096</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr> <tr> <td>1129</td><td>1231096</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr> </tbody> </table>						Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	728	1233583		1233580		Object	Not Stated	1128	1231096				Object	Not Stated	1129	1231096				Object	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance																												
728	1233583		1233580		Object	Not Stated																												
1128	1231096				Object	Not Stated																												
1129	1231096				Object	Not Stated																												
Summary of representations	<p>One objection raises detailed points on the IIA.</p> <p>One objector queries the lack of reference in LDP03 Infrastructure Plan to the proposed road</p>																																	

	<p>improvements as part of the HN1.7 Holywell Rd / Green Lane Ewloe allocation in the section regarding 'Highways Improvements in Flintshire'. Also disagrees with Background Paper 08 regarding landscape impact and the loss of green barrier.</p> <p>One objection seeks the amendment of the Plan period to 2019-2034 and the incorporation of any housing shortfall from 2000-2019.</p>																			
Changes sought																				
Summary of Council Response	<p>The detailed points raised regarding the IIA are addressed in the Council's response to this objection.</p> <p>The proposed highways improvements are not a Welsh Government or Council proposed scheme and therefore not reference in that section of the Infrastructure Plan. Instead it is referenced in the Appendix 2 which de4als with the Plans allocations. The Council considers that the site does not have an unacceptable landscape impact and that it does not undermine the integrity of the green barrier given the specifics of the site and its surroundings.</p> <p>The amendment of the Plan period would have profound implications for the timetable for progressing the Plan to adoption. There is no requirement for an LDP to add an alleged shortfall in housing both during the UDP and in the early years of the Plan period.</p>																			
Minor Change proposed	No																			
Policy / page / Para / Map	How to Use / Navigate and Interpret the Plan P15 para 3.17 Deposit Plan written statement																			
Relevant Content of Plan	Explains the structure of the LDP in terms of the written statement and the proposals maps. References the 'How to Register' leaflet.																			
Representations	Total 1 representation – objection																			
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>1094</td><td>1235915</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	1094	1235915				Object	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance														
1094	1235915				Object	Not Stated														
Summary of representations	Objection highlighting issue of presentation and font size on documents at Hope drop in session.																			
Changes sought	Not specified																			

Summary of Council Response		The Council apologized for the font size but had laptops available at the drop in session to view documents. The 'How to Register' leaflet is made up of screenshots from the Objective website and would be difficult to have presented differently.				
Minor Change proposed		No				
Policy / page / Para / Map		Strategic Context P17 para 3.25 Deposit Plan written statement				
Relevant Content of Plan		Explains the context in which the Plan has been prepared split by national, regional and local				
Representations		Total 1 representation – objection				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
1017	1235357				Object	Not Stated
Summary of representations		Seeks reference to TfN (Transport for the North) Strategic Transport Plan and Wales & West.				
Changes sought		Seeks additional documents referenced.				
Summary of Council Response		The objector has not explained how the documents to be referenced are relevant to the strategy for the LDP and are therefore not appropriate to be included.				
Minor Change proposed		No				
Policy / page / Para / Map		County Profile / Overview P21 para 3.26 Deposit Plan written statement				
Relevant Content of Plan		Provides a brief overview of the County in terms of its location, geography and make up.				
Representations		Total 2 representations – objections				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
123	1142217				Object	Not Stated
1018	1235357				Object	Not Stated
Summary of representations		The modest increase in population based on 2014 population forecasts does not warrant several thousand houses being built. Para 3.28 should be 'cross border' not 'cross broader'.				

Changes sought	Not specified																			
Summary of Council Response	Population forecasts are one component of how the Plans housing requirement figure has been calculated. A further consideration is the projected increase in households arising from people living longer, couples separating etc. The Plan also seeks to contribute to achieving growth aspirations both for Flintshire and the wider sub-region and part of this will be in-migration. The Council acknowledges the typographical error in para 3.28																			
Minor Change proposed	Amendment of 'cross broader' to 'cross border' in para 3.28.																			
Policy / page / Para / Map	Key Issues and Drivers for Change P21 para 3.30 Deposit Plan written statement																			
Relevant Content of Plan	Identifies what the Council considers to be key issues and drivers for change and identifying what it is the Council needs to plan for.																			
Representations	Total 1 representation - objection																			
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>894</td><td>1234902</td><td></td><td>1234870</td><td></td><td>Object</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	894	1234902		1234870		Object	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance														
894	1234902		1234870		Object	Not Stated														
Summary of representations	The previous UDP Inspector commented on the approach to defining settlements rather than identifying urban areas was backward looking and that a fundamental review of open countryside and green barriers was needed. It is not considered that the Plan fully responds to this and is therefore unsound.																			
Changes sought	Seeks allocation of land at Drury Lane (Bank Lane), Drury																			
Summary of Council Response	The earlier Key Messages document presented 6 options for categorising settlements before deciding on the preferred option, and this formed the basis for the 5 spatial strategy options presented as part of the Strategic Options document. The green barrier have also been reviewed. However, in the context of the objection site referenced by the objector, this is already within the settlement boundary.																			
Minor Change proposed	No																			
Policy / page / Para / Map	Forming the Plan's Strategy from this Context																			

			P24 para 3.36 Deposit Plan written statement			
Relevant Content of Plan			Identifies the Plan’s vision, themes and objectives.			
Representations			Total 5 representations: 2 objection 2 support 1 not specified			
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
264	1230721				Object	Not Stated
521	1231100					Not Stated
734	1233605		1233580		Object	Not Stated
821	1234489		1234487		Support	Not Stated
887	1234883		1234870		Support	Not Stated
Summary of representations			<p>One objection (in the context of HN1.6 Land between Denbigh Rd and Gwernaffield Rd) considers that the Plan does not reflect reservations expressed during consultation and is not sufficiently locally specific.</p> <p>The LDP vision is flawed as it is based on a ‘lasting balance’ at a time of absolute climate change and carbon reduction, has inadequate reference to brownfield land, and an inappropriate application of the concept of sustainable development, and inappropriate references to reference to growth and prosperity. The Plan is a green light to an estate builders charter.</p> <p>The vision is lacking in detail as there is no reference or commitment to the LDP delivering, in the very least, the minimum housing and employment needs of the County, nor is there any detail on where these needs will be met (for example, directing new development towards sustainable locations). The objection also seeks the rewording of objective 11 along similar lines.</p>			
Changes sought			Not specified			
Summary of Council Response			<p>The written statement is a concise statement and must be read in conjunction with the evidence base and it would not be appropriate for the written statement to include details of all previous consultations nor the level of detail sought by the objector. The detailed point raised in the objection are responded to in detail in the Council’s response.</p>			

	<p>The Plan has been prepared in the context of national guidance and the detailed points of objection are addressed in the Council's response to this objection.</p> <p>Welsh Government that each LDP must contain a vision and specifically advises a vision should 'be a concise, focused and positive statement'. The level of detail sought by the objector is inappropriate for a vision as it is set out in the Plans strategic policies. The wording of objective 11 is considered to adequately address the matters referred to by the objector.</p>
Minor Change proposed	No

Appendix 21b Main Issues Schedule Strategic Policies

Main Issues – Strategic Policies

Policy / page / Para / Map	Strategic Policies – General (NB: Representations simply tagged to this section heading in the plan via online consultation portal)					
Relevant Content of Plan	n/a					
Representations	Total 7 representations – objections					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
245	1230721				Object	Not Stated
260	1230721				Object	Not Stated
261	1230721				Object	Not Stated
266	1230721				Object	Not Stated
281	1230721				Object	Not Stated
372	1230721				Object	Not Stated
374	1230721				Object	Not Stated
Summary of representations	One objector has submitted a significant number of objections raising a variety of issues labelled under 'Strategic Policies' relating the allocation HN1.6 Land between Denbigh Road and Gwernaffield Rod, Mold, which have been submitted to different parts / policies in the Plan.					

	Deliberate over-provision strategy leading to farmland being (unnecessarily) allocated for development (HN1.6 – Mold) and lack of control by FCC to deliver this Lack of policy to protect Welsh Language Uncertainty over exactly what site is allocated (HN1.6) Questions over decision making by Members and availability of key evidence documents Mold is a special case compared to other Tier 1 settlements
Changes sought	Seeks deletion of the HN1.6 Land between Denbigh Rd and Gwernaffield Rd, Mold allocation
Summary of Council Response	The Council has responded in detail to each individual objection.
Minor Change proposed	No

Strategic policies – Creating Sustainable Places and communities

Policy / page / Para / Map	Strategic Policies - Creating Sustainable Places and communities – General NB: Representations simply tagged to this section heading in the plan via online consultation portal					
Relevant Content of Plan	n/a					
Representations	Total 3 representations - objections					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
17	1228898				Object	Not Stated
247	1230721				Object	Not Stated
265	1230721				Object	Not Stated
Summary of representations	<p>One objection considers sustainable development should include how the schools, medical services and shop needs are impacted by large scale developments as well as roads and carbon emissions.</p> <p>Objection raises lack of analysis of ongoing effects of successive large housing developments on welsh language and community cohesion in Mold in the context of objecting to the HN1,6 site in Mold.</p> <p>Objection raises concern over the process of including the HN1.6 site within the settlement boundary of Mold.</p>					
Changes sought	Deletion of site HN1.6					

Summary of Council Response	<p>The LDP site allocations are informed by a robust evidence base which involved consultation with statutory consultees including education, health, highways and utility companies and no major constraints have been identified that would prevent a site from being developed sustainably. The Plan's new allocations will not deliver completed houses until 2023-24 and will be developed over a number of years. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is no formal objection from either statutory body to the Plan nor allocation.</p> <p>Mold is a vibrant town which is the administrative centre for the County and sits well in terms of the growth triangle concept of Wrexham Chester and Deeside in the former Wales Spatial Plan and the principle of Wrexham and Deeside as a focus for growth in the draft NDF. It is not considered that the settlement hierarchy and spatial strategy in respect of Mold is contrary to PPW10 or the NDF. Mold has rightly always been in the highest tier of settlements. The objection does not identify harm the Plan / allocation will cause to Welsh Language in Mold or why it is inappropriate to have an allocation in Mold.</p> <p>In preparing a Deposit Plan for consultation the Council must identify what sites are allocated in the Plan to meet the housing requirement. The Deposit Plan therefore included the site within the settlement boundary and allocated it for housing.</p>
Minor Change proposed	No

Policy / page / Para / Map	STR1 Strategic Growth P43 Deposit Plan written statement
Relevant Content of Plan	The policy sets out the broad parameters of growth in terms of jobs (8-10,000), employment land (139.67ha) and housing (6,950 dwellings).
Representations	Total 42 representations: 41 objections 1 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
252	1230991				Object	No
320	1227548		1227538		Object	Not Stated
331	1231151		1231150		Object	Yes

332	1231151		1231150		Object	Yes
334	1231164		1148845		Object	No
337	1231151		1231150		Object	Yes
341	1231151		1231150		Object	Yes
365	1231153		1231150		Object	Yes
385	1231153		1231150		Object	Yes
386	1231153		1231150		Object	Yes
410	1144556				Object	Yes
523	1232074				Object	Not Stated
583	1230731		1148845		Object	Not Stated
590	1230730		1148845		Object	Not Stated
605	1232721				Object	Not Stated
637	1224983		1224982		Object	Not Stated
685	1233248		1149190		Object	Yes
707	1233454		1232502		Object	Yes
738	1233614		1233580		Object	Not Stated
742	1233625		1233580		Object	Not Stated
761	1144593				Object	Not Stated
787	1234106		1233580		Object	Not Stated
790	1148956		1148947		Object	Not Stated
852	1150807				Object	Not Stated
910	1148344				Object	Not Stated
918	1235103		1234870		Object	Yes
920	1230461				Object	Not Stated
933	1235344		1149800		Object	Yes
939	1235357				Object	Not Stated
950	1149828		1149800		Object	Not Stated
965	1235343		1149800		Object	Not Stated
980	1235470				Object	Not Stated
983	1149823		1149800		Object	Not Stated
1004	1235341		1149800		Object	Not Stated
1100	1236195		1232426		Object	Not Stated
1130	1149498				Support	Not Stated
1150	1149498				Object	Not Stated
1171	1232503		1233580		Object	Not Stated
1172	1232503		1233580		Object	Not Stated
1187	1149498				Object	Not Stated
1254	1149350		1232395		Object	Not Stated
1274	1232396		1232395		Object	Not Stated

Summary of representations

Several objections seek a LOWER Housing Requirement Figure:

the population and household forecasts are out of date
In the current economic climate, with political uncertainty and national economic slowdown the ambitious job growth plans appear to be highly unrealistic.
the forecast increase in population by 2,811 by 2030, even allowing for inward migration, the need for 7950 houses appears to be excessive.
The Plans provision for housing is in excess of provision in the draft NDF

	<p>The jobs growth is primarily based upon the fact that there is nearly 140 hectares of employment land available in Flintshire, mainly in the Deeside Enterprise Zone. Whilst there are high aspirations to create large number of jobs there is little track record at the moment of these being created despite the advantageous offerings within the Enterprise Zone</p> <p>Simply adding 14.4% (1000 dwellings) to the 6,950 swelling requirement is not a very sound scientific approach and should be based on previous experience in Flintshire or other North Wales Planning Authorities LDPs which specify 10%.</p> <p>A significant number of objections sought a HIGHER housing requirement figure:</p> <p>Lack of ambition:</p> <ul style="list-style-type: none"> • Level of housing growth not ambitious / aspirational enough • Plan does not align with clear growth aspirations of draft NDF, Mersey Dee Alliance and Growth Deal and fails to account for the significant potential growth • Surprising that the Council is not taking the opportunity to plan positively for the County • the proposed levels of employment and housing growth do not match. STR1 makes provision for some 8,000 – 10,000 new jobs (i.e. a range of jobs) yet identified a need for only 7,950 new homes. • Shortcomings and lack of ambition of Council approach of choosing a mid point of growth options - Council should be planning for the upper end of growth options ie 7350 (and total provision 8,410) <p>• Insufficient housing / jobs -Target housing requirement is too low / Jobs target does not reflect or correlate with the employment growth target, which is considered too low / Jobs target does not correlate with housing target.</p> <p>• the Technical Paper 'population and household projections with dwelling and employment impacts' which was published at the same time indicates a dwelling requirement derived from the employment led growth option of between 480 and 540 dwellings (Table 3.3); it is not explained how this assessment then translates into the, significantly lower, proposed figure for provision.</p> <p>• Plan is not consistent with 2014 based Welsh Government projections – Plan has a significant shortfall</p> <p>• Lack of flexibility in housing requirement figure if Economic growth and job created higher than Plan</p>
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	<p>envisages. / unclear what evidence used to inform jobs figure</p> <ul style="list-style-type: none"> the Council should maintain the commuting rate constant at 40% for the purposes of planning for housing and not seek to artificially suppress the housing Plan's figure by virtue of a metric that it simply cannot control. This is likely to increase the housing requirement significantly. A stepchange in housing and employment land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. The Plan proposes fewer homes each year than in recent years. Recent levels of completions above the Plan requirement proves the demand <p>Concern about 2015 Plan base date and short plan period when adopted - should be a longer Plan period of up to 20 years</p> <p>Other matters raised were:</p> <p>Policy Wording Objections consider that STR1 criterion iii) should be reworded by adding 'minimum' before 'housing requirement of 6,950'. The housing requirement should be treated as a minimum figure.</p> <p>UDP Shortfall The UDP required 7400 dwellings to be provided (or 493 per annum) over the period 200-2015 but there is a shortfall in delivery of 2755 units shortfall in housing delivery from the previous UDP period should be met and provided for during the LDP period moving forward Given that the housing needs of the UDP period were not met in full, this will result in an increase to the overall LDP housing requirement</p> <p>LHMA need LHMA Update identified annual need of 238 affordable homes LDP only seeks to provide 132 affordable homes per annum Plan should seek to meet this housing need in full Necessitates uplift to overall housing requirement and additional allocations (both market and affordable sites)</p>
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	<p>Housing Balance Sheet Components: Objectors highlight issues with elements of the Housing Balance Sheet as detailed below and consider that the housing requirement figure should be increased. One objector considers that these concerns taken together suggest that there should be an overall housing target of 10,500 units which is very significantly more than the number put forward by the Council and is more reflective of the amount of allocations that will be needed to deliver housing and the Council's jobs-led strategy.</p> <p>Commitments: Over-reliance on existing commitments concerns that commitments will not be delivered need for additional flexibility.</p> <p>Small Site / Windfall Allowances: Over-reliance on windfall allowances (120 per annum) Previous figures taken account of speculative housing planning permissions Concern over future delivery Council 50% discount on past trends not sufficient</p> <p>Allocations: Concern over delivery rates at Northern Gateway Concern Warren Hall unsustainable and undeliverable Concern over delivery of two allocated sites carried over from UDP Concern over delivery rates on Plan housing allocations</p> <p>Welsh Government The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect. It is pleasing to note the Deposit Plan has been prepared having regard to the guidance in DPM 3, particularly Chapter 5 and the de-risking checklist. This puts the Council in a good position moving forward to the examination stage. Further comments are set out in the annex to this letter with additional guidance contained in the draft LDP Manual (3rd Edition). In moving forward to the LDP examination, demonstrating delivery of the plan will be essential. The development planning system in Wales is evidence-led; demonstrating how a plan is shaped by this evidence is a key requirement of the examination. Demonstrating the delivery and viability of all sites in the plan is critical, particularly development proposed on strategic sites and other large housing/employment allocations which are integral to the strategy/objectives of the plan.</p>
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	<p>Affordable Housing Authority Wide Target - The Affordable Housing Background Paper states the affordable housing target for the plan is 1,981 homes. This should be included within a policy in the plan. Policy STR1: Strategic Growth could be amended to state “7,950 homes are provided of which xxx are affordable”. The target does not include the contribution from windfall sites (Table 6). It should do. The affordable housing target in the plan should be derived from all components of supply to ensure it is realistic in its aspiration and for monitoring purposes. Spatial Distribution of Affordable Housing Supply – the Affordable Housing Background Paper includes an analysis of affordable housing contributions by housing component. A table setting out anticipated affordable housing contributions by settlement tier and component of supply in line with guidance in the DPM (Ed. 3) would be helpful aiding clarity of the plan and effective monitoring.</p> <p>The Council has not spatially allocated the Deeside Enterprise Zone (EZ) on the proposals map. The EZ should be shown spatially in the plan. Part of the EZ boundary is within a green barrier designation EN11.15 Sealand-Cheshire Border. It is not clear how/why a green wedge designation should be shown in an EZ. Would this preclude maximising economic opportunities within the EZ? This will be for the relevant Department of Welsh Government to comment on.</p>
Changes sought	Amended policy wording / increased housing requirement figure / revision to elements of Housing Balance Sheet.
Summary of Council Response	<p>In terms of objections seeking a LOWER housing requirement figure, the Council would comment as below: The plan has taken account of the 2014 projections published following agreement of the Preferred Strategy where despite slightly higher household change trends, these were still substantially lower than the Preferred Strategy housing requirement figure and did not therefore impact on the strategic approach being taken by the Council.</p> <p>Later trends have been considered alongside the deposit LDP as whilst the Welsh Government produced 2017 based population projections they did not publish related household projections. Instead the Council provided its own 2017 based household projections produced by the Research and Information Unit at Conwy County Council to again determine if later trend projections had any impact on the plan’s strategy. The background paper produced by the Research Unit in fact compares the 2011 and 2014 Welsh Government figures with their own 2017 projections to conclude that none of the trends affect the</p>

	<p>stance taken in the LDP in relation to setting a housing requirement.</p> <p>Finally recently released Welsh Government 2018 based household projections show a falling projected trend in household change with even the high variant only indicating projected growth at half the level provided for in the LDP based on supporting its economic growth strategy.</p> <p>In 2014 Ministerial advice was issued, which is still in place today, whereby LPA's should not simply project negative recessionary trend period's forward in terms of planning for future growth. In the context of the draft NDF and the Growth Deal, the Council is rightly seeking to provide for growth in the County over the Plan period.</p> <p>There is a difference between the LDP housing requirement figure and how it is derived, and the NDF figures which relate to housing need based on affordable shortfalls and which are therefore not directly comparable. Of most relevance is the fact that in their formal comments on the Deposit LDP the Welsh Government are satisfied that the LDP is in general conformity with the draft NDF.</p> <p>It is not the case that the job requirement is simply based on the amount of employment land provided in the plan, as it is based on the ability of the two large strategic sites to deliver jobs, referenced to the employment projections identified in the Employment Land background paper prepared by the County. It is also partly deliberately aspirational as this aligns with the intentions behind the North Wales Economic Ambition Board Growth Vision for North Wales from which the Growth Deal has been agreed by UK and Welsh Governments to support and fund infrastructure, projects and skills development all geared to improving economic activity, prosperity and well-being in a North Wales context.</p> <p>The provision of a contingency is a requirement of the Welsh Government LDP Manual which refers to 10% as a starting point. Even if the Council followed the 10% lead of other North Wales Authorities this would still add almost 700 units to the LDP housing requirement as a contingency. It is the Council's view that the level of contingency allowed for is balanced and proportionate to help facilitate the delivery of sufficient homes to meet the plan's housing requirement figure.</p> <p>In terms of objections seeking a HIGHER housing requirement figure, the Council would comment as below:</p>
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Lack of ambition:

In their formal comments on the deposit Plan Welsh Government state that they are “broadly supportive of the strategy, Council response level of housing and jobs proposed, considers it [the plan] aligns with national policy and is in general conformity with the emerging NDF”.

Only option 6 of the LDP growth options was presented as a range, as it was the product of an aspirational job growth being presented as a range from which the resulted housing need was derived. Objectors do not consider selecting a mid-point from option 6 projected housing growth is reasonable but don’t explain why, other than the approach is not “ambitious enough”.

Instead some objectors state that to be more ambitious the Council should have selected the upper end of the growth range, a measure of housing ambition just 400 greater than the selected mid-point figure. The key point ignored by objectors, and as set out in the Plan, is that the selection of a mid-point from option 6 was also informed by reference to growth option 4 which was a more traditional demographic projection derived option where the high variant level of migration used to derive option 4 and its resultant level of housing requirement, was in line with that derived at the mid-point of the range of housing requirement derived from option 6.

This translates into a level of ambition that sets a challenging but achievable housing requirement, ensuring compliance with PPW in terms of sustainability and deliverability of the plans housing requirement, to the extent that a development plan can actually deliver the housing it provides, as endorsed by Welsh Government. Objectors also ignore the fact that the chosen housing requirement figure is significantly in excess of the formal published Welsh Government Household Projections both at the time that the growth options were derived (2011-Based WG Projections) and now where, with the recent publication of the 2018-based WG Projections, the differential from the projection household growth and the LDP requirement is now even greater.

Some other figures proposed by objectors would in fact be over 4 times the official projected growth but no assessment of the impact of this excess of growth over need has been made by objectors.

The NDF is also not yet finalized but the Council considers that its contribution to the NDF’s growth ambitions for Wrexham and Flintshire can be met by the LDP, accepting also that the timeframes for the two

strategies are different, with the NDF covering a longer time period than the LDP extending to 2040. It is also the case that the housing growth need assessed in the NDF is not directly compatible with the method for deriving housing requirements in LDPs. That said, when the housing need for Wrexham and Flintshire in the draft NDF is annualized and compared to the annualized cumulative housing requirements in the Flintshire and Wrexham LDPs, there is a high degree of conformity with the growth ambitions of the NDF. Welsh Government consider the Plan to be in general conformity with the draft NDF.

Objectors criticize the robustness of the Council's evidence base they provide no evidence or assessment of where the evidence falls short, and themselves go beyond the aspirational approach taken by the Council in setting its job growth target just above the upper limit of the job projections, and speculate on an even higher job target on a 'what if?' basis, without providing any evidence of how an even higher job target is achievable, what empirical basis this has, and which sites will accommodate the higher figure? It is therefore difficult for the Council to give weight to such speculative and unsubstantiated general commentary.

Insufficient housing / jobs: Objectors makes a number of subjective and superficial statements in relation to the growth planned for in policy STR1 but does not provide any empirical evidence or reasoned arguments to support these statements. For example it is stated that the housing requirement is "too low" but there is nothing provided to explain why? by how much? or what is the 'correct' figure? Equally the jobs target is said to be "too low" and does not "correlate" with the housing target but again it is not explained how it is too low, by how much, what is the correct level, and what is the nature of the correlation between employment and housing targets.

Objectors generally provide little or no information in the way of alternative figures or evidence and simply seems to be saying the housing and employment targets are too low and should be higher but without saying why, by how much or provide supporting evidence to justify this.

Reference is made to the **technical paper** published at the time of the Preferred Strategy entitled 'Population and Household Projections with Dwelling and Employment Impacts', and specifically refers to table 3.3 of that document not clearly explaining the difference between the housing requirement figure published in the Deposit LDP (6,950/463 dpa) and the range presented from the growth option of between 480 – 540 dpa.

With reference to table 3.3 in the background paper, the Council have made clear through its approach to the deposit LDP strategy that it has adopted the mid-point of the option 6 housing growth range which is clearly identified in table 3.34 as 6,950 dwellings, the figure that also appears in policy STR1 of the deposit LDP as the housing requirement or need to be met. Dividing this by the 15 year plan period gives the annualized requirement of 463 dpa. The objector's reference to the higher figures in the table is as a result of adding at that time a 10% contingency to the baseline requirement. In the second column of table 3.3 this adds 700 units to the 6,950 requirement, providing an overall provision for 7,650 units or 510 dpa. In fact since the preferred strategy, the level of homes actually provided for in the plan has increased as the contingency has gone up to 14.4% meaning that the plan overall provides for 7,950 homes at an annual rate of 530 dpa.

Projections - Objectors consider that when compared to the 2014 based Welsh Government household projections, the LDP housing requirement figure represents a "significant shortfall" to the growth projected in the 2014 Welsh Government projections. Whilst objectors provide no assessment or analysis of the data to illustrate this point, the Council are confused as the consistent trends shown in household change in consecutive Welsh Government projections from 2011, 2014, and now 2018 all show low levels of household growth in Flintshire, that are significantly below the housing requirement set in the plan.

The Council therefore do not understand the point about the LDP figure being a "shortfall" on the projections. The true position is entirely the opposite and to illustrate this the projected household growth from the 2014 Welsh Government projections for the plan period 2015-2030 was 305 per annum from the Hi variant projection, and 250 pa from the principal projection. These levels of projected change are similar when households are converted to dwellings and are significantly below the levels of growth required and provided for in the LDP (463/530 dpa respectively). It should also be noted that Welsh Government have recently published its 2018 based household projections which show for Flintshire a falling level of household change, with equivalent change for 2015-2030 at around 232 pa for the hi variant, and 166 pa for the principal projection.

Insufficient flexibility - The LDP strategy is based on an employment led approach where housing is part of the supporting infrastructure to help achieve and support job

growth. This approach is reflective of the stance taken by the draft NDF for the area as well as being the central focus for the North Wales Growth Vision. Having set such a strategy for the LDP, the Welsh Government in their formal comments on the deposit plan state that they are “generally supportive of the spatial strategy and level of homes and jobs proposed and have no fundamental concerns in this respect”. They also consider the LDP to be in general conformity with the emerging NDF.

Given this the Council is unsure how the plan is unsound, as objectors simply speculate that they are not sure there is enough housing allocated in the plan in the event that more jobs are created than expected. Whilst objectors criticize the robustness of the Council’s evidence base they provide no evidence or assessment of where the evidence falls short, and themselves go beyond the aspirational approach taken by the Council in setting its job growth target just above the upper limit of the job projections, and speculate on an even higher job target on a ‘what if?’ basis, without providing any evidence of how an even higher job target is achievable, what empirical basis this has, and which sites will accommodate the higher figure? It is therefore difficult for the Council to give weight to such speculative and unsubstantiated general commentary.

Objectors propose a speculative question as to how housing provision would be increased if more jobs are created, and the likely logical answers would include building out LDP housing sites fully, assistance from the 14.4% flexibility built into the housing requirement figure, and if it came to it, triggering a plan review.

Reference is made to the need to maintain previous high levels of **commuting** rates (40%) as opposed to the assumptions made as part of developing the LDP growth options. To support this they state that the Council are assuming that higher levels of job growth can be sustained from the same population but they have failed to recognise that in order to achieve the level of housing growth set out in the plan, net migration into the County will need to be encouraged at consistently high levels. This is the step change in attracting ‘new’ people into the county to sustain job growth and improve internal self-sufficiency within the economy that the strategic growth is based on, thereby reducing the dependency on commuting out of the County. If the levels of migration do not materialize then the level of housing required would be much lower, as indicated by the low levels of household growth shown in the recently published Welsh Government 2018 Based National Projections.

Stepchange - Objectors refer to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the development Industry has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst objectors refer to the delivery rate over the first three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. Objectors also fail to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s, both under the long term planned average in the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate.

Some objectors state that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their support for the employment levels, the objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment range in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth, then converted to

dwelling need. Instead they state that a higher figure “could” be achieved but fail to set out what the higher figure ‘could be’ or ‘should be’ or provide evidence to justify a higher figure.

Objectors refer to the need for the County to “raise its profile” but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire’s perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit.

The objector also considers that the plan period should be significantly extended to between 15 and 20 years beyond the adoption date of the plan, which at its maximum would provide for a 25 year plan period. The Council is not aware of any other LDP in Wales that has such a plan period or, in relation to the Flintshire LDP how it would be realistic or practical to plan with any certainty over such a long timeframe, given also the need to provide certainty to communities and to demonstrate the deliverability of the plan, which is challenging enough to evidence over 15 years let alone 25.

Other matters raised were:

Policy wording ‘minimum’

Several objections seek the addition of the word ‘minimum’ before ‘housing needs’ in criterion iii) of the policy wording. In line with the Development Plan Manual 3 the Plan has clearly identified its housing requirement of 6,950 and that provision has been made for 7,950 by ensuring sufficient flexibility exists to deliver the requirement figure. It is not necessary or appropriate for the Plan to refer to a minimum’ housing requirement’.

UDP shortfall

Several objectors seek a higher housing requirement figure based on the premise that the LDP should not only make sufficient provision for the assessed need during its plan period (2015-2030) but should also look backwards and include under-delivered housing from the previous UDP plan period. Objectors blame the UDP for this but do not acknowledge the role that the economic climate,

actual level of demand coming from potential house buyers, or the willingness, capacity or ability of developers to deliver new homes, as it is these factors that determine delivery. There is no relevant guidance in PPW or the Development Plans Manual that sets out the concept of transposing under-provision from one plan period to another, or the mechanism for doing so and the Council is unaware of any other LDPs in Wales for where this has been accepted. The housing need identified in the UDP was calculated at a different point in time and in the context of different circumstances and the LDP housing requirement has been calculated in the light of up to date information and circumstances. The two are not comparable and it is overly simplistic to add the UDP under delivery figure to the LDP requirement.

LMMA Need

The LHMA methodology produces an inflated need as it assesses the backlog of need but only has a lifespan of 5 years. It is therefore incorrect to transpose the annual need over the Plan period. It is also stressed that there are a number of sources of supply of affordable housing in Flintshire than just via the planning system, including the Councils own SHARP building programme.

Commitments

The Plans commitments, identified in Appendix 1 of the Deposit Plan have been reviewed and are based on developer information obtained through the annual housing land monitoring studies and is considered to be realistic and deliverable. Objections to specific sites are often out of date and inaccurate. The Council's commentary on such sites is set out in detailed responses to objections.

Small site / windfall allowances

In terms of the point made by the objector about the potential for recent large speculative windfalls to skew the assumptions made for windfall supply in the LDP balance sheet, the Council has accounted for this by reviewing the windfall trends over an 18 year period and by reducing the allowance by 50% of that trend, also in the knowledge that in terms of the more recent trend years, speculative sites have not contributed more than 50% of the overall windfall provision. Whilst the objector is concerned about the future supply of windfall sites even at the modest levels proposed, which they support, they have failed to note the findings of the Urban Capacity Study carried out to support the balance sheet and specifically the setting of the windfall and small sites allowance in the LDP. This shows a reasonable and healthy potential supply within existing settlements to support the allowances made.

The Plans housing provision is not over-reliant on windfalls. The Plan makes a conservative allowance of 50

units for large sites and 60 units for small sites when compared with past trends. The role of the Urban Capacity Study was not to identify allocations but to determine whether scope exists to deliver the allowances identified in the Plan. The objectors approach is to remove all large site windfalls from the Housing Balance Sheet which is not appropriate or necessary. There is no objection from Welsh Government to the effect that the Plan is over-reliant on windfalls. The industries representative body HBF agree the allowances made are appropriate.

Allocations

The Council has commented separately on the deliverability of the two strategic sites at Northern Gateway and Warren Hall in terms of responses to objections to policies STR3A and STR3B. The Council has also responded in terms of objections in respect of the Plans allocated sites. In summary, the Plans allocations, including the two reassessed and carried over from the UDP, are considered to be sustainable, viable and deliverable. The completion rates in the trajectory is considered to be realistic and achievable.

The Council notes the support from Welsh Government for the Plan's strategy and proposed levels of growth, and the recognition of the Council response evidential basis for this that is in line with the requirements of the Development Plans Manual edition 3.

The Council accepts the Welsh Government objection that the affordable housing target should be included in the Policy wording in criteria iii). The affordable housing Background Paper will be updated with a table showing the anticipated affordable housing supply by settlement tier, and will include the expected contribution from windfall sites with ten or more units in line with the guidance set out within DPM3. The affordable housing target will also be revised to include the expected contribution from windfall sites with ten or more units.

The Enterprise Zone (EZ) is not a planning land use designation and was derived with Welsh Government to support Council response funding/financial relief measures to facilitate economic investment in key sites specifically identified within the EZ such as Deeside Industrial Park and Principle Employment Area. The EZ boundary was not drawn up in a planning land use context and nor did its creation involve planners. Reference to the extent of the EZ could be made on the constraints map that's sits alongside the LDP Proposals Map.

Minor Change proposed	No

Policy / page / Para / Map	STR2 The Location of Development P46 Deposit Plan written statement
Relevant Content of Plan	The policy sets out the Plans spatial strategy in terms of distributing growth based on the settlement hierarchy
Representations	Total 53 representations: 35 objections 17 support 1 not specified

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
29	1229705				Support	No
39	1229995				Object	No
47	1230020				Support	Not Stated
85	1230323				Support	Not Stated
126	1230598				Support	Not Stated
136	1147889		1230687		Object	Not Stated
208	1230917				Support	No
212	1230905				Object	Yes
269	1231039				Support	Not Stated
272	1229111		1227685		Object	Yes
333	1231151		1231150		Support	Yes
338	1231151		1231150		Object	Yes
342	1231151		1231150		Object	Yes
354	1231217				Support	No
368	1231153		1231150		Support	Yes
373	1230699				Object	No
381	1231186				Object	No
387	1231153		1231150		Support	Yes
423	1230991		1230989		Support	Not Stated
451	1230979					Not Stated
475	1231475				Object	Not Stated
588	1232541		1232537		Support	Not Stated
608	1232742				Support	Not Stated
622	1230050				Support	No
627	1233028		1232939		Object	Not Stated
632	1233028		1232939		Object	Not Stated
638	1224983		1224982		Object	Not Stated
659	1233213		1233212		Object	Yes
674	1233213		1233212		Object	Yes
704	1233444		1233212		Object	Not Stated
706	1233454		1232502		Support	Not Stated
757	1233879		1233580		Object	Not Stated
801	1234331		1234330		Object	Not Stated
919	1235111		1234870		Object	Not Stated

934	1235344		1149800		Object	Not Stated
951	1149828		1149800		Object	Not Stated
966	1235343		1149800		Object	Not Stated
984	1149823		1149800		Object	Not Stated
1005	1235341		1149800		Object	Not Stated
1059	1229839				Object	Not Stated
1119	1236829				Object	No
1123	1236844				Object	Yes
1131	1234608				Object	Yes
1143	1149498				Object	Not Stated
1146	1149498				Object	Not Stated
1151	1234431				Support	Yes
1152	1234431				Object	Not Stated
1176	1232503		1233580		Support	Not Stated
1178	1232503		1233580		Object	Not Stated
1186	1149498				Object	Not Stated
1198	1230917				Object	Not Stated
1255	1149350		1232395		Object	Not Stated
1275	1232396		1232395		Object	Not Stated

Summary of representations

Countywide Distribution

The settlement hierarchy does not allow sufficient flexibility for the even distribution of new development across the County which is primarily being directed to the eastern half. The rigidity of the settlement hierarchy definitions mitigates against a more balanced distribution of housing development. As there are more Tier 3 and 4 settlements in the west there should be more allocations or settlement boundary changes to compensate for this uneven distribution where this would not create harm. Seeks site in Trelawnyd.

Distribution amongst settlement tiers

A number of representations express concern that the Plan does not distribute growth in a logical or sustainable manner amongst settlements in the settlement hierarchy. Too focused on lower order settlements at the expense of more sustainable larger settlements
Too focused on higher order settlement at the expense of lower tier settlements
Various settlements and sites are promoted as part of these objections.

Mismatch of Settlements – Employment / Housing

There is a mismatch between housing and employment in that settlements with housing allocations do not have employment allocations.

Reclassification of settlements:

Pen-y-ffordd should be re-categorised as a Rural Defined Village for a variety of reasons.

	<p>Gwernffield should be a Tier 3 settlement as it is in a highly sustainable location and benefits from a number of services and facilities such as an employment site, churches, school and sustainable transport. Therefore, in meeting the plans needs up to 2030, the settlement requires further growth with a housing allocation and not to rely on windfall/ exception sites. Seeks allocation of land at Coppy Farm Gwernaffield for housing.</p> <p>New Brighton should be re-classified as a Tier 4 Defined Village for a variety of reasons Objects to the current Sustainable Settlement Hierarchy based on its allocation of Broughton as a Local Service Centre, rather than Main Service Centre.</p> <p>Exceptions Schemes Welsh Government Exception Sites – Affordable housing exception sites are permissible under policy STR2: Location of Development and HN4 (criteria f). It is unclear why small scale exception sites are only allowed in Tiers 2-5 and not Tier 1 which are the most sustainable settlements? The approach requires justification and clarification given affordable housing need across Flintshire is significant.</p> <p>The rural exceptions policy applicable to Tier 1, 2, 3 and 4 settlements needs to be changed to allow on site market housing as cross subsidy for affordable housing. This need not involve excessive development out of character with the rural settlement.</p> <p>The reference to additional developments of affordable homes adjacent, but outside, settlement boundaries is not qualified, either in scale, number of developments or site specific locations considered acceptable for affordable development. Para 9.2 says that development must be controlled which contradicts this wording and leaves sites open to potential exploitation.</p> <p>Employment sites It is suggested new (employment) development will be directed towards Principal employment allocations yet this is not the case and insufficient land has been identified at the PE2 site at Sealand IE.</p> <p>Nannerch Concerned at the lack of any new housing in Nannerch until 2030.</p> <p>Welsh Government seek clarification of spatial distribution & housing components by settlement tier & the housing trajectory Background Paper 10: Housing Land Supply</p>
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	<p>and Delivery contains all the tables required by DMP (Ed.3) namely, Table 4 and Appendix 2-5 which collectively set out the spatial distribution of housing provision in the plan, the housing trajectory and the timing and phasing of all the components of supply by settlement tier. They should all be included in the plan as required by the Manual and current consultation on PPW.</p> <p>NRW welcome the requirement that for Tiers 4 and 5 housing development should be related to the scale, character and role of the settlement and that in Tier 5 'development needs to be sensitively conceived and designed...to respect the character and appearance of the site and its surroundings'. We recommend that design related to scale and positive character should apply to all Tiers of development.</p> <p>Whilst it is possible to assess where development will be permitted in the Defined Villages, which have settlement boundaries, it is less clear where development might take place in the Tier 5 settlements. The committee would suggest that additional safeguards to prevent the unacceptable expansion of these settlement is required to set out more precise criteria against which proposals will be judged.</p>
Changes sought	Seeks review of settlement hierarchy, revised apportionment between settlements and additional provision in certain settlements. Seeks revisions to policy wording.
Summary of Council Response	<p>Countywide Distribution</p> <p>The settlement hierarchy in policy STR2 is based on a comprehensive suite of Settlement Audits which were published as part of the earlier Key Messages document alongside options in terms of categorizing settlements. This established that the most sustainable settlements are generally those in the eastern part of the County. The subsequent Strategic Options document then looked at 5 distinct spatial options for how growth should be distributed throughout the County. Option 1 was entitled 'proportional distribution' and involved the amount of development in each settlement being based on where a settlement is in the settlement hierarchy. Following an assessment of consultation responses, Option 5 which was a 'Sustainable Distribution plus refined approach to rural settlements'. This option involved planned growth through allocations in the first three tiers of the settlement hierarchy and provision in the bottom two tiers through local needs based housing development. This is felt to be a far more sustainable approach as it is based on the relative sustainability of settlements rather than the "even distribution" advocated, which ignores this main principle.</p>

Although it is acknowledged that the new allocations are in the eastern half of the County, it must be stressed that the Plans housing supply comprises more than just new allocations. The Housing Balance Sheet comprises completions that have already taken place in the first 4 years of the Plan period, housing commitments that have a valid planning permission at present and allowances for small site and large site windfalls. As part of this wider housing supply there will be scope for housing in the western part of the County. In Tier 4 Defined Villages such as Trelawnyd policy STR2 focuses on schemes which bring about local needs affordable housing either through small scale exceptions schemes on the edge of settlement boundaries or windfall sites within settlement boundaries, and allows an element of market housing where necessary to deliver local needs housing. The objection relating to Tralwnyd is commented on in the Councils response on this objection.

Distribution amongst settlement tiers

The Plans spatial strategy and approach to allocating land sites for housing is not premised on making allocations in every single settlement within the top three tiers of the settlement hierarchy. The fact that a settlement does not feature in the list of housing allocations in policy HN1 does not mean that these settlements will not experience growth. This may also be achieved by completions during the first 4 years of the Plan, by commitments and by allowances for small and large site windfall developments.

The Plan's spatial strategy distributes development based on a 5 tier settlement hierarchy with only the top three tiers receiving planned growth in the form of allocations. The Plan focuses on the most sustainable settlements and sites and does not apportion quantum of development across the board. Tier 1 and Tier 2 settlements accommodate 83% of the planned growth, whereas Tier 3 will accommodate just 14%, therefore the Council disagree with the objectors comment that "smaller settlements are identified for comparatively large levels of housing growth". In Tier 4 settlements provision is made for growth through a variety of windfalls, and small scale exceptions schemes to meet local needs whilst in the least sustainable Tier 5 settlements provision exists for infill and rounding off development which meets local needs. In their formal representations on the Plan Welsh Government have no objections to, and have supported in principle the amount of growth and spatial strategy.

Only two allocations are proposed in Tier 3 settlements because this tier of settlements has seen a number of

	<p>speculative housing schemes allowed on appeal and also completions during the first years of the Plan period. Growth is not only achieved through new allocations as it also achieved through completions, commitments and possible windfalls</p> <p>The settlements and sites promoted by objections are commented on in the Council responses to individual objections.</p> <p>Mismatch housing sites / employment sites</p> <p>In terms of the objectors comment that “some larger settlements have no corresponding employment growth” the following summarises the existing employment areas and any new employment allocations within the settlements which include residential allocations;</p> <p>Buckley – has employment allocations and Principal Employment Area’s (PEA’s)</p> <p>Connah’s Quay – has PEAs and is close to the allocated strategic allocation, Northern Gateway</p> <p>Flint – has large PEA’s</p> <p>Mold – has employment allocations and PEA’s</p> <p>Ewloe – is adjacent to St Davids Park and is close to several PEA’s and the allocated strategic site Northern Gateway.</p> <p>Hawarden - close to several PEA’s, the allocated strategic site Northern Gateway, and Airbus</p> <p>HCAC – close to Llay Industrial Estate.</p> <p>New Brighton – close to Mold, Buckley and Deeside</p> <p>Penymynydd – close to Broughton and the allocated strategic site Warren Hall</p> <p>Flintshire has a large number of settlements and traditional employment locations and interrelationships between the two, it is not necessary or appropriate for every settlement to have its own employment as the objector suggests. If this approach was taken, then the objectors proposed site in Broughton would not be suitable as there is no employment allocation in Broughton itself, the nearest is Hawarden Park Industrial Estate and the Strategic allocation Warren Hall.</p> <p>Reclassification of settlements</p> <p>Penyffordd / Penymynydd is appropriately classified as a Tier 3 Sustainable Settlement as set out in the Council’s response on this objection.</p> <p>Gwernymynydd is considered to be appropriately classified as a Tier 4 Defined Village. Both the explanation for this and the Councils commentary on the suggested site in the detailed response to this objection.</p> <p>New Brighton is appropriately classified as a Tier 3 Sustainable Settlement as set out in the Council’s response to these objections.</p>
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Broughton is considered to be appropriately designated as a Tier 2 Local Service Centre as set out in the Council's response to this objection.

Exceptions schemes

The provision of small scale affordable housing exceptions in STR2 as further explained in HN4-D is a means of providing affordable housing on the edges of settlements. The approach is fully in line with PPW (para 4.2.34). However, para 4.2.34 of PPW specifically states 'Affordable housing exception sites are not appropriate for market housing'. Unless there is a change to national planning guidance it would not be appropriate to amend the Plan to include an element of market housing / cross subsidisation on exceptions schemes.

The policy approach is carried over from the UDP (policy HSG11) whereby small scale developments on the edge of settlements can be delivered for affordable housing, as an 'exception' to normal planning policies. Given the nature of and workings of the policy it is not possible to predict the number or scale of developments. Schemes could arise where there is an identified and evidence housing need to be met, a willing landowner and a housing association or similar body to ensure that the units remain affordable in perpetuity. However, schemes would also need to be acceptable in planning terms in terms of representing a logical extension to the settlement, and acceptable in terms of highways and other considerations. The Plan, when read as a whole contains adequate safeguards to ensure the policy is not mis-used.

The Deposit Plans exclusion of Tier 1 Main Service Centres reflects a carry over from the adopted UDP whereby policy HSG11 applied 'rural' exceptions schemes as was defined in PPW at that time. Therefore adopted policy did not allow small scale exceptions schemes in the larger category A settlements as they were not rural settlements. It is noted that PPW describes such development as 'Affordable Housing Exceptions Schemes' and that reference to 'rural' settlements no longer applies. It is accepted that as Tier 1 settlements are considered to be most sustainable settlements then provision for small scale affordable housing exceptions development would be appropriate in principle. The Council would therefore offer no objection to the Inspector recommending that policy STR2 be amended to allow 'Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries', within criteria a. re Tier 1 Main Service Centres.

Employment Sites

Policy STR2 explains that new development will be directed to i) allocated sites (which are identified in policy PE1) and ii) Principal Employment Areas which are identified in policy PE2. Unless an employment allocation happens to occur in a PEA, specific provision is not made within PEA's. Rather, PEA's provide a degree of flexibility in delivering new employment development by facilitating new employment development, extensions and expansion within existing defined employment areas.

The site is commented on the Councils response to the objection in respect of PE2.

Nannerch

Nannerch is a Tier 4 'Defined Village' which benefits from some services and facilities to sustain local needs. Policies within the plan enable small scale local needs housing within rural areas such as Nannerch, either as windfall sites within the settlement boundaries or as small exception sites on the edge of settlement boundaries for affordable housing. Windfall market housing will only be permitted on sites when it is essential to delivering affordable housing. Policies STR2 and HN4-D specifically provide the opportunity to develop local needs housing within Tier 4 Defined Villages such as Nannerch therefore it is not necessary to allocate a site to meet future needs.

In response to Welsh Government, the information contained in the Background Paper and referred to, can be included in the final version of the written statement and can potentially be dealt with as an MAC at the Examination stage.

In response to NRW, such additional guidance is not considered appropriate or necessary for the top 3 tiers of the settlement hierarchy and it must be stressed that the Plan also needs to be read as a whole whereby all development proposals would need to satisfy policies PC2, 3 and 4.

The policy wording in criteria e. of STR2 permits only sensitive and small scale housing developments which take the form of either infill or rounding off. A further policy proviso is that developments must be for local needs affordable housing. In many respects the approach is similar to small scale exceptions schemes, but without the delineation of a settlement boundary. The explanation in para 5.16 further explains the policy wording by stating 'In these lower tier settlements, development needs to be sensitively conceived and designed and to respect the

	character and appearance of the site and its surroundings'. The implementation of the policy requires an analysis of the form and pattern of built development in each of the settlements and the relationship between built development and open countryside. The success or otherwise of a proposed development is whether it respects the present development pattern and respects the character and appearance of the locality. These are concepts which are embodied throughout the Plan and particularly in policies PC2 and PC3.
Minor Change proposed	No

Policy / page / Para / Map	STR3 Strategic Sites P52 Deposit Plan written statement
Relevant Content of Plan	The policy identifies the Plan's two strategic sites at Northern Gateway, Deeside and Warren Hall, Broughton which are both mixed use allocations.
Representations	Total 1 representations objection

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
1149	1149498				Object	Not Stated

Summary of representations	<p>Welsh Government stress that a key matter for the examination will be whether the plan contains sufficient information in relation to the implementation, delivery and monitoring of the plan. Specifically, whether key elements of the master planning principles, delivery statements, and the infrastructure plan, should be in the plan to ensure good design and comprehensive development for housing and employment sites.</p> <p><input type="checkbox"/> Masterplan & Delivery Statements have been prepared for both strategic sites. Additional information, where necessary and relevant, along with statements of common ground to support the plan would be advantageous. This also applies to employment sites and key non-strategic housing sites, where relevant.</p> <p><input type="checkbox"/> Strategic Sites need significant infrastructure which should be articulated in the plan, including specific constraints such</p>
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	<p>as those regarding the nearby airfield i.e. height restrictions which could impact on the developable area.</p> <p>□ The level and rational for the housing flexibility allowance is for the LPA to justify. The DPM (Edition 3) states 10% is a starting point, with any variation being robustly evidenced. It is not the role of Welsh Government to comment on the merits or the timing of individual sites in the plan. The key point is that the LPA demonstrates that there is sufficient flexibility at key points in the plan period through the trajectory. Statements of Common Ground will assist in clarifying the timing and phasing of all sites. The trajectory should illustrate the degree of flexibility throughout the plan period.</p>
Changes sought	Evidence of viability, deliverability and flexibility.
Summary of Council Response	<p>The Council has done a considerable amount of work to provide a robust evidence base to support the policies and proposals in the deposit LDP and to demonstrate the deliverability of the sites in the plan, and its overall soundness. The Council notes and welcomes the Welsh Government's positive support in its formal comments on the Plan for the levels of housing and employment growth and the spatial strategy for distributing and delivering that growth.</p> <p>Whilst the Council acknowledges the need to ensure as far as possible that it can demonstrate the deliverability of the strategic sites in the plan, given the advanced planning status of the Northern Gateway site, which has both outline and now reserved matters permissions across the site, that are enabling the delivery of housing and employment on the ground, the Council is confident that this site is highly sustainable and deliverable, particularly as development interest grows.</p> <p>In relation to the Warren Hall strategic site this is in Welsh Government ownership and a significant amount of background work has and continues to be done to evidence and justify the developability and delivery of this site. This is assisted by the site's priority status as part of the North Wales Growth deal where significant funding is available to provide the necessary infrastructure to prime the delivery of development on this site. In</p>

	<p>addition, the housing element of this site will be fed into the Welsh Government project to accelerate the provision of affordable housing on sites in its ownership working in conjunction with Registered Social Landlords to facilitate this. This provides added certainty of the delivery of the housing element of this mixed use site, and the contribution this makes to the overall housing requirement of the Plan.</p> <p>In terms of flexibility, the Plan includes an allowance that is significantly above the minimum prescribed in DPM3 and the Council considers that this is both reasonable and pragmatic in terms of ensuring the delivery of sufficient housing to meet the housing requirement, consistently throughout the Plan period.</p>
Minor Change proposed	no
Policy / page / Para / Map	STR3A Strategic Sites – Northern Gateway P52 Deposit Plan written statement
Relevant Content of Plan	The policy identifies the Plan's two strategic sites at Northern Gateway, Deeside and Warren Hall, Broughton which are both mixed use allocations.
Representations	Total 25 representations: 23 objections 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
207	1230959				Object	Not Stated
257	1229111		1227685		Object	Yes
335	1231151		1231150		Object	Yes
339	1231151		1231150		Object	Yes
343	1231151		1231150		Object	Yes
369	1231153		1231150		Object	Yes
388	1231153		1231150		Object	Yes
424	1230991		1230989		Object	Not Stated
633	1233028		1232939		Object	Not Stated
639	1224983		1224982		Object	Not Stated
661	1146891				Support	Not Stated
758	1233887		1232502		Object	Not Stated
883	1148889		1234839		Support	Not Stated
921	1230461				Object	Not Stated

922	1235175		1234870		Object	Not Stated
935	1235344		1149800		Object	Yes
952	1149828		1149800		Object	Not Stated
967	1235343		1149800		Object	Not Stated
985	1149823		1149800		Object	Not Stated
997	1235357				Object	Not Stated
1007	1235341		1149800		Object	Not Stated
1060	1229839				Object	Not Stated
1205	1229108		1227685		Object	Not Stated
1260	1149350		1232395		Object	Not Stated
1276	1232396		1232395		Object	Not Stated

Summary of representations

Over-reliance of strategic sites - Delivery of economic and housing growth objective is entirely reliant on two strategic sites.

Slippage / delays / delivery

Long history of allocation in UDP and poor track record of delivery

Strategic sites complex to deliver and prone to delay / slippage – two ownerships, with Pochin in administration

Concern about delivery on the site – 100 units per annum is extremely high and needs evidencing / number of dwellings to be delivered by 2030 to be re-assessed and evidenced.

Given necessary infrastructure enabling works, it is unlikely housing units will be delivered in 2020.

Need for evidence that there is no funding gap for infrastructure works.

Doubt that the site will delivered in the Plan period given no proven deliverability

The 200 unit discount on the Pochin part of the site should be increased.

National Grid identify electricity infrastructure within / nearby the site.

Queries whether it is necessary in para 5.18 –to include a reference to Cheshire West and Chester Council / seeks clarification regarding para 5.24 whether the area in the policy reflects the whole site, or whether it is the residual left to be developed.

NRW comment that the Strategic Flood Consequences Assessment (SFCA), and specifically Appendix B (FCC Development Site Assessment) lists the site for mixed use development. The

	<p>Development Site Assessment advises that there should be a presumption against highly vulnerable development on this site, and that the Council should consider the removal of highly vulnerable development from the plan. Given the site is intended for allocation further narrative to support viability for the plan period would be beneficial. On both STR3A and NRW recommend reference is made to provision of a Green Infrastructure network and strategic landscaping and GI network. We suggest that these networks be included in the Proposed Green Infrastructure SPG.</p>
Changes sought	<p>/ reduction in forecast number of completions within Plan period / Identification of further allocations / contingency sites which are available, viable and deliverable in accordance with settlement hierarchy and sequentially preferable.</p>
Summary of Council Response	<p>It is undoubtedly the case that the employment growth objectives of the Plan rely heavily on the two strategic sites, although there is additional provision in the Plan through other employments allocations and flexibility with the Principal Employment Areas. The Plan is in line with the Growth Deal where both sites form a key part of the economic strategy for the region. However, the housing objectives of the Plan are not solely reliant on the two strategic sites as the Plan makes a number of allocations, in addition to completions, commitments and allowances for small and large site windfalls. The Plan is also on track with the intended housing delivery in the first four years of the Plan. It is not considered that additional housing allocations are required in the Plan. In their formal representations on the Plan, Welsh Government broadly support the level of housing and employment growth and the spatial strategy and consider the Plan to be in general conformity with the draft NDF.</p> <p>The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships</p>

	<p>with Praxis promoting the northern part and Pochin the southern part.</p> <p>Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A.</p> <p>On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site.</p> <p>The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on</p>
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site. It is quite normal on a strategic site of this size to have several housebuilders on site at the same time.

Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable.

The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory).

The ethos behind several objection appears to be simply to object to the housing element of this strategic site in order to promote smaller housing elsewhere in the County. Such an approach does not recognise the context of this important mixed use development and the combined package of economic benefits.

There is presently no requirement in PPW10 or the Development Plans Manual 3 for LDP's to incorporate contingency sites. The Plan already has a healthy 14.4% flexibility allowance and the allowances for small and large site windfalls is also a conservative estimate, offering further flexibility. It is also unclear when Anwyl are promoting significant alternative sites such as the large predominantly housing only extension to Croes Atti, how they would be in a position to deliver significant housing on a large scale at a rate to meet the requirements of the plan, when multiple developers now with reserved matters consents on the Northern Gateway site would not.

In para 5.18 the Council is seeking to clarify that there are strategic sites in CWAC, Wrexham and Denbighshire and that the

		<p>Flintshire LDP does not seek to identify any new strategic sites other than the two sites carried over from the UDP. In para 5,24 the Council is providing an overview and further explanation of the Northern Gateway development. The allocation in the Plan is for the whole site. The whole site has the benefit of two outline planning permissions and further reserved matters and discharge of conditions applications have been approved on both halves of the site. It is not considered that the policy or explanatory text is unclear that it relates to the whole site.</p> <p>In respect of the NRW objection on the Northern Gateway allocation, the site was allocated in the adopted UDP. The site has the benefit of outline planning permissions, consents in respect of discharges of conditions and reserved matters approvals. Housing development is now under construction on the site. Welsh Government has invested in flood defence works involving the strengthening of the embankments along the R. Dee. NRW were a statutory consultee throughout the sites allocation and planning application processes and an appropriate flood management scheme put in place.</p> <p>In respect of both STR3A and B, reference is made as part of the policy wording on each site to 'green infrastructure'. It is not considered further reference is necessary</p>				
Minor Change proposed		No				
Policy / page / Para / Map		STR3B Strategic Sites – Warren Hall P52 Deposit Plan written statement				
Relevant Content of Plan		The policy identifies the Plan's two strategic sites at Northern Gateway, Deeside and Warren Hall, Broughton which are both mixed use allocations.				
Representations		Total 37 representations: 33 objections 4 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object	Hearing attendance

					to this policy?	
7	1228415				Object	Not Stated
215	1230944				Object	Not Stated
220	1230953		1229964		Object	Not Stated
351	1229035				Support	Yes
399	1227975				Object	Yes
435	1231333				Object	Not Stated
541	1232271				Object	No
580	1232506		1232501		Object	Not Stated
614	1232794				Object	Not Stated
666	1233248		1149190		Object	Not Stated
678	1146891				Support	Not Stated
765	1144593				Object	Not Stated
766	1144593				Object	Not Stated
824	1231124		788759		Object	Not Stated
1116	1236741				Object	No
1138	1234608				Object	Yes
1156	1234431				Object	Not Stated
1204	1229108		1227685		Object	Not Stated
1219	1229111		1227685		Object	Not Stated
1221	1235341		1149800		Object	Not Stated
1224	1231151		1231150		Object	Yes
1225	1235344		1149800		Object	Yes
1226	1231151		1231150		Object	Yes
1227	1231151		1231150		Object	Not Stated
1228	1149828		1149800		Object	Not Stated
1229	1149828				Object	Not Stated
1230	1235343		1149800		Object	Not Stated
1232	1234883		1234870		Object	Not Stated
1235	1231153		1231150		Support	Yes
1236	1231153		1231150		Object	Not Stated
1237	1149823		1149800		Object	Not Stated
1261	1149350		1232395		Object	Not Stated
1270	1232506		1232501		Support	Not Stated
1271	1230991		1230989		Object	Not Stated
1272	1229839				Object	Not Stated
1273	1230461				Object	Not Stated
1277	1232396		1232395		Object	Not Stated

Summary of representations

Public objections

Local highway network and traffic issues and congestion
Need a new junction providing direct access / egress to Shopping Park
Concern about access to and capacity of schools and health facilities.
Broughton is becoming overloaded and unrecognizable without the correct infrastructure in place to support additional people.
Merging of Broughton and Higher Kinnerton.

	<p>Concern about the name given to the site as this is the name of an adjacent private residential property.</p> <p>Concerns about ecology and routing of electricity lines</p> <p>Developer Based Objections</p> <p>Over-reliance of strategic sites - Delivery of economic and housing growth objective is entirely reliant on two strategic sites.</p> <p>Slippage / delays / delivery</p> <p>Strategic sites complex to deliver and prone to delay / slippage</p> <p>The site has unimplemented outline consent and no indication the site will come forward within the Plan period.</p> <p>The proposal is for a complex and aspirational mixed use development which is highly unlikely to be delivered in the Plan period.</p> <p>Regardless of previous permissions the site should be re-assessed on its own merits.</p> <p>Significant investment required regarding infrastructure which raises concerns about viability and deliverability – lack of detail on funding.</p> <p>Sustainability</p> <p>The site is isolated and does not have any relationship to facilities. It is therefore not a sustainable option for residential development and the lack of facilities mean that even if residential development comes forward in that location the need for facilities will delay delivery over many years.</p> <p>No assessment of sustainable access particularly given its divorced position relative to settlements</p> <p>Fails the sequential approach to site selection.</p> <p>Greenfield site in an isolated and unsustainable location which does not reflect Plan policies or PPW.</p> <p>Creation of an isolated new community</p> <p>Constraints</p> <p>The aeronautical constraints will impose significant commercial constraints on development.</p> <p>Involves loss of grade 3a BMV</p>
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	<p>Significant water supply and electricity supply problems No trajectory for the site Effect of WG imposing constraints on delivery partners – zero carbon housing, bungalow development.</p> <p>NRW recommend reference is made to provision of a Green Infrastructure network and strategic landscaping and GI network. We suggest that these networks be included in the Proposed Green Infrastructure SPG.</p> <p>Para 5.33 should be amended to include B1 and B2 to reflect the policy wording</p>
Changes sought	<p>Identification of further allocations / contingency sites which are available, viable and deliverable in accordance with settlement hierarchy and sequentially preferable.</p> <p>Deletion of site or deletion of the 300 units from housing land supply.</p>
Summary of Council Response	<p>Public objections: It must be stressed that the site is allocated for a business park and hotel in the UDP and already has outline planning permission for a business park. In the LDP the site area has been extended and the mix of uses broadened to include housing and a commercial local centre. The Deposit Plan was accompanied by a Masterplan and Delivery Statement document which summaries the wide range of background and technical documents which had been undertaken for the site.</p> <p>Highways: One of these was a Transport Assessment which concluded that the local highway network is able to accommodate the development. Options exist for Lesters Lane in terms of one-way or no through road.</p> <p>New junction: The Council has for some time pushed for a new access off the A55(T) eastbound to provide a direct route to Airbus and the Retail Park, thereby avoiding Main Road. A sub-regional transport is presently taking place to look at options for improving access into the Broughton / Saltney area and the western edge of Chester.</p> <p>Services and facilities:</p>

	<p>The housing element will not deliver completed houses until 2023-24 and will be developed over a number of years. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is no formal objection from either statutory body to the Plan nor allocation.</p> <p>Broughton</p> <p>This is a sustainable and vibrant settlement in terms of its significant employment and retail offer and is a key part of delivering the growth ambitions of the Plan.</p> <p>Merging of settlements</p> <p>The Council has extended the green barrier along the southern edge of Broughton to ensure a gap between the site and Higher Kinnerton</p> <p>Site name</p> <p>The site has always been known as Warren Hall or Warren Hall Business Park.</p> <p>Ecology / electricity</p> <p>Welsh Government has commissioned ecological studies and there is no objection from NRW. The Utilities Study does not show upgraded power lines being any closer to existing properties.</p> <p>Developer Objections:</p> <p>Over-reliance on strategic sites:</p> <p>Although Warren Hall is a strategic site for a mixed use development, the housing element is not strategic, being similar in scale to some LDP housing allocations. The housing element of 300 units is quite capable of being delivered within the Plan period. It is acknowledged that the Warren hall site has not come forward for development despite being previously allocated in the UDP and having the benefit of outline planning permission (not including the housing element). Nevertheless, the mix of uses has been broadened and the site extended to improve the viability of the site and to improve the mix of development in order to improve sustainability. The need for public sector investment in order to bring forward the site, particularly the employment part, is clearly referenced in the Growth Deal. There</p>
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is therefore no shortfall in housing from this site. The delivery of 300 units on a strategic site, in a strong housing market area is not unduly onerous or challenging.

It is undoubtedly the case that the employment growth objectives of the Plan rely heavily on the two strategic sites, although there is additional provision in the Plan through other employments allocations and flexibility with the Principal Employment Areas. The Plan is in line with the Growth Deal where both sites form a key part of the economic strategy for the region. However, the housing objectives of the Plan are not solely reliant on the two strategic sites as the Plan makes a number of allocations, in addition to completions, commitments and allowances for small and large site windfalls. The Plan is also on track with the intended housing delivery in the first four years of the Plan. It is not considered that additional housing allocations are required in the Plan.

Slippage / delays / delivery

The Warren Hall allocation is for a strategic site in the form of a mixed use development. Further to the existing UDP allocation and outline planning permission, the LDP allocation has been extended slightly and the range of uses broadened to include a commercial hub alongside the hotel and to include 300 houses.

The site has outline planning permission for a business park and a hotel. Investment by Welsh Government in the improved grade separated interchange between the A55(T) and the A5119 has been completed. In the LDP the size of the site has been extended and the mix of land uses broadened to include a commercial hub associated with the hotel and 300 houses. It is not considered that the LDP allocation, in comparison with the UDP allocation and planning permission is 'complex and aspirational'. Rather, it is representative of the facilities that would be expected as part of a sustainable mixed use strategic site.

The existing consent is clearly relevant as it establishes the principle of development in this location and on this site. It is not

	<p>considered that the new mix of uses and extent of the site is so different as to warrant ignoring the sites planning history.</p> <p>The relevance of the sites importance to the regional growth agenda is also important. There is a clear commitment in the Growth Deal, through the North Wales Economic Ambition Board, to delivering the Warren Hall site and there is significant financial support to ensure the site can come forward.</p> <p>Several of the objectors take a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, that just building more homes alone cannot match.</p> <p>Sustainability:</p> <p>Welsh Government in PPW10 recognises the sustainability role that mixed use development can play. The site will comprise high quality employment development alongside 300 houses and a commercial hub with hotel, leisure and retail facilities. Residents will not be in an isolated development but will be part of a mixed use development. Furthermore, the site is located on the edge of Broughton which is a shopping and employment centre of sub-regional importance and which has a range of other facilities and services. The site is also close to Higher Kinnerton and Penyffordd / Penymynydd villages which also have a range of services and facilities. Although the site does not adjoin a settlement boundary or have a full range of facilities and services on site it sits in a sustainable location.</p> <p>The Masterplan which accompanied the Deposit Plan for Warren Hall identified the provision of an extensive green infrastructure network across the site to maximise opportunities to promote community cohesion within the site and to enable sustainable linkages with nearby settlements. It clearly shows a network of green infrastructure and walking / cycling routes through the site. The policy requires that the</p>
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development links in with the Active Travel scheme linking Mold, Buckley and Broughton, which is being developed by the Councils Transport Strategy unit. Consideration will be given to ensuring links between the site and the Active travel route and Higher Kinnerton. Bus services also operate along the A5104 adjacent to the site. It is acknowledged that the site is not an extension to an existing settlement but rather, it forms part of a strategic mixed use site in a highly sustainable location close to several settlements and major employment and shopping at Broughton.

Constraints:

Aeronautical - The masterplan shows the location of the housing, business park and commercial hub and these are not affected by the height constraints associated with the flight path. It is the higher north western part of the site which is most constrained and the Masterplan clearly shows this as being retained as open land. The aeronautical constraint does not prevent the site coming forward for development. Further work has now been undertaken in the form of an Instrument Flight Procedure Safeguarding assessment by Cyrrus on behalf of Welsh Government and discussions have taken place with Airbus. The outcome of this work is that development of two or more storeys in height will be acceptable on approximately 54.6ha or 71.2% of the overall site area. These results have been presented to Airbus who consider that further detailed design work at Warren Hall can proceed.

Agricultural land - The majority of the site is already allocated in the adopted UDP and has outline planning permission. Although this part of the site has BMV, the principle of development has previously been established. The housing element comprises grade 3b and this is based on an onsite survey and is clearly referenced on the Welsh Government Predictive Agricultural Land Classification Map.

Utilities infrastructure - The need for infrastructure improvements is acknowledged and this is reference in the Growth Deal in terms of the public funding being needed to

	<p>deliver this. The commitment to fund the necessary infrastructure is a clear demonstration of the importance of the site to the regional growth strategy.</p> <p>Trajectory - The Deposit LDP is accompanied by Background Paper 10 Housing Land Supply. The summary trajectory in table 3 (as supported by the detailed trajectory in appendix 3) indicates that 75 units will be delivered in years 6-10 (30 in 2023-24, 45 in 2024/25) and 225 will be delivered in years 11-15 (45 per year). In this strong market area a build rate of 45 units per annum is realistic and achievable.</p> <p>WG requirements - As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site.</p> <p>Reference is made as part of the policy wording on each site to 'green infrastructure'. It is not considered further reference is necessary.</p> <p>The Council accepts that para 5.33 is not consistent with the policy wording and should be amended to refer to B1 and B2, if the Inspector considered this appropriate.</p>
Minor Change proposed	No
Policy / page / Para / Map	STR4 Principles of Sustainable Development, Design and Placemaking P56 Deposit Plan written statement
Relevant Content of Plan	The policy provides strategic guidance and principles in respect of sustainable development, design and placemaking.
Representations	Total 12 representations 11 objections 1 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
404	1144556				Object	Yes
546	1232314				Object	No
593	1232541		1232537		Object	Not Stated
640	1224983		1224982		Object	Not Stated
740	1233619		1233580		Object	Not Stated
762	1144593				Object	Not Stated
854	1150807				Object	Not Stated
924	1235184		1234870		Object	Not Stated
1061	1229839				Object	Not Stated
1137	1149498				Support	Not Stated
1262	1149350		1232395		Object	Not Stated
1278	1232396		1232395		Object	Not Stated

Summary of representations	<p>The objections mostly related to concerns that the criteria within the policy were too onerous and placed unrealistic burdens on developers and should not be applied to all developments.</p> <p>One objection is to the HN1.8 Ash Lane, Hawarden site in terms of the local highway network, particularly around the school and Cross Tree Lane. Also raises contradictory advice regarding the number of access points.</p> <p>One objector seeks evidence of delivery rates for the period from 2000 to determine whether the housing needs from the UDP period were met in full or not.</p> <p>Other objections raise minor wording changes and concerns about the policy / explanation and these are addressed in the Council's response to individual objections.</p>
Changes sought	Seeks changes to policy wording / explanation
Summary of Council Response	<p>Planning Policy Wales (PPW) places great emphasis on 'sustainable placemaking design principles'. This is a strategic policy that seeks to achieve that aspiration by improving the overall quality of design for all new development in the County. It is therefore vitally important for this strategic policy and the more detailed policies associated with it, to form the basis of all planning decisions and set out how development can achieve positive</p>

	<p>sustainable, design and placemaking outcomes and minimise any adverse outcomes. All of the criteria are material planning considerations, some are more relevant than others depending on the type of development and this is why the policy wording uses the term 'should' not 'must'. Therefore the appropriate weight to be attached to each issue will be recognised and considered at the planning application stage.</p> <p>The Ash lane site allocation has been informed by a Transport Study and Highways Development Management Officers have no objection to the proposal. Clearly there are pressures around the school and Cross Tree Lane and the Council's Highways Strategy Team (Streetscene) are considering options for traffic management in the area. Scope exists as part of drawing up the detail of the development to address these issues. It must also be stressed that the site is in a sustainable location and within walking distance of two schools.</p> <p>It is accepted that delivery rates during the UDP Plan period did not keep up with what the Plan specified. This is largely down to the economic downturn and its impact on the housebuilding industry. The housing requirement figure for the UDP was calculated in the context of projections and circumstances at the turn of the century. Those circumstances and projections are completely different to those which informed the LDP housing requirement. The relevance of delivery rates between 2000 and 2006 (at a time when the UDP had not been adopted) is not considered relevant to the present debate.</p>
Minor Change proposed	No
Policy / page / Para / Map	STR5 Transport and Accessibility P60 Deposit Plan written statement
Relevant Content of Plan	The policy provides strategic guidance in respect of transport and accessibility in the County.
Representations	Total 8 representations: 6 objections 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
147	1230363				Object	No
292	1229111		1227685		Object	Yes
553	1149198		1148968		Object	Not Stated
807	1234408		1234407		Support	Not Stated
823	1234491		1234487		Support	Not Stated
1002	1235357				Object	Not Stated
1019	1235357				Object	Not Stated
1063	1229839				Object	Not Stated
Summary of representations			<p>One objection was to the HN1.8 Ash Lane housing allocation in terms the local highway network and contradictory advice regarding the number of access points.</p> <p>An objection seeks reference to the Chester Western Relief Road and another objector seeks reference in criteria to iv) to highways matters outside of Flintshire.</p> <p>An objection suggested that the full extent of the Red Route (which extends beyond the County boundary) should be shown and that para 5.41 is reworded to better reflect cross border issues.</p> <p>NRW seek reference to green infrastructure, Active Travel and Dark Skies</p> <p>One objection sought reference in the policy to the provision of road side facilities (this objector is seeking the allocation of a large mixed use development at Kelsterton).</p>			
Changes sought			Seeks amendments to policy wording and explanation.			
Summary of Council Response			<p>The Ash Lane allocation is informed by a Transport Study and there is no objection from the Council's Highways Development Management officers. A response to the other representations on site HWN005 relating to highways matters is made separately.</p> <p>Nothing in Policy STR5 conflicts with the Chester Western Relief Road proposal which</p>			

is part of Chester's transport strategy. Reference is included in the supporting explanation to maximizing the benefits of regional transport infrastructure investment (para 5.38) and to cross border working with CWAC and others to deliver improved vehicular access to Chester and Broughton (para.5.41) – this project is still on-going. It is not considered appropriate to include reference to the Strategic Road or sub regional network under Policy STR5 as the County as Highway Authority has very limited responsibility for delivery of schemes on these networks. PPW (para. 5.3.29 references Trunk Roads and Motorways as the Strategic Network. The Explanation to Policy STR5 does reference sub regional and regional initiatives (para. 5.3.6). The policy is also supported by a detailed policy PC5.

It is considered appropriate that the LDP shows protected routes within the LDP area only, though the Council acknowledges that the red route extends beyond the Flintshire County border.

Reference is already included in Policy STR5 to Green Infrastructure networks and the thrust of Active Travel is included in bullet point (vi) and in the explanation to policy EN2 which mentions the production of green infrastructure SPG. No further wording is necessary in STR5. The Plan has a detailed policy (EN5) regarding the AONB and policy EN18 addresses light pollution in the policy wording and reference Dark Skies initiative in the explanatory wording. The Plan needs to be read as a whole.

While the policy does not specifically reference new roadside facilities it does reference 'new development and transport infrastructure' and incorporates criteria against which proposals can be assessed. The Council is also aware of the Welsh Government's aim (para. 5.3.19 of PPW Edition 10) for there to be an increase in freight movement by rail and water rather than by road. Any proposals for roadside facilities can be considered on their merits

	against the Plans framework of policies and national planning guidance. The site promoted by the objector is commented on by the Council in response to other objections.
Minor Change proposed	No
Policy / page / Para / Map	STR6 Services, Facilities and Infrastructure P65 Deposit Plan written statement
Relevant Content of Plan	The policy sets out the types pf infrastructure that will sought in order to mitigate the impacts of new development.
Representations	Total 16 representations: 14 objection 1 support 1 not specified

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
145	1230363				Object	Yes
146	1230363				Object	No
191	1230881				Object	Not Stated
347	1231188				Object	No
413	1144556				Object	Yes
641	1224983		1224982		Object	Not Stated
679	1146891				Support	Not Stated
770	1144593				Object	Not Stated
855	1150807				Object	Not Stated
936	1235344		1149800			Not Stated
953	1149828		1149800		Object	Not Stated
968	1235343		1149800		Object	Not Stated
986	1149823		1149800		Object	Not Stated
1008	1235341		1149800		Object	Not Stated
1133	1234608				Object	Yes
1153	1234431				Object	Yes

Summary of representations	<p>Two objections relate to the HN1.8 Ash Lane housing allocation in terms of access to health facilities school capacity and the scale of the development.</p> <p>Mostly, representations argue that the policy needs to contain more detail as to how obligations are calculated and that it raises concerns about the viability of the Plans strategic sites and housing allocations.</p>
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	<p>Several objections seek to establish a link between the policy and Place Plans.</p> <p>One objection seeks the deletion of reference to public art.</p> <p>Two objections suggest developers providing towards the establishment of a pot of money to be accessible to bids from the community.</p> <p>One objection considers the Council is not ambitious enough in terms of a wide variety of matter, projects and funding.</p>
Changes sought	Amendments to policy wording
Summary of Council Response	<p>Policy STR6 sets out the types of infrastructure and other developer obligations that can be sought in order to mitigate the impacts of development. Criteria iii) specifies health 'facilities' as the LDP and planning system cannot be required to contribute funding to revenue schemes such as the employment of GP's and other medical staff. This is the remit and responsibility of the Health Board. There is no objection to the Plan or this allocation from the Health Board. There is no objection from the Education Authority to the LDP or to this allocation. The Education Authority is assessing how additional school capacity can be established. It must be stressed that this allocation is not scheduled to deliver housing completions until 2023/24 so there is sufficient time to address this.</p> <p>STR6 sets out the framework for developer contributions and makes it clear that not all the list of infrastructure will be required by all developments. Alongside the LDP an Infrastructure Plan (IP) has been produced which sets out all the Infrastructure requirements for each strategic and allocated sites. The IP is a 'live' document and will be updated as more detailed information comes forward.</p> <p>Place Plans will be considered as a material planning consideration on planning applications although it does not have the status of formal SPG. Planning Policy Wales edition 10 is clear that Place Plans should "<i>support the delivery of LDP policies</i>" which</p>

implies that the Village Plan should align with the LDP. The draft LDP Manual edition 3 also states that “*Place Plans should be in conformity with the development plan*” and also that “*they cannot duplicate or introduce new policy, nor can they de-allocate sites identified in the adopted development plan. Place Plans are not part of the statutory development plan; instead they add detail to the adopted plan*”. Place plans can be adopted as Supplementary Planning Guidance once the LDP has been adopted and only if the Place Plan (PP) adheres to the policies in the LDP. Although PP will be material considerations when drawing up LDP’s it is important to note that PP’s need to reflect the LDP so they cannot be adopted as SPG until the LDP is adopted.

The Council considers it reasonable to seek public art on certain types and scales of development.

Where a development would impact upon a community the developer will need to enter into a S106 legal agreement with the Local Authority to provide funds/works to mitigate against the impact of the development. This money can only be spent in accordance with the S106, for example if it is collect for affordable housing purposes it can only be spent on the provision of new affordable housing within that local area, it could not be used to fund other things. Once the LDP is adopted the Local Authority will explore the viability of producing a CIL for Flintshire. It has not been possible to do this while preparing the LDP due to time and resource issues. Until a CIL is formally adopted the Council will continue to use traditional S106 agreements to mitigate against the impact of development on communities.

The role of the LDP is to provide a framework of land use policies and it is not a guide or statement of intent regarding the matters sought by the objector. Each of the objectors points is commented on in the Councils separate response on this objection.

Minor Change proposed	No
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Appendix 21d Main Issues Schedule Dev Man Policies – Supporting a Prosperous Economy

Strategic Policies – Supporting a Prosperous Economy

Policy / page / Para / Map		Strategic Policies – Supporting a Prosperous Economy - General				
Relevant Content of Plan		n/a				
Representations		Total 1 representation - objection				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
998	1235357				Object	Not Stated
Summary of representations		Objection submitted under the label of ‘Strategic Policies – Supporting a Prosperous Economy’ seeking clarification over the Plans provision for employment land and jobs growth given economic forecasts and the relationship between strategic sites and other employment site.				
Changes sought		Not specified				
Summary of Council Response		Policy STR1 Strategic Growth sets out the broad quantum of development that the Plan provides for. Policy PE1 General Employment Land Allocations shows the breakdown of employment land allocated between the strategic sites and the range of other employment allocations. It is unclear why the objector considers the two policies might be inconsistent.				
Minor Change proposed		No				
Policy / page / Para / Map		STR7 Economic Development, Enterprise, and Employment P72 Deposit Plan written statement				
Relevant Content of Plan		The policy identifies the Plans strategic approach to economic development, enterprise and employment.				
Representations		Total 8 representations: 5 objections 3 support				

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
688	1233345		1233325		Object	Not Stated
806	1234408		1234407		Support	Not Stated
826	1234493		1234487		Support	Not Stated
886	1148889		1234839		Support	Not Stated
911	1148344				Object	Not Stated
917	1141895		1234985		Object	Not Stated
937	1235344		1149800		Object	Yes
1164	1149498				Object	Not Stated

Summary of representations	<p>Welsh Government seek a policy / strategy in respect of telecommunications.</p> <p>Several objections raise concerns about the focus on two strategic sites which have not demonstrated deliverability and also raise a mismatch between the jobs target and employment land.</p> <p>Other objections seek the inclusion of reference to minerals and energy development in the policy.</p> <p>One objection promotes a strategic mixed use site to the north of Shotwick Road.</p>
Changes sought	Seeks policy on telecommunications.
Summary of Council Response	<p>The Council notes the need for a policy on telecommunications and has suggested a policy and explanatory wording for consideration by the Inspector.</p> <p>The policy notes that the strategic sites will provide employment however the policy also states that general employment sites that are part of the LDP will provide employment along with additional flexibility provided by numerous PEAs. The Council has engaged extensively with landowners to ensure that the sites allocated are deliverable and can realistically be brought forward for development over the plan period.</p> <p>It is accepted that the Northern Gateway site has been slow to get off the ground. However, significant investment in flood defence and transport infrastructure has been undertaken by Welsh Government and reserved matters approval given to one phase of housing and a large storage and distribution warehouse on the northern part of the site and one phase of housing on the southern part. Developer interest is being expressed in other phases of the development. This more positive outlook and the confidence that commencement of development on site has created, confirms the Council's assertion that</p>

	<p>the site can be predominantly delivered during the Plan period. With regards to Warren Hall, the site has outline planning permission for a business park and a hotel. The relevance of the sites importance to the regional growth agenda is also important. There is a clear commitment in the Growth Deal, through the North Wales Economic Ambition Board, to delivering the Warren Hall site.</p> <p>The objector has not explained what is meant by a mismatch between the jobs target and the amount of employment land identified, and the Council are satisfied that from the combination of strategic sites, and the wider employment portfolio, there is more than sufficient context to facilitate the job growth aimed for by the Plan. The site promoted by the objector is commented on in separate responses.</p> <p>The Council considers that the plan has to be read as a whole and clearly recognises the importance of minerals and energy as demonstrated by STR16 and STR14 and the accompanying detailed policies. It is not considered necessary or appropriate for minerals and energy to be specifically referenced in policy STR7.</p> <p>The LDP has allocated sufficient land for development to meet identified needs during the Plan Period and additional allocations are not required. It is considered that the Northern Gateway is a well-established site along with the Warren Hall strategic site which is deliverable and other employment areas allocations as well as flexibility provided by numerous Principal Employment Areas. The focus of the Plan is on delivering growth through the development of the two strategic sites as these form a key part of the Growth Deal.</p> <p>The promoted site is located between Deeside Industrial Park and the Flintshire / Cheshire County boundary and it is currently designated as green barrier land which has been reviewed and been found to comply with the purposes of a green barrier as defined in PPW. Development would also result in the loss of a large swathe of grade 2 BMV agricultural land. The submission proposes development on the back of the Welsh Government red route road scheme but there is no evidence yet that this will be delivered within the Plan period. The site is also sited with zone C1 flood risk on NRW's Development Advice Maps and it is not clear how the objector considers that a mixed use development (including residential) can meet the justification tests</p>
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	in TAN15 given that the site is greenfield land. It is considered that the proposal for the inclusion of the site next to the red route located at land North of Shotwick Road, Deeside Industrial Estate is not necessary or appropriate.					
Minor Change proposed	No					
Policy / page / Para / Map	STR8 Employment Land Provision P76 Deposit Plan written statement					
Relevant Content of Plan	The policy sets out how the Plan provides for employment land in terms of commitments, allocations, safeguarding of existing employment and flexible policies elsewhere in the County.					
Representations	Total 5 representations: 4 objections 1 support					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
827	1234495		1234487		Support	Not Stated
888	1148889		1234839		Object	Not Stated
938	1235344		1149800		Object	Not Stated
999	1235357				Object	Not Stated
1170	1232503		1233580		Object	Not Stated
Summary of representations	<p>One objection considers that there is a need for additional employment sites around the County which would need to be supported by additional housing sites. A site is promoted at Northop. Another objector considers there seems to be a significant oversupply of employment land, but the explanation suggests this is required for regional growth (rather than specific to Flintshire). Seeks clarification whether this is referring to the North Wales regional growth, or does it include cross boundary Mersey Dee Alliance and the Cheshire West and Chester area?</p> <p>One objection considers STR8 is unclear in relation to STR3 Northern Gateway in terms of the mix of uses. Seeks greater flexibility in the range of uses allowed at Northern Gateway</p> <p>One objection sought greater flexibility to allow existing employment development to expand onto land outside a settlement boundary. A site on the edge of Chester is promoted by the objector.</p>					
Changes sought	Seeks policy amendments and additional allocations					

Summary of Council Response	<p>It is considered that sufficient employment land has been allocated within the County to identify the growth needs over the plan period in accordance with the recommendation contained within the ELR and in terms of contributing to the wider growth ambitions of the region. The Employment Land Review 2015 has analysed employment land and premises demand, supply and need to 2030. ELR's should be updated every five years and therefore the current ELR is in date. The ELR has been supplemented by further work from the same specialist consultants, namely the Flintshire Further Employment Growth Scenarios Oct 2015 and the Employment and Housing Advice April 2019. The Plan contains two strategic sites, the employment allocations in PE1 and additional flexibility provided by the Principal Employment Areas in PE2 and a flexible policy approach. This should provide for sufficient choice of location, type and size of site to meet the needs of commercial operators. It is not considered additional employment allocations / housing allocations are required. The site being promoted by the objector is commented on in the Council's detailed response.</p> <p>Northern Gateway is specifically addressed by policy STR3A and is also mentioned in PE1 which lists employment allocations and HN1 which lists housing allocations. Policy STR8 is intended to provide broad strategic guidance on the provision of employment land and is not intended to be site specific. When read as a whole, the Plan is considered to provide appropriate reference to and explanation of the importance of the Northern Gateway site without the need for it to be referenced in policy STR8. The specific guidance in STR3A provides for an appropriate mix of development at Northern Gateway and it is not considered necessary for either STR8 to provide further clarification on other uses within employment sites as this is set out in policy PE6.</p> <p>Policy STR8 seeks to provide general strategic advice on the provision of employment and is not intended to cover all eventualities as it is supported by a suite of more detailed Development Management Policies. Policy PE5 provides guidance on the expansion of existing employment enterprises and policy PE3 permits employment development outside settlement boundaries subject to satisfying certain criteria. Clearly, the Plan needs to be read as a whole and it is evident that there is policy to provision to consider the expansion needs of existing businesses. The suggested site on the edge of Chester is commented on in other site specific representations.</p>
Minor Change proposed	No

Policy / page / Para / Map		STR9 Retail Centres and Development P79 Deposit Plan written statement				
Relevant Content of Plan		The policy sets out the use of a retail hierarchy in planning for new retail development, based on the town centres first principles in national guidance.				
Representations		Total 3 representations: 2 objections 1 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
297	1229111		1227685		Object	Yes
796	1234331		1234330		Object	Not Stated
1022	1235357				Support	Not Stated
Summary of representations		<p>The policy must be more specific and determined in being committed to master plans and action plans and using planning mechanisms such as its compulsory purchase powers to assemble land which have vacant or underused buildings to bring in a range of compatible new uses to the centres and the fringes recognising that it might not be just about retail.</p> <p>Objection to the lack of retail allocations with which to meet the need identified in the Retail Study. The level of need is greater than that identified in the Retail Study as the Saltney planning permission has expired.</p> <p>The Retail Study clearly references in para 6.6 (first bullet point) a monitoring and review process including the 'implementation of existing retail commitments' and recognises that 'non-implementation of commitments or the expiry of existing planning permissions will release additional capacity'. The implications of the expiry of the Saltney Retail Park planning permission will increase the overall Plan period requirement from 508sqm (new sales) to 4028sqm (net sales). The UDP made six retail / commercial allocations and only one of these has been implemented. This demonstrates the difficulty in allocating relatively small sites across a large number of centres, which could serve to prevent other sites coming forward. Given the number of centres it is still the Council's belief, even with an increased comparison floorspace need, that a flexible approach which allows the market to bring forward sites or sites to be identified through regeneration activities, is appropriate for the County.</p>				
Changes sought		Seeks allocations and amendments to policy.				

Summary of Council Response	Policy STR9 is a strategic policy which is signposted to other more detailed Development management Policies. It sets out a strategy of seeking to support town, district and local centres through an appropriate set of planning policies. The third para of the policy wording specifically references health checks, masterplans and action plans. These initiatives can be pursued by the Councils Economic Development Team within the policy framework set by the LDP and it is not considered necessary or appropriate for the LDP to try to set out the detailed strategy and programme for each town centre as this will change over time. The Council has given consideration to the use of CPO powers to buy up land and buildings in order to facilitate town centre regeneration projects. It remains a course of action that could be utilized subject to availability of finance. It would be inappropriate for the Plan to commit the Council to such actions, as they are more appropriately considered outside of the Plan making process.																																															
Minor Change proposed	No																																															
Policy / page / Para / Map	STR10 Tourism, Culture, and Leisure P83 Deposit Plan written statement																																															
Relevant Content of Plan	The policy sets out strategic principles in respect of tourism, cultural and leisure development.																																															
Representations	Total 5 representations: 2 objections 3 support																																															
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>12</td><td>1228815</td><td></td><td></td><td></td><td>Support</td><td>Not Stated</td></tr><tr><td>349</td><td>1231204</td><td></td><td></td><td></td><td>Support</td><td>No</td></tr><tr><td>802</td><td>1234331</td><td></td><td>1234330</td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>830</td><td>1234497</td><td></td><td>1234487</td><td></td><td>Support</td><td>Not Stated</td></tr><tr><td>1065</td><td>1229839</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	12	1228815				Support	Not Stated	349	1231204				Support	No	802	1234331		1234330		Object	Not Stated	830	1234497		1234487		Support	Not Stated	1065	1229839				Object	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance																																										
12	1228815				Support	Not Stated																																										
349	1231204				Support	No																																										
802	1234331		1234330		Object	Not Stated																																										
830	1234497		1234487		Support	Not Stated																																										
1065	1229839				Object	Not Stated																																										
Summary of representations	One objection seeks rewording of criteria i) to read 'supporting new and extended tourism, culture and leisure development which is appropriate to its location...'. NRW consider that with regards to promoting accessibility to Flintshire's landscape we advise recognition that this must be done in tandem with sensitive management (noted in 6.28 but could be in STR10).																																															
Changes sought																																																

Summary of Council Response	<p>The Council have no objection to the suggested rewording of criterion 1).</p> <p>The Plan is meant to be read as a whole as policies interlink, the Council considers that the current wording of Policy STR10 (and associated policies) is sufficient. The proposed additional information is noted in 6.28 and within part (iv) which reads: <i>‘Conserving and enhancing Flintshire’s natural, built and cultural heritage;’</i></p>
Minor Change proposed	Suggested rewording of criteria i) to read ‘supporting new and extended tourism, culture and leisure development which is appropriate to its location...’.

Appendix 21e Main Issues Dev Man Policies – Meeting Housing Needs Strategic Policies – Meeting Housing Needs

Policy / page / Para / Map	Strategic Policies – Meeting Housing Needs - General																			
Relevant Content of Plan	n/a																			
Representations	Total representation 1 – objection																			
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>282</td><td>1230721</td><td></td><td></td><td></td><td></td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	282	1230721					Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance														
282	1230721					Not Stated														
Summary of representations	Objection submitted under the label of ‘Strategic Policies – Meeting Housing Needs’ which seeks the deletion of the HN1.6 allocation in Mold. Concern expressed about the commentary in Background Paper 8 regarding the assessment of candidate sites in Mold and considers that there are better sites available than the allocated site.																			
Changes sought	Deletion of HN1.6																			
Summary of Council Response	The Council responds in detail to the individual representation but considers that the process of identifying the allocated site in Mold is soundly based and evidence.																			
Minor Change proposed	No																			

Policy / page / Para / Map	STR11 Provision of Sustainable Housing Sites P89 Deposit Plan written statement
Relevant Content of Plan	The policy provides strategic guidance on the provision of new housing in the County and is accompanied by the Housing Balance Sheet which sets out how the Plans

		housing requirement figure is to be met through housing supply.				
Representations		Total 30 representations: 24 objections 5 support 1 not specified				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
25	1229483				Object	Not Stated
40	1229995				Object	No
159	1230731		1148845		Object	Not Stated
249	1230721				Object	Yes
250	1230721				Object	Yes
327	1231134		1231130		Object	Yes
360	1229111		1227685		Object	Yes
362	1231173				Object	Not Stated
405	1144556				Object	Yes
406	1144556				Object	Yes
412	1144556				Support	Not Stated
426	1230991		1230989		Support	Not Stated
584	1230731		1148845		Object	Not Stated
591	1230730		1148845		Object	Not Stated
594	1232541		1232537		Object	Not Stated
629	1233028		1232939		Object	Yes
642	1224983		1224982		Object	Not Stated
670	1233248		1149190		Object	Not Stated
705	1233444		1233212		Support	Not Stated
743	1233633					Not Stated
759	1233900		1233580		Support	Yes
763	1144593				Object	Not Stated
795	1148956		1148947		Object	Not Stated
925	1235188		1234870		Object	Yes
954	1149828		1149800		Object	Not Stated
969	1235343		1149800		Object	Not Stated
979	1235470				Object	Not Stated
987	1149823		1149800		Object	Not Stated
1009	1235341		1149800		Object	Not Stated
1177	1232503		1233580		Support	Not Stated
Summary of representations		Two representations considered the Plan's housing requirement figure was too high based on Welsh Government population and housing projections and the draft NDF and that this has led to the allocation of unnecessary and unsuitable greenfield sites as HN1.6 in Mold. The remainder of the objections all take a different view, seeking a higher overall requirement figure for housing and additional supply even though it is policy STR1 that sets out the plan's housing requirement figure.				

	<p>One objector has concerns about the lack of flexibility in the settlement hierarchy and lack of housing allocations in the western part of the County and in Tier 3 and 4 settlements. Seeks allocation of land on the edge of Trelawnyd</p> <p>Several objections seek changes to the policy in the event that TAN1 is revoked in full and that greater attention be placed on monitoring arrangements including the identification of contingency sites in the Plan, even though there is no such provision in national guidance.</p> <p>Several objections have concerns about the overreliance on windfall sites and also commitments and that the shortfall from these two sources of supply should be added to the Plans overall requirement. One objector considers the commitments figure should be discounted by 50% and that almost every allocation fails to meet the criteria in the policy</p> <p>One objector raises concerns about the deliverability of Northern Gateway and that the projected annual completion rates on allocated sites are too high, resulting in sites not being delivered in full. Also raises concerns about the windfall trajectory which should not count until 20/21. The 14% flexibility does not therefore exist in practice, necessitating additional allocations.</p> <p>One representation seeks the inclusion of a policy or proposal to meet the needs of an ageing population (and proposes a site on the western edge of Flint).</p> <p>Several objections consider that the criteria within the policy are unreasonable as they do not all apply to every housing development.</p>
Changes sought	Seeks revised spatial distribution of growth. Seeks policy amendments and allocations in particular settlements.
Summary of Council Response	<p>PPW10 states that the latest Welsh Government Local Authority level household projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) form a fundamental part of the evidence base for development plans. These two pieces of evidence have formed the starting point for calculating the housing targets within the LDP, further considerations need to be taken into account including the appropriateness of the projections for the individual local authority area and any other relevant evidence.</p> <p>Population and Household projections are based upon past trends. Therefore the global economic crisis in 2008 has resulted in lower household projections as new</p>

	<p>households have not been able to afford to move out of their family home etc.</p> <p>In April 2014 Welsh Government wrote to all Local Authorities in Wales advising caution when projecting forward low household projections as this would not deliver the growth needed to meet current and future housing needs. In this letter Welsh Government emphasised the importance of not relying solely on Welsh Government projections, highlighting the need to consider all sources of data. The LDP is focused on promoting and enhancing Flintshire's role as an economic hub and is a driver for growth both locally and regionally. Therefore the strategy of the LDP is focused on supporting economic growth and the need to secure continued economic recovery and resilience.</p> <p>This ambitious approach to economic growth and the housing needs identified by the evidence base has directly informed the growth option chosen for the LDP. Welsh Government have not raised any objections to the growth level within the plan.</p> <p>In January 2020 Welsh Government published a series of explanatory notes on the NDF, including a note on housing need. This states that "The national and regional estimates do not reflect the impact of future policies or events and are not a Housing Requirement for Wales or the Regions. However, the estimates do provide part of the evidence and context on which Housing Requirements can be based. While it is expected that there will be a clear alignment between the estimates of housing need and the Housing Requirements set out in LDPs and SDPs, they are not the same and therefore are not expected to match"</p> <p>As stated above the Council need to consider a wider evidence base to determine the housing requirement within the LDP, and it would be contrary to Welsh Government advice to simply revise the LDPs housing requirement in line with the NDF and projections data. That said in their formal comments on the plan Welsh Government state they have no comments regarding the level of homes and jobs proposed and also consider the LDP to be in broad conformity with the NDF.</p> <p>The Plans settlement hierarchy and spatial distribution of development is based on the sustainability of settlements and broader issues relating to the growth zone in the north eastern part of the County. Allocations are not the only means of delivering growth in settlements as this can be achieved through commitments and small / large</p>
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windfall proposals as well as small scale exceptions schemes. The Council does not consider the site on the edge of Trelawnyd is appropriate and has responded separately on this particular objection.

The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. It is accepted amendments will be required to the policy and Plan in the light of the revocation of TAN1.

The Council does not accept that too much reliance is placed on the contribution of large and small windfall sites in the LDP housing land supply. Background Paper 10 (section 2.5) explains that an analysis of past trends has been carried out and this is detailed in Section 4.3 of the Flintshire Urban Capacity Study (June 2019) undertaken by Arcadis. This approach accords with the latest National guidance as contained in Development Plans Manual Edition 3: Consultation Draft (June 2019). The Draft Manual advises (para. 5.63) that 'an urban capacity study can inform the identification of site allocations and assist to demonstrate delivery of windfall allowance in the Plan'.

Both the Arcadis Study and BP10 explain that large and small windfall site contributions used in the Plan are significantly lower than the level of past completions achieved from these sources. The commitments have been subject to review throughout the Plan process and the Council has not sought to include long standing sites which haven't delivered.. Each site that objectors question are commented on the detailed responses to objections No evidence has been provided to justify a 50% reduction of the commitments figure. It is also the case that the representative body of the development industry, the HBF, agree that the allowances, as well as commitments, are appropriate.

Work has now commenced on the Northern Gateway site which comprises a number of phases and developers, including a social housing provider. The delivery

	<p>assumptions used take account of information provided by landowners and developers.</p> <p>On the issue of windfall allowances, it is considered fully justified to incorporate the small sites allowance, (which averages 60 units per annum) in the housing supply trajectory from 2018/19, as these are units which are not included elsewhere in the supply. It can be seen from the trajectory that the allowance of 60 pa is significantly lower than recent completion rates on small sites, of 87, 102, and 104 units per annum for 2015/16, 2016/17 and 2017/18 respectively.</p> <p>With regard to the large sites windfall allowance, this is not applied from 2018/19 in the trajectory. As referenced in para. 2.5.6 of LDP10 it is acknowledged that ‘in practice it is likely that the contribution from large windfall sites will be less in the very early years as they will be sites which did not have planning permission at 1.4.18’. For this reason the trajectory does not include any large windfall units in 2018/19 and reduces the contribution in years 2019/20 and 2020/21 to 20 and 40 units respectively. It should also be noted that sites granted planning permission subject to the signing of a section 106 agreement are not included in the main supply and would therefore be likely to contribute to the windfall supply in these early years (as explained in para 2.4.2 of LDP 10.</p> <p>All allocations have been assessed in terms of deliverability within the plan period. The allocations at Warren Hall, Ewloe, Hawarden and Mold are in strong market areas, with house builders already in place to develop the Hawarden and Mold sites, and discussions taking place between the Ewloe site promoter and another house builder. The Warren Hall site forms a key part of the regional growth bid and has attracted interest from a number of developers. The Council are satisfied that there is significant developer interest in all of the allocations, and that 45dpa is fully achievable on all of the mentioned sites. Additional flexibility within the rural areas is therefore not needed.</p> <p>The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate</p>
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	<p>flexibility/contingency to ensure a sufficient housing supply.</p> <p>Even if the Council were to accept the objector's stance, which it does not, it would not be logical or sustainable to look for more housing in predominantly rural lower tier settlements, in preference to higher tier service centres.</p> <p>Policy HN2 and its explanation recognises the need for housing for the elderly. Proposals are capable of being considered against the Plans framework of policies. The Council does not consider the site promoted on the edge of Flint is appropriate as detailed in the Council's response on this objection.</p> <p>The aim of policy STR11 is to ensure the sustainable delivery of housing sites across Flintshire. The suggested rewording would dilute the impact of this policy and limit the sustainability of new residential schemes. It is essential that this sentence remains to ensure applications meet these key sustainability criteria, which will result in the efficient development of land for housing purposes. This strategic policy seeks to set the scene in terms of some key planning principles in respect of ensuring sustainable housing sites. In the Council's detailed response on this objection each criteria is commented on as to its appropriateness. It is unclear why developers would not embrace such well established principles of sustainable development.</p>														
Minor Change proposed	No														
Policy / page / Para / Map	STR12 Provision for Gypsies and Travellers P95 Deposit Plan written statement														
Relevant Content of Plan	The policy sets out the Plans strategic position in terms of meeting the needs of Gypsy and Travellers in the County.														
Representations	Total 1 representation – objection														
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>27</td><td>1229483</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr></table>		Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	27	1229483				Object	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance									
27	1229483				Object	Not Stated									
Summary of representations	By proposing an increase in pitches for travellers the Council will be failing to deliver on its objective to 'Ensure														

	communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly'. Fail to consider the impact on the local community such as. Ewloe Green school.
Changes sought	Not specified
Summary of Council Response	Welsh Government has placed a statutory duty through the Housing (Wales) Act 2014 on local authorities to make provision for sites for Gypsies and Travellers where a needs assessment identifies need. Further guidance is set out in PPW10. In preparing a development plan it is necessary to consider the housing needs of all members of society and this includes the needs of Gypsies and Travellers.
Minor Change proposed	No

Appendix 21f Main Issues Dev Man Policies - Valuing the Environment Deposit Consultation Publications

Strategic Policies – Valuing the Environment

Policy / page / Para / Map		Strategic Policies – Valuing the Environment - General				
Relevant Content of Plan		n/a				
Representations		Total 2 representations: 1 objection 1 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
624	1230050					Not Stated
912	1148344					Not Stated
Summary of representations		Seeks relocation of policy STR16 to section 6 supporting a prosperous economy				
Changes sought		Seeks relocation of policy				
Summary of Council Response		The 16 strategic policies need to be read together and in conjunction with the detailed development management policies. The economic role of the minerals industry is recognised by the Plan but it does not occur in 'employment areas' and is typically located in open countryside where minerals exist and often these are in sensitive areas in terms of landscape and ecology. The				

	policy is properly included within the 'environment' section.
Minor Change proposed	No
Policy / page / Para / Map	STR13 Natural and Built Environment, Green Networks and Infrastructure P101 Deposit Plan written statement
Relevant Content of Plan	The policy sets out strategic principles in respect of the natural and built environment and green infrastructure.
Representations	Total 16 representations: 11 objections 5 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
13	1228815				Support	Not Stated
66	1230290				Support	No
213	1230905				Support	Not Stated
408	1144556				Object	Yes
418	1231156				Support	Not Stated
682	1233248		1149190		Object	Not Stated
760	1233946		1232502		Support	Not Stated
773	1144593				Object	Not Stated
835	1234501		1234487		Object	Not Stated
940	1235344		1149800		Object	Not Stated
955	1149828		1149800		Object	Not Stated
970	1235343		1149800		Object	Not Stated
988	1149823		1149800		Object	Not Stated
1010	1235341		1149800		Object	Not Stated
1048	1229839				Object	Not Stated
1066	1229839				Object	Not Stated

Summary of representations	<p>One objection considers the policy wording to be unreasonable as not all developments can be expected to meet every criteria. Another objection considers the policy is more onerous than PPW and not consistent and is not reasonable.</p> <p>Several objections from one agent seek reference within the policy to the protection of Best and Most Versatile agricultural land.</p> <p>NRW seek a minor policy wording change to include reference to geodiversity.</p> <p>One objector seeks a green barrier along the western edge of Higher Kinnerton, whilst another seeks the</p>
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	removal of land at Llys Ben, Northop Hall from the green barrier (to facilitate housing development).																																																						
Changes sought	Seeks amendments to policy																																																						
Summary of Council Response	<p>This is a strategic policy that sets out high level principles which seek to protect and enhancing the County’s environmental and historic assets. An aspiration that is set out in national planning policy and one which the Council fully advocates and supports as is reflected in the policy wording of the accompanying detailed policies such as EN1. Not all development will affect all the criteria listed on this policy but it is important to highlight all the issues to ensure that all developments have considered them.</p> <p>Welsh Government advice is very clear on this issue and states that PPW policies should not be repeated in LDP’s. LDP Manual Edition 3 states in paragraph 3.11 “ A LDP should be focussed, succinct and relevant to the key issues it is seeking to address. It should not repeat national policy.”</p> <p>The two objections which reference site specific green barrier changes are responded to in the Councils separate responses.</p>																																																						
Minor Change proposed	No																																																						
Policy / page / Para / Map	STR14 Climate Change and Environmental Protection P105 Deposit Plan written statement																																																						
Relevant Content of Plan	The policy sets out broad principles in respect of climate change and environmental protection.																																																						
Representations	Total 6 representations: 3 objections 3 support																																																						
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr><tr><td>419</td><td>1231156</td><td></td><td></td><td></td><td>Support</td><td>Not Stated</td></tr><tr><td>644</td><td>1224983</td><td></td><td>1224982</td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>680</td><td>1146891</td><td></td><td></td><td></td><td>Support</td><td>Not Stated</td></tr><tr><td>690</td><td>1233350</td><td></td><td>1233325</td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>856</td><td>1150807</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>1067</td><td>1229839</td><td></td><td></td><td></td><td>Support</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance	419	1231156				Support	Not Stated	644	1224983		1224982		Object	Not Stated	680	1146891				Support	Not Stated	690	1233350		1233325		Object	Not Stated	856	1150807				Object	Not Stated	1067	1229839				Support	Not Stated
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856	1150807				Object	Not Stated																																																	
1067	1229839				Support	Not Stated																																																	
Summary of representations	One objection required the Council to consider whether the policy is necessary and justified. Consideration should																																																						

	<p>be given to amending criteria iii), v) and vii) to provide clear guidance to developers.</p> <p>Another objection was to the lack of reference in the Plan to the Mold Flood Alleviation Scheme (except for HN1.6 allocation) and that the policy was not strong enough in terms energy efficiency and renewable energy generation as part of new development. Does not consider the policy is firm enough.</p> <p>The remaining objection seeks additional wording 'Supporting the development of infrastructure necessary for the transition to a low carbon Wales, on suitable sites, such as those designated under Policy ENxx.'</p>																			
Changes sought	Seek revisions to policy wording																			
Summary of Council Response	<p>The policy is considered to be reasonable appropriate in terms of focus in PPW on climate change and sustainable development. The Council's separate response has commented on the three criteria.</p> <p>The Mold Flood Alleviation Scheme has planning permission but will not be delivered in its present form and is being reconsidered. It is therefore not referenced in the Plan. The HN1.6 needs to be designed in such a way that it can work in conjunction with any future revised scheme. In terms of the energy efficiency and generation, this strategic policy needs to be read alongside policy EN12 and the present / future Building Regulations which also address energy matters.</p> <p>Policy EN13 Renewable Energy and Low Carbon Energy Development permits proposals for renewable and low energy carbon subject to certain criteria. The Council have carried out a Renewable Energy Assessment which has identified the Indicative Local Search Areas in order to focus this type of development in the most appropriate locations. It is considered unnecessary therefore to have an addition policy setting out allocations for energy storage infrastructure.</p>																			
Minor Change proposed	No																			
Policy / page / Para / Map	STR15 Waste Management P109 Deposit Plan written statement																			
Relevant Content of Plan	The policy sets out how the Plan will work towards the sustainable management of waste in the County.																			
Representations	Total 1 representation – objection																			
	<table border="1"> <thead> <tr> <th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing attendance</th></tr> </thead> <tbody> <tr> <td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>						Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance							
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance														

836	1234510		1234487		Object	Not Stated
Summary of representations		Objection seeks reference to sensitive receptors such as other users of land and holiday accommodation in policy wording. The objection also seeks a similar change to policy STR16 Mlnerals				
Changes sought						
Summary of Council Response		The Council considers that the two strategic policies, when read in conjunction with linked minerals and waste development plan policies, and detailed policies such as PC2, EN18 and EN27 provide sufficient safeguards in respect of amenity.				
Minor Change proposed		No				
Policy / page / Para / Map		STR16 Strategic Planning for Minerals P111 Deposit Plan written statement				
Relevant Content of Plan		The policy provides strategic advice on how minerals will be sustainably managed in the County.				
Representations		Total 4 representations: 2 objections 1 support 1 not specified				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
181	1230851				Support	Not Stated
299	1231033				Object	Not Stated
908	1148344					Not Stated
1029	1235357				Object	Not Stated
Summary of representations		<p>Objection expressing concern about the size of the extension to the Ddol Uchaf Quarry EN25.3 in terms of the environment, impact on highways and residential amenity.</p> <p>Objection seeking clarification on criteria iii) 'collaboration with Wrexham CBC' and how has the proportion been split and also seeks clarification on criteria v) as to what is meant by 'appropriate restoration' and 'specific environmental and community benefits'.</p> <p>Objection to i) the inclusion of the policy within the environment section of the Plan rather than the economy section ii) the Plan should specify which minerals resources are intended to be safeguarded iii) the figures in criteria iii) are not a true reflection of the RTS First</p>				

	Review which uses the terminology 'at least' iv) the policy is too restrictive in specifying extensions to sites only.
Changes sought	Seeking amendments to positioning of policy within written statement
Summary of Council Response	<p>The Ddol Uchaf extension would be assessed against the criteria in policy EN26. It is considered logical to seek to extend existing this existing quarry site rather than identify new sites. The allocation is considered appropriate and the detailed points of objection are responded to separately in the Councils detailed response to this objection.</p> <p>The explanatory text and the Minerals Background Paper refer to collaborative working and provide further explanation with regards to the nature of the collaboration with WCBC. The figures contained in STR16 were published prior to the consultation draft RTS second review. In reality more sand and gravel, and crushed rock is required to be identified through the LDP; at least 3.543 million tonnes and 35.9 million tonnes respectively. Flintshire will work in collaboration with Wrexham County Borough Council, and Denbighshire County Council to provide for the minerals needs of the region for both the provision of sand and gravel and crushed rock. Further commentary is provided in the Council's detailed response to this objection. The Council would no objection to change a rewording of point iii to reflect the new figures in the RTS second review, subject to the agreement of the Inspector.</p> <p>Each quarry site will have specific restoration requirements which will be derived from the type of mineral that has been excavated, and the way in which mineral has been excavated. Therefore it would be difficult to present a prescriptive policy to define what is meant by appropriate restoration, and environmental and community benefits as this will vary from site to site.</p> <p>The detailed objections to STR16 are responded to in detail in the Council's response to this policy. The Council suggests a rewording of criteria iii) [as referenced above] as well as a rewording of criteria ii), the explanation in para 8.27 and additional wording in the 'Key Evidence' section of the policy, subject to the agreement of the Inspector.</p>
Minor Change proposed	No

Appendix 21c Main Issues – Development Management Policies – Creating Sustainable Places and Communities

Policy / page / Para / Map	PC1 The Relationship of Development to Settlement Boundaries P114 Deposit Plan written statement
Relevant Content of Plan	The policy explains the significance of settlement boundaries which are defined for Tier 1-4 settlements in terms of development proposals within and outside settlement boundaries. The settlement boundaries are delineated on the proposals maps.
Representations	Total 28 representations: 22 objections 5 support 1 not specified

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance?
15	1149448		1149435		Object	Not Stated
43	1230000				Object	Not Stated
154	1230363				Object	Not Stated
194	1226342		1226341		Object	Not Stated
276	1230123					Not Stated
312	1230721				Object	Not Stated
258	1230721				Object	Not Stated
256	1230721				Object	Not Stated
262	1230721				Object	Not Stated
316	1231080				Support	Not Stated
319	1231067				Support	Not Stated
356	1231145				Support	Not Stated
774	1144593				Object	Not Stated
989	1149823		1149800		Object	Not Stated
956	1149828		1149800		Object	Not Stated
587	1230730		1148845		Object	Not Stated
820	1230801				Object	Not Stated
619	1232940		1232939		Object	Not Stated
769	1234023		1233580		Object	Not Stated
971	1235343		1149800		Object	Not Stated
1206	1227700		1227685		Object	Not Stated
1011	1235341		1149800		Object	Not Stated
832	1234498		1234487		Support	Not Stated
927	1235195		1234870		Support	Not Stated
972	1235343		1149800		Object	Not Stated
941	1235344		1149800		Object	Not Stated
1182	1232503		1233580		Object	Not Stated
1101	1236197				Object	Not Stated

Summary of representations	<p>Objections generally seek either the inclusion of additional land within the settlement boundary or the exclusion of land from within settlement boundaries.</p> <p>Several representations consider that the policy is vague and does not enable existing facilities to expand beyond the settlement boundaries.</p> <p>One objector considers that the strategic sites, particularly the Warren Hall Strategic Site does not meet and comply with the policy</p> <p>Support is expressed for the policy itself and for the exclusion of certain sites from settlement boundaries.</p>
Changes sought	Changes seek either the amendments of settlement boundaries
Summary of Council Response	<p>The Council considers that the policy is clearly worded in terms of the use of settlement boundaries in considering development proposals.</p> <p>The Council considers that the delineation of settlement boundaries is robust and has responded in detail on each site specific objection elsewhere.</p> <p>The Council does not consider that the lack of a settlement boundary for the two strategic sites diminishes their sustainability.</p>
Minor Change proposed	No
Policy / page / Para / Map	PC2 General Requirements for Development P115 Deposit Plan written statement
Relevant Content of Plan	The policy seeks to provide a set of general planning criteria which is applicable to most development proposals. The policy allows the removal of repetitive criteria from other policies throughout the Plan.
Representations	Total 11 representations: 8 objections 3 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
182	1230851				Support	Not Stated
779	1144593				Object	Not Stated
681	1146891				Support	Not Stated
645	1224983		1224982		Object	Not Stated
990	1149823		1149800		Object	Not Stated
957	1149828		1149800		Object	Not Stated
771	1234029		1233580		Support	Not Stated

837	1234511		1234487		Object	Not Stated
942	1235344		1149800		Object	Not Stated
1068	1229839				Object	Not Stated
1012	1235341		1149800		Object	Not Stated
Summary of representations			<p>One objection considers the policy to be vague and ineffective and out of accord with national guidance.</p> <p>NRW seek reference to green infrastructure and another objector seeks amendment to widen the scope of the policy in protecting amenity of holiday accommodation.</p> <p>One objector raises concerns that the impacts of the Warren Hall development on Higher Kinnerton should be mitigated through conditions, obligations or CIL charges. Another objector considers it is difficult to see how the (draft) strategic sites (especially Warren Hall) and (draft) housing allocation sites will manage to meet and comply with this policy.</p> <p>Support is expressed for the policy.</p>			
Changes sought			Objections seek either the deletion or amendment of the policy.			
Summary of Council Response			<p>The Council considers the policy to be robust and clearly defined in seeking to set out general requirements for development in a single policy, rather than having criteria repeated in other policies throughout the Plan.</p> <p>The acceptability of the strategic sites and housing allocations in the context of this policy are more appropriately dealt with in the consideration of detailed representations on the site allocations.</p>			
Minor Change proposed			No			
Policy / page / Para / Map			PC3 Design P116 Deposit Plan written statement			
Relevant Content of Plan			The policy sets out a number of criteria which seek to ensure that new3 development is of an appropriate design.			
Representations			Total 8 representations: 3 objections 5 support			
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
214	1230905				Support	Not Stated
889	1148889		1234839		Object	Yes
646	1224983		1224982		Object	Not Stated
833	1234499		1234487		Support	Not Stated
717	1233454		1232502		Support	Not Stated
1070	1229839				Object	Not Stated

772	1234031		1233580		Support	Not Stated
1174	1232503		1233580		Support	Not Stated
Summary of representations		One objection considered the policy criteria are too general and implementable. Another objection seeks additional explanatory guidance in respect of new development within employment areas. NRW seeks reference to 'colour' in the policy wording, queries reference to landscaping and also seek a comprehensive SPG on Design.				
Changes sought		Objections seek a variety of changes ranging from the comprehensive reconsideration of the policy to suggested amendments to the policy / explanation.				
Summary of Council Response		The Council considers the policy to be appropriate in seeking to ensure quality design in new development				
Minor Change proposed		No				
Policy / page / Para / Map		PC4 Sustainability and Resilience of New Development P117 Deposit Plan written statement				
Relevant Content of Plan		The policy sets out a number of criteria, which will work towards achieving sustainable development that is resilient to climate change.				
Representations		Total 6 representations: 3 objections 3 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
662	1146891				Support	Not Stated
928	1235196		1234870		Support	Not Stated
1157	1234431				Object	Not Stated
778	1234082		1233580		Support	Not Stated
1071	1229839				Object	Not Stated
1142	1234608				Object	Yes
Summary of representations		NRW seek reference in the policy explanation to 'Sustainable Management of Natural Resources (SMNR)'. Several objections seek assurances that the policy will be enforced. The remaining objection is to the requirement in criteria e) to renewable energy.				
Changes sought		Objections seek amendments to the policy wording.				
Summary of Council Response		The Council considers the policy to be appropriate in seeking to ensure sustainable and resilient development. However, if the Inspector considers that reference to SMNR would improve the understanding				

	and implementation of the policy then the Council would have no objection to this.					
Minor Change proposed	No					
Policy / page / Para / Map	PC5 Transport and Accessibility P118 Deposit Plan written statement					
Relevant Content of Plan	The policy sets out a criteria based approach to scrutinising new development proposals in respect of transport and accessibility matters.					
Representations	Total 7 representations: 4 objections 3 support					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
414	1144556				Object	Yes
784	1144593				Object	Not Stated
720	1233454		1232502		Support	Not Stated
691	1233357				Object	Yes
1072	1229839				Object	Not Stated
1175	1232503		1233580		Support	Not Stated
780	1234087		1233580		Support	Not Stated
Summary of representations	One objection related to the lack of reference in the policy to the actual safeguarding of sites and preventing development which would be detrimental to railway transport. NRW request that the policy makes reference to green infrastructure. An objection seeks to promote a walkable wildlife corridor along a disused railway line in Higher Kinnerton and the need for s106 agreements to achieve this. The remaining objection is to the requirement for 10% of parking spaces to have electric charging points.					
Changes sought	Objections seek changes including the safeguarding of land for (unspecified) transport projects, reference to green infrastructure, and the deletion of criteria d.					
Summary of Council Response	The Council considers that the policy is appropriate and clearly worded. Those transport schemes where it is necessary for land to be safeguarded have been referenced in policy PC10. Green Infrastructure is referenced elsewhere in the Plan and it is not necessary to be included in this policy. The provision of a walkway along a disused railway line at Higher Kinnerton can be pursued outside of the development plan process. The inclusion of a criteria which requires a modest level of parking spaces to have electric charging points is considered reasonable.					
Minor Change proposed	No					

Policy / page / Para / Map		PC6 Active Travel P120 Deposit Plan written statement				
Relevant Content of Plan		The policy sets out a criteria based approach to ensuring that new development has regard to Active Travel.				
Representations		Total of 8 representations – all objections				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
775	1144593				Object	Not Stated
958	1149828		1149800		Object	Not Stated
595	1232541		1232537		Object	Not Stated
694	1233357				Object	Yes
973	1235343		1149800		Object	Not Stated
1021	1235357				Object	Not Stated
838	1234512		1234487		Object	Not Stated
943	1235344		1149800		Object	Not Stated
Summary of representations		One objection seeks an amendment to the policy wording whilst another considers that it is unreasonable in that it sets an unreasonably high bar to development proposals. Several objections from one agent considers that Warren Hall cannot satisfy this policy and another objection seeks assurance that Warren Hall will include a network of walking and cycling routes. NRW seek reference to green infrastructure. The remaining objection is related to the lack of reference in the policy to the actual safeguarding of sites and preventing development which would be detrimental to railway transport.				
Changes sought		Objections seek amendments to the policy wording and explanation and the safeguarding of land for (unspecified) transport projects.				
Summary of Council Response		The Council considers that the policy soundly based having regard to the importance attached by Welsh Government to Active Travel. However, it is accepted that not all of the criteria will be applicable criteria. If the Inspector considers that the policy would be improved by adding after ‘should’ the words ‘wherever possible’ then the Council would have no objection to this. The Warren Hall development can link in with Active Travel proposals and will incorporate a network of walking and cycling routes. Green Infrastructure is referenced elsewhere in the Plan and it is not necessary to be included in this policy. Those transport schemes where it is necessary for land to be safeguarded have been referenced in policy PC10.				
Minor Change proposed		No				

Policy / page / Para / Map		PC7 Passenger Transport P121 Deposit Plan written statement				
Relevant Content of Plan		The criteria based policy seeks to ensure, wherever possible, that new development facilitates the use of public transport.				
Representations		Total 2 representations: 1 objection 1 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
209	1230905				Support	Not Stated
695	1233357				Object	Yes
Summary of representations		The objection is related to the lack of reference in the policy to the actual safeguarding of sites and preventing development which would be detrimental to railway transport				
Changes sought		Safeguarding of land for (unspecified) transport projects.				
Summary of Council Response		Those transport schemes where it is necessary for land to be safeguarded have been referenced in policy PC10. The Council is unclear exactly what form of protection is required in the policy nor what 'railway enforcement' means.				
Minor Change proposed		No				
Policy / page / Para / Map		PC8 Airport Safeguarding Zone P122 Deposit Plan written statement				
Relevant Content of Plan		The policy seeks to prevent development where it would prejudice the safe and efficient operation of Hawarden Airport.				
Representations		Total 1 representation – objection				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
348	1229035				Object	Yes
Summary of representations		One objection has been made to the explanatory wording to this policy to ensure it more accurately reflects guidance, legislation and consultation procedures.				
Changes sought		Seeks amendment to explanation to policy				

Summary of Council Response	The Council accepts that the wording of part of the explanation to the policy could be improved, subject to the agreement of the Inspector.
Minor Change proposed	No
Policy / page / Para / Map	PC9 Protection of Disused Railway Lines P122 Deposit Plan written statement
Relevant Content of Plan	The policy seeks to prevent development which would prejudice re-use of former railway lines for walking, cycling, horse riding or other transport, provided that there was a reasonable prospect of this being achieved.
Representations	Total 3 representations – all objections

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
59	1230290				Object	Not Stated
782	1144593				Object	Not Stated
696	1233357				Object	Yes

Summary of representations	One objection seeks reference in the policy or explanatory wording to the historic environment implications of re-using former railway lines. Another objection references again the re-use of the former railway line at Higher Kinnerton. The remaining objection is related to the lack of reference in the policy to the actual safeguarding of sites and preventing development which would be detrimental to railway transport.
Changes sought	Safeguarding of land for (unspecified) transport projects and amendments to wording of policy or explanation.
Summary of Council Response	The Council considers that the Plan should be read as a whole and it is not necessary to include reference to the historic environment, when this is covered in other policies. The provision of a walkway along a disused railway line at Higher Kinnerton can be pursued outside of the development plan process. Those transport schemes where it is necessary for land to be safeguarded have been referenced in policy PC10.
Minor Change proposed	No
Policy / page / Para / Map	PC10 New Transport Schemes – 1) A494(T) /A55(T)/A548 Northop to Shotwick Interchange Improvement P123 Deposit Plan written statement Proposals Map 02 (Front)
Relevant Content of Plan	The policy safeguards the route of this new road scheme as instructed by Welsh Government.
Representations	Total 1 representation – support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
554	1149198		1148968		Support	Not Stated
Summary of representations		One supporting representation promotes a 40ha mixed use development at Kelsterton on the back of the Red Route.				
Changes sought		n/a				
Summary of Council Response		The Councils commentary on the proposed allocation is set out in response to other objections by this representor.				
Minor Change proposed		No				
Policy / page / Para / Map		PC10 New Transport Schemes – 2) Plough Lane Link Road P123 Deposit Plan written statement Proposals Map 02 (Front) / Proposals Map 02 (Back) – Aston and Shotton				
Relevant Content of Plan		The policy safeguards the route of this Council road scheme.				
Representations		Total 3 represents – objections.				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
133	1228141				Object	Not Stated
170	1230826				Object	Not Stated
981	1235470				Object	Not Stated
Summary of representations		Objections raise concerns about the impact of the scheme on residents and the environment and the previous lack of delivery of the scheme. One objection suggests active travel type scheme rather than a road scheme.				
Changes sought		Objections seek deletion or amendment of the scheme.				
Summary of Council Response		The Council considers that the scheme is rightly safeguarded in the Plan as it is a formal Council transport scheme. It is safeguarded in the first instance as a road scheme, with possible linkages with Welsh Government proposals for the Red Route and the section of the A494(T) between Ewloe and R. Dee but is also recognised as having potential as a walking / cycling route.				
Minor Change proposed		No				

Policy / page / Para / Map		PC10 New Transport Schemes P123 Deposit Plan written statement				
Relevant Content of Plan		The policy safeguards the route of road schemes where it is necessary to protect land to facilitate delivery.				
Representations		3 Objections				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
697	1233357				Object	Yes
1074	1229839				Object	Not Stated
1188	1230981				Object	Not Stated
Summary of representations		<p>One objection related to the lack of reference in the policy to the actual safeguarding of sites and preventing development which would be detrimental to railway transport.</p> <p>NRW seek reference in the policy to landscape and other environmental considerations, mitigation and potential enhancements.</p> <p>One objection is concerned with the lack of provision in the Plan for the re-opening of a railway station at Greenfield / Holywell and suggests a suitable site.</p>				
Changes sought		Objections seek amendments to the policy, and safeguarding of transport schemes in the Plan.				
Summary of Council Response		<p>Those transport schemes where it is necessary for land to be safeguarded have been referenced in policy PC10. The Council is unclear exactly what form of protection is required in the policy nor what 'railway enforcement' means.</p> <p>The Council considers that the Plan should be read as a whole and it is not necessary or appropriate to include criteria within the policy – particularly when schemes will still require planning permissions.</p> <p>The Council considers that transport schemes should only be safeguarded in a LDP when there is evidence to suggest that there is a reasonable prospect of them being delivered. Whilst not disagreeable to the principle of a re-opened / new station, there is no evidence that this is realistic or feasible.</p>				
Minor Change proposed		No				
Policy / page / Para / Map		PC12 Community Facilities P125 Deposit Plan written statement				

Relevant Content of Plan	The policy provides guidance in respect of the development of new community facilities, and the protection of existing community facilities. It also allocates 3 sites for new community facilities.					
Representations	Total 2 representations: 1 objection 1 support					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
237	1147889		1230687		Support	Not Stated
776	1144593				Object	Not Stated
Summary of representations	The objection expresses concern over the continuing loss of facilities and services in Higher Kinnerton.					
Changes sought	n/a					
Summary of Council Response	The policy provides guidance in respect of new facilities and adopts a criteria based approach to consider any development proposals which involve the loss of existing community facilities.					
Minor Change proposed	No					

Appendix 21d Main Issues – Development Management Policies – Supporting a Prosperous Economy

Policy / page / Para / Map	PE1 General Employment Land Allocations P128 Deposit Plan written statement					
Relevant Content of Plan	The policy allocates sites for B1, B2 and B8 employment development across the County.					
Representations	Total 9 representations: 6 objections 2 support 1 not stated					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
84	1230290				Support	Not Stated
115	1230530		1230529		Object	Not Stated
117	1230530				Object	Not Stated
663	1146891					Not Stated
879	1234645		1234643		Object	Not Stated
890	1148889		1234839		Support	Not Stated
944	1235344		1149800		Object	Not Stated
1052	1229839				Object	Not Stated
1249	1234608				Object	No

Summary of representations	<p>One objection considers that insufficient sites have been allocated in the Plan but does not identify specific sites.</p> <p>One objection seeks the de-allocation of PE1.3 Drury New Road, Buckley and redevelopment for housing.</p> <p>Two objections seek the allocation of land (Northern and Southern Sites) at Connah's Quay Power Station.</p> <p>One objection identifies an error in the proposals map at Deeside whereby the designation for STR3A Northern Gateway excludes the John Summers Building.</p> <p>NRW express concern about several employment allocations (PE1.1, PE1.2, PE1.4, PE1.5, PE1.6, PE1.8, PE1.9, PE1.10, PE1.12.) as they have not been supported by a Flood Consequences Assessment</p>
Changes sought	Amendments sought include allocation of sites, de-allocation of sites and amendments to the proposals map.
Summary of Council Response	<p>The Council has identified a broad portfolio of sites to ensure flexibility and choice for different types of employment development in terms of location, type and size.</p> <p>The Council does not consider that there is presently sufficient justification to warrant the de-allocation of PE1.3 and note that a planning application for housing is presently being considered on the site.</p> <p>The Council does not consider that there is presently sufficient evidence that the allocation of two sites at Connah's Quay Power Station is appropriate, viable or deliverable in view of site constraints.</p> <p>The Council accepts that an amendment is required to the proposals map is required in respect of the STR3A allocation subject to the agreement of the Inspector.</p> <p>The employment allocations are all carried over from the adopted UDP and not new sites. The existence of flood constraints is known for these sites but given that the Plan Strategy is not dependent on every allocation is being allocated, it was not considered that a FCA was necessary as a FCA is more appropriate undertaken at planning application stage when the exact nature of the development proposal is known. The Council has commissioned further FCA work on the affected sites but stress that these can only be on the basis of indicative and broad development parameters and are not therefore detailed FCA's. However they should give assurances that development can be accommodated on the site</p>

	either by i) avoiding flood risk areas or ii) design measures to mitigate flood risk.
Minor Change proposed	No
Policy / page / Para / Map	PE2 Principal Employment Area P131 Deposit Plan written statement
Relevant Content of Plan	The policy identifies 30 Principal Employment Areas across the County on the proposals maps which comprise a mix of existing employment land and buildings, commitments, allocations and other undeveloped land.
Representations	Total 9 representations: 8 objections 1 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
132	1230530				Object	Not Stated
242	1230971				Object	Not Stated
684	1233328		1233325		Object	Not Stated
808	1234408		1234407		Object	Not Stated
880	1234645		1234643		Object	Not Stated
893	1148889		1234839		Support	Not Stated
945	1235344		1149800		Object	Not Stated
1053	1229839				Object	Not Stated
1075	1229839				Object	Not Stated

Summary of representations	<p>Two objections seek the designation of sites at Connah's Quay Power Station and at Sony Beach Quarry / Lane Quarry, Buckley as PEA's. One objection seeks the removal of a site from PEA PE2.7 Little Mountain Industrial Estate, Buckley. One objection seeks an extension to the PEA PE2.9 Evans Way Business Centre, Cheshire West.</p> <p>One objection seeks an amendment to the proposals maps in respect of PEA PE2.11 Deeside Industrial Park and the John Summers Building.</p> <p>Objections seek a broadening of the development permissible within PEA's for 'other' uses and one objector seeks policy provision for energy uses and more specifically 'locations for Transmission Connected Energy Generation and Storage Facilities'.</p> <p>NRW raises concerns that the policy promotes 'areas' where employment development will be permitted but where some sites are affected by flood risk considerations, but are not informed by FCA. The PEA's</p>
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	of concern are PE2.24; PE2.30; PE2.23; PE2.29; PE2.13; PE2.14; PE2.28; PE2.3; PE2.22; PE2.21; PE2.27; PE2.18; PE2.26; PE2.10; PE2.17; PE2.16; PE2.4; PE2.15; PE2.19; PE2.20; PE2.9; PE2.11; PE8. NRW also seeks ref to additional criteria in respect of PEA 2.17, 2.18 and 2.19 given proximity to the AONB.
Changes sought	Objections seek the addition, deletion and extension of PEA's and amendments to policy wording.
Summary of Council Response	<p>The Council does not consider that there is presently sufficient justification to warrant the de-allocation of PE1.3 and note that a planning application for housing is presently being considered on the site.</p> <p>The Council does not consider that the designation of sites as PEA's or the extension / PEA's is appropriate as explained in the response to individual representations.</p> <p>The Council accepts that an amendment is required to the proposals map 02 Front is required in respect of the boundary of PEA PE2.11 to exclude the John Summers building. from the boundary of the PEA PE2.11, subject to the agreement of the Inspector.</p> <p>The Council does not consider that the wording of the policy should be broadened to include, as a matter of course, energy or other land uses. The focus of the PEA's is on employment development and other land use proposals can be considered on their merits.</p> <p>In respect of the NRW objection regarding flood risk, the Council does not consider that the PEA's are allocations in themselves and any development proposals arising with PEA's must be considered against policies in the Plan as a whole. Nevertheless amendments are being considered to the wording of the policy and the explanation in respect of flood risk, as set out in the response to representation id 1053 and as set out in a SoCG to be prepared with NRW.</p> <p>Additional policy wording in respect of three PEA's in Mold in respect of the AONB is not considered necessary or appropriate as the Plan's policies should be read as a whole.</p>
Minor Change proposed	No
Policy / page / Para / Map	PE3 Employment Development Outside Allocated Sites and Principal Employment Areas P134 Deposit Plan written statement
Relevant Content of Plan	The policy provides guidance on employment proposals which arise on land outside allocated sites or Principal Employment Areas. The policy draws a distinction

	between sites within and outside settlement boundaries and offers criteria based guidance in respect of the latter.					
Representations	Total 2 representations – both objections					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
631	1233028		1232939		Object	Not Stated
946	1235344		1149800		Object	Not Stated
Summary of representations	<p>One objection was to the fact that principal Employment Area PE2.9 and Chester are not identified in the settlement hierarchy.</p> <p>The other objection raises detailed concerns about several criteria in the policy in the context of seeking a mixed use allocation at Northop.</p>					
Changes sought	One objection seeks the inclusion of PEA2.9 in the Plans settlement hierarchy. The other objection seeks policy amendments.					
Summary of Council Response	<p>The Council considers it wholly inappropriate for PEA's to form part of the Plans settlement hierarchy given that PEA's are existing employment areas which are not related to or controlled by the settlement hierarchy.</p> <p>The Council does not consider amendments to the wording of part ii of the policy are necessary or appropriate. This part of the policy seeks to provide scope for employment development on the edge of settlements in a similar manner to small scale affordable housing exceptions sites. The objectors comments are made solely in the context of promoting a large mixed use development on the edge of Northop.</p>					
Minor Change proposed	No					
Policy / page / Para / Map	PE4 Farm Diversification P135 Deposit Plan written statement					
Relevant Content of Plan	The policy provides criteria based guidance in respect of development proposals involving farm diversification.					
Representations	Total 2 representations: 1 objection 1 support					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
61	1230290				Support	Not Stated
1076	1229839				Object	Not Stated

Summary of representations	NRW object on the basis that all development should not be harmful to landscape character and tranquility.					
Changes sought	Seeks amendment to policy wording.					
Summary of Council Response	The Council considers that the policies in the Plan should be read as a whole and other policies provide sufficient safeguards.					
Minor Change proposed	No					
Policy / page / Para / Map	PE6 Protection of Employment Land P137 Deposit Plan written statement					
Relevant Content of Plan	The policy adopts a criteria based approach to considering development proposals which involve the loss of employment land or buildings.					
Representations	Total 1 representation – objection					

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
896	1148889		1234839		Object	Yes

Summary of representations	The objection considers the policy is unduly restrictive and should provide flexibility for other uses.					
Changes sought	Seeks policy wording amendment					
Summary of Council Response	The Council does not consider relaxation of the policy is either necessary or appropriate. The focus of applying the policy criteria is to determine whether other uses of employment land / buildings is appropriate or not. If the policy were to list suitable other uses this could be interpreted as pre-determining the outcome of that assessment. Each proposal should be assessed on its individual merits.					
Minor Change proposed	No					
Policy / page / Para / Map	PE7 Retail Hierarchy P139 Deposit Plan written statement					
Relevant Content of Plan	The policy					
Representations	Total 1 representation – objection.					

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
800	1234331		1234330		Object	Not Stated

Summary of representations	This policy attracted one objection only which sought the recognition of Broughton Shopping Park as a town centre within the retail hierarchy in view of the changing scale and composition of units at the shopping park. References the previous inclusion of Broughton within retail hierarchy in Preferred Strategy.
Changes sought	Seeks inclusion of Broughton as a town centre in retail hierarchy.
Summary of Council Response	The Council notes that the concept of amending the retail hierarchy was included in the Preferred Strategy consultation document within policy STR9. However, in the light of further consideration, and the findings of the Retail Study, it is not considered appropriate for Broughton to be included in the retail hierarchy, given the Welsh Governments continuing promotion of the 'town centers first' principle. Despite the composition of the shopping park changing over time it is not considered that it has character, role and mix of units that a typical town centre does.
Minor Change proposed	No
Policy / page / Para / Map	PE10 District and Local Centres P142 Deposit Plan written statement
Relevant Content of Plan	The policy seeks to provide guidance on retail development proposals in District and Local Centres.
Representations	Total 1 representation – objection

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
1	1226584				Object	Yes

Summary of representations	Objects to the present wording of the second sentence of the explanation in para 10.25.
Changes sought	Seeks amendment to explanation to policy
Summary of Council Response	The Council accepts that the wording of the second sentence of para 10.25 of the explanation should be reworded.
Minor Change proposed	Amend second sentence of para 10.25 to read 'As a consequence proposals for retail and non-retail commercial uses may be more difficult to satisfactorily accommodate in such Local Centres, and the importance of safeguarding residential amenity will be a key consideration'.
Policy / page / Para / Map	PE11 Edge and Out of Town Retail Development

	P143 Deposit Plan written statement
Relevant Content of Plan	The policy provides a criteria based approach to the consideration of retail development proposals outside town, district and local centres.
Representations	Total 2 representations – objections

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
180	1230854				Object	Not Stated
1024	1235357				Object	Not Stated

Summary of representations	<p>The first objection is to the use of word ‘attractiveness’ in the policy wording which is considered by the objector to be out of accord with PPW.</p> <p>The second objection seeks reference in the policy to safeguarding ‘Chester’ and not just centres within Flintshire.</p>
Changes sought	Seeks amendments to policy wording.
Summary of Council Response	<p>The Council considers that the policy properly reflects the approach to retail development taken by Welsh Government in PPW10. Inclusion of the term ‘attractiveness’ is appropriate given that it is reference several times in PPW10.</p> <p>The Council would have no objection to including reference to retail centers outside of the County if the Inspector considers appropriate.</p>
Minor Change proposed	No

Policy / page / Para / Map	PE12 Tourism Accommodation, Facilities and Attractions P143 Deposit Plan written statement
Relevant Content of Plan	The policy provides advice on development proposals for tourism accommodation, attractions and activities and draws a distinction between proposals inside or outside of a settlement boundary. A criteria based approach is set out for the latter.
Representations	Total 3 representations - objections

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
238	1147889		1230687		Object	Not Stated
839	1234513		1234487		Object	Not Stated
1054	1229839				Object	Not Stated

Summary of representations		<p>The first objection sought additional safeguards in the policy in terms of tourism development in the AONB.</p> <p>The remaining objection seeks a change to the opening part of policy wording change to include reference to ‘associated or ancillary’ before ‘facilities’.</p> <p>The second objection is from NRW who consider that the policy designates large areas of land as being suitable for tourism facilities and land use as well as directing that attractions specific development ‘will be permitted’, when the policy relates to areas that lie partially within Zone C1 and/or Zone C2.</p>				
Changes sought		Objections seek policy wording amendments.				
Summary of Council Response		<p>The Council considers that the Plan’s policies should be read as a whole and there is a specific policy in respect of AONB. It is not necessary to repeat terms throughout several policies.</p> <p>The policy already references ‘tourist attractions and facilities’ in the opening part of the policy and it is not considered necessary to further define this as ‘associated or ancillary’ facilities.</p> <p>In response to NRW objection the Council stress that the policy does not identify any particular sites or areas of land for tourism development. It is a County wide policy and must be read in conjunctions with the Plans policies as a whole. The Plan contains a policy in respect of flood risk (EN14).</p>				
Minor Change proposed		No				
Policy / page / Para / Map		PE13 Caravan Development in the Open Countryside P146 Deposit Plan written statement Proposals Map 01 Front				
Relevant Content of Plan		The policy seeks to prevent further new caravan development in the Talacre/Gronant/Gwespyr area as defined on the proposals maps.				
Representations		Total 3 representations - objections				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
239	1147889		1230687		Object	Not Stated
841	1234514		1234487		Object	Not Stated
1055	1229839				Object	Not Stated
Summary of representations		The first objection seeks specific reference to the AONB within the policy wording and also seeks the identification				

	<p>of a further area (in addition to the Talacre area) around the Wheeler Valley where further static caravan and chalet development will not be permitted.</p> <p>The second objection from NRW is based on interpreting the policy as 'promoting' the Talacre area for static caravan / chalet development, despite its location with C1 and C1 flood risk zone.</p> <p>The third objection considers that the policy restricts investment and development at existing sites in the defined coastal area. It seeks amendments to the policy wording in the form of two additional criteria to enable static caravan development to potentially take place in the defined area..</p>
Changes sought	Seeks amendments to policy wording and designation of an additional area of restraint.
Summary of Council Response	<p>The Council considers that the Plan's policies should be read as a whole and policy EN5 provides guidance in respect of the AONB. It is not considered necessary or appropriate for terms to be repeated throughout several policies. The restrictive policy approach to the Talacre area is one that has been carried over from the UDP and reflects the flat coastal landscape and the visually harmful nature of existing static caravan development. It is not considered that such harm exists in the Wheeler Valley area and that each proposal is more appropriately considered against the policy criteria and other Plan policies.</p> <p>The Council considers that NRW have misunderstood the policy wording as the first part of the policy permits static caravan accommodation 'outside' of the Talacre, Gronant and Gwespyr area. It therefore does not allocate large areas of land for such development. Nevertheless the Council would have no objection to a minor rewording of the first sentence of the policy if this would more clearly identify the policy intention.</p> <p>The Council does not consider, as a matter of principle, that further static caravan development should take place in the defined coastal area, given the landscape harm arising from existing development. The suggested revisions to the policy do not change this view.</p>
Minor Change proposed	No
Policy / page / Para / Map	<p>PE14 Greenfield Valley P147 Deposit Plan written statement Proposals Map 01 Back - Holywell</p>

Relevant Content of Plan	The policy seeks to ensure that development proposals respect the distinct and varied character of the Greenfield Valley.					
Representations	Total 3 representations; 1 objection 2 support					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
14	1228815				Support	No
62	1230290				Support	Not Stated
1056	1229839				Object	Not Stated
Summary of representations	The NRW objection is on the basis that the policy 'promotes' development at Greenfield Valley which is inappropriate given flood risk and protected area designations and implications.					
Changes sought	Seek amendments to policy					
Summary of Council Response	The intention of the policy is not to actively promote development at Greenfield Valley but to ensure that any new development is undertaken in an appropriate and sensitive manner. Nevertheless the Council are considering with NRW a rewording of the opening part of the policy to clarify the policy intention and will be set out in a SOCG to be prepared..					
Minor Change proposed	No					

Appendix 21e Main Issues – Development Management Policies – Meeting Housing Needs

Policy / page / Para / Map	Development Management Policies – Meeting Housing Needs - General					
Relevant Content of Plan	n/a					
Representations	Total 1 representation – objection					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
130	1230667					

Summary of representations	Would FCC consider Ty Gwyn, The Catch, Halkyn for the Local Development plan
Changes sought	Allocation in Plan
Summary of Council Response	This representation was submitted under the label of the 'Development Management Policies – Meeting Housing Needs'. The Council does not consider the site should be included in the Plan given that Halkyn is a Tier 5 settlement and that the size of the site is out of character with and would harm its surroundings. The Council has responded in detail to the individual representation.
Minor Change proposed	No
Policy / page / Para / Map	HN1.1 New Housing Development Proposals - Well Street, Buckley P149 Deposit Plan written statement Proposals Map 03 Back - Buckley
Relevant Content of Plan	The policy allocates land at Well Street, Buckley for housing development.
Representations	Total 9 representations: 8 Objections 1 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
211	1230929				Object	Not Stated
664	1146891				Support	Not Stated
715	1233454		1232502		Object	Not Stated
1179	1232503		1233580		Object	Not Stated
1209	1234007		1232502		Object	Not Stated
1280	1232396		1232395		Object	Not Stated
1288	1231151		1231150		Object	Not Stated
1290	1231151		1231150		Object	Not Stated
1292	1231151		1231150		Object	Not Stated

Summary of representations	Objection to the allocation of the site in terms of increased traffic. Objections that the site has been carried over from the UDP and is not available, viable and deliverable, and should be replaced by other site allocations. Welsh Water point out that the site requires improvements to the Buckley Waste Water Treatment Works.
Changes sought	Objections seek deletion of site.
Summary of Council Response	The Council highlights a recent change in circumstances relating to the site being bought by Clwyd Alyn Housing Association. Recently, Clwyd Alyn have undertaken a PAC and a follow up screening

	request application in respect of EIA, ahead of the submission of a planning application for housing development. It is considered that the site is sustainable, viable and deliverable.
Minor Change proposed	No
Policy / page / Para / Map	HN1.3 New Housing Development Proposals - Highmere Drive, Connah's Quay P149 Deposit Plan written statement Proposals Map 02 Back – Connah's Quay
Relevant Content of Plan	The policy allocates land at Highmere Drive, Connah's Quay for housing development.
Representations	Total 10 representations: 9 Objections 1 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
597	1232541		1232537		Object	Not Stated
613	1232770				Object	Not Stated
764	1234007		1232502		Object	Not Stated
1190	1232503				Object	Not Stated
1201	1233454		1232502		Object	Yes
1239	1146891				Support	Not Stated
1258	1149350		1232395		Object	Not Stated
1282	1232396		1232395		Object	Not Stated
1289	1231151		1231150		Object	Not Stated
1291	1231151		1231150		Object	Not Stated
1293	1231151		1231150		Object	Not Stated

Summary of representations	Objections that the site has been carried over from the UDP and is not available, viable and deliverable, and should be replaced by other site allocations.
Changes sought	Objections seek deletion of the site
Summary of Council Response	The Council has referenced a renewed commitment from the owner of the site as evidenced by key background studies and ongoing discussions with potential developers. It is considered that the site is sustainable, viable and deliverable.
Minor Change proposed	No
Policy / page / Para / Map	HN1.4 New Housing Development Proposals – Northop Road, Flint P149 Deposit Plan written statement
Relevant Content of Plan	The policy allocates land at Northop Rd, Flint for housing development.

Representations	Total 7 representations: 5 Objections 2 support
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Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
164	1230793				Object	Not Stated
367	1231153		1231150		Support	Yes
566	1232356		1232358		Object	Not Stated
1073	1229839				Object	Not Stated
1240	1146891				Support	Not Stated
1256	1149350		1232395		Object	Not Stated
1284	1232396		1232395		Object	Not Stated

Summary of representations	Objection that the site is in unsustainable location and an objection that the site is constrained and should be replaced with another site elsewhere.
Changes sought	Objections seek deletion of the site.
Summary of Council Response	The Council considers that the site is in a sustainable location and that it is deliverable given the presence of two willing developers as demonstrated by the two planning applications on the two parts of the site. The Council is seeking to facilitate a collaboration agreement whereby the two sites can be developed off a single access.
Minor Change proposed	No
Policy / page / Para / Map	HN1.6 New Housing Development Proposals – Land between Denbigh Road and Gwernaffield Rd, Mold P149 Deposit Plan written statement Proposals Map 03 Back - Mold
Relevant Content of Plan	The policy allocates land at Mold between Denbigh Road and Gwernaffield Road for housing development.
Representations	Total 50 representations: 48 Objections 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
268	1230689				Object	Not Stated
283	1230721				Object	Not Stated
284	1230721				Object	Not Stated

286	1230721				Object	Not Stated
300	1230721				Object	Not Stated
301	1230721				Object	Not Stated
303	1230721				Object	Not Stated
306	1230721				Object	Not Stated
307	1230721				Object	Not Stated
311	1230721				Object	Not Stated
325	1231151		1231150		Support	Not Stated
358	1230721				Object	Not Stated
359	1230721				Object	Not Stated
361	1230721				Object	Not Stated
364	1230721				Object	Not Stated
446	1231358				Object	Not Stated
449	1231370				Object	Not Stated
450	1231373				Object	Not Stated
453	1231383				Object	Not Stated
534	1232240				Object	Not Stated
604	1232717				Object	Not Stated
857	1150807				Object	Not Stated
1000	1235506				Object	Not Stated
1001	1235508				Object	Not Stated
1003	1235519				Object	Not Stated
1006	1235529				Object	Not Stated
1014	1235552				Object	Not Stated
1015	1235554				Object	Not Stated
1016	1235555				Object	Not Stated
1042	1235712				Object	Not Stated
1043	1235715				Object	Not Stated
1044	1235717				Object	Not Stated
1045	1235720				Object	Not Stated
1046	1235723				Object	Not Stated
1047	1235728				Object	Not Stated
1051	1235731				Object	Not Stated
1062	1235748				Object	Not Stated
1064	1235750				Object	Not Stated
1087	1235836				Object	Not Stated
1088	1235840				Object	Not Stated
1089	1235851				Object	Not Stated
1090	1235854				Object	Not Stated
1091	1235857				Object	Not Stated
1102	1236253				Object	Not Stated
1104	1236250				Object	Not Stated
1105	1236247				Object	Not Stated
1114	1230689				Object	Not Stated
1242	1146891				Support	Not Stated
1248	1232074				Object	Not Stated
1250	1245793				Object	Not Stated
Summary of representations		Objections are made to the allocation on the basis of a wide variety of matters and these are all set out in the Council's summary response on this site.				
Changes sought		Objections seek the deletion of the site.				

Summary of Council Response	The Council considers the site to be sustainable, viable and deliverable and points to a willing developer, as evidenced by a recent PAC for the site.
Minor Change proposed	No
Policy / page / Para / Map	HN1.7 New Housing Development Proposals – Holywell Road / Green Lane, Ewloe P150 Deposit Plan written statement Proposals Map 02 Front
Relevant Content of Plan	The policy allocates land at Holywell Road / Green Lane, Ewloe for housing development.
Representations	Total 137 representations: 131 Objections 6 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
22	1229300				Object	Not Stated
44	1230006				Object	Not Stated
48	1230046				Object	Not Stated
55	1230160				Object	Not Stated
102	1230433				Object	Not Stated
163	1230799				Object	Not Stated
167	1230821				Object	Not Stated
169	1230820				Object	Not Stated
172	1230829				Object	Not Stated
175	1230837				Object	Not Stated
178	1230844				Object	Not Stated
179	1230848				Object	Not Stated
186	1228408				Object	Not Stated
187	1230864				Object	Not Stated
189	1228930				Object	Not Stated
190	1230885				Object	Not Stated
196	1230897				Object	Not Stated
198	1230907				Object	Not Stated
441	1231106				Object	Not Stated
444	1230727				Object	Not Stated
445	1231107				Object	Not Stated
447	1231365				Object	Not Stated
466	1231416				Object	Not Stated
477	1231486				Object	Not Stated
485	1231604				Object	Not Stated
547	1227864				Object	Not Stated
549	1232341				Object	Not Stated
550	1232351				Object	Not Stated
552	1232361				Support	Not Stated
557	1232387				Object	Not Stated
560	1232397				Object	Not Stated
562	1232401				Object	Not Stated
563	1232408				Support	Not Stated

564	1232424				Support	Not Stated
565	1220511				Support	Not Stated
569	1232438		1232358		Object	Not Stated
570	1232450				Object	Not Stated
572	1232468				Object	Not Stated
577	1232484				Object	Not Stated
621	1249859		1232358		Object	Not Stated
628	1228626				Object	Not Stated
671	1233250		1232358		Object	Not Stated
683	1233327				Object	Not Stated
687	1233339				Object	Not Stated
712	1233450				Object	Not Stated
713	1233480				Object	Not Stated
718	1233510				Object	Not Stated
719	1233531				Object	Not Stated
722	1233546				Object	Not Stated
725	1233564				Object	Not Stated
726	1233567				Object	Not Stated
727	1233579				Object	Not Stated
730	1233591				Object	Not Stated
731	1233601				Object	Not Stated
732	1233595				Object	Not Stated
733	1233599				Object	Not Stated
737	1233613				Object	Not Stated
739	1233615				Object	Not Stated
741	1233621				Object	Not Stated
745	1233645				Object	Not Stated
746	1233651				Object	Not Stated
747	1233656				Object	Not Stated
749	1233663				Object	Not Stated
750	1233673				Object	Not Stated
751	1233676				Object	Not Stated
752	1233682				Object	Not Stated
754	1233687				Object	Not Stated
789	1234238				Object	Not Stated
791	1234281				Object	Not Stated
792	1232468				Object	Not Stated
793	1234299				Object	Not Stated
794	1234299				Object	Not Stated
797	1234336				Object	Not Stated
798	1234339				Object	Not Stated
799	1234346				Object	Not Stated
805	1234399				Object	Not Stated
809	1234430				Object	Not Stated
811	1234438				Object	Not Stated
812	1234447				Object	Not Stated
814	1234464				Object	Not Stated
816	1234469				Object	Not Stated
818	1234483				Object	Not Stated
822	1234490				Object	Not Stated
825	1234492				Object	Not Stated
828	1234496				Object	Not Stated
829	1234519				Object	Not Stated
842	1234525				Object	Not Stated
844	1234530				Object	Not Stated

845	1234536				Object	Not Stated
847	1234542				Object	Not Stated
850	1234546				Object	Not Stated
853	1234556				Object	Not Stated
863	1234566				Object	Not Stated
865	1234587				Object	Not Stated
866	1234589				Object	Not Stated
867	1234592				Object	Not Stated
868	1234596				Object	Not Stated
871	1234625				Object	Not Stated
872	1234627				Object	Not Stated
873	1234631				Object	Not Stated
874	1234634				Object	Not Stated
877	1234797				Object	Not Stated
878	1234822				Object	Not Stated
881	1234835				Object	Not Stated
882	1234843				Object	Not Stated
884	1234850				Object	Not Stated
885	1234856				Object	Not Stated
891	1234891				Object	Not Stated
892	1234895				Object	Not Stated
895	1234905				Object	Not Stated
898	1233116				Object	Not Stated
900	1234920				Object	Not Stated
902	1234924				Object	Not Stated
903	1234928				Object	Not Stated
904	1230877				Object	Not Stated
906	1234937				Object	Not Stated
907	1234940				Object	Not Stated
909	1234941				Object	Not Stated
1020	1231088				Object	Not Stated
1032	1235584				Object	Not Stated
1033	1235590				Object	Not Stated
1034	1235618				Object	Not Stated
1035	1235619				Object	Not Stated
1036	1235633				Object	Not Stated
1038	1235646				Object	Not Stated
1039	1235653				Object	Not Stated
1069	1235765				Object	Not Stated
1081	1235802				Object	Not Stated
1082	1233250				Object	Not Stated
1083	1232438				Object	Not Stated
1084	1231486				Object	Not Stated
1085	1231416				Object	Not Stated
1097	1236067				Object	Not Stated
1113	1236706				Support	Not Stated
1117	1236754				Object	Not Stated
1197	1231216				Object	Not Stated
1243	1146891				Support	Not Stated

Summary of representations	Objections are made to the allocation on the basis of a wide variety of matters and these are all set out in the Council's summary response on this site.
Changes sought	Objections Seek the deletion of allocation

Summary of Council Response	The Council considers the site to be sustainable, viable and deliverable as evidenced by the large suite of supporting background evidence commissioned by the two landowners.
Minor Change proposed	No
Policy / page / Para / Map	HN1.8 New Housing Development Proposals – Ash Lane Hawarden P150 Deposit Plan written statement Proposals Map 02 Front
Relevant Content of Plan	The policy allocates land at Ash Lane, Mancot for housing development.
Representations	Total 203 representations: 201 Objections 2 support Schedule of individual reps;

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
2	1227739				Object	Not Stated
8	1228763				Object	Not Stated
9	1228785				Object	Not Stated
10	1228808				Object	Not Stated
11	1228801				Object	Not Stated
16	1228768				Object	Not Stated
26	1229483				Object	Not Stated
34	1229209				Object	Not Stated
36	1229990				Object	Not Stated
38	1229993				Object	Not Stated
49	1230056				Object	Not Stated
50	1230074				Object	Not Stated
51	1230095				Object	Not Stated
52	1230137				Object	Not Stated
53	1228768				Object	Not Stated
58	1232277				Object	Not Stated
87	1230329				Object	Not Stated
97	1230398				Object	Not Stated
98	1230401				Object	Not Stated
99	1230403				Object	Not Stated
100	1230410				Object	Not Stated
105	1230463				Object	Not Stated
106	1230465				Object	Not Stated
107	1230466				Object	Not Stated
108	1230469				Object	Not Stated
109	1230475				Object	Not Stated
111	1230482				Object	Not Stated
112	1230494				Object	Not Stated
113	1230517				Object	Not Stated

116	1230512		1230509		Object	Not Stated
118	1230577				Object	Not Stated
127	1230599				Object	Not Stated
128	1230607				Object	Not Stated
129	1230613				Object	Not Stated
135	1230683				Object	Not Stated
137	1230693				Object	Not Stated
138	1230695				Object	Not Stated
139	1230703				Object	Not Stated
140	1230705				Object	Not Stated
141	1230706				Object	Not Stated
142	1230710				Object	Not Stated
153	1230363				Object	Not Stated
156	1230724				Object	Not Stated
157	1230726				Object	Not Stated
158	1230729				Object	Not Stated
161	1230740				Object	Not Stated
162	1230746				Object	Not Stated
165	1230812				Object	Not Stated
171	1230827				Object	Not Stated
173	1230832				Object	Not Stated
176	1230838				Object	Not Stated
199	1230911				Object	Not Stated
200	1230912				Object	Not Stated
202	1230919				Object	Not Stated
203	1230920				Object	Not Stated
204	1230921				Object	Not Stated
206	1230923				Object	Not Stated
216	1230946				Object	Not Stated
218	1230951				Object	Not Stated
219	1230924				Object	Not Stated
226	1230955				Object	Not Stated
227	1230955				Object	Not Stated
248	1230980				Object	Not Stated
254	1230982				Object	Not Stated
255	1230984				Object	Not Stated
259	1230987				Object	Not Stated
288	1231069				Object	Not Stated
294	1231085				Object	Not Stated
295	1231084				Object	Not Stated
352	1231216				Object	Not Stated
363	1231226				Object	Not Stated
366	1231236				Object	Not Stated
375	1231247				Object	Not Stated
377	1231252				Object	Not Stated
378	1231257				Object	Not Stated
382	1231261				Object	Not Stated
390	1231268				Object	Not Stated
397	1231277				Object	Not Stated
403	1231280				Object	Not Stated
407	1231288				Object	Not Stated
420	1231285				Object	Not Stated
421	1231286				Object	Not Stated
422	1231309				Object	Not Stated
425	1231314				Object	Not Stated

428	1231317				Object	Not Stated
430	1231321				Object	Not Stated
436	1231334				Object	Not Stated
437	1231342				Object	Not Stated
439	1231345				Object	Not Stated
440	1231347				Object	Not Stated
442	1231352				Object	Not Stated
443	1231353				Object	Not Stated
448	1231369				Object	Not Stated
452	1231382				Object	Not Stated
455	1231393				Object	Not Stated
456	1231395				Object	Not Stated
457	1231398				Object	Not Stated
458	1228734				Object	Not Stated
459	1231031				Object	Not Stated
461	1231402				Object	Not Stated
463	1231404				Object	Not Stated
464	1230483				Object	Not Stated
465	1231414				Object	Not Stated
467	1231418				Object	Not Stated
468	1231420				Object	Not Stated
470	1231424				Object	Not Stated
471	1231426				Object	Not Stated
472	1231430				Object	Not Stated
473	1231431				Object	Not Stated
474	1231447				Object	Not Stated
476	1231484				Object	Not Stated
478	1231489				Object	Not Stated
480	1231495				Object	Not Stated
482	1231504				Object	Not Stated
483	1231512				Object	Not Stated
487	1231635				Object	Not Stated
488	1231651				Object	Not Stated
489	1231659				Object	Not Stated
490	1231661				Object	Not Stated
491	1231662				Object	Not Stated
492	1231663				Object	Not Stated
493	1231669				Object	Not Stated
494	1231688				Object	Not Stated
495	1231691				Object	Not Stated
496	1231695				Object	Not Stated
497	1231697				Object	Not Stated
498	1231699				Object	Not Stated
499	1231700				Object	Not Stated
500	1231705				Object	Not Stated
501	1231711				Object	Not Stated
502	1231715				Object	Not Stated
503	1231722				Object	Not Stated
504	1231725				Object	Not Stated
505	1231757				Object	Not Stated
506	1231825				Object	Not Stated
507	1231831				Object	Not Stated
508	1231841				Object	Not Stated
509	1231871				Object	Not Stated
510	1231892				Object	Not Stated

511	1231966				Object	Not Stated
512	1231970				Object	Not Stated
513	1231978				Object	Not Stated
514	1231980				Object	Not Stated
515	1231982				Object	Not Stated
516	1231988				Object	Not Stated
517	1231993				Object	Not Stated
518	1231998				Object	Not Stated
519	1231999				Object	Not Stated
524	1232116				Object	Not Stated
525	1232147				Object	Not Stated
526	1232153				Object	Not Stated
527	1232157				Object	Not Stated
528	1232168				Object	Not Stated
529	1232172				Object	Not Stated
531	1232211				Object	Not Stated
532	1232218				Object	Not Stated
535	1232246				Object	Not Stated
536	1232251				Object	Not Stated
538	1232257				Object	Not Stated
542	1232273				Object	Not Stated
543	1232287				Object	Not Stated
545	1232308				Object	Not Stated
556	1232381				Object	Not Stated
573	1232475				Object	Not Stated
576	1232489				Object	Not Stated
578	1232496				Object	Not Stated
585	1232533				Object	Not Stated
592	1232558				Object	Not Stated
609	1232744				Object	Not Stated
610	1232746				Object	Not Stated
612	1232749				Object	Not Stated
615	1232805				Object	Not Stated
617	1232831				Object	Not Stated
630	1233054				Object	Not Stated
634	1233060				Object	Not Stated
635	1233066				Object	Not Stated
643	1233100				Object	Not Stated
651	1233116				Object	Not Stated
652	1233128				Object	Not Stated
654	1233141				Object	Not Stated
655	1233146		873545		Support	Not Stated
657	1233150				Object	Not Stated
672	1233230				Object	Not Stated
673	1233217				Object	Not Stated
676	1233171				Object	Not Stated
677	1233179				Object	Not Stated
700	1233411				Object	Not Stated
703	1233422				Object	Not Stated
709	1233447				Object	Not Stated
710	1233448				Object	Not Stated
711	1233449				Object	Not Stated
723	1233548				Object	Not Stated
724	1233550				Object	Not Stated
729	1233586				Object	Not Stated

905	1230877				Object	Not Stated
1092	1235878				Object	Not Stated
1096	1236048				Object	Not Stated
1098	1236076				Object	Not Stated
1099	1236095				Object	Not Stated
1109	1236572				Object	Not Stated
1110	1236639				Object	Not Stated
1244	1146891				Support	Not Stated
1295	1248768				Object	Not Stated

Summary of representations	Objections are made to the allocation on the basis of a wide variety of matters and these are all set out in the Council's summary response on this site.
Changes sought	Objections seek the deletion
Summary of Council Response	The Council considers the site to be sustainable, viable and deliverable as evidence by the large suite of supporting background evidence commissioned by the landowners and the identification of a preferred developer.
Minor Change proposed	No
Policy / page / Para / Map	HN1.9 New Housing Development Proposals – Wrexham Road, HCAC P150 Deposit Plan written statement Proposals Map 03 Front
Relevant Content of Plan	The policy allocates land at Wrexham Road, Abermorddu (HCAC) for housing development.
Representations	Total 25 representations: 24 Objections 1 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
94	1230319				Object	Not Stated
95	1230375				Object	Not Stated
185	1148998				Object	Not Stated
274	1231053				Object	Not Stated
277	1231056				Object	Not Stated
302	1231058				Object	Not Stated
304	1231102				Object	Not Stated
305	1231057				Object	Not Stated
308	1231058				Object	Not Stated
309	1231058				Object	Not Stated
310	1231102				Object	Not Stated
313	1231102				Object	Not Stated
314	1231104				Object	Not Stated
376	1231243				Object	No
380	1231254				Object	Not Stated
438	1231343				Object	Not Stated

548	1232322				Object	Not Stated
708	1233445				Object	No
1086	1150110				Object	No
1093	1235915				Object	No
1111	1236682				Object	No
1191	1229108		1227685		Object	Not Stated
1245	1146891				Support	Not Stated
1259	1149350		1232395		Object	Not Stated
1283	1232396		1232395		Object	Not Stated

Summary of representations	Objections are made to the allocation on the basis of a wide variety of matters and these are all set out in the Council's summary response on this site. Some objectors have suggested other sites in the settlement as being preferable to replace the allocated site, Conditions are also suggested to be attached to the allocation.
Changes sought	Objections seek deletion or replacement of the allocation or propose conditions to be attached to the allocation.
Summary of Council Response	The Council considers the site to be sustainable, viable and deliverable as evidenced by the large suite of supporting background evidence commissioned by the landowners as part of a previous planning application.
Minor Change proposed	No
Policy / page / Para / Map	HN1.10 New Housing Development Proposals – Cae Isa, New Brighton P150 Deposit Plan written statement Proposals Map 02 Front
Relevant Content of Plan	The policy allocates land at for housing development at Cae Isa, New Brighton
Representations	Total 11 representations: 9 Objections 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
183	1230860				Object	Not Stated
321	1228898				Object	Not Stated
353	1231206				Object	No
544	1230681				Object	Yes
596	1232541		1232537		Support	Not Stated
1118	1236809				Object	No
1121	1236829				Object	No
1122	1236844				Object	Yes
1247	1146891				Support	Not Stated
1257	1149350		1232395		Object	Not Stated

1281	1232396		1232395		Object	Not Stated
Summary of representations		Objections are made to the allocation on the basis of a wide variety of matters and these are all set out in the Council's summary response on this site.				
Changes sought		Objections seek the deletion of the allocations				
Summary of Council Response		The Council considers the site to be sustainable, viable and deliverable as evidenced by the large suite of supporting background evidence commissioned by the landowners as part of a current undetermined planning application.				
Minor Change proposed		No				
Policy / page / Para / Map		HN1 New and Resubmitted Sites P150 Deposit Plan written statement				
Relevant Content of Plan		The policy allocates land for housing development at 11 sites.				
Representations		Total 86 representations: 82 Objections 1 support 3 not stated				

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
481	1231500				Support	Not Stated
18	1228969		1228968		Object	Not Stated
41	1229995				Object	Not Stated
88	1229108		1227685		Object	Not Stated
89	1229109		1227685		Object	Not Stated
90	1229681		1227685		Object	Not Stated
166	1230816				Object	Not Stated
192	1230888				Object	Not Stated
193	1226342		1226341		Object	Not Stated
221	1230953		1229964		Object	Not Stated
222	1230954				Object	Not Stated
223	1230957		1149435		Object	Not Stated
244	1230976				Object	Not Stated
328	1231134		1231130		Object	Not Stated
329	1231134		1231130		Object	Yes
383	1231128		1231126		Object	Not Stated
454	1231391		1231390		Object	Not Stated
551	1232359		1232358		Object	Not Stated
559	1232396		1232395		Object	Not Stated
561	1232399				Object	Not Stated
571	1232453		1232358		Object	Not Stated
574	1232453		1232358		Object	Not Stated
575	1232482		1232358		Object	Not Stated

579	1232503		1232502		Object	Not Stated
581	1230731		1148845		Object	Not Stated
586	1230730		1148845		Object	Not Stated
602	1232660		1232659		Object	Not Stated
618	1226342		1226341		Object	Not Stated
626	1233028		1232939		Object	Not Stated
636	1224983		1224982		Object	Not Stated
653	1233134		1232501		Object	Not Stated
658	1233157				Object	Not Stated
675	1233184				Object	Not Stated
689	1233248		1149190		Object	Not Stated
693	1231164		1148845		Object	Not Stated
698	1233184				Object	Not Stated
699	1233184				Object	Not Stated
701	1233184				Object	Not Stated
702	1233184				Object	Not Stated
736	1233611				Object	Not Stated
755	1231128		1231126		Object	Not Stated
756	1231151		1231150		Object	Not Stated
783	1234093		1233580		Object	Not Stated
786	1148956		1148947		Object	Not Stated
788	1148956		1148947		Object	Not Stated
813	1234453				Object	Not Stated
815	1234466		1234465		Object	Not Stated
817	1234480		788759		Object	Not Stated
831	1231124		788759		Object	Not Stated
870	1149350		1232395		Object	Not Stated
876	1234645		1234643		Object	Not Stated
914	1235010		1234870		Object	Not Stated
915	1141895		1234985		Object	Not Stated
926	1230461				Object	Not Stated
929	1230461				Object	Not Stated
959	1149828		1149800		Object	Not Stated
974	1235343		1149800		Object	Not Stated
991	1149823		1149800		Object	Not Stated
1013	1235341		1149800		Object	Not Stated
1108	1232660		1232659		Object	Not Stated
1124	1236877				Object	Not Stated
1183	1232503		1233580		Object	Not Stated
1194	1230953		1229964		Object	Not Stated
1195	1230953		1229964		Object	Not Stated
1196	1230953		1229964		Object	Not Stated
1202	1233454		1232502		Object	Not Stated
1203	1229108		1227685		Object	Not Stated
1207	1229110		1227685		Object	Not Stated
1210	1233157				Object	Not Stated
1211	1233157				Object	Not Stated
1212	1233157				Object	Not Stated
1213	1233157				Object	Not Stated
1214	1233157				Object	Not Stated
1218	1229111		1227685		Object	Yes
1251	1231151		1231150		Object	Not Stated
1265	1247627		1229404		Object	Not Stated
1266	1247627		1229404		Object	Not Stated
1267	1233684		1232502		Object	Not Stated

1268	1233684		1232502		Object	Not Stated
1269	1149198		1148968		Object	Not Stated
1286	1233213		1233212		Object	Not Stated
1287	1233213		1233212		Object	Not Stated
1296	1234645		1234643		Object	Not Stated
1193	1236741					Not Stated
1200	1235343		1149800			Not Stated
1208	1233454		1232502			Not Stated

Summary of representations

Objections seek the allocation of land in the form of new sites (submitted at Deposit Consultation stage) and previous sites (submitted as Candidate Sites or Alternative Sites).

List of new sites / resubmitted sites:

Site type	New or resubmitted site
New site	Bryn Y Pys, Well Street, Buckley
New site	Bryn Glas, Flint
New site	Leeswod SE site County Road, Leeswood
New site	Land NE of Holywell Road, Ewloe
New site	Chester Road , Penyffordd
New site	Land adj Brook Farm, Kinnerton Lane, Higher Kinnerton
Re-submitted site	TLD001(or part) on land opposite Erw Wen, London Rd, Trelawnyd
Re-submitted site	Candidate Site HCAC029 for inclusion as a housing allocation.
Re-submitted site	land at Wood Green, Mold. Candidate site MOL004
Re-submitted site	NAN001
Re-submitted site	NEW002, in New Brighton
Re-submitted site	BUC047-AS Megs Lane, Buckley
Re-submitted site	Candidate sites HK007
Re-submitted site	BRYN003
Re-submitted site	GYM003 Llys Newydd Gwernymynydd
Re-submitted site	FLI005 Manor Estate, Flint
Re-submitted site	CAR001 Carmel, Land at Halfway Field
Re-submitted site	CAR001 Carmel, Land at Halfway Field
Re-submitted site	SAL002
Re-submitted site	BUC018
Re-submitted site	Candidate Site MOL040
Re-submitted site	FLI018 Land West of Leadbrook Drive, Flint
Re-submitted site	MOL004 Land North of Wood Lane, Mold
Re-submitted site	Candidate Site MOL006 Land South of Haven, Off Upper Bryn Coch, Mold
Re-submitted site	Candidate Site MOL05, Land North of Junction of A494 and Ruthin Road, Mold
Re-submitted site	Green Space EN2.89 GRO001
Re-submitted site	PEN050-AS Land East of Vounog Hill, Penyffordd
Re-submitted site	Land to the north east of Issa Farm, MYN015-AS
Re-submitted site	PEN037
Re-submitted site	Land off Church Road, Northop
Re-submitted site	BUC047 (AS) Megs Lane, Buckley
Re-submitted site	land adjacent to Maes Celyn, Holywell Road, Northop NOR037
Re-submitted site	MYN018AS Ffordd Fer, Mynydd Isa
Re-submitted site	MOL056 Pen Y Bont Farm

Re-submitted site	HCAC021 Land west of Gwalia / Bryn Yorkin
Re-submitted site	ALLT 006 Land adj Tavern Public House, Alltami
Re-submitted site	NH024 Lllys Ben Northop Hall
Re-submitted site	MOL004 Land at Wood Lane Mold
Re-submitted site	DRU011 Land North of Holmleigh/ Lower Farm
Re-submitted site	BUC006 Land north of A 549
Re-submitted site	NEW010 Land Adj Argoed View
Re-submitted site	BROU001 Bretton Road, Bretton
Re-submitted site	BRYN002 Land North of Hiraethog Brynford
Re-submitted site	SAL002
Re-submitted site	MOL024 , MOL046 Gwernaffield Road Mold
Re-submitted site	CAR001 Land North of Holway Road Carmel
Re-submitted site	BUC026 Adj Viandra Bannel Lane Buckley
Re-submitted site	PEN047AS
Re-submitted site	NH003 Land off Bryn Gwyn Lane, Northop Hall
Re-submitted site	HK003 Land Adj/ S of Kinnerton Lane
Re-submitted site	BROU001 Bretton Road, Bretton
Re-submitted site	BUC 30 Land between Chester Road and Bannel Lane, Buckley
Re-submitted site	DRU001 Bank Lane Drury
Re-submitted site	DEE009(AS) Land North of Shotwick Road
Re-submitted site	BUC22 Land at Liverpool Road Buckley
Re-submitted site	HWN001 Land at Lower Aston Hall Farm, Hawarden
Re-submitted site	Mancot Lane, Mancot, Queensferry MAN0012
Re-submitted site	Warren Bank Lane, Broughton BROU10
Re-submitted site	Plas Aney, Ruthin Road, Mold MOL002/MOL051
Re-submitted site	Bistre, Well Street, Buckley BUC023, BUC036, BUC055AS
Re-submitted site	land off Church Road, Northop
Re-submitted site	Candidate Site Ref HOL015 Land at wood Lane Pen Y Maes, Holywell
Re-submitted site	PEN050AS Land east of Vounog Hill, Penyffordd
Re-submitted site	Candidate sites HK008
Re-submitted site	Candidate sites HK011
Re-submitted site	Candidate sites HK012
Re-submitted site	HOL018 North of Moor Lane, Holywell
Re-submitted site	HCAC029
Re-submitted site	FLI008
Re-submitted site	HCAC 025 Land off Huxleys Lane Hope
Re-submitted site	HCAC 021 Land West of Gwalia, Bryn Yorkin
Re-submitted site	HCAC 026 Gresford Road Hope
Re-submitted site	Gresford Rd, Hope HCAC028
Re-submitted site	HCAC023 Land rear of 17 Plas Yn Bwl
Re-submitted site	FLI008
Re-submitted site	NEW001/3/9/11 Bryn Y Baal, New Brighton
Re-submitted site	PEN005 Land South of Rhos Road, Penyffordd, Nr Chester
Re-submitted site	TREU001 Land adjacent to Bryn Tirion, Ffordd Y Rhos, Treuddyn, Flintshire
Re-submitted site	NH008/020 Wellfield Farm, Northop Hall
Re-submitted site	DRU009 Woodside Cottages, Drury
Re-submitted site	CON 096AS Kelsterton Farm
Re-submitted site	LEE001 Land adj Queens Farm Dingle Rd Leeswood
Re-submitted site	GFD001 Coppy Farm Gwernaffield Road
Re-submitted site	BUC021
Re-submitted site	BROU010 Land to the S of Old Waren Broughton
Re-submitted site	EWL007 Land off Old Aston Hill/Church Lane Ewloe

Changes sought	Objections seek the allocation of sites
Summary of Council Response	The Council considers that the Plan has identified an appropriate housing requirement and that this can be delivered through the various sources of supply and through a 14.4% flexibility allowance. It is not considered necessary or appropriate for further allocations to be made either in place of or in addition to existing allocations. The Council has responded to each site separately.
Minor Change proposed	No
Policy / page / Para / Map	HN2 Density and Mix P151 Deposit Plan written statement
Relevant Content of Plan	The policy seeks to ensure that new housing development achieves a density of at least 30 dwellings per hectare and will only permit lower density where there are particular characteristics of the site and locality. The policy also seeks to achieve a good mix of dwellings by type and size.
Representations	Total 13 representations: 5 objections 8 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
429	1230991		1230989		Support	Not Stated
598	1232541		1232537		Support	Not Stated
647	1224983		1224982		Support	Not Stated
714	1233454		1232502		Support	Not Stated
767	1234011		1233580		Support	Not Stated
810	1234431				Object	Yes
869	1234608				Support	Yes
930	1235201		1234870		Support	Not Stated
960	1149828		1149800		Object	Not Stated
975	1235343		1149800		Object	Not Stated
992	1149823		1149800		Object	Not Stated
1023	1235341		1149800		Object	Not Stated
1180	1232503		1233580		Support	Not Stated

Summary of representations	<p>Several objections from one agent expressed concerned that 30 dwellings per hectare will not be achievable on all housing allocations.</p> <p>One objection queried whether the density is based on gross or net site area.</p>
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	<p>Two objections expressed the need for a good mix of housing on new sites to be achieved and for this to be controlled.</p> <p>General support for the Plans requirement to strive to achieve 30 dwellings per hectare with one representation explaining that higher densities may be appropriate and achievable.</p>
Changes sought	Not specified
Summary of Council Response	<p>The Council considers that the policy is robust in seeking to make the best use of land, to create a mix of housing units, at an appropriate density which bring about quality places and living environments.</p> <p>The density figure applies to the net site area.</p> <p>The objector puts forward no evidence that the density cannot be achieved on the Plan's allocated site.</p>
Minor Change proposed	No
Policy / page / Para / Map	HN3 Affordable Housing P152 Deposit Plan written statement
Relevant Content of Plan	The policy sets out the requirements for affordable housing on sites of 10 or more units, based on different sub market areas.
Representations	<p>Total 28 representations:</p> <p>21 objections</p> <p>7 support</p>

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
72	1144556				Object	Not Stated
324	1231151		1231150		Object	Yes
350	1231145				Support	Yes
409	1144556				Object	Yes
432	1230991		1230989		Support	Not Stated
599	1232541		1232537		Object	Yes
601	1232541		1232537		Object	Not Stated
613	1232770				Object	Not Stated
649	1224983		1224982		Object	Yes
716	1233454		1232502		Object	Not Stated
753	1233684		1233580		Support	Not Stated
768	1234018		1233580		Object	Not Stated
777	1144593				Support	Not Stated
858	1150807				Object	Not Stated
864	1148956		1148947		Object	Yes
897	1148889		1234839		Object	Yes
923	1230461				Support	Not Stated

931	1235203		1234870		Object	Yes
976	1235343		1149800		Object	Yes
993	1149823		1149800		Object	Not Stated
1025	1235341		1149800		Object	Not Stated
1139	1149498				Object	Yes
1145	1234608				Support	Yes
1158	1234431				Support	Yes
1173	1232503		1233580		Object	Not Stated
1181	1232503		1233580		Object	Not Stated
1264	1149350		1232395		Object	Not Stated
1279	1232396		1232395		Object	Not Stated

Summary of representations	<p>Two objections seeks reassurance that the % requirements will be properly enforced. One objection seeks reassurance that the affordable housing to be provided is genuinely affordable. One objection seeks greater clarity on affordable housing 'contributions' and concern that development sites cannot be split into order to avoid the threshold number of units at which affordable housing will be required.</p> <p>Welsh Government seek clarity and consistency between the policy and the LHMA in terms of the tenure split of affordable housing.</p> <p>The issues arising from the bulk of objections are summarized below:</p> <p>Concern about high level nature of viability study</p> <p>Concern that the level of need in the LHMA will not be delivered by the Plan</p> <p>The % requirements should be referenced as a 'target' and not as a starting point for negotiation</p> <p>The lack of boundaries on the proposals maps for the sub market areas</p> <p>Concern the increase in the % requirements compared with the 30% in the UDP is challenging and unviable</p> <p>Affordable housing can be secured by planning condition rather than planning agreement</p> <p>Concerns about the soundness and robustness of the Viability Study in terms of</p> <p>Relevance and accuracy of the sub market area boundaries</p> <p>Assumptions relating to developer profit</p> <p>Assumptions relating to mix of units</p> <p>Assumptions relating to other policy requirements</p> <p>Assumptions relating to land values</p> <p>Assumptions relating to construction costs</p> <p>Lack of consideration to abnormals</p> <p>Objectors generally considered that the % requirements should be reduced but one objector considered that the policy requirements were lower than the 51% in the draft NDF</p>
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Changes sought	Objections seek lower % requirements that are expressed as targets and the inclusion of the market areas on the proposals map. The affordable housing target should also be added to STR1 within the written statement.
Summary of Council Response	<p>Affordable Housing will be delivered at 70% market value for low cost home ownership dwellings to eligible applicants from the Tai Teg register. Intermediate rental dwellings will be let at no more than 80% of private rental values. Applicants must meet specific eligibility criteria in terms of their income and any local connection criteria. This will ensure that only applicants who cannot afford to buy or rent on the open market are offered a property, and that they can afford to live in the property.</p> <p>Policy HN3 resists applications to deliberately phase sites to avoid meeting the threshold of 10 for affordable housing contributions.</p> <p>The LHMA has been clarified to show the tenure split between social and intermediate rental. This has shown that the tenure split used within the viability assessment is in line with the findings of the LHMA.</p> <p>If the Inspector considers that the affordable housing target should be added to Policy STR1 then the Council would have no objection to this. The target for affordable housing delivery can also be seen in the affordable housing background paper LDP07.</p> <p>The viability assessment has been carried out using robust and up to date evidence compiled by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. The policy wording does not mean that the Council will be looking for a higher percentage than those specified within Policy HN3, these are simply the starting position for negotiation where the levels are a maximum and which may reduce downwards subject to detailed viability considerations supported by clear and robust evidence.</p> <p>The LHMA Sub Market areas are mapped within the LHMA Update 2018. If the Inspector is minded that the implementation of the policy would be improved by adding the LHMA sub-areas to the LDP proposals map then the Council would have no objection to this.</p> <p>The viability assessment does not make an allowance for abnormal costs as this would be highly speculative,</p>

	<p>and not appropriate for the majority of sites. Abnormal costs are not the 'norm' therefore it would be unreasonable to apply an element of abnormal costs to all sites.</p> <p>Land Value – The DVS have used land values that in their opinion reflect the level required for the land to be released onto the market for residential development. This may well be lower than transactions in the recent past, but the DVS appraisals are based on current market conditions, with the affordable housing requirements as expected at the time and assuming the land is acquired at the date of valuation.</p> <p>Housing Mix – The DVS looked at the housing mix on recent developments within Flintshire to reach the mix within the viability assessment.</p> <p>Construction Costs –The DVS have used information from their internal quantity surveyors and the BCIS data to establish a current base price per square metre for residential development within the Flintshire area. The DVS reduced the build cost for larger schemes with more than 150 dwellings to reflect the economies of scale achieved by developments of this size. This is based upon the DVS evidence and experience of using build costs when carrying out viability assessments.</p> <p>Developer Profit - The DVS have used a profit level of 17.5% which is considered reasonable based upon the nature of the developments and their perceived associated risks.</p> <p>It is assumed that the NDF has not carried out bespoke viability assessments within Flintshire therefore the Council cannot apply this percentage and ignore its own viability assessment results.</p>
Minor Change proposed	No
Policy / page / Para / Map	HN4 Housing in the Countryside P154 Deposit Plan written statement
Relevant Content of Plan	The policy provides guidance on proposals for new housing in the open countryside. The policy references TAN6 in respect of rural enterprise dwellings and one planet developments and other more detailed policies.
Representations	Total 4 representations: 2 objection 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
6	1228075				Object	No
114	1230508				Support	No
355	1231217				Support	No
433	1230991		1230989		Object	Not Stated
Summary of representations		One objection seeks provision within the policy for housing to be permitted on brownfield sites in open countryside such as former mineral sites. The other objection is concerned with the restrictive approach of the policy and how sustainable development on the edge of settlements should be capable of coming forward.				
Changes sought		Reference in policy wording to brownfield sites and reference to development on the edge of settlements.				
Summary of Council Response		<p>The Council considers it inappropriate for the policy to make provision for new housing on brownfield or minerals sites in open countryside as PPW clearly references not all brownfield land is suitable for development. Any such proposal should be considered on their individual merits.</p> <p>The policy reflects PPW10 in setting out the specific cases where new housing in open countryside may be permitted. Given that the Plan seeks to meet its housing requirement through a varied housing supply, with a 14% flexibility, it is not understood why it would be appropriate for provision to be made in the policy for housing development on the edge of settlements (other than for affordable housing exceptions schemes)</p>				
Minor Change proposed		No				
Policy / page / Para / Map		HN4B Residential Conversions of Rural Buildings P156 Deposit Plan written statement				
Relevant Content of Plan		The policy provides criteria based guidance in respect of development proposals involving the conversion of rural buildings to housing.				
Representations		Total 2 representations: 1 objection 1 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to	Hearing attendance

					this policy?	
63	1230290				Support	Not Stated
289	1229111		1227685		Object	Yes
Summary of representations			The objection considers that the requirements to consider an employment re-use before residential conversion is unreasonable and unnecessary.			
Changes sought			Seeks deletion of criterion a b and c.			
Summary of Council Response			The Council considers that the policy approach of seeking business re-use wherever possible, is justified in the context of PPW10.			
Minor Change proposed			No			
Policy / page / Para / Map			HN4C Infill Development in Groups of Houses P157 Deposit Plan written statement			
Relevant Content of Plan			The policy provides criteria based guidance in respect of infill housing proposals within groups of houses in the open countryside.			
Representations			Total 1 representation – objection Schedule of individual reps;			

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
275	1229111		1227685		Object	Yes

Summary of representations			The objection claims that the policy has not delivered affordable housing and should be amended to include market or 50/50 mix with market and affordable.			
Changes sought			Seeks amendment to deliver market or a mix of market / affordable.			
Summary of Council Response			The Council considers the policy is reasonable in seeking to provide for opportunities for dwellings in rural areas where there is a local need for housing which cannot be met due to prevailing house prices.			
Minor Change proposed			No			
Policy / page / Para / Map			HN4D Affordable Housing Exceptions Schemes P159 Deposit Plan written statement			
Relevant Content of Plan			The policy provides guidance on small scale affordable housing exceptions schemes on the edge of settlement boundaries.			
Representations			Total 4 representations: 3 objections 1 support			

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
273	1229111		1227685		Object	Yes
623	1230050				Support	No
1132	1234608				Object	Yes
1185	1149498				Object	Yes
Summary of representations		Welsh Government query why affordable housing exceptions schemes are only permitted in Tier 2-5 settlements and not in Tier 1 settlements. One objection considers the policy has failed (nationally and locally) and that the policy should allow for market housing as part of such developments to cross subsidise the affordable element. One objection is to the fact that the policy does not quantify such developments and that the policy is open to abuse.				
Changes sought		Inclusion of market housing to cross subsidise affordable housing. Amendment of policy wording to include Tier 1 settlements.				
Summary of Council Response		The Council considers that the policy fully reflects national guidance which presently does not allow market housing on exceptions schemes outside settlement boundaries. It is accepted that the policy should also apply to Tier 1 settlements. However, it is not possible for the policy to prescribe in advance the number of such developments coming forward but the policy does provide controls over the size and configuration of such developments.				
Minor Change proposed		Inclusion of Tier 1 settlements in the opening part of policy wording and a consequential change to STR2a) in respect of Tier 1 settlements.				
Policy / page / Para / Map		HN6 Annex Accommodation P161 Deposit Plan Written Statement				
Relevant Content of Plan		The policy provides criteria based guidance in respect of development proposals for annex accommodation.				
Representations		Total 2 representations – objections				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
122	1230593				Object	No
290	1229111		1227685		Object	Yes

Summary of representations	Objection to third sentence of para 11.27 which is considered to be factually incorrect in the context of previous court decisions. Objection considers the policy to be prescription in seeking to control annex accommodation.
Changes sought	Seeks revision to para 11.27 of explanation. Seeks deletion of criteria of i) and iii)
Summary of Council Response	The Council considers the policy wording and its explanation is appropriate in seeking to prevent the creation of accommodation which in effect is a free stranding new dwelling in open countryside.
Minor Change proposed	No
Policy / page / Para / Map	HN7 Houses in Multiple Occupation P162 Deposit Plan Written Statement
Relevant Content of Plan	The policy adopts a criteria based approach to the consideration of proposals for HMO development.
Representations	Total 1 representation – objection

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
1144	1149498				Object	Not Stated

Summary of representations	Welsh Government seeks additional evidence to demonstrate where areas are located which have 'over concentrations of HMO's'. This would assist in determining what cumulative impacts would be.
Changes sought	Revisions to policy wording
Summary of Council Response	The Council does not presently have an accurate register of HMO's with which to identify geographical concentrations of HMO's whereby cumulative impacts of further HMO's can be prevented. Work is continuing to address Welsh Government's concerns.
Minor Change proposed	No
Policy / page / Para / Map	HN8 Gypsy and Traveller Sites (general representation)
Relevant Content of Plan	The policy identifies three site allocations which to meet the need for residential pitches identified in the GTAA as well as the identification of a transit site.
Representations	Total 1 representation – objection

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or	Hearing attendance
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					object to this policy?	
1140	1149498				Object	Not Stated
Summary of representations		<p>Welsh Government seeks clarity on the position regarding the two GTAA's in order to ensure that need is evidenced in an approved Study. The Council needs to demonstrate that the 5 year and Plan period need can be met through suitable and deliverable site allocations.</p> <p>Identifies that the Magazine Lane is within a green barrier and needs to be justified in terms of PPW10 and also overlaps with a landfill buffer zone – EN20.</p> <p>Identifies that the Riverside site is within C1 and will require a FCA in line with TAN15.</p> <p>Identifies that the Castle Park site overlaps with solar allocation EN13.</p>				
Changes sought		Seeks additional evidence to address concerns.				
Summary of Council Response		<p>Welsh Government Equalities Division have confirmed that the earlier GTAA is still valid in terms of establishing need over the Plan period.</p> <p>In responses to other objections on the Magazine Lane allocation the Council has confirmed that the Inspector is requested to consider the appropriateness of an alternative remodeling of the existing authorized site rather than a physical extension.</p> <p>In response to other objections on the Riverside allocation the Council has explained that a FCA been undertaken and further work arising from this.</p> <p>The Castle Park transit site allocation does not overlap with the solar allocation (which now has planning permission).</p>				
Minor Change proposed						
Policy / page / Para / Map		HN8.1 Gypsy and Traveller Sites – Magazine Lane, Ewloe P164 Deposit Plan written statement Proposals Map 01 Front				
Relevant Content of Plan		The policy allocates land at Magazine Lane, Ewloe for an extension to the existing residential site.				
Representations		Total 6 representations: 4 objection 2 support				

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
568	1232435				Object	Not Stated
665	1146891				Support	Not Stated
1028	1235357				Support	Not Stated
1126	1236754				Object	Not Stated
1192	1230433				Object	Not Stated
1215	1227700		1227685		Object	Not Stated

Summary of representations	Objections have raised a variety of issues and these are set out in the Council's summary of representations.
Changes sought	Seeks deletion of site
Summary of Council Response	The Council has explained in the summary of representations and responses that the site is considered to represent a sustainable and reasonable extension to the existing authorized site. However, the Inspector is requested to consider the appropriateness of the remodeling of the existing site, rather than a physical extension to the site. A planning application is currently under consideration for an additional 10 pitches.
Minor Change proposed	
Policy / page / Para / Map	HN8.2 Gypsy and Traveller Sites - Gwern Lane, Cae Estyn, Hope P164 Deposit Plan written statement
Relevant Content of Plan	The policy allocates land at Gwern Lane, Hope for an extension to the existing residential site.
Representations	Total 17 representations: 15 objection 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
30	1229657				Object	Not Stated
241	1229189				Object	Not Stated
251	1230990				Object	Not Stated
315	1231109				Object	Not Stated
371	1231214				Object	Not Stated
379	1231242				Object	Not Stated
431	1231323				Object	Not Stated
460	1231401				Object	Not Stated
462	1231403				Object	Not Stated
469	1231422				Object	Not Stated
479	1231491				Object	Not Stated

669	1233157				Object	Not Stated
1040	1231177				Object	Not Stated
1041	1235707				Object	Not Stated
1216	1227700		1227685		Object	Not Stated
1220	1235357				Support	Not Stated
1231	1146891				Support	Not Stated

Summary of representations	Objections have raised a variety of issues and these are set out in the Council's summary of representations.
Changes sought	Seek deletion of site or reduction in scale.
Summary of Council Response	The Council has explained in the summary of representations and responses that the site is considered to represent a sustainable and reasonable extension to the existing authorized site. However, the Inspector is requested to note that the number of pitches is now proposed to be less. A planning application is currently under consideration for an additional 4 pitches.
Minor Change proposed	No
Policy / page / Para / Map	HN8.3 Gypsy and Traveller Sites – Riverside, Queensferry P164 Deposit Plan written statement
Relevant Content of Plan	The policy allocates land at Riverside, Queensferry for an extension to the existing residential site.
Representations	Total 5 representations: 2 objection 3 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
69	1230290				Support	Not Stated
1057	1229839				Object	Not Stated
1217	1227700		1227685		Object	Not Stated
1222	1235357				Support	Not Stated
1233	1146891				Support	Not Stated

Summary of representations	Objections have raised a variety of issues and these are set out in the Council's summary of representations.
Changes sought	Seek Deletion of allocation / replacement with a site in Mynydd Isa
Summary of Council Response	The Council has explained in the summary of representations and responses that the site is considered to represent a sustainable and reasonable extension to the existing authorized site. Following

	comments on a FCA by NRW further work is progressing in terms of establishing compensatory flood water storage in order to address the raising of site levels, given the sites location in C1 flood risk zone.
Minor Change proposed	No
Policy / page / Para / Map	HN8.4 Gypsy and Traveller Sites – Castle Park Industrial Estate, Flint P164 Deposit Plan written statement
Relevant Content of Plan	The policy allocates land at Castle Park Industrial Estate, Flint for a new transit site.
Representations	Total 11 representations: 9 objection 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
21	1229203				Object	Not Stated
33	1229826				Object	Not Stated
101	1230419				Object	Not Stated
110	1230477				Object	Not Stated
168	1230678				Object	Not Stated
278	1231054				Object	Not Stated
287	1231068				Object	Not Stated
567	1232356		1232358		Object	Not Stated
606	1232722				Object	Not Stated
1223	1235357				Support	Not Stated
1234	1146891				Support	Not Stated

Summary of representations	Objections have raised a variety of issues and these are set out in the Council's summary of representations.
Changes sought	Seeks deletion of allocation
Summary of Council Response	The Council has explained in the summary of representations and responses that the site is considered to represent a sustainable brownfield site with which to accommodate a small transit site.
Minor Change proposed	No
Policy / page / Para / Map	HN9 Gypsy and Traveller Accommodation P166 Deposit Plan written statement
Relevant Content of Plan	The policy provides a criteria based approach to the consideration of any gypsy and traveler development proposals arising over the Plan period.
Representations	Total 3 representations – objections

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing attendance
240	1147889		1230687		Support	Not Stated
840	1234513		1234487		Object	Not Stated
1141	1149498				Object	Not Stated
Summary of representations		<p>Welsh Government object to criteria a) and b) and seek amendments to para 11.37 as the present policy is considered to be unduly restrictive in the light of guidance in Annex B of Circular 005/19.</p> <p>One objection considers the policy should place restrictions on sites in the AONB. Another objection seeks minor wording changes to the policy.</p>				
Changes sought		Minor changes to policy and explanation				
Summary of Council Response		<p>The Council accepts the need for revisions to the policy and explanation to be in line with Circular 008/15, subject to the agreement of the Inspector, as follows:</p> <p>Delete criteria a)</p> <p>Delete criteria b)</p> <p>Renumber criteria</p> <p>Amend para 11.37 as follows: ‘Despite provision being made in the Plan through allocations, there may be development proposals for Gypsy and Traveller sites submitted during the Plan period, particularly in order to meet a specific need. This policy takes the form of a criteria based policy for assessing such proposals and should be read alongside the Plan’s framework of policies. 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.</p> <p>It is not considered necessary for the policy to reference the AONB as policy EN4 provides guidance on the AONB and the Plan should be read as a whole. The suggested wording in the remaining objection is neither necessary nor appropriate.</p>				
Minor Change proposed		No				

Appendix 21f Main Issues – Development management Policies – Valuing the Environment

Policy / page / Para / Map		Development Management Policies – Valuing the Environment - General				
Relevant Content of Plan		n/a				
Representations		Total 6 representations: 2 objections 4 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
949	1149828		1149800			Not Stated
539	1232265					Not Stated
686	1233338		1233325		Object	Not Stated
995	1235341		1149800			Not Stated
932	1235344		1149800		Object	Not Stated
964	1235343		1149800			Not Stated
Summary of representations		<p>The objections have been submitted under the label of ‘Development Management Policies – Valuing the Environment’.</p> <p>Seeks an additional policy known as “Locations for Transmission Connected Energy Generation and Storage Facilities” to provide support for such developments at suitable locations in employment areas where there is an established energy use or existing transmission infrastructure. Suggests former Deeside Power Station, Connah’s Quay.</p> <p>Para 9.5 is almost the only place in the LDP where mention is made of protecting high quality agricultural land; yet despite this and the fact PPW10 places significant weight on BMV the LDP is devoid of any policy and makes no mention of any assessment of how this might have influenced housing site selection. References Sealand development site?</p>				
Changes sought						
Summary of Council Response		<p>The objection lacks any detail on the nature of such proposals and technical evidence to demonstrate that the Connah’s Quay Power Station (and other unspecified sites throughout the County) might be suitable for the proposed (unspecified) use or development. The objector already recognises that such development proposals may fall outside the scope of the LPA as they constitute major infrastructure projects. The Plan should only include site specific proposals where there is evidence that the proposed development is viable, deliverable and sustainable and this is clearly not the case. It would be inappropriate for</p>				

	<p>the Plan to include the policy wording proposed by the objector.</p> <p>The objector recognises that the protection of Best and Most Versatile Agricultural Land is clearly and fully set out in paras 3.54-3.55 of PPW10. It is not necessary or desirable for LDP's to slavishly repeat national guidance from PPW10. Indeed, para 3.11 of Development Plan Manual 3 states 'An LDP should not repeat national policy. Plans should not be a compendium of policies to cover every eventuality'. The adopted LDP will clearly need to be read in the context of LDP. There is no objection from Welsh Government in their representations on the Plan regarding the lack of a policy on agricultural land. The Deposit Plan is also supported by Background Paper.</p>
Minor Change proposed	No
Policy / page / Para / Map	EN1 Sports Recreation and Cultural Facilities p168 Deposit Plan written statement
Relevant Content of Plan	The policy sets out a criteria based approach to considering development proposals which would result in a loss of facilities. The policy also requires new residential development to provide open space.
Representations	Total 4 representations: 3 objection 1 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
322	1231153		1231150		Object	Yes
323	1231151		1231150		Object	Yes
785	1144593				Object	Not Stated
648	1224983		1224982		Support	Not Stated

Summary of representations	<p>Two objections consider that the policy lacks clarity on the requirements for open space, in the absence of an up to date SPG.</p> <p>One objection seeks assurances that the lesire facilities and walking and cycling routes at the Warren Hall development will be available to benefit the wider community.</p>
Changes sought	Seeks amendment to policy / production of SPG
Summary of Council Response	The Council is presently undertaking an Open Space Survey in order to inform open space standards and requirements. The Could will include requirements

	within policy wording if considered necessary and appropriate.
Minor Change proposed	No
Policy / page / Para / Map	EN2 Green Infrastructure p169 Deposit Plan written statement
Relevant Content of Plan	The policy seeks to protect green infrastructure and seek the establishment of green infrastructure as part of new development. The policy also seeks to protect 173 green spaces throughout the County.
Representations	Total 12 representations: 9 objections 3 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
56	1228731		1228728		Object	Not Stated
229	1147889		1230687		Support	Not Stated
149	1230363				Object	No
210	1230905				Support	Not Stated
415	1144556				Object	No
391	1231156				Support	Not Stated
859	1150807				Object	Not Stated
843	1234528		1234487		Object	Not Stated
1155	1234431				Object	Not Stated
1160	1234431				Object	Yes
1148	1234608				Object	Yes
1136	1234608				Object	Yes

Summary of representations	<p>An objection considers that the policy is more onerous than PPW and seeks amended policy wording. Another objection seeks clarity on whether the policy applies to the site and immediate surroundings or the anywhere in the County.</p> <p>One objector considers that 'Country parks' should be identified on the proposals map.</p> <p>Other objections are site specific referring to: a recent planning permission on Mold Business Park and seeking the relocation of the greenspace from the front of the site to land at the rear of the site in order to reflect the planning permission.</p> <p>The housing allocation at Ash Lane, Hawarden resulting in the loss of green infrastructure various land in Mold which is or isn't designated as green space and also seeks reference to the Mold 'Green band' in the Plan.</p>
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	Several parcels of land in and adjacent to Penyffordd / Penymynydd to be designated as green space
Changes sought	Seek amendments to policy and designations / allocations
Summary of Council Response	<p>The Council considers the policy reasonable and justified in the context of PPW10 which attaches great importance to green infrastructure as part of placemaking. The policy seeks to protect green infrastructure County wide but in connection with new development proposals must be reasonably related to the development concerned.</p> <p>It is not appropriate or necessary to safeguard Country parks as greenspace as these are already protected by virtue of their location in open countryside and that they are managed by public bodies.</p> <p>In terms of the site specific objections: the greenspace at Mold Business can be reviewed based on progress in implementing the planning application.</p> <p>The Ash Lane housing development will not result in the loss of green space as existing green infrastructure features can be retained and incorporated as part of a green infrastructure network.</p> <p>It is not considered necessary to protect every piece of land as green space in Mold as policy EN1 provides general protection to such land. It is unclear why the Plan needs to reference the Mold Green Band as this is a project that can progress outside of the Plan making process. The Inspector may consider that there is benefit in extending greenspace EN1.127 to include all of the green space and ensure that this whole block of open land is treated in a similar manner.</p> <p>The sites referenced in Penyffordd / Penyffordd are not considered to be necessary or appropriate to be designated as greenspaces.</p>
Minor Change proposed	No
Policy / page / Para / Map	EN4 Landscape Character P175 Deposit Plan written statement
Relevant Content of Plan	Policy requires new development to have regard to landscape character.
Representations	Total 8 representations: 5 objections 3 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
230	1147889		1230687		Support	Not Stated
393	1231156				Support	Not Stated
962	1149828		1149800		Object	Not Stated
977	1235343		1149800		Object	Not Stated
834	1234500		1234487		Support	Not Stated
947	1235344		1149800		Object	Not Stated
994	1149823		1149800		Object	Not Stated
1026	1235341		1149800		Object	Not Stated
Summary of representations		Multiple objections that the policy cannot stand as it is not justified by any evidence of special landscape character assessment.				
Changes sought		Not specified				
Summary of Council Response		The policy does not seek to identify any specific landscape areas but simply requires that the impact of new development on landscape character is considered. The application of the policy to specific development proposals will done in the context of Landmap.				
Minor Change proposed		No				
Policy / page / Para / Map		EN5 Area of Outstanding Natural Beauty P176 Deposit Plan written statement				
Relevant Content of Plan		The policy seeks to ensure that new development conserves and enhances the natural beauty of the AONB. The policy sets out a criteria based approach to assessing development proposals.				
Representations		Total 2 representations: 1 objection 1 support				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
231	1147889		1230687		Support	Not Stated
1077	1229839				Object	Not Stated
Summary of representations		NRW object to the lack of reference to 'setting' The supporting representation also raises the following concerns:				

	<p>Seeks inclusion of reference to 'setting' in the opening part of policy wording</p> <p>Seeks at the end of criterion c the additional wording 'and seeks to enhance the character and appearance of the area'.</p> <p>Seeks reference in para 12.17 that the 'special qualities' of the AONB are referenced in the AONB Management Plan.</p> <p>Seeks inclusion of AONB boundary on the proposals maps and no the constraints map.</p>																																	
Changes sought	Amendments to policy wording, explanation and proposals maps.																																	
Summary of Council Response	<p>Broad support is noted and in terms of the points made: The inclusion of after 'AONB' of 'and its setting' in opening part of policy is considered reasonable, if considered appropriate by the Inspector.</p> <p>The additional wording at the end of criteria c is not considered necessary in the context of the policy wording as a whole.</p> <p>Reference has already been to the Management Plan, and the recently adopted joint SPG in para 12.21.</p> <p>The boundary of all national / international landscape and nature conservation designations have been shown on the constraints map. However there is no objection in principle to including the AONB on the proposals map if this considered appropriate.</p>																																	
Minor Change proposed	No																																	
Policy / page / Para / Map	EN6 Sites of Biodiversity Importance P177 Deposit Plan written statement																																	
Relevant Content of Plan	The policy sets out a hierarchy of international, national and local nature conservation designations and offers guidance on each in terms of considering development proposals.																																	
Representations	Total 3 representations – objections																																	
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing Attendance</th></tr><tr><td>148</td><td>1230363</td><td></td><td></td><td></td><td>Object</td><td>No</td></tr><tr><td>394</td><td>1231156</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr><tr><td>1078</td><td>1229839</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance	148	1230363				Object	No	394	1231156				Object	Not Stated	1078	1229839				Object	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance																												
148	1230363				Object	No																												
394	1231156				Object	Not Stated																												
1078	1229839				Object	Not Stated																												
Summary of representations	<p>One objection raises concerns about the biodiversity value of the Ash Lane, Hawarden housing allocation.</p> <p>NRW seek reference to 'geodiversity' in the policy title.</p> <p>NRW also seek in the third section of the policy wording</p>																																	

	reference to 'and priority habitats' after 'priority species'.
Changes sought	Seeks deletion of Ash lane housing allocation /
Summary of Council Response	<p>The key features of biodiversity value at the Ash Lane housing site i.e. the trees and hedgerows can be safeguarded as part of a green infrastructure / ecological framework for the development of the site.</p> <p>The Council considers the policy wording and explanation is adequate in covering geodiversity, but would have no objection to amending the policy title if the Inspector considers appropriate. The Council considers the policy and its explanation is clear in referring to both habitats and species and that further wording is not necessary.</p>
Minor Change proposed	No
Policy / page / Para / Map	EN7 Development Affecting Trees, Woodlands and Hedgerows P178 Deposit Plan written statement
Relevant Content of Plan	The policy seeks to ensure that new development retains trees. Woodlands and hedgerows. However, it is accepted that there are circumstances where loss is unavoidable and the policy sets out mitigation measures in addressing this.
Representations	Total 8 representations: 6 objections 2 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
177	1230328				Object	Not Stated
416	1144556				Object	No
279	1230328				Object	Not Stated
396	1231156				Support	Not Stated
395	1231156				Support	Not Stated
600	1232541		1232537		Object	Not Stated
781	1234088		1233580		Object	Not Stated
721	1233454		1232502		Object	Not Stated

Summary of representations	<p>One objection is site specific relating to the designation of land on the edge of Holywell as a 'restored ancient woodland'.</p> <p>One objection considers that the policy is too firm and should allow some flexibility through an amendment to the policy wording. Two objections relate to the use of</p>
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	the word 'significant' in the policy wording and seek a rewording of the policy. The remaining objection is to the concept of a 'net gain in biodiversity' which is claimed to be not supported by national policy.																																	
Changes sought	Seek policy amendments																																	
Summary of Council Response	<p>The designation of land as 'restored ancient woodland' is not a matter for the development as this is shown only on the constraints map. The objector can pursue this outside of the LDP.</p> <p>The policy is essentially split into two parts. The first part seeks to prevent the 'significant' loss of or harm to trees, woodland or hedgerows. However the second part of the policy recognizes that in some cases an impact on trees, woodland or hedgerows may be acceptable, provided that it satisfies the three criteria. This second part of the policy would appear to meet the concerns of the objector. The concept of a net gain in biodiversity is considered appropriate in the context of para 6.4.5 of PPW10 which references biodiversity enhancements and benefits.</p>																																	
Minor Change proposed	No																																	
Policy / page / Para / Map	EN8 Built Historic Environment and Listed Buildings P180 Deposit Plan written statement																																	
Relevant Content of Plan	The policy provides guidance in respect of listed buildings, Scheduled ancient Monuments, other archaeological remains and historic parks, gardens and landscapes.																																	
Representations	Total 3 representations: 1 objection 2 support																																	
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing Attendance</th></tr><tr><td>64</td><td>1230290</td><td></td><td></td><td></td><td>Support</td><td>No</td></tr><tr><td>152</td><td>1230363</td><td></td><td></td><td></td><td>Object</td><td>No</td></tr><tr><td>398</td><td>1231156</td><td></td><td></td><td></td><td>Support</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance	64	1230290				Support	No	152	1230363				Object	No	398	1231156				Support	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance																												
64	1230290				Support	No																												
152	1230363				Object	No																												
398	1231156				Support	Not Stated																												
Summary of representations	<p>An objection is made in the context of this policy to the Ash Lane, Hawarden allocation in terms of the listed St Deiniols Ash Farm.</p> <p>The two supporting representations highlight that historic structures are often of importance for protected</p>																																	

	species and note that 'assets' is a more up to date term than 'remains'.
Changes sought	Deletion of Ash Lane, Hawarden housing allocation
Summary of Council Response	The Council's summary representations and responses statement provides additional details on the Ash Lane housing allocation and the listed farmhouse.
Minor Change proposed	No
Policy / page / Para / Map	EN9 Development in or Adjacent to Conservation Areas P181 Deposit Plan written statement
Relevant Content of Plan	The policy provides guidance on development within or on the edge of conservation areas preserving or enhancing character and appearance.
Representations	Total 1 representation – objection

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
151	1230363				Object	No

Summary of representations	An objection is made in the context of this policy to the Ash Lane, Hawarden allocation in terms of the site being next to a conservation area.
Changes sought	Seeks deletion of housing allocation
Summary of Council Response	The Ash Lane site does not sit adjacent to the Hawarden conservation area.
Minor Change proposed	No
Policy / page / Para / Map	EN10 Buildings of Local Interest P182 Deposit Plan written statement
Relevant Content of Plan	The policy sets out the circumstances where the demolition or alteration of a Building of Local Interest will be permitted.
Representations	Total 1 representation – objection

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
298	1229111		1227685		Object	Yes

Summary of representations	The objection is not to the policy itself but the processes by which BLI's are designated.
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Changes sought	Seeks reference in the explanatory text to the process of identification and inclusion of properties on the list.
Summary of Council Response	The Council considers that this is a procedural matter that can be progressed outside of the development plan.
Minor Change proposed	No
Policy / page / Para / Map	EN11Green Barriers P184 Deposit Plan written statement Background Paper 01 Green Barrier
Relevant Content of Plan	The policy identifies 16 green barriers across the County and provides guidance on development which is permissible within a green barrier.
Representations	Total 35 representations: 25 objections 7 support 3 not specified

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
92	1227700		1227685		Object	Not Stated
93	1229110		1227685			Not Stated
125	1150437				Support	Not Stated
195	1226342		1226341		Object	Not Stated
150	1230363				Object	Not Stated
232	1147889		1230687		Support	Not Stated
155	1228141				Support	Not Stated
417	1144556				Support	Not Stated
326	1229111		1227685		Object	Not Stated
246	1230977				Object	Not Stated
434	1230991		1230989			Not Stated
400	1231156				Support	Not Stated
916	1141895		1234985		Object	Not Stated
555	1149198		1148968		Object	Not Stated
963	1149828		1149800		Object	Not Stated
650	1224983		1224982		Object	Not Stated
901	1230826				Support	Not Stated
603	1232680		1232659		Object	Not Stated
625	1233028		1232939		Object	Not Stated
660	1233248		1149190		Object	Not Stated
620	1232940		1232939		Object	Not Stated
819	1234480		788759			Not Stated
948	1235344		1149800		Object	Not Stated
1163	1149498				Object	Not Stated
1159	1234431				Object	Not Stated
1147	1234608				Object	Not Stated
1027	1235341		1149800		Object	Not Stated
851	1234550		1234487		Object	Not Stated
875	1234645		1234643		Object	Not Stated

978	1235343		1149800		Object	Not Stated
1263	1149350		1232395		Support	Not Stated
996	1149823		1149800		Object	Not Stated
1285	1232506		1232501		Object	Not Stated
1154	1234431				Object	Not Stated
1134	1234608				Object	Not Stated
Summary of representations			Welsh Government consider that green barriers should be renamed green wedges in line with PPW10. The remaining objections are all site specific whether: Seeking the deletion of green barriers in order to promote housing development Objecting to particular green barriers Seeking the designation of green barriers Objecting to the drawing back of green barriers to facilitate housing allocations in the Plan.			
Changes sought			Various – as above.			
Summary of Council Response			The Council considers that PPW10 gives scope for other local designations and that the green barriers are in line with national guidance. Nevertheless, if the Inspector considers a rewording then the Council would not object to this. The summary representations and responses are all set out in the individual representations on EN11.			
Minor Change proposed			No			
Policy / page / Para / Map			EN12 New Development and Renewable and Low Carbon Energy Technology P186 Deposit Plan written statement			
Relevant Content of Plan			The policy seeks to ensure that new development maximizes the potential for renewable and low carbon energy, particular for larger scale development.			
Representations			Total 2 representations – objections			
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
899	1148889		1234839		Object	Not Stated
803	1234331		1234330		Object	Not Stated
Summary of representations			The policy is considered to be too onerous and should be reworded to ‘encourage’ or ‘promote’. The floorspce thresholds are considered to be too onerous and should be increased to 2,500sqm.			

Changes sought	Seeks amendments to policy wording
Summary of Council Response	The Council considers the policy to be reasonable in the context of PPW10 which promotes renewable and low carbon energy. In the context of other examples the floorspace thresholds are considered to be reasonable.
Minor Change proposed	No
Policy / page / Para / Map	EN13 Renewable and Low Carbon Energy Development P 187 Deposit LDP written statement LDP Background Paper 13 Renewable Energy
Relevant Content of Plan	The policy contains a number of strands: Identifying Solar Indicative Search Areas Allocating land for two solar farms Criteria to be applied to the consideration of all renewable and low carbon energy development Two additional criteria to be applied to wind energy proposals.
Representations	Total 22 representations: 8 objections 14 support

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
68	1230290				Object	Not Stated
70	1230290				Support	Not Stated
74	1230290				Support	Not Stated
76	1230290				Support	Not Stated
78	1230290				Support	Not Stated
80	1230290				Support	Not Stated
82	1230290				Support	Not Stated
71	1230290				Support	Not Stated
73	1230290				Support	Not Stated
75	1230290				Support	Not Stated
77	1230290				Support	Not Stated
79	1230290				Support	Not Stated
81	1230290				Support	Not Stated
83	1230290				Support	Not Stated
233	1147889		1230687		Support	Not Stated
345	1231151		1231150		Object	Not Stated
860	1150807				Object	Not Stated
1161	1149498				Object	Not Stated
1058	1229839				Object	Not Stated
1189	1230981				Object	Not Stated
846	1234537		1234487		Object	Not Stated
1079	1229839				Object	Not Stated

Summary of representations	A large number of representations pointed out that there were potential heritage assets within ILSAs which
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	<p>would need assessment if a proposal were to come forward, whilst others interpreted the areas as allocations that were all to be developed to the extent of the areas indicated.</p> <p>Welsh Government made a number of points: Conformity with draft NDF Priority Area for solar The Solar Indicative Local Search Areas should be listed within the policy The actual allocations should be separate within the policy from the search areas The need to include target energy contributions The solar allocation at castle Park Flint overlaps with Gypsy allocation</p> <p>NRW identify that Crumps Yard allocation lies within flood zone C1. Also highlight the need for landscape assessment of the Solar Indicative Local Search Areas.</p> <p>One objector sought reference to sensitive receptors such as holiday accommodation.</p> <p>One objection expressed concern about the Solar Indicative Local Search Area adjacent Waen y Llyn Country Park at Hope Mountain given the intervisibility with the AONB. An objection highlighted that land on the edge of New Brighton was not available for solar development. A further objection considered that the Solar Indicative Local Search Area at Holway (Holyweell) was on a SSSI.</p> <p>In response to NRW a FCA has been undertaken for the Crumps Yard allocated site and a planning application for a solar farm is presently under consideration. A landscape assessment of the SILSA is presently being undertaken with a view to further refining each search area.</p> <p>It is not considered necessary to refer to holiday accommodation with the policy.</p> <p>The site specific objections are all responded to separately.</p>
Changes sought	Seeks amendments to policy.
Summary of Council Response	<p>In response to the objections by Welsh Government: The draft NDF is a higher level Plan than the LDP and there is little evidence available about the mapping work and assumptions which underpinned the solar area referenced.</p> <p>the inclusion of the SILSA as a list within the policy wording is acceptable, subject to the agreement of the Inspector.</p>

	<p>It is unclear why the allocations need to be separated out of the policy, particularly as one already has planning permission and an applications is under consideration on the other.</p> <p>The Council is continuing to refine the Renewable Energy Assessment and will identify a target energy figure.</p> <p>The Solar Allocation at Castle Park does not overlap with the Gypsy Transit site.</p>
Minor Change proposed	No
Policy / page / Para / Map	EN14 Flood Risk P189 Deposit Plan written statement
Relevant Content of Plan	The policy provides guidance on new development and flood risk.
Representations	<p>Total 4 representations:</p> <p>2 objections</p> <p>1 support</p> <p>1 not specified</p>

Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
401	1231156				Support	Not Stated
1049	1229839					Not Stated
1050	1229839				Object	Not Stated
1162	1149498				Object	Not Stated

Summary of representations	<p>WG note that the SFCA alludes to some allocations having flooding issues and the Council should ensure no highly vulnerable development in C2 and only in C1 if informed by FCA.</p> <p>NRW have expressed concerns that PE1 employment allocations have not been subject to FCA to establish suitability and deliverability given flood risk locations. Also considers the IIA has understates flood risk for some of the allocations and notes that allocations in PE2 have not been assessed.</p>
Changes sought	
Summary of Council Response	The objection by Welsh Government is noted and the Council is working closely with its flood risk consultants and NRW. The issues raised by NRW are commented on in more detail in relation to the specific policies PE1 and PE2.
Minor Change proposed	No
Policy / page / Para / Map	EN18 Pollution and Nuisance

	P194 Deposit Plan written statement					
Relevant Content of Plan	The policy looks at firstly new development which is sensitive to such effects and secondly, new development which would create an increased risk of such effects.					
Representations	Total 2 representations – objections					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
234	1147889		1230687		Object	Not Stated
804	1234331		1234330		Object	Not Stated
Summary of representations	One objection seeks additional wording to the policy in respect of the AONB. The other objections considers that the policy should refer to the ‘Agent of Change’ principle in PPW.					
Changes sought	Seeks policy amendments					
Summary of Council Response	The Council considers that this policy in junction with other policies clearly recognises the issue of light pollution affecting the AONB. The policy is considered to clearly reference the scenario referenced by the objector without the need to reference guidance which already exists in PPW10.					
Minor Change proposed	No					
Policy / page / Para / Map	EN21 Locations for Waste Management Facilities P197 Deposit Plan written statement					
Relevant Content of Plan	The policy identifies potential locations for waste management facilities and sets out a criteria based approach to the consideration of development proposals.					
Representations	Total representations 4: 3 objections 1 support					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
235	1147889		1230687		Support	Not Stated
119	1230530				Object	Not Stated
1080	1229839				Object	Not Stated
848	1234545		1234487		Object	Not Stated
Summary of representations	One objection seeks amendment to the policy wording to refer to the amenity of residents and other users of land, in the context of tourism development. An					

	objection seeks confirmation that waste development does not override employment allocations for general employment development. The remaining objection seeks additional policy wording to the effect that the sites are outside of the AONB or its setting.					
Changes sought	Seeks policy amendments					
Summary of Council Response	The Council considers that the policy, in conjunction with other Plan policies provides sufficient safeguards in terms of the amenity or living conditions of all users of land. The policy merely seeks to identify the broader principle of waste development in the identified locations. The policy, in conjunction with policy EN4 provides sufficient protection for the AONB and its setting.					
Minor Change proposed	No					
Policy / page / Para / Map	EN23 Minerals Safeguarding P199 Deposit Plan written statement					
Relevant Content of Plan	The policy defines minerals safeguarding areas on the proposals maps and sets out a criteria based approach to considering development proposals arising within them.					
Representations	Total 3 representations – objections					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
5	1228075				Object	No
188	1230851				Object	Not Stated
330	1231134		1231130		Object	Yes
Summary of representations	One objection queries the evidence behind and robustness of the areas safeguarded. Another objection considers that areas should not be safeguarded if they can be used for other purposes, and that the maps suggest areas on the edges of settlement could be used for extraction.					
Changes sought						
Summary of Council Response	The Council stresses the MSA's are based on British Geological Survey minerals resource map which show at a strategic level the distribution of minerals across the Count, and the GGS Aggregates Safeguarding Map. The MSA's on the proposals maps reflect the presence of minerals and must be read alongside the criteria within the policy and the explanation in the Minerals Background Paper.					
Minor Change proposed	No					

Policy / page / Para / Map		EN24 Minerals Buffer Zones P201 Deposit Plan written statement				
Relevant Content of Plan		The policy defines minerals buffer zones on the proposals maps and provides guidance in order to protect mineral operations whilst also protecting living condition of sensitive development.				
Representations		Total 1 representation – objection				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
4	1228075				Object	No
Summary of representations		The buffer zone should be measured from the outer edge of the area where extraction and processing takes place, and not from the site boundary.				
Changes sought		Amendment to policy wording and proposals maps.				
Summary of Council Response		The Council considers that the buffer zones zones have been reasonably defined and are not intended to be a moratorium to development.				
Minor Change proposed		No				
Policy / page / Para / Map		EN25 Sustainable Minerals Development P204 Deposit Plan written statement				
Relevant Content of Plan		The policy allocated four sites which will contribute to meeting the need for minerals.				
Representations		Total 6 representations: 2 objections 3 support 1 not specified				
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
236	1147889		1230687		Support	Not Stated
228	1149006				Support	No
668	1146891					Not Stated
913	1148344				Support	Not Stated
861	1150807				Object	Not Stated
1165	1149498				Object	Not Stated
Summary of representations		Welsh Government reference the Regional Technical Statement 2 and the need for the Plan to meet				

	<p>increased requirements for sand and gravel and crushed rock.</p> <p>Concern that the sites are in close proximity to the AONB, in particular the Ddol Uchaf Quarry near Afon which has the potential to impact on views from the higher ground of the AONB.</p> <p>Concern about the expansion of Hendre Quarry and traffic generation in addition to the 246 dwellings on Denbgh Rd, Mold. The objection also considers the Plan should adopt a firmer stance regarding fracking.</p>																										
Changes sought																											
Summary of Council Response	<p>The Council is working collaboratively with Wrexham and Denbighshire with respect to both sand and gravel and crushed rock and is in discussions with operators about suitable sites. A collaboration agreement will be presented ahead of the examination.</p> <p>The progression of the Ddol Ucaf site will be accompanied by a Landscape and Visual Impact Assessment to inform how the site is to be developed.</p> <p>The progression of the Hendre Quarry site will be accompanied by a Transport Statement to consider routing and traffic generation information. The Council does not consider it necessary to repeat national guidance and that each development should be considered on its individual merits.</p>																										
Minor Change proposed	No																										
Policy / page / Para / Map	EN26 Criteria for Minerals Development P206 Deposit Plan written statement																										
Relevant Content of Plan	The policy sets out criteria to be applied when considering proposals for minerals development.																										
Representations	Total 2 representations – objections																										
<table><tr><th>Comment ID</th><th>Consultee ID</th><th>Consultee Full Name</th><th>Agent ID</th><th>Agent Full Name</th><th>Do you support or object to this policy?</th><th>Hearing Attendance</th></tr><tr><td>1252</td><td>1234528</td><td></td><td>1234487</td><td></td><td>Object</td><td>Yes</td></tr><tr><td>1030</td><td>1235357</td><td></td><td></td><td></td><td>Object</td><td>Not Stated</td></tr></table>							Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance	1252	1234528		1234487		Object	Yes	1030	1235357				Object	Not Stated
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance																					
1252	1234528		1234487		Object	Yes																					
1030	1235357				Object	Not Stated																					
Summary of representations	<p>The policy should be amended to inclusion provision for sensitive receptors and other users of land such as holiday accommodation to be protected.</p> <p>Clarification should be provided as to what represents satisfactory restoration and after uses.</p>																										

Changes sought	Seeks policy / explanation amendments					
Summary of Council Response	<p>The Council considers that the policy, when read in conjunction with other Plan policies provides sufficient protection to living standards.</p> <p>It is difficult to prescribe exactly what would represent satisfactory after case and uses might be as this will be different for each type of minerals extracted and the specifics of the site. Proposals would need to be considered on their merits against other Plan policies.</p>					
Minor Change proposed	No					
Policy / page / Para / Map	EN27 Secondary and Recycled Aggregates P207 Deposit Plan written statement					
Relevant Content of Plan	The policy provides guidance on development proposals involving secondary and recycled aggregates.					
Representations	Total 2 representations – objections					
Comment ID	Consultee ID	Consultee Full Name	Agent ID	Agent Full Name	Do you support or object to this policy?	Hearing Attendance
1031	1235357				Object	Not Stated
1253	1234528		1234487		Object	Yes
Summary of representations	One objection seeks clarification on the type of development that the policy provides guidance on. The other objection considers that the policy should include reference to protecting the amenity of sensitive receptors such as holiday accommodation.					
Changes sought	Seeks policy amendments					
Summary of Council Response	The policy is concerned with The management of secondary and recycled aggregate does include all those listed; crushing, sorting, screening, stockpiling, storage and transfer. The Council considers that the policy, in conjunction with other Plan policies provides sufficient safeguards in terms of the amenity or living conditions of all users of land.					
Minor Change proposed	No					



Planning and Compulsory Purchase Act 2004
The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004
The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 and (Amendment) Regulations 2015 (Regulation 17)
NOTICE OF DEPOSIT OF PROPOSALS FOR A LOCAL DEVELOPMENT PLAN PUBLIC CONSULTATION
Flintshire Local Development Plan 2015-2030

Flintshire County Council has prepared the **Local Development Plan (LDP)** documents for the above plan. The LDP will, upon adoption, replace the current *Unitary Development Plan (2000-2015)* and form the basis for decisions on land use planning for the County of Flintshire.

The LDP documents include the '**Deposit LDP**', the Integrated Impact Assessment (Incorporating Sustainability Appraisal / Strategic Environmental Assessment/ Habitats Regulations Assessment) and **Initial Consultation Report** together with a list of other **supporting documents** as shown on the Council's website.

Consultation on the Deposit LDP will run from **30th September until 5pm Monday 11th November 2019**. The consultation will allow the public the opportunity to view the plan and make representations.

The LDP documents, as well as all the supporting documents, are available to view on the Council's website www.flintshire.gov.uk/ldp by clicking on the consultation portal.

The LDP documents will be available to view at the County Council offices at Ty Dewi Sant, Ewloe and County Hall, Mold and the Connects Offices for 6 weeks from 30th Sept to 11th Nov 2019.

Copies of the LDP documents accompanied by an information board will also be available for public inspection free of charge at:

Main Libraries	Date	Time
Broughton Library	30 th September - 11 th November 2019	During normal library opening hours.
Buckley Library		
Deeside Library		
Flint Jade Jones Pavilion (Flint Library is closed due to refurbishment)		
Holywell Library		
Mancot Community Library		

Mold Library		
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A series of drop-in sessions will be held at the following venues on the dates and times shown where officers will be on hand during the sessions to guide the public and to advise on how comments on the documents can be made.

Location	Date and Time
Broughton & Bretton Community Centre, Brookes Avenue, Broughton	4pm – 8pm Tuesday 1 st October 2019
Buckley (Bistre) Youth & Community Centre, Nant Mawr Road	4pm – 8pm Wednesday 2 nd October 2019
Mold Parkfields Community Centre, Ash Grove	4pm – 8pm Thursday 3 rd October 2019
Mancot and Moor Village Hall, Mancot Lane	4pm – 8pm Friday 4 th October 2019
Connah's Quay, the Quay Building, Fron Road	4pm – 8pm Monday 7 th October 2019
Hope, Caergwrle Abermorddu Cefn Y Bedd – Heulwen Close Community Centre, Hope	4pm – 8pm Tuesday 8 th October 2019
Ewloe Woodside Close Community Centre	4pm – 8pm Wednesday 9 th October 2019
Flint Town Hall, Market Square	4pm – 8pm Thursday 10 th October 2019
Caerwys Memorial Institute - South Street, Caerwys, Caerwys to focus on minerals proposals	4pm – 8pm Tuesday 15 th October 2019
New Brighton Community Centre, Moel Fammau Road	5pm – 8pm Friday 18 th October 2019

Representations on the deposit LDP should preferably be made online via the LDP Consultation Portal:

<https://consult.flintshire.gov.uk/portal/>

Alternatively, representations can be made using the Representation Form, available to download from the Council's website at:

www.flintshire.gov.uk/ldp

Or representations can also be emailed to the Council at:

developmentplans@flintshire.gov.uk

Finally, representations can be made in writing and sent to the Council at:

**Andrew Farrow, Chief Officer – Planning, Environment and Economy
Flintshire County Council, County Hall, Mold, Flintshire, CH7 6NF.**

Representations should clearly express **support** or **objection**. Representations (including those taking the form of objections) should identify which part of the plan the comment relates to and specify what changes are to be made.

Objections should be accompanied by reasons and where the respondent wishes to do so, specify which of the **Tests of Soundness** that the Plan fails (*the Tests of Soundness are set out in para 3.2 of the Written Statement*).

The Council has published a Background Paper Assessment of Candidate / Alternative Sites. None of the alternative sites, which were submitted as part of the consultation on the Preferred Strategy (and published in a Register of Alternative Sites), have been included in the Deposit LDP. Nevertheless, as part of the examination into the LDP, it may be that such Alternative Sites are included in the Plan. As such, the opportunity exists for representations to be made on the alternative sites now. Any new sites submitted as part of representations to the Plan must be accompanied by a site plan clearly identifying the location and boundary of the site.

**All representations must be received by
5.00pm on Monday 11th November 2019 any received after that
will not be considered.**

All representations made about the Plan will be available for the public to view as soon as possible following the consultation.

The Local Planning Authority cannot change the plan at this stage but it can decide whether it is in favour of any changes proposed as a result of the representations received during consultation.

Representations made in accordance with this notice (i.e. 'duly made') will be considered by an independent Inspector appointed to examine the soundness of the plan in due course.

Only those making representations seeking to change the deposit LDP (i.e. objectors) whose representations were 'duly made' have the right to appear before and be heard by the Inspector at the Examination (Section 64 (6) of the 2004 Act).

Andrew Farrow
Chief Officer (Planning, Environment and Economy)



September 2019

The supporting documents include the following:

Supporting Documents
Flintshire LDP Revised Delivery Agreement May 2019
Deposit Local Development Plan Written Statement 2019
Integrated Impact Assessment (Incorporating Sustainability Appraisal / Strategic Environmental Assessment) 2019
Habitats Regulations Assessment 2019

Initial Consultation Report
Public Notice
Representation Form
Summary Leaflet
Flintshire Proposal Map 1
Flintshire Proposal Map 2
Flintshire Proposal Map 3
Aston/Shotton Inset Plan
Buckley Inset Plan
Connah's Quay Inset Plan
Flint Inset Plan
Holywell Inset Plan
Mold Inset Plan
Queensferry Inset Plan
Saltney Inset Plan
Urban Capacity Study 2019
Housing Land Monitoring Statement 2018
Background Paper 1 Green Barrier Review 2019
Background Paper 2 Green Infrastructure Assessment 2019
Background Paper 3 Infrastructure Plan 2019
Background Paper 4 Minerals 2019
Background Paper 5 Waste 2019
Background paper 6 Gypsy and Traveller Site Search
Background Paper 7 Affordable Housing 2019
Background Paper 8 Assessment of Candidate / Alternative Sites
Background Paper 9 Minimising the Loss of Best and Most Versatile Agricultural Land 2019
Background Paper 10 Housing Supply and Delivery
Background Paper 11 Soundness Self-Assessment
Background Paper 12 Welsh Language
Background Paper 13 Renewable Energy
Flintshire Retail Study 2019
Flintshire Viability Study 2019 (Study concerning the economic viability of providing affordable housing across Flintshire)
Employment Land Review 2015
Flintshire Further Employment growth Scenarios Assessment 2015
Employment and Housing Advice April 2019
Gypsy Traveller Accommodation Assessment 2016 and update 2019
Local Housing Market Assessment 2015 and Contextual Report
Planning Strategy Group Minutes
Local Housing Market Assessment Update 2018
Strategic Flood Consequence Assessment 2018
Flintshire LDP Renewable Energy Assessment 2019
Warren Hall Masterplan and Delivery Statement
Northern Gateway Masterplan and Delivery Statement – Pochin Goodman

Northern Gateway Masterplan and Delivery Statement - Ancer Spa (Praxis / Crag Hill Estates)
Commentary on Anticipated 2017 Based Household Projections

Appendix 23 LDP Consultation Letter Final for emails

Your Ref/Eich Cyf

Our Ref/Ein Cyf

Date/Dyddiad

Ask for/Gofynner am

LDP Consultation

19 September 2019

Direct Dial/Rhif Union 01352 703213

Fax/Ffacs

E-mail/e-bost

developmentplans@flintshire.gov.uk

Annwyl Syr /Fadam,

**Ymgynghoriad ar Gynllun Datblygu Lleol
Sir y Fflint i'w Archwilio gan y Cyhoedd**

Fel rhywun sydd ar restr e-bost CDLI y Cyngor, rwy'n ysgrifennu atoch i'ch hysbysu y bydd Cynllun Datblygu Lleol Sir y Fflint i'w Archwilio gan y Cyhoedd yn destun ymarfer ymgynghori cyhoeddus 6 wythnos o hyd, gan ddechrau dydd Llun 30 Medi ac yn gorffen am 5.00pm dydd Llun, 11 Tachwedd 2019.

Mae gwybodaeth yn ymwneud â threfniadau ymgynghori'r Cynllun i'w Archwilio Gan y Cyhoedd yn cael ei chynnwys yn y copi o'r hysbysiad cyhoeddus ynghlwm.

Os oes gennych unrhyw ymholiadau ynghylch â'r Cynllun neu'r ymgynghoriad, gallwch anfon neges e-bost at developmentplans@flintshire.gov.uk neu fel arall, ffoniwch linell gymorth y CDLI ar 01352 703213.

Dear Sir/Madam,

**Deposit Flintshire Local Development Plan
(LDP) Consultation**

As someone who is on the Council's LDP mailing list, I am writing to inform you that the Deposit Flintshire Local Development Plan will be the subject of a 6 week public consultation exercise commencing on Monday 30th September and ending at 5.00pm on Monday 11th November 2019.

Information relating to the Deposit Plan consultation arrangements is contained in the enclosed copy of the public notice.

If you have any queries relating to the Plan or the consultation you can email developmentplans@flintshire.gov.uk or alternatively call the LDP helpline on 01352 703213.

Yn gywir/ Yours faithfully



Andrew Roberts
Rheolwr Gwasanaeth
Strategaeth
Service Manager Strategy

Appendix 24 All site Notices
Site Notices for the Flintshire LDP Deposit Consultation 2019

Ash Lane, Hawarden
Broad Oak Holding, Connah's Quay
Cae Isa, New Brighton
Chester Road, Penymynydd
Denbigh Road /Gwernaffield Road, Mold
Gypsy /Traveller site Castle Park Industrial Estate, Flint
Gypsy /Traveller site Gwern Lane, Cae Estyn, Hope
Gypsy /Traveller site Magazine Lane, Ewloe
Gypsy /Traveller site Riverside, Queensferry
Highmere Drive, Connah's Quay
Holywell Road/Green Lane, Ewloe
Maes Gwern , Mold
Northern Gateway, Deeside
Northop Hall ,Flint
Warren Hall, Broughton
Well Street ,Buckley
Wrexham Road, HCAC

DEDDF CYNLLUNIO GWLAD A THREF 1990 **TOWN AND COUNTRY PLANNING ACT 1990**

Mae Cyngor Sir y Fflint wedi lansio ymgynghoriad ar y Cynllun Datblygu Lleol (CDLI) i'w Archwilio gan y Cyhoedd. Fel rhan o'r Cynllun Datblygu Lleol i'w Archwilio gan y Cyhoedd mae'r safle isod wedi cael ei glustnodi fel safle datblygu arfaethedig. Mae gwahoddiad i chi daro golwg ar fapiau'r cynnig, y CDLI i'w Archwilio gan y Cyhoedd ynghyd â rhestr o ddogfennau ategol sydd ar gael ar wefan y Cyngor:

www.siryfflint.gov.uk/cdll Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019**.

Os oes gennych unrhyw sylwadau am y Cynllun Datblygu Lleol i'w Archwilio gan y Cyhoedd, rhaid cyflwyno'r rhain ar-lein rhwng **30 Medi a 11 Tachwedd 2019 drwy'r Porth Ymgynghori CDLI:** <https://consult.flintshire.gov.uk/portal/>. Fel arall,

defnyddiwch y Ffurflen Sylwadau sydd ar gael i'w lawrlwytho o wefan y Cyngor:

www.siryfflint.gov.uk/cdll. Neu gellir e-bostio sylwadau i'r Cyngor:

developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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www.flintshire.gov.uk/ldp The LDP documents will be available to view at the County Council offices at Ty Dewi Sant, Ewloe and County Hall, Mold and the Connects Offices and main libraries for 6 weeks from **30th Sept to 11th Nov 2019**.

If you have any comments to make on the Deposit Local Development Plan, these must be submitted **online from 30th Sept to 11th Nov 2019 via the LDP Consultation**

Portal: <https://consult.flintshire.gov.uk/portal/>. Alternatively, using the Representation Form, available to download from the Council's website at:

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Site Number/Y Cyfeirnod: **HWN005**

Proposal/Y Gwaith Arfaethedig: **Potential Residential Use.**

Site Location/Y Lleoliad: **Ash Lane Hawarden/Mancot.**

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

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www.siryfflint.gov.uk/cdll Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019**.

Os oes gennych unrhyw sylwadau am y Cynllun Datblygu Lleol i'w Archwilio gan y Cyhoedd, rhaid cyflwyno'r rhain ar-lein rhwng **30 Medi a 11 Tachwedd 2019 drwy'r Porth Ymgynghori CDLI**: <https://consult.flintshire.gov.uk/portal/>. Fel arall, defnyddiwch y Ffurflen Sylwadau sydd ar gael i'w lawrlwytho o wefan y Cyngor:

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Site Number/Y Cyfeirnod: CON002

Proposal/Y Gwaith Arfaethedig: Potential Residential Use.

Site Location/Y Lleoliad: Broad Oak Holding, Mold Road, Connahs Quay

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

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Site Number/Y Cyfeirnod: **NEW004/013**

Proposal/Y Gwaith Arfaethedig: **Potential Residential Use.**

Site Location/Y Lleoliad: **Cae Isa, New Brighton.**

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

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www.sirffflint.gov.uk/cdli. Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y

Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019**.

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Site Number/Y Cyfeirnod: PEN038

Proposal/Y Gwaith Arfaethedig: Potential Residential Use.

Site Location/Y Lleoliad: Chester Road, Penymynydd.

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

Mae Cyngor Sir y Fflint wedi lansio ymgynghoriad ar y Cynllun Datblygu Lleol (CDLI) i'w Archwilio gan y Cyhoedd. Fel rhan o'r Cynllun Datblygu Lleol i'w Archwilio gan y Cyhoedd mae'r safle isod wedi cael ei glustnodi fel safle datblygu arfaethedig. Mae gwahoddiad i chi daro golwg ar fapiau'r cynnig, y CDLI i'w Archwilio gan y Cyhoedd ynghyd â rhestr o ddogfennau ategol sydd ar gael ar wefan y Cyngor:

www.sirffflint.gov.uk/cdli Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019**.

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Porth Ymgynghori CDLI: <https://consult.flintshire.gov.uk/portal/>. Fel arall, defnyddiwch y Ffurflen Sylwadau sydd ar gael i'w lawrlwytho o wefan y Cyngor:

www.sirffflint.gov.uk/cdli. Neu gellir e-bostio sylwadau i'r Cyngor:

developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: **MOL044/045**

Proposal/Y Gwaith Arfaethedig: **Potential Residential Use.**

Site Location/Y Lleoliad:
Road Mold.

Land Between Denbigh Road/ Gwernaffield

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)
Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT
Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

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Site Number/Y Cyfeirnod: **HN8-4**

Proposal/Y Gwaith Arfaethedig: **Transit Gypsy and Travellers Site.**

Site Location/Y Lleoliad: **Castle Park Industrial Estate**

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

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www.siryfflint.gov.uk/cdli Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019.**

Os oes gennych unrhyw sylwadau am y Cynllun Datblygu Lleol i'w Archwilio gan y Cyhoedd, rhaid cyflwyno'r rhain ar-lein rhwng **30 Medi a 11 Tachwedd 2019 drwy'r**

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www.siryfflint.gov.uk/cdli. Neu gellir e-bostio sylwadau i'r Cyngor: developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig

i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: HN8-2

Proposal/Y Gwaith Arfaethedig: Gypsy and Travellers.

Site Location/Y Lleoliad: Gwern Lane, Cae Estyn, Hope (Extension).

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

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Site Number/Y Cyfeirnod: HN8-1

Proposal/Y Gwaith Arfaethedig: Gypsy and Travellers.

Site Location/Y Lleoliad: Magazine Lane, Ewloe (Extension).

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

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TOWN AND COUNTRY PLANNING ACT 1990

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www.siryfflint.gov.uk/cdll. Neu gellir e-bostio sylwadau i'r Cyngor: developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: HN8-3

Proposal/Y Gwaith Arfaethedig: Gypsy and Travellers.

Site Location/Y Lleoliad:

Riverside, Queensferry (Extension).

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

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TOWN AND COUNTRY PLANNING ACT 1990

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www.siryfflint.gov.uk/cdli Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019**.

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www.siryfflint.gov.uk/cdli. Neu gellir e-bostio sylwadau i'r Cyngor:

developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: CON093

Proposal/Y Gwaith Arfaethedig: Potential Residential Use.

Site Location/Y Lleoliad: Highmere Drive, Connah's Quay.

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

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www.siryfflint.gov.uk/cdli Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019.**

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i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: EWL017/020

Proposal/Y Gwaith Arfaethedig: Potential Residential Use.

Site Location/Y Lleoliad: Holywell Road/Green Lane, Ewloe.

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

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TOWN AND COUNTRY PLANNING ACT 1990

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Site Number/Y Cyfeirnod: MOL020

Proposal/Y Gwaith Arfaethedig: Potential Residential Use.

Site Location/Y Lleoliad: Maes Gwern, Mold.

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

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www.siryfflint.gov.uk/cdll. Neu gellir e-bostio sylwadau i'r Cyngor:

developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: STR3A

Proposal/Y Gwaith Arfaethedig: Potential Mixed Use Site: Employment, Housing, Commercial, Community Facilities.

Site Location/Y Lleoliad: Strategic Site Northern Gateway

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

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www.sirffflint.gov.uk/cdli. Neu gellir e-bostio sylwadau i'r Cyngor:

developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: **FLI007**

Proposal/Y Gwaith Arfaethedig: **Potential Residential Use.**

Site Location/Y Lleoliad: **Northop Road, Flint.**

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990
TOWN AND COUNTRY PLANNING ACT 1990

Mae Cyngor Sir y Fflint wedi lansio ymgynghoriad ar y Cynllun Datblygu Lleol (CDLI) i'w Archwilio gan y Cyhoedd. Fel rhan o'r Cynllun Datblygu Lleol i'w Archwilio gan y Cyhoedd mae'r safle isod wedi cael ei glustnodi fel safle datblygu arfaethedig. Mae gwahoddiad i chi daro golwg ar fapiau'r cynnig, y CDLI i'w Archwilio gan y Cyhoedd ynghyd â rhestr o ddogfennau ategol sydd ar gael ar wefan y Cyngor:

www.siryfflint.gov.uk/cdli Bydd dogfennau'r CDLI ar gael i'w gweld yn swyddfeydd y Cyngor Sir yn Nhŷ Dewi Sant, Ewlo a Neuadd y Sir, yr Wyddgrug a Swyddfeydd Sir y Fflint yn Cysylltu a'r prif lyfrgelloedd am 6 wythnos rhwng **30 Medi ac 11 Tachwedd 2019**.

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developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig
i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r
Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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and Economy Flintshire County Council, County Hall, Mold, Flintshire, CH7 6NF.**

Site Number/Y Cyfeirnod: STR3B

**Proposal/Y Gwaith Arfaethedig: Potential Mixed Use Site: Employment and
Housing.**

Site Location/Y Lleoliad: Strategic Site Warren Hall

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

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Site Number/Y Cyfeirnod: BUC031

Proposal/Y Gwaith Arfaethedig: Potential Residential Use.

Site Location/Y Lleoliad: Well Street, Buckley.

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019

DEDDF CYNLLUNIO GWLAD A THREF 1990 **TOWN AND COUNTRY PLANNING ACT 1990**

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www.siryfflint.gov.uk/cdli. Neu gellir e-bostio sylwadau i'r Cyngor:

developmentplans@flintshire.gov.uk Yn olaf, gallwch anfon sylwadau yn ysgrifenedig i'r Cyngor: **Andrew Farrow - Prif Swyddog – Cynllunio, yr Amgylchedd a'r Economi, Cyngor Sir y Fflint, Neuadd y Sir, yr Wyddgrug, Sir y Fflint, CH7 6NF.**

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Site Number/Y Cyfeirnod: HCAC004

Proposal/Y Gwaith Arfaethedig: Potential Residential Use.

Site Location/Y Lleoliad: Wrexham Road HCAC.

Signed / Arwyddwyd:

Chief Officer (Planning, Environment & Economy)

Prif Swyddog (Cynllunio, Amgylchedd ac Economi)

On behalf of FLINTSHIRE COUNTY COUNCIL / Arran CYNGOR SIR Y FFLINT

Date/Dyddiad: 30th September 2019