

Flintshire Deposit Local Development Plan 2015 - 2030

Initial Consultation Report
September 2019

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1. Introduction

1.1 This Consultation report had been prepared in accordance with the requirements of Regulation 16A of the Town and Country planning (Local Development Plan) (Wales) (Amendment) Regulations 2015, and advice contained within the draft Local Development Plan (LDP) Manual 2019, and identifies:

- The steps taken to publicise and engage throughout the LDP preparation process and how this complies with the Community Involvement Scheme (CIS) contained in the Delivery Agreement (DA), including any deviation from it.
- The bodies engaged, notified and consulted at pre-deposit participation (Regulation 14) and pre-deposit consultation (Regulation 15).
- A summary of the main issues raised at the pre-deposit stages, including the total number of representations received and how these have influenced the preparation of the Deposit LDP.
- Summary of the comments received on the Candidate and Alternative Sites.

1.2 This report will be updated following completion of the Deposit LDP stage and form the Consultation Report which will be submitted in accordance with Regulation 22 (2) (c) of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

2. Key Plan Stages and Engagement Process

2.1 The Delivery Agreement (DA) commits the Council to producing the Local Development Plan according to the timescales identified within it. It also sets out who, how and when the Council will consult on Plan preparation in accordance with the Community Involvement scheme (CIS) which forms part of the DA.

Table 1 sets out the key plan stages to date along with the periods of consultation.

Key Plan Stage	Period of Consultation
Delivery Agreement (Including Community Involvement Scheme)	5 th August to 30 th September 2013 Agreed by Welsh Government on 12 th February 2014.
Revised 2016, 2017 and 2018	Agreed By Welsh Government on 3 rd November 2016, 8 th November 2017, 9 th May 2019
Call for Candidate Sites	Timetable for submission of sites 28 th February 2014 to 3 rd May 2014
Candidate site register	Register available for Inspection from February 2015
Candidate Sites Assessment Methodology and Topic Papers	9 th March to 20 th April 2015
Further Call for Candidates Sites, Minerals and Waste, Gypsy and Traveller Accommodation	30 th June to 11 th August 2017
Key Messages Document including the settlement Audit Reports	18 th March to 29 th April 2016

Strategic Options	28 th October to 9 th December 2016
Alternative Sites	9 th November to 21 st December 2017
Preferred Strategy	9 th November to 21 st December 2017

2.2 The DA was revised in 2016 due to the slippage mainly as a result the following:-

- The initial timetable which sought to secure deposit consultation ahead of local elections in May 2017 was overly ambitious and unrealistic;
- the initial timetable for adopting the Plan was 4 years and 2 which was overly ambitious compared to the time actually taken by most local planning authority's in reaching adoption;
- the assertion by Welsh Government that the Council can learn from best practice and from Welsh Government in a 'hand holding' capacity, whereas in reality good practice is not readily signposted and the assistance from Welsh Government has not materialised;
- the scale and complexity of the evidence gathering stage, had been underestimated;
- the number of Candidate Site submissions has significantly exceeded that envisaged;
- the need to take a more measured, step by step approach to preparing the Preferred Strategy in terms of engagement and consultation;
- the resource implications of speculative enquiries / applications on the back of a lack of 5 year housing land supply;
- changes to the LDP Regulations part way through the timetable.

2.3 The DA was revised in 2017 due to :-

- The effect of the Local Elections in May 2017 which delayed the approval of the Preferred Strategy by Cabinet
- The desire to hold Member and Town and Community Council briefing sessions ahead of the Preferred Strategy being agreed by Cabinet
- The delay incurred in translating key documents due to resource and capacity problems
- The need to ensure policy improvements as a result of the findings of the draft IIA (Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Authority)
- The delay in implementing an document publishing / on-line consultation software system
- Capacity issues within the Policy Section

2.4 The DA was revised in 2018 due to:-

- The need for a compliance check of the draft written statement against PPW10
- Procurement difficulties in progressing a number of background studies and securing translation capacity
- Continuing pressure from speculative housing development despite the dis-application of para 6.2 of TAN1

- Delays associated with establishing key development parameters on the Warren Hall strategic site, arising from changing external constraints
- Staffing and resourcing pressures including the loss of one Planner and 2 Senior Planners.
- A recent office move

2.5 The timetable contained in the DA has been met in respect of the requirements of Regulation 14, Pre-Deposit Consultation participation (Key Messages Document and Strategic Options) and Regulation 15, Pre-Deposit Consultation (Preferred Strategy).

3. Community Involvement Scheme (CIS)

3.1 The Community Involvement Scheme (CIS) sets out the Council's principles, strategy and process for engaging with stakeholders and the community throughout the LDP process. The CIS is contained within the Delivery Agreement and can be viewed within the [third Revised Delivery Agreement](#) on the Council's Website.

3.2 The Community Involvement Scheme ensures that any community and stakeholder engagement undertaken in the preparation of the Flintshire Local Development Plan is inclusive, consistent, and co-ordinated. This will provide a more transparent planning process allowing the general public, communities and other stakeholders an input in planning the future of their local area. The aim is to reduce conflict by encouraging consensus and, where this cannot be achieved, ensuring the sources of information leading to a decision and the decision itself are clear and understood by all parties.

3.3 The CIS identified a number of existing ways in which the Council engages with and consults the general public, and sought to utilise these well-established channels of communication where ever possible. This approach would maximise the audience for the LDP and increase opportunities for engagement. A summary of these methods and the activities involved can be seen below;

- The Council produces a free newspaper 'Your Community Your Council' three times per year which provides valuable information about services and projects to local residents. The DA specified this as a method for distributing information about the LDP and key consultation dates. Due to budget cuts within the Local Authority this newspaper is no longer produced, therefore the LDP has not been able to engage with local residents of Flintshire via this route.
- Community Strategy - As part of a WG initiative, Flintshire was one of 6 Local Strategy Boards (LSB) in Wales set up to develop and improve public service delivery. The LSB comprises an Executive and a Strategy Group and one of its key terms of reference is the delivery and review of a meaningful and fit for purpose Flintshire Community Strategy. The LDP has engaged with the Community Strategy by inviting many of the LSB members to be members of the LDP Key Stake holder Forum.
- Website - The Council is continually developing its website and is increasingly used as part of a wide range of community engagement and

consultation processes. The LDP pages of the Flintshire Website has been regularly updated with progress on developing the LDP and key consultation dates. The LDP Newsletter has also been published here.

- Communities First – Ceased to exist following Welsh Government consultation by the then Minister for Local Government and Communities, therefore the Policy Team have not been able to engage Communities First in the LDP preparation process as intended.
- Other Partnerships and forums – The LDP team have engaged with Town and Community Councils via the County Forum, Planning Officers attended these forum meetings to provide an update on the LDP and raise awareness of forthcoming consultation dates. Officers have also attended many individual Town and Community Council meetings to update on progress with the LDP over the past four years. In addition to this the LDP team have engaged with other local partnership forums including the Equalities Impact Assessment Assurance Group on the 30th July 2014, 50+Action Group on the 16th March 2015 following which a member of that group joined the Key Stakeholder Forum, and the Flintshire Youth Forum on May 7th 2019.

3.4 In addition to the above consultation mechanisms the Council also sought to use a variety of means of engaging and consulting with the public. These included the following:

Method	Where/When
Exhibitions	Exhibitions were held at Libraries and the two main Council Offices during the Key Message, strategic options and Preferred Strategy stages (Reg 15).
Seminars / conferences	Member and Officer Training Seminar 11 th and 15 th January 2013 the Strategic Context for the Local Development Plan. Member/Officer Training LDP update Oct 15 th 2013
Workshops	<u>Strategic Options:</u> <ul style="list-style-type: none"> • Elected Member Training Workshop (Friday 23rd September 2016) • A Key Stakeholder Forum Workshop (Wednesday 12th October 2016) • Town and Community Council Workshops (Friday 21st October, Monday 24th October and Tuesday 25th October 2016)
Site notices	Site Notices were advertised adjacent to allocated residential sites, Gypsy Traveller sites and the two key Strategic sites ahead of the Deposit consultation process to alert

	neighbouring residents to these allocated sites within the plan.
Press releases	<p>The Local Authority have carried out a press release during each stage of the LDP. This included a press release for:</p> <ul style="list-style-type: none"> • First Delivery Agreement • Call for Candidate Sites • Candidate Sites Register and Methodology • Key Messages • Preferred Strategy <p>The Local Authorities' press officer notified local newspapers of the forthcoming LDP and the key dates for consultation.</p>
Formal public notices	<p>A public notice was advertised within The Daily Post newspaper ahead of the Preferred Strategy Consultation. A copy of the public notice can be seen in the appendix 18.</p>
On line consultation system (and supporting back office system)	<p>The Local Authority have used the online consultation portal, Objective, for consultees to view and comment on the LDP at the Preferred Strategy stage.</p>
Independent facilitator, Planning Aid Wales	<p>Planning Aid Wales facilitated workshops on the Strategic Options:</p> <ul style="list-style-type: none"> • Elected Member Training Workshop (Friday 23rd September 2016) • A Key Stakeholder Forum Workshop (Wednesday 12th October 2016) • Town and Community Council Workshops (Friday 21st October, Monday 24th October and Tuesday 25th October 2016)

3.5 An extensive programme of engagement has been undertaken involving key stakeholders and members of the public. Engagement events were held with key stakeholders and forums with exhibitions displayed across the County at Key Message, Strategic Options and Preferred strategy (Reg15) stages. These sessions helped to identify the key issues facing the County, consider the strategic options for the amount and location of growth, establish the objectives for the future of the County, consult on the strategic policies and ultimately reach consensus on the best way forward.

3.6 All elements of the engagement process have been recorded, with the comments received helping to inform the Deposit LDP. The following sections summarise the process of engagement, the comments received and the responses made by the LPA pursuant to:

- A Delivery Agreement
- Consultation on Topic Papers (Mar / April 2015)
- Publication of Candidate Sites Register and consultation on Candidate Site Assessment Methodology (Mar/April 2015)
- Consultation on Key Messages document and the settlement audits (Mar 2016)
- Consultation on Strategic Options (Growth and Spatial Options) Oct 2016
- Consultation on the Preferred Strategy (November / December 2017)

4. Delivery Agreement

- 4.1 The Council's Delivery Agreement was consulted upon for 8 weeks from 5th August up to 30th September 2013. Letters and emails were sent out to everyone on the LDP consultation mailing list, including all statutory consultees, internal departments, town and community councils, County Councillors, and interested members of the public, informing them of the consultation dates and that the documents were available on the Councils website. Following that 48 representations were received which led to various changes which are detailed in the Appendix 5
- 4.2 The original Delivery Agreement was approved by Welsh Government on 12th Feb 2014. A revised versions of the Delivery Agreement were subsequently agreed by Welsh Government in November 2016, 8th November 2017, and the 9th May 2019. The revised Delivery Agreements set out a new timetable for preparing the LDP to take account of slippage to date. The published [Delivery Agreement \(pdf\)](#) and the [revised Delivery Agreement \(pdf\)](#) and the [third Revised Delivery Agreement](#) can be viewed on the Councils website. There was no formal consultation at this time as the changes only related to a review of the timetable.

5. Call for Candidate Sites

- 5.1 The LPA invited the submission of sites for potential inclusion in the LDP from developers, land owners and the public between 28th February 2014 and the 30th May 2014. Everyone on the LDP consultation database at the time, were sent either a letter or email inviting the submission of sites for consideration in the LDP together with a site submission form and notes on how to complete the form. The call for sites was also published on the Council's website along with the relevant representation form. Submissions were accepted via email or post.
- 5.2 This exercise resulted in the submission of 734 sites for consideration. These were all mapped and entered into a database to allow the sites to be assessed for their suitability for inclusion within the plan. Following the call for sites the Local Authority produced a Candidate Site Register, which was also made available on the Councils website for information only, members of the public could then view the sites submitted for assessment.

5.3 In order to assess the suitability of the sites and identify constraints, consultation letters/emails and maps were sent to the consultees listed in Table 1 below. Details about the assessment process can be found in Assessment of Candidate Sites / Alternative Sites Background Paper.

Table 1 Candidate Site Statutory Consultees

Flintshire CC Internal Departments internal departments	External Organisations
Highways officers	Natural Resources Wales
Ecologist	Welsh Water
Conservation Officer	Network Rail
Education	Dee Valley Water
Housing	Welsh Government
Economic Regeneration	CADW
Environmental Health	CPAT
Street scene	Scottish Power
Waste and Minerals	Betsi Cadwaladr University Health Board
Drainage	North Wales Fire and Rescue
Tree officer	British Telecom, O2, Vodaphone, UK Broadband, Orange Ltd
Development Management	Police
	Welsh Ambulance Service
	Wales and West Utilities
	National Grid
	Clwydian Range and Dee Valley AONB

5.4 Following the Call for Candidate Sites, the Council published a Candidates Sites Draft Methodology and Assessment Process document, setting out the methodology by which the LDP Candidate Sites will be assessed. The Draft Methodology was the subject of a 6 week consultation exercise which ran between Monday 9th March and Monday 20th April 2015. There were 13 respondents to this consultation making a total of 66 representations which resulted in 14 changes to the candidate site assessment methodology. A summary of the representations can be seen in appendix 7.

5.5 At the same time, consultation on 18 Summary Topic Papers was also carried out. Summary Topic Papers on a number of land use related topics such as Biodiversity and Nature Conservation and Population Household Growth and Housing were produced. These set out the relevant guidance and identified the issues to be considered within the plan and possible policy approaches on a range of issues. The Topic papers were intended to give stakeholders and the public an early opportunity to have an input into the plan by identifying issues which the plan should be tackling and ideas on how these should be addressed.

5.6 Letters and emails were sent out to everyone on the LDP consultation mailing list, including all statutory consultees, internal departments, town and community councils, County Councillors, and interested people informing them that the documents were available on the Councils website. The documents were also available for inspection at Council Offices and at libraries. Representations made

to the Draft Methodology and the Topic Papers were considered by the Planning Strategy Group on 21st May 2015.

5.7 There was a total of 18 respondents making 110 representations on 13 of the topic papers. The table below summarises the issues raised and the subsequent changes where necessary, the table doesn't include topic papers where no comments were received. The full results of the consultation can be seen in appendix 9.

Topic Paper	Number of comments	Implications for LDP
Topic Paper 1 – Biodiversity and Nature Conservation	5	No change
Topic Paper 2 – Flooding and Environmental Protection	2	No change
Topic Paper 4 - Open Space	2	No change
Topic paper 6 - Minerals	5	No change
Topic Paper 7 - Spatial Strategy	44	Review existing settlement hierarchy and categorisation based on an assessment of the services and facilities of each settlement and whether it is a sustainable location to accommodate further growth Need to have regard to the close relationship between Flintshire and CWAC in terms of housing and employment
Topic Paper 8 Economy & Employment	8	Ensure that there is a close correlation between the economic growth aspirations of the Plan and the provision of housing Seek to improve accessibility to key employment sites
Topic Paper 10 – Population, Household Growth and Housing	27	Need to identify brownfield land alongside a range of greenfield sites which are viable and deliverable, and which are capable of contributing to maintaining a 5 year land supply
Topic Paper 11 – Retailing and Town Centres	1	No change
Topic Paper 13 - Landscape	3	No change
Topic Paper 14 – Rural Affairs	2	No change
Topic Paper 15 - Energy	1	No change
Topic Paper 16 - Transport	7	Refer to Network Rail Route Study Report and its main findings
Topic Paper 18 - Tourism	3	No change
TOTAL:	110	

6. Further Call for Candidate sites Minerals and Gypsy Traveller

6.1 Following the original call for candidate sites it was apparent that there were insufficient sites submitted for the development of Gypsy Traveller accommodation and Minerals and Waste uses. Therefore the Council carried out a further call for candidate sites inviting all Minerals and Waste operators, landowners, developers, agents and members of the public to suggest suitable

sites. This did not include sites for housing, employment or any other development uses

- 6.2 The further call for candidate sites for minerals, waste and Gypsy and Traveller accommodation ran for six weeks from 30th June to the 11th August 2017. This was advertised on the Council's website and letters were sent out to everyone on the consultation database who had previously received the invitation for the call for candidate sites. In addition letters were sent to specific minerals and waste operators within the area, see letter from dated 30th June 2017 in the appendix 10. The further call for sites resulted in the submission of seven minerals sites for assessment but no Gypsy Traveller sites. Although the Call for Sites did not directly result in the submission of Gypsy Traveller sites, on-going discussions with the Council's Gypsy and Traveller Liaison Officer did lead to sites being put forward.

7. LDP Key Stakeholder Forum

- 7.1 An LDP Key Stakeholder Forum (KSF) was set up in February 2015 to share ideas, draw out key issues and act as a sounding board to assist in the production of the emerging LDP. The role of the KSF was to act within an advisory capacity and is not a decision making body as decisions on the Plan rest with the Council's elected Members. Planning Strategy Group (PSG) approved the formation of the KSF at their meeting on the 23rd April 2015.
- 7.2 The KSF is drawn heavily on the existing Local Service Board (responsible for Community Strategy and Single Integrated Plan) and includes representatives from public and private sectors from a variety of disciplines. It is made up of those key statutory consultees and other organisations representing environmental, social and economic disciplines who are able to take a more strategic role in looking at the Plan.
- 7.3 The first KSF meeting was held on 27th February 2015 whereby the Vision for the plan and the various issues and objectives were discussed. Comments from the meeting were used to make minor changes to the wording of the issues and objectives please see KSF Meeting Notes 27 Feb 2015 in appendix 14. A further KSF meeting was held on 12th October 2016 where the 6 growth options and 5 Spatial Options for the LDP were discussed and preferences for each option were highlighted. Please See KSF Meeting Notes 12th October 2016 Appendix 14.
- 7.4 A third KSF meeting was held on 15th November 2017 which related to the emerging Preferred Strategy and comprised a presentation on the preferred strategy and a question and answer session covering issues in the emerging plan, please see KSF Meeting Notes 15th November 2017 in Appendix 14.
- 7.5 The principal aim of the key stakeholder engagement programme was to establish whether a broad consensus could be reached on the vision, issues and objectives to the strategic growth and the spatial options for the future development of the County to help inform the scope and content of the Preferred Strategy for the LDP. Subsequent consultations included the KSF member but no further meetings were considered necessary.

8. Settlement Audit and Settlement Hierarchy

8.1 In July 2015 Planning Strategy Group Members were asked to consider a report 'Defining a Settlement Hierarchy for the LDP' which provided an overview of the process by which settlements were being assessed in terms of their facilities and services. This resulted in the production of individual settlement audit reports which were then the subject of an informal consultation with all County Council Members and with Town & Community Councils. In October 2015 a report was presented to Members looking at the issue of settlement categorisation and identified a number of alternative methods alongside the UDP approach. An important input into the report was the findings of the settlement audits. Many County Councillors and Town and Community Council members commented on the audits and clarified what services and facilities were available in each settlement. This feedback helped officers gain a better understanding of the role of each settlement and informed the creation of the settlement hierarchy within the LDP.

9. Key Message Document

9.1 In March 2016 the Council produced a 'Key Messages' document which set out the vision, issues and objectives for the Plan. The intention of the consultation exercise was to ensure that a range of stakeholders, including the general public, were comfortable with the direction that the Plan was heading in, and to continue to raise awareness of the LDP prior to the Preferred Strategy Stage

9.2 The document also built on work relating to the survey of settlement services and facilities. This work on the sustainability of each settlement has informed a review of the approach taken in the UDP regarding settlement categorisation and resulted in a number of settlement hierarchy options being considered. The consultation therefore sought views as to whether the approach taken in the UDP is still fit for purpose or whether one of the alternative approaches is more appropriate.

9.3 The consultation documents included the [Key Messages document \(PDF 2MB\)](#) itself and the [supporting settlement audit reports](#). The Key Messages document comprised three elements:

- The covering section with pre-set questions and answer boxes
- Appendix 1 - sets out the methodology for assessing the sustainability of settlements
- Appendix 2 - sets out a number of different approaches to settlement categorisation

9.4 The Key Messages document was the subject of a six week consultation exercise commencing on 18th March and ending the 29th April 2016. The consultation received 562 representations, which were reported to Planning Strategy Group on 25th May 2016 and resulted in a number of amendments to the document. Subsequently a revised [Key Messages document](#) was made available on the Council's website, having regard to the [summary table of comments and responses](#) presented to and agreed by Planning Strategy Group. Furthermore, some amendments were also made to the settlement audits for Penyffordd /Penymynydd, Afonwen, Caerwys and Leeswood. This assisted the Planning

Strategy Group in considering the formulation of growth and spatial options within the LDP.

10. Strategic Options

10.1 In October 2016 the Council produced a 'Strategic Options' document which was the subject of a consultation exercise commencing the 28th October 2016 and ending on the 9th December 2016. This consultation follows on from and was informed by the consultation on the Key Messages document. The Key Messages document consultation enabled the Council to firm up the vision for the LDP, the issues to be faced by the Plan, the objectives, a preferred settlement hierarchy and the key messages emerging.

10.2 The Strategic Options document considered Growth Options for the Plan (the amount of growth to be provided) and Spatial Options (how growth is to be distributed across the County). The outcome of this consultation informed the development of the 'Preferred Strategy'.

The Strategic Options documentation included:

- [A summary leaflet](#)
- [An easy read version of the main consultation document](#)
- [The main 'Strategic Options' consultation document](#)
- [A comments form](#)
- [Sustainability Appraisal of Strategic Options \[pdf\]](#)

10.3 At the Planning Strategy Group meeting on 1st September 2016, Members approved the Strategic Options consultation document for public consultation. The report also provided an overview of the planned engagement and consultation exercise.

10.4 Prior to conducting the consultation, the Strategic Options were the subject of a series of engagement events which led up to the 6 week public consultation. The engagement events comprised:

- A Member Training Workshop (County Council Members) on Friday 23rd September 2016
- A Key Stakeholder Forum Workshop on Wednesday 12th October 2016
- Town and Community Council Workshops (which also included some County Council members) on Friday 21st October, Monday 24th October and Tuesday 25th October 2016

10.5 The engagement events were all facilitated by Planning Aid Wales in conjunction with Flintshire County Council, and were conducted so as to be interactive with audience participation in the form of workshop exercises and question and answer sessions. Planning Aid Wales were also involved in drafting the suite of 'easy read' documents which accompanied the main consultation document as well as the display material for engagement events and exhibitions.

10.6 A considerable amount of effort went into organising the engagement events. Each event was attended by Officers from the Policy Team and other internal departments who acted as facilitators. This reflects the intention to make a

genuine attempt to engage with key stakeholders and Town and Community Councils as well as Elected Members. The engagement events were generally well received both by those acting as facilitators and by attendees. The use of Planning Aid Wales enabled a different perspective to be taken in presenting and discussing material and to do so in a neutral and impartial manner.

10.7 The Strategic Options documents were available on the website www.flintshire.gov.uk/LDP and available in hard copy at Council Offices and libraries, during normal opening hours. An exhibition was displayed at County Hall for the duration of the consultation period and also at the following locations, during normal opening hours:

County Hall, Mold, Main Reception – 28/10/16 to 09/12/16

Buckley Library, Upstairs Gallery – 28/10/16 to 09/12/16

Deeside Leisure Centre – 28/10/16 to 18/11/16

Holywell Library – 28/10/16 to 18/11/16

Broughton Library – 18/11/16 to 09/12/16

Flint Library – 18/11/16 to 09/12/16

Mold Library – 18/11/16 to 09/12/16

Mancot Library - 18/11/16 to 09/12/16

Heulwen Community Centre, Hope 10/11/16 to 09/12/16

10.8 The same exhibition as used for the workshop meetings was displayed in main libraries across the County. Once the consultation had begun there were three requests by local members to have the exhibition displayed at additional venues or for a longer period of time. The exhibition at Buckley was on display for 6 weeks and at Mancot Library the exhibition was displayed for the last 3 weeks of the consultation period. Also Hope and Caergwrle Community Council requested their own set of exhibition posters and displayed them at Heulwen Community Centre Hope from 10th November to December 9th 2016.

10.9 The results of the consultation were reported to the Planning Strategy Group Meeting on 15th December 2016. In analysing the feedback at the events there were clear messages emerging about both the growth and spatial options. In terms of the growth options the favoured options were clearly Option 4 (2014 based 10 year highest migration 2008 headship rates – 6,600 new homes / 440 per annum) and Option 6 (Employment led projection 8,000 to 10,000 new jobs – 6,350 to 7,350 new homes / 440-490 per annum). In terms of the Spatial Options the favoured option is Option 5 (Sustainable Distribution and Refined Approach to Rural Settlements) although there was some support for Option 4 Transport Hubs and Corridors.

11. Town and Community Council Meetings

11.1 In order to keep Town and Community Councils updated and fully informed on the progress of the LDP the Policy Team have attended several Town and Community Council meetings over the last past four years. At each stage of the LDP, planning officers have offered to attend T/CC meeting to explain the process. Since 2013 officers have attended 44 such meetings (including County Forum meetings) and of the 34 Town and Community Councils 23 have accepted our offer to attend and present information on the emerging LDP. The meeting were as follows:

2013

Northop Hall CC - Tues 8th January 2013, Llys Ben Pavillion

Llanasa CC – Tues 19th March 2013, Ysgol Bryn Garth, Llanasa

Trelawnyd & Gwaenysgor CC – Mon 22 April 2013, Village Hall, Gwaenysgor

Mold Town Council – Wed 24th April 2013, Town Hall, Mold

Meeting with County Forum – Thur 27 June 2013, County Hall

Gwaenysgor Community Council Re LDP (open meeting with the public) 16th Sept 2013
Village Hall, Gwaenysgor

2014

Hope Community Council 30th April 2014, Heulwen Close Community Centre, Hope.
(AR/RP/VW)

Buckley Town Council 1st May 2014

Northop Community Council 12th May 2014 Edith Banks Memorial Hall, Northop (AR)

Bagillt Community Council 14th May 2014 Bagillt Community Library, Gadlys Lane,
Bagillt. (AR/VW)

Penyffordd 21st May 2014

Meeting with County Forum – 16th October 2014 County Hall

2015

Hope Community Council 4th Feb 2015 Heulwen Community Centre

Hawarden Community Council 9th Feb 2015

Caerwys Town Council 17th March 2015

Trelawnyd CC Memorial Hall 23 March 2015

Northop Hall CC 24th March 2015

Higher Kinnerton CC 16th April

Holywell TC 21st April 2015

Mostyn CC 15th May 2015

Flint Town Council 22nd June 2015

County Forum Update Pantasaph 25th June 2015

Whitford CC 16th July 2015

Buckley TC 28th July 2015

Argoed CC 1st Sept 2015 Mynydd Isa Community Centre

Llanfynydd 21st September 2015

Leeswood 6th October 2015

Treuddyn 14th October 2015

2016

Cilcain CC 29th Feb 2016 Cilcain Village Hall

Argoed CC 1st March 2016 Mynydd Isa Community Centre

Higher Kinnerton CC 12th April 2016

Holywell Town Council 20th Sept 2016

Gwernymynydd CC 24th November 2016

Saltney TC 14th December 2016

2017

Hope CC 4th January 2017

Trelawnyd and Gwaenysgor CC 12th January 2017

County Forum Meeting Mold Town Council Offices 28th February 2017

Holywell TC 21st March 2017

Buckley Town Council 26th Sept 2017

County Forum Buckley Town Council offices 12th Oct 2017

Northop Hall 12th Oct 2017

2018

Flint TC 5th Feb 2018

Northop CC 12th March 2018

Higher Kinnerton 14th Nov 2018

2019

Northop Hall CC 12th Feb 2019

- 11.2 Prior to the Deposit LDP consultation all Town and Community Council Members were invited to attend a presentation on the contents of LDP and to participate in a question and answer session. The aim of this was to inform councilors of the forthcoming consultation processes and how they can submit their representations on the plan. The briefing took place at County Hall Mold on Wednesday 11th September and Thursday 12th September 2019 and were well attended.

12. Equalities Impact Assessment (EIA) Quality Assurance Group Meetings

12.1 The EIA Quality Assurance Group organised by Flintshire County Council to bring together specific minority groups such as the elderly, transgender and people with disabilities to ensure that their voice is heard when consultations on Council processes are being carried out. Officers have attended meetings of this group at various stages of preparing the LDP including:

- 30th July 2014
- 18th September 2014
- 18th May 2015
- 21st November 2016

Details of the notes taken at those meeting are available in Appendix 13.

13. Preferred Strategy

13.1 The LDP Preferred Strategy and accompanying supporting documents were published for public consultation between 9th November 2017 and 21st December 2017. A letter and emails were sent out to all consultees on the consultation database on the 31st October 2017 notifying them of the forthcoming consultation on the Preferred Strategy, please see letter in appendix 19. A public notice was also advertised within the Daily Post newspaper, please see appendix 18. The following documentation were made available for public inspection:



- Preferred Strategy
- Integrated Impact Assessment – Interim Report (Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) including a Non-Technical Summary)
- Habitat Regulations Assessment (HRA) Screening Report
- Background Paper on the Candidate Sites Register

Copies of these documents were made available:

- On the Council's Website www.flintshire.gov.uk/ldp
- At County Hall Main Reception during normal opening hours
- At Flintshire Connects Offices in Buckley, Connah's Quay, Flint, Holywell and Mold and at all libraries, during normal opening hours
- At an exhibition in County Hall Main Reception for the 6 week consultation period
- At the following exhibitions during normal opening hours: Buckley Library, Deeside Library (Leisure Centre), Holywell Library and Mancot Community Library between Thursday 9th November and Wednesday 29th November 2017
- Broughton Library, Flint Library and Mold Library between Thursday 30th November and Thursday 21st December 2017

- 13.2 This consultation allowed for comments to be made on the existing register of candidate sites, as well as making provision for the submission of Alternative Sites (essentially additional Candidate Sites), in line with regulation changes brought in by the Welsh Government.
- 13.3 Overall 561 representations were received on the Preferred Strategy from 83 consultees, with the majority of these relating to the candidate sites. A number of the objections to the strategy itself were made by local developers seeking to increase growth in order to accommodate more housing allocations. From the key representations received on the Strategy itself, there is a general level of support for the approach taken by the Strategy, including the level of growth proposed and the spatial strategy. Perhaps the most significant submission was that made by the Welsh Government, which made a number of supportive and confirmatory comments which relate to;
- Affordable Housing
 - Delivery & Phasing
 - Employment
 - Gypsy and Travellers
 - Minerals, and
 - Renewable Energy
- 13.4 Welsh Government also stipulated the need to strengthen the evidence base to ensure the plan is 'sound'. Following these comments additional evidence has been gathered including a Renewable Energy Assessment, Green Infrastructure Assessment, Housing Supply Background Paper, an updated Local Housing Market Assessment, Affordable Housing Viability Assessment and an updated Gypsy Traveller Accommodation Needs Assessment.
- 13.5 In addition to the Welsh Government's support, other significant stakeholders have provided support for the growth level and approach to the plan strategy. These include the Home Builders Federation and neighbouring authorities who do not find the plan in conflict with their own. At this stage statutory undertakers such as Welsh Water do not object to the strategy, and the Health Board have acknowledged the stage which the plan has reached and are keen to work with the Authority in assessing how they meet the health need implications of the growth the Strategy sets out.
- 13.6 In terms of other general comments and particularly objections to the Strategy, these are summarised on a question by question basis in appendix 20 along with the recommended responses. Those objecting to the key elements of the strategy i.e. the growth level and spatial strategy have done so for a number of reasons that include:
- The plan should provide for higher levels of housing growth to be more aspirational;
 - Under-delivery of housing from the UDP should be added to the LDP requirement;
 - A 10% flexibility allowance is insufficient;
 - Better understanding needed of the link between jobs and housing;
 - More flexibility for rural growth is required;
 - Unclear impact of Brexit on employment/development;

- Concern that the strategic sites won't come forward and more alternative housing sites are required.

13.7 From the above, and as can be seen from the summaries provided, the majority of the objections are not to the Strategy itself, but are made from the perspective of the strategy needing to be changed to support cases being made by objectors that it currently doesn't support. For example, comments requiring the highest growth option and/or for more flexibility to be used come from agents and landowners supporting candidate sites, potentially in locations not prioritised by the spatial strategy. Equally, some objectors have used the consultation as an opportunity to repeat previous comments made, for example the need to subdivide Hope, Caergwrle, Abermorddu and Cefn y Bedd as the plan treats them as a single settlement.

13.8 The vast majority of comments did not raise matters or issues that resulted in a change to the Preferred Strategy. Where points were accepted, these in the main related to wording changes in policies rather than more fundamental points.

14. Alternative Sites

14.1 During the Preferred Strategy Consultation there was also an opportunity to suggest alternative sites which was advertised alongside the Preferred Strategy. Ninety Alternative Sites were proposed across a range of settlements. These sites varied in size, and most were proposed for residential use. It was a requirement of the consultation that Alternative Sites were put forward using the appropriate submission form in order to ensure a consistent and transparent approach. Some sites were put forward without this, and where this has occurred, proposers were asked to provide the completed form within a specified timeframe. In cases where the form was not provided as requested, the Council were unable to consider the sites put forward.

14.2 The alternative sites were assessed against the same methodology used for the candidate sites. This process did not generate any new sites for allocation within the Deposit LDP.

Appendices for the Initial Consultation Report

Appendix 1 Membership of the Planning Strategy Group (PSG)

Cllr Marion Bateman,
Cllr Chris Bithell,
Cllr Derek Butler,
Cllr Ian Dunbar,
Cllr David Evans,

Cllr Patrick Heesom,
Cllr Richard Jones,
Cllr Mike Peers,
Cllr Neville Phillips,

Cllr Owen Thomas,
Cllr David Wisinger,

Appendix 2 Membership of the Key Stakeholder Forum

KSF Members

One Voice Wales.	Deeside Enterprise -Board David Jones	Dee Valley Water / Hafren Dyfydwy (Severn Trent)	Mike Pender - Anwyl/ HBF
Wirral MBC - Andrew Frazer or John Entwistle	Clwyd Alyn Housing Association - Deiniol Evans	Home Builders Federation - Mark Harris	Amec Foster Wheeler E&I UK - Robert Deanwood
Natural Resources - Wales Angharad Crump	AONB Joint Advisory Service - Tony Hughes	Clwyd Powys Archaeological Trust - Mark Walters	Association of Town and Larger Community Councils - Robert Robinson
Flintshire Local Voluntary Council - Ann Woods	Dwr Cymru/Welsh Water - Dewi Griffiths	Sports Wales	Wales and West Utilities - Nigel Winnan
Pennaf Housing Group - Arwyn Evans	Airbus - Carolyn Fleming, David Adams, Catalina Peters, Richard Grundy s	Campaign for the Protection of Rural Wales - Mike Moriarty	North Wales Police - Sharon McCairn
Cheshire West and Chester - Catherine Morgetroyd	Denbighshire County Council Lara Griffiths and Luci Duncalf	Mineral Products Association - David Harding	National Grid - Spencer Jeffries
North Wales Fire and Rescue Service - Chris Nott	Welsh Government - Candice Myers	Cadw Historic Environment	FCC Streetscene and Transportation - Steve O Jones
Flintshire Tourism Association - Christine Artus and Sandra Blackwell	Cheshire West and Chester - Gill Smith or Dave Butler	Farmers Union of Wales - Brian Coleclough	Coleg Cambria Deeside - Janice Bellis, Steve Jackson
FCC Leader of the Council - Aaron Shotton	FCC Economic Development Manager - Niall Waller	50+ Action group (Flintshire) - Gerald Kitney	Betsi Cadwaladr University Health Board - Sally Baxter Rachael Lewis

Wrexham County
Borough Council –
Nicola Corbishley
no Linda Sharp

West Cheshire &
N Wales Chamber
of Commerce -
Colin Brew

Ramblers'
Association Wales
- Howard White
John Roberts

Scottish Power -
Rachael Shorney ,
Rachael Salter

FCC Cabinet
member for
Environment -
Bernie Attridge
FCC - Chief
Executive Lisa
Parsonage for Colin
Everett

North East Wales
Wildlife - Leah
Williams

FCC Leisure -
Mike Welch

Taith
Management
Team

Appendix 3 – List of Consultees

B2 Specific Consultation Bodies

Welsh Government
Natural Resources Wales
Secretary of State for Wales
Planning Inspectorate

Adjoining Local Authorities

Denbighshire County Council
Wrexham County Borough Council
Cheshire West and Chester
Wirral MBC

Flintshire Town & Community Councils

Argoed Community Council
Bagillt Community Council
Broughton & Bretton Community
Council
Brynford Community Council
Buckley Town Council
Caerwys Town Council
Cilcain Community Council
Connah's Quay Town Council
Flint Town Council
Gwernaffield Community Council
Gwernymynydd Community Council
Halkyn Community Council
Hawarden Community Council
Higher Kinnerton Community Council
Holywell Town Council
Hope Community Council

Leeswood Community Council
Llanasa Community Council
Llanfynydd Community Council
Mold Town Council
Mostyn Community Council
Nannerch Community Council
Nercwys Community Council
Northop Community Council
Northop Hall Community Council
Penyffordd Community Council
Queensferry Community Council
Saltney Town Council
Sealand Community Council
Shotton Town Council
Trelawnyd & Gwaenysgor Community
Council
Treuddyn Community Council
Whitford Community Council
Ysceifiog Community Council

Adjoining Town and Community Councils – Denbighshire

Prestatyn Town Council
Dyserth Community Council
Tremeirchion, Cwm & Waen
Community Council
Bodfari Community Council
Aberwheeler Community Council
Llandyrnog
Llangnhaful Community Council
Llanbedr DC Community Council
Llanferres Community Council

Llanarmon yn Iâl Community Council

Llandegla Community Council

Adjoining Town and Community

Councils – Wrexham

Rossett Community Council

Llay Community Council

Gwersyllt Community Council

Brymbo Community Council

Minera Community Council

**Adjoining Parish Councils –
Cheshire**

West and Chester City

Dodleston & District Parish Council

Saughall & Shotwick Park Parish
Council

Puddington & District Parish Council

Neston Town Council

**Telecommunications (electronic
communications code – direction
under a106(3) Communications Act
2003)**

Mobile UK

British Telecom

UK Broadband

Orange Limited

O2 plc

Vodafone Limited

T Mobile Ltd

Hutchinson 3G UK Ltd

Airwave Solutions

EE

Any person who owns or controls

**electronic apparatus situated in any
part**

of the authority's area

North Wales Police

Welsh Ambulance Service, NHS Trust

Local Health Board

Betsi Cadwaladr University Health
Board

**A person to whom a license has
been**

**granted under section 6(1)(b) or (c)
of**

the electricity act 1989

National Grid

Scottish Power

Powersystems UK Ltd

Deeside Power Development
Company

**A person to whom a license has
been granted under section 7(2) of
the gas act 1986**

British Gas

National Grid

United Utilities

Sewerage / water undertaker

Welsh Water

Dee Valley Water plc

United Utilities

**B3 UK GOVERNMENT
DEPARTMENTS**

Department for Transport

Department for Business, Enterprise &
Regulatory

Reform

Department of Energy & Climate
Change

Home Office

Ministry of Defence

B4 General Consultation Bodies

**Voluntary bodies, some or all of
whose activities benefit any part of
the authority's area**

Flintshire Access Groups

Age Concern Cymru

Barnardo's Cymru

Bryn Gwalia Communities First

Campaign for Real Ale

CAIS Wrexham & Flintshire

Children in Wales

The Community Development
Foundation Wales

Community Transport Association

Council for Wales Voluntary Youth
Services

Flintshire Local Voluntary Council

Flint Castle Communities First

Higher Shotton Estate Communities
First Holywell

Neighbourhoods Communities First

Rural Flintshire Communities First

Estuary Voluntary Car Scheme

Flintshire Federation of Tenants and
residents

Associations

Save The Family

Together Creating Communities

Unllais North East

Youth Cymru

Keep Wales Tidy

Bodies representing different racial, ethnic or national groups

Equalities & Human Rights
Commission

Ethnic Minorities Foundation

Friends, Families & Travellers

North Wales Race Equality Network

National Federation of Gypsy Liaison
Groups

Race Council Cymru

Traveller Law Reform Project

Irish Travellers Movement in Britain

Gypsy Association (Council)

Welsh Refugee Council

Womens Institute Wales Office

Bodies representing different religious groups

Anglican Church in Wales

The Catholic Church in England and
Wales

Diocese of Wrexham

Methodist Church in Wales

Presbyterian Church of Wales

Quakers

The Salvation Army

Churches Together on Deeside

Bodies representing disabled persons

Agoriad Cyf
Alzheimer's Society
Arthritis Care Wales
Asthma UK Cymru
Shine Charity Cymru
British Heart Foundation
Clwyd ME Support Group
Cystic Fibrosis Trust
Deaf Association Wales
Deaf Access Cymru
Disabled Motoring
Disabled Persons Transport Advisory Committee
Disability Wales
Epilepsy Wales
Equality and Human Rights Commission
Mencap Cymru
Flintshire Mind
Motor Neurone Disease Association
Multiple Sclerosis Support Centre
Muscular Dystrophy Campaign
National Autistic Society
Royal National Institute for the Blind Cymru
Royal National Institute for the Deaf
Sense Cymru
Wales Council for the Blind
Wales Council for the Deaf
Bodies representing persons carrying on business in the area

British Holiday & Home Park Association
Renewable UK Cymru
Business and Professional Women UK Ltd
Business in the Community
Cadwyn Clwyd
Camping and Caravanning Club
The Caravan Club
Clwydian Range Tourism Group
Deeside Industrial Park Business Forum Deeside
Enterprise Zone
Destination Flintshire Partnership
National Caravan Council Ltd
Country Land and Business Association Wales
Deeside College The National Federation of SelfEmployed and Small Businesses Ltd
Farmers Union of Wales
NFU Cymru
Finance Wales
Flintshire Rural partnership
Flintshire Tourism Association
Holywell Town Partnership
Mold Town Partnership
Queensferry Residents and Business Association
Road Haulage Association Ltd
Wales Co-operative Centre
Young Enterprise
Young Farmers Wales

Bodies Representing Welsh Culture

Arts Council for Wales

Cadw

Welsh Government

Cymuned

Menter Iaith Sir y Fflint

The National Trust for Wales

The Theatres Trust

Urdd Gobaith Cymru

Welsh Historic Gardens Trust

Welsh Language Commissioner

Airport Operators

Airbus UK Ltd

Hawarden Air Services

General Aviation Awareness Council

Civil Aviation Authority

The British Aggregates Association

British Astronomical Association

British Geological Survey

The British Horse Society

British Red Cross

British Trust for Ornithology

**British Waterways, Canal Owners
and Navigation Authorities**

Dee Conservancy

Strategic Marine Services Ltd

The Port of Mostyn

Centre for Ecology & Hydrology

**Chambers of Commerce, local CBI
and local branches of Institute of
Directors**

West Cheshire & N Wales Chamber of
Commerce

Confederation of British Industry
Wales

Institute of Directors

The Coal Authority

Confederation of UK Coal Producers
(CoalPro)

Grosvenor Estate

Coed Cymru

Confederation of Passenger Transport
Countryside

Alliance

The Crown Estate

Cyclists Touring Club National Office

Design Commission for Wales

**Electricity, Gas and
Telecommunications companies
and National Grid Company**

See B2 above

**Environmental Groups at National
and Local level**

The Byways & Bridleways Trust

British Trust for Conservation
Volunteers

Clwyd Badger Group

Clwyd Bat Group

Clwyd Ornithological Society

Clwyd Powys Archaeological Trust

Clwydian Range and Dee Valley
AONB Joint

Advisory Committee

Campaign for the Protection of Rural
Wales

Cheshire Campaign for the Protection
of Rural

England

Dee Estuary Conservation Group

Deeside Naturalists Society

Groundwork North Wales - Wrexham

North East Wales Wildlife

North Wales Wildlife Trust

Welsh Beekeepers' Association

Butterfly Conservation Wales

RSPB Cymru

UK Rainwater Harvesting Association
Woodland

Trust Wales (Coed Cadw)

B2 Emergency Services

North Wales Police

Welsh Ambulance Service

Fire and Rescue Services

Maritime and Coastguard Agency

RNLI

North East Wales Search and Rescue

North Wales Fire and Rescue Service /
Authority

Wales Air Ambulance

Flintshire Local Access Forum

Fields in Trust Cymru

Freight Transport Association

Girlguiding Cymru (Girlguiding Wales)

Scouts Wales

Health and Safety Executive Wales

Home Builders Federation

Housing Associations

Wales & West Housing Association

Clwyd Housing Association

Pennaf

Grŵp Cynefin

Local community, conservation and amenity groups, including agenda 21

groups and civic societies

British Horse Society

Buckley Society

Caergwrle Heritage Conservation
Society

Clwyd Powys Archaeological Trust

Envirowatch

Flintshire Historical Society

Flintshire Federation of Tenants &
Residents

Associations

Greenfield Valley Trust

Groundwork North Wales

Gwaenysgor Conservation Society

Hope & Caergwrle Heritage and
Conservation

Society

Llanasa Conservation Society

Mold Civic Society

Mostyn History Preservation Society

Offas Dyke Association

Pantasaph Conservation Group

Pennant Group

The Royal Commission on the Ancient
and

Historical Monuments of Wales

Fields In Trust Cymru (npfa)

Nacro (Crime Reuction Charity)

National Society of Allotment and
Leisure

Gardeners

The National Trust

Saltney History Society

Together Creating Communities

Wrexham Birkenhead Rail Users
Association

Local Transport Operators

Arriva plc

Deeside Shuttle

Arriva Trains Wales

Virgin Trains

First

Hutchinson Coaches

National Express

Oares Coaches

P&O Lloyd

Phillips Coaches

Taith

Townlynx

Welsh Community Transport

Members of Parliament /

Assembly Members / MEP's

Mark

Tami MP

David Hanson MP

Mandy Jones AM

Jack Sargeant AM

Llyr Huws Gruffydd AM

Mark Isherwood AM

Hannah Caroline Blythyn AM

Michelle Margaret Brown AM

Flintshire Councillors

Cllr Mike Allport

Cllr Bernie Attridge

Cllr Janet Axworthy

Cllr Glyn Banks

Cllr Haydn Bateman

Cllr Marion Bateman

Cllr Sean Bibby

Cllr Chris Bithell

Cllr Sian Braun

Cllr Helen Brown

Cllr Derek Butler

Cllr Clive Carver

Cllr Geoff Collett

Cllr Bob Connah

Cllr David Cox

Cllr Paul Cunningham

Cllr Jean S Davies

Cllr Rob Davies

Cllr Ron Davies

Cllr Adele Davies-Cooke

Cllr Chris Dolphin

Cllr Rosetta Dolphin

Cllr Ian Dunbar
Cllr Andy Dunbobbin
Cllr Mared Eastwood
Cllr Carol Ellis
Cllr David Evans
Cllr Veronica Gay
Cllr George Hardcastle
Cllr David Healey
Cllr Gladys Healey
Cllr Patrick Heesom
Cllr Cindy Hinds
Cllr Andrew Holgate
Cllr Dave Hughes
Cllr Kevin Hughes
Cllr Ray Hughes
Cllr Dennis Hutchinson
Cllr Joe Johnson
Cllr Paul Johnson
Cllr Rita Johnson
Cllr Christine Jones
Cllr Richard Jones
Cllr Tudor Jones
Cllr Colin Legg
Cllr Brian Lloyd
Cllr Richard Lloyd
Cllr Mike Lowe
Cllr Dave Mackie
Cllr Hilary McGuill
Cllr Billy Mullin
Cllr Ted Palmer

Cllr Mike Peers
Cllr Michelle Perfect
Cllr Vicky Perfect
Cllr Neville Phillips
Cllr Mike Reece
Cllr Ian Roberts
Cllr Tony Sharps
Cllr Aaron Shotton
Cllr Paul Shotton
Cllr Ralph Small
Cllr Ian Smith
Cllr Carolyn Thomas
Cllr Owen Thomas
Cllr Martin White
LDP Delivery Agreement 48
Cllr David Williams
Cllr David Wisinger
Cllr Arnold Woolley
Cllr Andy Williams

**Network Rail and Train Operating
Companies**

Network Rail
Arriva Trains Wales
Wrexham to Birkenhead Rail Users
Association
Virgin Trains
B5 Other Consultees
All Flintshire Credit Union Ltd
Land Access & Recreation Association
Glyndwr University (NEWI)

North Wales Energy Efficiency Advice Centre

CPDA - Eastern Divisional

One Voice Wales

Open Spaces Society

Play Wales

Post Office Property Holdings

Professional Bodies / Associations

Royal Institute Chartered Surveyors

RTPI Cymru

Planning Aid Wales

Chartered Institute of Housing Cymru

Institution of Civil Engineers Cymru

Chartered Institute of Waste Management Cymru,

Royal Society of Architects in Wales

The Royal Commission on the Ancient and

Historical Monuments of Wales

Minerals Products Association

Rail Freight Group

Ramblers' Association Wales

Royal Mail Properties

Shelter Cymru

Soil Association

Sports Wales

Sustrans Cymru

Wales Council for Voluntary Action

Visit Wales

Wales Tourism Alliance

Environmental Services Association
NHS

Wales Shared Services Partnership

Specialist Estates

Wales Local Government Association

WRVS

Wales Council for Voluntary Action

Women's Institute NFWI Wales Office

House builders

Agents

LDP Delivery Agreement 49

Appendix 4 - LDP Stakeholder Forum /
Planning Strategy Group /

Sustainability Appraisal Group

LDP Stakeholder Forum

Public • Betsi Cadwaladr

University Health

Board

• North Wales Police

• North Wales Fire &

Rescue Service

• Deeside College

• Pennaf

• Sport Wales

• WG (Department of
Economy & Transport)

• Taith

• Natural Resources

Wales (NRW)

• Cadw

• AONB Joint Advisory

Service

• Dwr Cymru/Welsh

Water

- Scottish Power
- Dee Valley Water
- National Grid
- FCC CEO / Leader / Cabinet Member for Environment
- Wrexham County Borough Council
- Denbighshire County Council
- Cheshire West & Chester City Council
- Wirral Council
- Rep of Town & Community Councils - One Voice Wales and North Wales

Association of Town and Larger Community Councils.

Private • Home Builders Federation

- West Cheshire & North Wales Chamber of Commerce
- Retail / Town Centres [Niall Waller – FCC Economic Dev. Manager]
- Key employers e.g. Airbus

Flintshire Tourism

Association

- NFU/FUW
- Enterprize Zone Board

Voluntary • Flintshire Local

Voluntary Council

- CPRW
- Clwyd Powys

Archaeological Trust

- North Wales Wildlife

Trust

- Ramblers / Local

Access Forum

Planning Strategy Group

- Cllr Chris Bithell (Chair)
- Cllr Derek Butler
- Cllr Ian Dunbar
- Cllr David Evans
- Cllr Patrick Heesom
- Cllr Mike Peers (Vice Chair)
- Cllr Richard Jones
- Cllr Neville Phillips
- Cllr Owen Thomas
- Cllr David Wisinger

SA/ SEA Technical Working Group

- Natural Resources Wales
- Cadw
- Ecologist, FCC
- Energy Manager, FCC
- Niall Waller, Economic Development Manager, FCC
- Senior Planning Officer, Planning Policy, FCC
- Tom Woodall, Countryside Services Manager, FCC
- Health & Wellbeing Development Officer, FCC
- Sustainable Development Officer, FCC
- Appointed consultants

Appendix 4

Delivery Agreement Consultation Letter dated 31st July 2013

Andrew Farrow

Head of Planning



Your Ref/Eich Cyf	
Our Ref/Ein Cyf	4111/DA
Date/Dyddiad	31 July 2013
Ask for/Gofynner am	Andy Roberts
Direct Dial/Rhif Union	01352 703213
Fax/Ffacs	
Email/Ebost	developmentplans@flintshire.gov.uk

Dear Sir / Madam,
Anwyl Syr / Madam

Flintshire Local Development Plan

Consultation on Draft Delivery Agreement

Following the adoption of the Flintshire Unitary Development Plan (UDP), the Council is now embarking on the preparation of a Local Development Plan (LDP) for the County. A Local Development Plan is a new style of Development Plan which differs from the UDP in terms of how it is prepared. A key feature of the LDP process is the opportunity for engagement from early on in the process, in order that people can have the opportunity to influence the Plan as it progresses.

The preparation of a Delivery Agreement is the first stage in the LDP process. The Delivery Agreement is essentially a project plan which sets out a 'timetable' for preparing the Plan and a 'community involvement scheme' which explains how and when people will have an opportunity to be engaged in its preparation and consulted with at key stages. The Council is now inviting comments on the draft Delivery Agreement in order to ensure that there is

broad consensus about how the Council proposes to prepare the Plan. This should assist the Plan in progressing smoothly and avoiding disputes and delays later on.

The Draft Delivery Agreement can be viewed on the Council's website www.flintshire.gov.uk/ldp, at Planning Reception in County Hall and at the Council Offices in Flint. It can also be inspected at the Holywell Connects office and at all libraries.

The consultation exercise on the Draft Delivery Agreement will run for 8 weeks commencing Mon 5th August 2013 and ending on Mon 30th September 2013. All comments must be received by 5.00pm on the last day of the consultation period.

There are various ways in which comments can be made on the draft Delivery Agreement:

- Using the comments form
- In writing
- By e-mail

Comments should be submitted to or queries directed to:

Head of Planning
Planning Policy Section
Environment Directorate
Flintshire County Council
County Hall

Mold
Flintshire
CH7 6NF

developmentplans@flintshire.gov.uk

LDP helpline: 01352 703213

Fax: 01352 756444

Any comments received will be scrutinised by Officers and an acknowledgement sent out by post or by e-mail. All comments will be compiled into a table and responses drafted by Officers, recommending changes to the Delivery Agreement, where appropriate. These will be considered by the Council's Planning Strategy Group before being reported to Cabinet to seek approval for the amended Delivery Agreement to be submitted to Welsh Government for approval.

Yours faithfully,

Yr eiddoch yn gywir,



Head of Planning



Pennaeth Cynllunio

Appendix 5

Flintshire Local Development Plan Key Comments on Draft Delivery Agreement (Comments by letter / e-mail)

Name / Organisation	Comments / Changes Sought	Response	Recommendation
Neil Keenan	Seeks clarification as to how the Council propose to consider specific areas in / around current settlements to be included within settlement boundaries in the LDP. Concerned about need for / shortage of housing and also the future community projects the Council is considering such as new schools and hospitals and other major projects. Concerned about quality of education, health facilities and town centres.	Noted. However, the Delivery Agreement consultation is concerned with ensuring that there is consensus as to how and when the Plan will be progressed. The Council will embark on a Call for Candidate Sites following Welsh Government approval of the Delivery Agreement. Guidance on how to submit a site for consideration will be provided in due course and a subsequent paper, setting out how candidate sites will be assessed will also be made available for consultation, in order to seek agreement on the methodology proposed. Candidate sites will then be assessed in parallel with the preparation of the Preferred Strategy for the Plan. A key consideration will therefore be the availability and adequacy of infrastructure, facilities and services such as those of concern to the representor.	n/a
Planning Inspectorate	Timetable should be amended as the Council should be in receipt of Inspector's Report 12 months from the date of submission (unless problems were to occur during the examination process whereby the timeframe would be extended).	Noted.	Amend summary timetable and detailed timetable in CIS to include a 12 month period from submission to receipt of Inspector's Report
Huw Evans Planning	Welcomes preparation of LDP but makes following comments:	Noted.	Amend age structure chart on p38

	<ul style="list-style-type: none"> • In terms of risk assessment concerned about possibility of further WG changes to LDP process • In terms of risk assessment concerned about possible budget cuts in terms of staff and resources • Pleased to see smaller more focused Planning Strategy Group • Queries processes for Candidate Sites • Clarification required on the age structure chart on p38 (must be more than 21 people in the County between ages 45 and 59). • Concerned about meaning of some of the tests of soundness 	<ul style="list-style-type: none"> • Welsh Government has recently published its report into the LDP refinement exercise which includes a limited number of changes to refine the LDP process. Further consideration will be given to these changes before Welsh Government consults on amended LDP guidance documents in 2014. However, Welsh Government have not identified any concerns about the DA other than the timetable. • The LDP is a statutory requirement of the Council and is one of its key responsibilities. Adequate resources will be made available to ensure its timely and efficient progression. • The Planning Strategy Group will have a key role in progressing the Plan, acting as a middle ground between key stakeholders and the public on the one hand and the Council's formal decision making mechanisms on the other hand. A smaller number of Members will ensure a level of expertise is developed as well as taking a more strategic approach to the Plan. • Guidance on the Candidate Sites process will be issued in due course • The age structure chart on p38 will be amended. • A simplifying of the tests of soundness is one of the findings from the WG refinement exercise. However, for the time being the Council must ensure that the Plan meets all the tests of soundness and will try to ensure that the tests are conveyed to the public in as simple a manner as possible. 	
Welsh Government	Pleased to see progress being made with the first step in producing a new development plan for the area.	<p>Noted</p> <p>The timetable was drawn up in good faith in terms of a timetable that the Council considered was realistic, having regard to the experience gained from the UDP.</p>	<p>That the Delivery Agreement is amended by:</p> <p>i) Drawing back the timetable with key dates being Pre deposit consultation draft Dec 2014, Deposit Dec 2015 and submission Dec 2016.</p>

	<p>The Community Involvement Scheme, appendices and associated explanations appear to be clear and appropriate.</p> <p>However, Welsh Government does have serious reservations regarding the proposed timetable which indicates it will take over 5 years to prepare the LDP with adoption not until 2019.</p> <p>The proposed timetable will mean that there is a significant gap between the end date of the UDP (2015) and having a replacement adopted Plan which will increase the likelihood of planning by ad hoc appeal decisions.</p> <p>The timetable will mean that a Community Infrastructure Levy (CIL) charging schedule could not be introduced until 2019 at the earliest (pooled s106 contributions such as those for education will be restricted by Regulations well before this date resulting in the loss of a funding source for key social and other infrastructure.</p> <p>Over half of Lpa's in Wales have adopted, or are in the final stages of adopting an LDP so there is a considerable amount of experience of using the system. Drawing</p>	<p>However, the Council accepts that the timetable could be more ambitious and learn from good practice gained from other LDP's. The Council also welcomes the intention of Welsh Government to work closely with Officers to ensure that such good practice is incorporated into each stage of the Plan's progression.</p> <p>The Council recognises the implications of not having an adopted development plan following the expiry of the adopted UDP at the end of 2015 in terms of housing land supply and planning by appeal and the delay in putting in place CIL and accepts that swifter progress on the LDP will help plug that policy 'gap'.</p> <p>The Council has reconsidered the Plan period and accepts that a Plan period running from 2015 to 2030 is advantageous in terms of ensuring a clear transition from UDP to LDP Plan periods and allowing for a longer Plan period following adoption.</p>	<p>ii) Amending the timetable to include for a standard 12 month period from submission to receipt of Inspector's Report.</p> <p>iii) Amending the Plan period to 2015 - 2030.</p>
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	<p>on the lessons learned and examples of best practice, it should now be possible to prepare an LDP in 4 years.</p> <p>Flintshire has an officer team in place capable of delivering a sound plan expeditiously and a 4 year target should not be unduly ambitious. It is also anticipated that elected members would respond to the challenge given the clear benefits of having a new plan in place at an earlier date.</p> <p>When finalizing the Delivery Agreement, consideration should be given to amending the timetable so that i) the LDP is submitted for examination by the end of 2016 ii) the standard 12 month period is allocated for the examination and inspector's report.</p> <p>Consideration should also be given to amending the proposed plan period so that the start date follows on from the UDP. The extension of the Plan period to 2030 would improve the plans shelf life after adoption, and there would be a longer period over which to demonstrate delivery at the examination.</p>		
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	Officials are prepared to meet regularly with officers to provide guidance on best practice.		
Clwydian Range and Dee Valley AONB JAC	<p>Welcomes commitment to prepare an LDP but concerns about the risk of unplanned development taking place as a result of out of date planning framework during the transitional period leading up to LDP adoption in 2019. Would urge the Council to speed up preparation of the LDP and to ensure that sufficient resources are made available to achieve this.</p> <p>Supports the intention to establish an LDP Stakeholder Forum to be involved in the Plan making process, and welcomes the invitation to be represented on this group.</p> <p>The Delivery Agreement should</p> <ul style="list-style-type: none"> i) use the new title 'Clwydian Range and Dee Valley AONB' ii) the statutory AONB Management Plan should be listed as one of the documents to have regard to in preparing the LDP. 	<p>Noted.</p> <p>A number of representations have highlighted the risks associated with a long period without an up to date adopted development plan. It is therefore proposed to amend the proposed timetable in line with the suggestions of Welsh Government.</p> <p>It is considered appropriate for the Clwydian Range AONB Management Plan to be included in the list of documents on p4.</p> <p>The correct name for the AONB on p44 should be used.</p>	<p>Amend timetable as above</p> <p>Include Clwydian Range AONB Management Plan in the list of documents on p4</p> <p>On p44 use correct title 'Clwydian Range and Dee Valley AONB JAC'</p>
Rothschild Trust (Schweiz) AG	The proposed timings for the preparation of the LDP are both contrary to national guidance and could serve to exacerbate the dramatic housing shortfall currently in existence.	<p>Noted.</p> <p>A number of representations have highlighted the risks associated with a long period without an up to date adopted development plan. It is therefore</p>	Amend timetable as above

	<ul style="list-style-type: none"> • The proposed six year period is forecast for plan preparation is contrary to WG's recommended four year target and has not been justified • Setting a six year target is likely to lead to even further delays due to contextual changes, consultees failing to stay engaged, and the fact that the evidence base is likely to be out of date by the time of the examination • The lack of an adopted plan will lead to a 'policy background' in the period between the end of the UDP period (2015) and adoption of the LDP in 2019 which could serve to exacerbate the current housing shortfall and lead to uncertainty among developers. • As the UDP was adopted recently in 2011, the Council should be able to build upon their existing evidence base and policies, which it is assumed are currently up to date. This should reduce the time and effort that it will take to prepare the Plan if they act quickly and efficiently. <p>Consider it appropriate for the Council to review their Draft Delivery Agreement and reduce timescales where feasible so that they are in line with the recommended four year period.</p>	<p>proposed to amend the proposed timetable in line with the suggestions of Welsh Government.</p> <p>The Key Stakeholder Forum is a group of key consultees, organisations and businesses (such as key employers) who are able to act in a more strategic manner as a sounding board on key issues. It would be inappropriate to include individual developers (particularly if they are promoting specific development sites) on the Forum. The house building industry is represented on the Forum by the HBF.</p>	
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	Welcomes the establishment of a Key Stakeholders Forum but, given the acute shortfall in housing within the area at present, it is considered that developers should be represented within the Forum.		
Cllr David Williams	<ul style="list-style-type: none"> • The process appears to be overcomplicated. Accept the reasons for the all the detail, but feel that the main areas that affect local people could be simplified. By making local aspect clearer and easier to follow, community members and representatives who are not necessarily familiar with such matters, could be in a more informed position to make a meaningful contribution to the process. • There needs to be improved clarity on exactly how local people would be involved in the process, what form of meetings, discussions and negotiations would take place. There is a real need for direct involvement in all stages in order to ensure the community has areal say in what will happen in the locality with regards to the nature of housing provision, recreation and amenities, local business opportunities etc • National demands will obviously need to be taken into account, but as the ward has made such a major contribution to these as part of the UDP, a far greater emphasis is now needed in catering for local people. 	<ul style="list-style-type: none"> • The process of preparing a LDP is prescribed by Welsh Government. Whilst the preparation process is long and complex, the Council has sought to ensure that the DA breaks it down into the individual stages and process and to explain as simply as possible what each stage involves. • The DA explains that a variety of methods can be used as part of the earlier engagement phases of the Plan's formulation. The method to be used will depend on the issue to be discussed and the nature of the participants. It is not necessary for the DA to be so prescriptive as to set out exact details of each meeting etc in advance. The DA builds some flexibility into the earlier stages thereby enabling the Plan's vision, objectives, areas of search etc to evolve in a more organic way, rather than in a pre-set regimented manner. • The representors comments are more appropriately dealt with as part of the pre-deposit participation in Stage 3. 	No change
Holywell Town Council	No comments on DA but wishes to stress that T&CC's consultation should be timely	Noted	No change

	and allow a sufficient period for responses.	The consultation for the DA was extended to 8 weeks to allow sufficient time for T&CC's to submit comments due to the summer holiday recess.	
Betsi Cadwaladr University Health Board	<p>Welcomes the opportunity to comment on the DA.</p> <p>Welcomes the opportunity to participate in discussions during the development of the LDP and to feed into the process through the Local Strategy Board and the Key Stakeholder Forum.</p> <p>Queries inclusion in Appendix 3 within the category of consultees regarding 'electronic apparatus'.</p> <p>In App 4 Key Stakeholder Forum, please note that the North Wales NHS Trust ceased to exist with the establishment of the Health Board.</p>	<p>Noted</p> <p>Appendix 3 will be revised in terms of the categorisation of BCUHB.</p> <p>North Wales NHS Trust will removed from Appendix 4</p>	Amend Appendix 3 and 4 accordingly.

Comments by Form

Representor	Comments / Changes Sought	Response	Recommendation
General:			
Q3 Presentation / Clarity – Do you consider the DA to be clearly presented and easy to understand?			
Cllr Hillary McGuill	<p>No</p> <p>Does not ask what is wanted or show what can be asked.</p>	Not accepted. The Delivery Agreement is about the timescale and processes of preparing the LDP. It is not at this stage concerned with actual land use and planning issues. These will be discussed as work on the Plan formally commences following approval of the DA by WG	n/a

Argoed Community Council	No No clear objectives	Noted. The DA is a document which seeks to set out the timetable for preparing the Plan and the processes and principles to be followed. It is not appropriate for the DA to set out land use and planning objectives and issues as these are clearly identified in the DA as part of Stage 3 in the process i.e. pre-deposit participation and stage 4 i.e. pre-deposit consultation.	No change
Trelawnyd & Gwaenysgor Community Council	No The draft DA is clearly presented, but it is difficult to understand, especially regarding the specific process that will select members of the Key Stakeholder Forum.	Noted. The LDP process is long and complex but the DA has tried to explain it as simply as possible by breaking it down into the component stages, and explaining the purpose and mechanisms of each. The Key Stakeholder Forum is made up of those key bodies and groups who are able to perform a more strategic role in both informing and subsequently implementing the Plan. There must be a limit to the number of representatives sitting on the KSF in order to keep its role and function manageable. It would be impossible to invite residents groups to such a forum, given the likely number of such groups. However, it is proposed to add further text to this section of the DA to explain further the role of the KSF.	In 2 nd para of the 'Key Stakeholder Forum' section add at the end of the first sentence 'The Forum is made of those key statutory consultees and organisations representing environment, social and economic disciplines who are able to take a more strategic role in discussing key issues'.
Penyffordd Community Council	No Clearly presented but an over complicated process to the disadvantage of local communities.	Noted The process of preparing a LDP is prescribed by Welsh Government. Whilst the preparation process is long and complex, the Council has sought to ensure that the DA breaks it down into the individual stages and process and to explain as simply as possible what each stage involves. It is not accepted that the process is to the disadvantage of local communities. The DA stresses throughout that the Council is seeking to engage with the wider community during the	No change

		earlier stages of Plan preparation rather than merely consulting as with the UDP.	
Campaign for the Protection of Rural Wales	No For the benefit of a lay person, all abbreviations / acronyms used within the document should be contained within a separate glossary to make far easier understanding and reading of the DA.	Noted. A review of the document for abbreviations / acronyms has been undertaken and the full terminology provided when first appearing in the document.	Ensure all abbreviations / acronyms are clarified in the document.
Timetable:			
Q4 Timetable - Do you consider the proposed timetable for LDP preparation to be realistic and achievable?			
Mold TC	Yes Stage 2 should have an end date. Stage 4 is 11 months and not 15 months. Stage 8 should be Nov 17 to allow for stage 7.	Noted. In the light of comments by Welsh Government it is proposed that the timetable for producing the Plan be condensed.	That the Delivery Agreement is amended by drawing back the timetable with key dates being Pre deposit consultation draft Dec 2014, Deposit Dec 2015 and submission Dec 2016
Girlguiding Cymru	No January 2019 is 5.5 years – life and expectations will have changed in that time.	It is accepted that 2019 is a long time away and that things may change. However, it must be stressed that the whole purpose of a development plan is to plan ahead for a 15 year period using the best evidence available to ensure policies and proposals are robust. Any significant changes in circumstances or new Government guidance will be picked up through monitoring and a Plan review instigated. Nevertheless, in the light of concerns about the timetable it is proposed to reduce the time taken to prepare the Plan.	That the Delivery Agreement is amended by drawing back the timetable with key dates being Pre deposit consultation draft Dec 2014, Deposit Dec 2015 and submission Dec 2016

Argoed Community Council	No No consultation taking place and not enough time given to gather data or when consultation is going to happen.	Noted The DA sets out from the Executive Summary onwards that the Plan preparation process is based on engagement and consultation. The detailed timetable in the Community Involvement Scheme identifies the purpose of each stage and sets out when, how and whom each will be involved. The evidence gathering process will continue throughout the process.	No change
Trelawnyd & Gwaenysgor Community Council	No The timescale to allow consultation with the community by community councils and subsequent preparation of community development plans is challenging and has not been taken on board by all community councils.	Noted The preparation of a Local Development Plan is a challenging process but the need for engagement and consultation must be balanced against the need for an adopted LDP to be in place as soon as possible. The representation by Welsh Government has identified the risks associated with the published timetable and the Council accepts that a more ambitious timetable is justified. The preparation of Community Development Plans is welcomed as it can form part of the evidence gathering process to inform Plan preparation. However, there is no requirement for each T&CC to do so. Furthermore, such CDP's will not form part of the LDP itself and must operate as stand alone documents.	Amend timetable
Roundhouse Properties (NJL Properties)	No See attached letter (rep by Rothschild Trust (Schweiz) AG)	Noted See response to rep by Rothschild Trust (Schweiz) AG	Amend timetable
Penyffordd Community Council	No Should the process really need to take so long?	Noted.	That the Delivery Agreement is amended by drawing back the timetable with key dates being Pre deposit

		In the light of comments by Welsh Government it is proposed that the timetable for producing the Plan be condensed.	consultation draft Dec 2014, Deposit Dec 2015 and submission Dec 2016
Campaign for the Protection of Rural Wales	No Considers slippage inevitable due to budget cuts and significant objections to any propped policy that might be contentious to some consultees and third parties.	Noted. Despite the potential for slippage to occur as a result of a variety of circumstances, there is considered to be benefits to be derived from adopting a more ambitious timetable as set out by Welsh Government.	That the Delivery Agreement is amended by drawing back the timetable with key dates being Pre deposit consultation draft Dec 2014, Deposit Dec 2015 and submission Dec 2016
Northop Community Council	Yes, the timetable appears to be realistic and achievable and slippage has been identified as a risk.	Noted Despite the potential for slippage to occur as a result of a variety of circumstances, there is considered to be benefits to be derived from adopting a more ambitious timetable as set out by Welsh Government.	That the Delivery Agreement is amended by drawing back the timetable with key dates being Pre deposit consultation draft Dec 2014, Deposit Dec 2015 and submission Dec 2016
Aldi Stores Ltd	No The timetable appears to be too long. From preparation to adoption the Council could potentially lose investment opportunities due to on-going planning uncertainty through the long progression of the Plan. It is not clear when sites can be put forward – site allocations (stage 6) are programmed for comment from Feb 2017 but the proposals map (stage 4) is programmed for consideration Dec 2015. The two stages of consultation do not appear	Noted. In the light of comments by Welsh Government it is proposed that the timetable for producing the Plan be condensed. Sites can be put forward for consideration for inclusion in the LDP at the Call for Candidate Sites which is explained in Stage 2 and is scheduled to commence in November 2013. It is not accepted that there is any lack of clarity between stage 4 and stage 6. Stage 4 is publication of	Amend timetable as above

	to marry and should be considered in tandem or in reverse order.	the 'Pre-deposit Consultation Plan' which is the preferred strategy and will include some key proposed site allocations. Stage 6 is the publication for consultation of those 'New or Alternative sites' which were submitted during stage 5 'Deposit Plan consultation'.	
Community Involvement Scheme			
Q5 - Is it clear how and when you will have the opportunity to get involved in the Plan making process?			
Cllr Hillary McGuill	No The mechanism is not clear. It is important to consult with all who will be affected by the proposed change	Noted. The DA explains that a number of methods will be used in engaging with and consulting with a whole range of bodies, groups and individuals to ensure good coverage. However, it will not be possible to involve all persons.	No change
Bryn Residents Against New Development	No The mechanism is not clear regarding community involvement in respect of proposed development sites. Important to consult with not just T&CC's but also individuals and groups who represent community concerns	The DA is not the appropriate place for detailed guidance on the Candidate Sites process - guidance will be issued in due course on the submission of sites and the methodology for assessing sites will be the subject of a specific consultation. Nevertheless, the DA specifies that Candidate Sites will be published at key venues and on the website, for information. It also specifies that in Stage 3, strategic options (as part of the preparation of the preferred strategy) will be the subject of engagement and consultation. Key allocations in the pre-deposit consultation and all allocations in the Deposit Plan will also be the subject of formal engagement and consultation exercises.	No change

		It is accepted that engagement and consultation must take place with a wide spectrum of persons not just T&CC's.	
Mold TC	Yes. However, T&CC's only referred to once in the process	Noted. However, the 'Consultation bodies' section on p15 of the DA explains that town and community councils are a 'specific' consultation body and these are listed at each relevant stage in the Community Involvement Scheme. T&CC's are also listed individually in Appendix 3. It is not necessary for 'T&CC's' to be separately listed throughout the document.	No change
Cllr Amanda Bragg	No Does not feel that the DA clearly reflects the diverse number of representatives in the local communities who should be consulted. Town and Community Councils appear to be the only ones.	Noted. The representor does not specify who these representatives are. T&CC's have a key role to play in the Plan's progression as they represent an important democratically elected link between the County Council and the local population. Nevertheless, Appendix 3 sets out a broad range of consultees who will be equally important in the process and no doubt more will come to light as the Plan progresses.	No change
Argoed Community Council	No The mechanism is not clear regarding community involvement, especially in respect of proposed development sites. It will be important to consult with not T&CC's but also individuals and groups who represent community concerns,	The DA is not the appropriate place for detailed guidance on the Candidate Sites process - guidance will be issued in due course on the submission of sites and the methodology for assessing sites will be the subject of a specific consultation. Nevertheless, the DA specifies that Candidate Sites will be published at key venues and on the website, for information. It also specifies that in Stage 4, strategic options (as part of the preparation of the preferred strategy) will be the subject of engagement and consultation. Key allocations in the pre-deposit	No change

		<p>consultation and all allocations in the Deposit Plan will also be the subject of formal engagement and consultation exercises.</p> <p>It is accepted that engagement and consultation must take place with a wide spectrum of persons not just T&CC's.</p>	
Trelawnyd & Gwaenysgor Community Council	<p>No</p> <p>The involvement of T&CC's on the Key Stakeholder Forum is not automatic, and the means of selection not described. There should be as a minimum, clusters of community councils represented by a person selected by a cluster.</p>	<p>Noted</p> <p>See response to Q3.</p> <p>The 'Consultation bodies' section on p15 of the DA explains that town and community councils are a 'specific' consultation body and these are listed at each relevant stage in the Community Involvement Scheme. T&CC's are also listed individually in Appx 3.</p> <p>The views of T&CC's as well as other stakeholders will be fed into the Key Stakeholder Forum for discussion and to achieve broad consensus, prior to being reported to the Council's decision making bodies. With 34 T&CC's the process of identifying clusters as well as selecting representatives to sit on the KSF would be fraught with difficulties.</p>	See Q3.
Penyffordd Community Council	<p>No</p> <p>In the 'How and When the Community will be involved' section p14 there is no indication of how the discussion process will be organised, who exactly will be involved and the forum for this</p>	<p>Noted.</p> <p>The text referred to on p14 explains that there will be several opportunities for community involvement throughout the process. Reference is also made to the detailed table later in the document which provides a more detailed explanation of each of the stages set out in the summary timetable. The DA on p15 also provides a</p>	No change

	stage. There is no clear time set out for this stage.	commentary on existing engagement and consultation methods and then sets out a range of methods that may be used as part of the LDP preparation, depending on the particular task at hand.	
Aldi Stores Ltd	<p>No</p> <p>Aldi Stores wishes to be included in the plan making process and therefore would wish to be informed at all stages within the process.</p> <p>As an operator in Flintshire with two stores, ownership of a development site for a new store, and interest in developing in other locations, Aldi would wish to be involved in the Stakeholder Forums.</p>	<p>Noted</p> <p>Aldi Stores Ltd will be kept informed at each stage of the Plan making process.</p> <p>In terms of the Key Stakeholder Forum please see response to Q10.</p>	No change
Q6 - Is it clear what the Council will expect of stakeholders throughout the process?			
Cllr Hillary McGuill	<p>No</p> <p>Community Council's best know their area and, if asked at the start where to develop and why is it needed, will reply.</p>	<p>Noted.</p> <p>However, the DA recognises that T&CC's are a 'specific consultation body' and will play a key role in progressing the Plan through each stage. Stage 3 of the preparation process will enable T&CC's to contribute to working up the Plan's vision, objectives, areas of search, key development sites etc.</p>	No change
Bryn Residents Against New Development	<p>No</p> <p>Given the welcome emphasis on involvement, none of the key stakeholders described in Appendix 4 represent local communities. Although T&CC's input is recognized their role should be</p>	<p>Noted.</p> <p>It is accepted that engagement and consultation must take place with a wide spectrum of persons not just T&CC's. The Key Stakeholder Forum is made up of those key bodies and groups who are able to perform a more strategic role in both informing and subsequently implementing the Plan. There must be a limit to the number of representatives sitting on the KSF in order to</p>	No change

	<p>primarily in relation to development proposals for their area.</p>	<p>keep its role and function manageable. It would be impossible to invite residents groups to such a forum, given the likely number of such groups</p> <p>However, it is not accepted that the role of T&CC's should primarily be in relation to development proposals for their area. T&CC's have a key role to play throughout all aspects of the Plan's preparation.</p>	
Cllr Amanda Bragg	<p>No</p> <p>The details are too vague and not enough information in the DA.</p>	<p>Noted.</p> <p>The representor does not provide what details and information the DA should include. The DA has sought to provide some key principles as to what is expected of stakeholders throughout the process. If the representor disagrees with these then details should have been provided.</p>	No change
Argoed Community Council	<p>No</p> <p>Given the welcome emphasis on community involvement none of the stakeholders described in Appendix 4 can be said to represent local communities. Although T&CC's input is recognised their role should primarily be in relation to development proposals for their area. It is not clear who are the stakeholders.</p>	<p>Noted.</p> <p>It is accepted that engagement and consultation must take place with a wide spectrum of persons not just T&CC's. The Key Stakeholder Forum is made up of those key bodies and groups who are able to perform a more strategic role in both informing and subsequently implementing the Plan. There must be a limit to the number of representatives sitting on the KSF in order to keep its role and function manageable. It would be impossible to invite residents groups to such a forum, given the likely number of such groups</p> <p>However, it is not accepted that the role of T&CC's should primarily be in relation to development proposals</p>	No change

		<p>for their area. T&CC's have a key role to play throughout all aspects of the Plan's preparation.</p> <p>'Stakeholders' is the collective name of anyone involved in the Plan.</p>	
Trelawnyd & Gwaenysgor Community Council	<p>No</p> <p>The desirability of community councils preparing their own development plan, and the scope and possible format of such plans is not covered. The availability of such local plans would materially assist in the development of the LDP.</p>	<p>Noted.</p> <p>The DA is a requirement of Welsh Government in setting out how and when the LDP will be prepared. It can only include guidance on the preparation of the LDP itself. See also the response to earlier questions.</p>	No change
Q7 - Is it clear what the stakeholders will expect of the Council throughout the process?			
Cllr Hillary McGuill	<p>No</p> <p>Need more guidelines so we do not end up with a free for all.</p>	<p>The DA sets out a number of expectations of the Council in terms of how it will conduct itself in preparing the Plan. It is not clear what the representor means by a 'free for all' or what guidelines might be introduced to address any deficiencies.</p>	No change
Cllr Amanda Bragg	<p>No</p> <p>Considers the details to be vague</p>	<p>Noted.</p> <p>The representor does not provide details as to how this section of the DA is vague. The DA has sought to provide some key principles as to what stakeholders can expect of the Council throughout the process. If the representor disagrees with these then details should have been provided.</p>	
Argoed Community Council	<p>No</p> <p>There is no clear view of what the Council wants from the community</p>	<p>Noted</p> <p>The Council sets out in the DA its expectations of the community and the community's expectations of the</p>	No change

	and therefore how the community can know what to expect.	Council. The representor does not provide any detail as to what principles should be included.	
Trelawnyd & Gwaenysgor Community Council	No Formal briefings with T&CC's possibly as part of the Council Forum meetings should be included in the process.	??	??
Q8 - Are there any particular methods of engagement or consultation that you consider should be used in the Plan's preparation?			
Cllr Hillary McGuill	Yes Learn from the mistakes of the UDP and consult with groups and individuals before decisions are made.	Noted The DA explains that the Council is seeking to engage with the public as the Plan is prepared, rather than consulting on the deposit Plan, as with the UDP. The intention is to seek consensus about the vision, objectives, strategy, areas of search for growth and possible allocations before sites are allocated in the Plan.	No change
Mostyn TC	Yes Any method which would encourage active involvement of community councils.	Noted. The 'Existing and proposed consultation methods' section of the DA sets out a number of methods of engagement and consultation that can be used. T&CC's are a key consultee in the Plan preparation process and will have opportunities to help shape the Plan. However, T&CC's can also play a role in assisting the Council in reaching local groups and people.	No change
Cllr Amanda Bragg	Yes Consultation with the local areas and residents prior to decisions being made about proposed sites preventing delays and objections later on.	Noted The DA explains that the Council is seeking to engage with the public as the Plan is prepared, rather than consulting on the deposit Plan, as with the UDP. The intention is to seek consensus, as far as possible, about the vision, objectives, strategy, areas of search for growth and possible allocations before sites are allocated in the	No change

		Plan. However, it should be recognized that all development sites will attract objections and in this context the Plan should be prepared on the basis of identifying the most sustainable locations and sites for development rather than merely the level of opposition to them.	
Argoed Community Council	<p>Yes</p> <p>If the UDP mistakes are to be avoided it will be important to consult with the elected representatives of the community council and should not affect the rights of any other groups or individuals.</p> <p>Public meetings should be used as a consultation method.</p>	<p>Noted</p> <p>The DA explains that the Council is seeking to engage with the public as the Plan is prepared, rather than consulting on the deposit Plan, as with the UDP. The intention is to seek consensus about the vision, objectives, strategy, areas of search for growth and possible allocations before sites are allocated in the Plan.</p> <p>The DA sets out a number of methods of engagement and consultation and includes seminars and exhibitions. However, public meetings are not a good way of bringing about sensible debate on issues as they encourage unruly behaviour and are taken over by the vocal few.</p>	No change
Trelawnyd & Gwaenysgor Community Council	<p>Yes</p> <p>Local community development plans based on local surveys and prepared by local T&CC's should be a major part of the LDP preparation.</p>	<p>Noted</p> <p>The preparation of local community plans is encouraged and clearly of benefit. However, even though they can inform the LDP, they are separate from the LDP itself. It would be misleading and inappropriate for the DA to give guidance on the preparation of local community plans.</p>	No change
Roundhouse Properties (NJL Properties)	<p>Yes</p> <p>Supports setting up of Stakeholders Forum and feel that developers should be consulted throughout the process.</p>	<p>Noted.</p> <p>It is accepted that developers have a key role to play in the process and it is anticipated that the majority of these will become known to the Council through the Candidate Sites process. Once in the system, such developers will be consulted throughout.</p>	No change

Penyffordd Community Council	Yes More local involvement and negotiation.	Noted. The representor does not specify any particular methods of engagement or consultation that would assist.	No change
Q9 - Are there any other groups or bodies that you consider the Council should add to the consultation list?			
Cllr Hillary McGuill	Yes Anyone affected by the proposals.	Noted. The DA explains that a number of methods will be used in engaging with and consulting with a whole range of bodies, groups and individuals to ensure good coverage and consensus. However, it will not be possible to involve or consult all persons.	No change
Roundhouse Properties (NJL Properties)	No Satisfied with list but developers should also be consulted.	Noted. It is accepted that developers have a key role to play in the process and it is anticipated that the majority of these will become known to the Council through the Candidate Sites process. Once in the system, such developers will be consulted throughout.	No change
Penyffordd Community Council	Yes Local voluntary organizations and committees, sports scouts and guides, institute, pubs and clubs etc	Noted. Appendix 3 already lists a comprehensive consultation list. It would not be possible to list every single sporting or other local group within the document given the size and complexity of the County and the costs associated with consulting each. Wherever possible national or regional representations have been included such as scouts. If there are particular local groups which T&CC's consider should be consulted then these should be brought to the attention of the Council. It is also considered that T&CC's themselves can have a role to play in cascading information down to such local groups as they are aware of their existence and presumably have working relationships with them.	No change

Q10 - Do you think those bodies provisionally earmarked for the Key Stakeholders Group is appropriate?			
Cllr Hillary McGuill	No Health, local schools headteachers, doctors in area etc	The Key Stakeholder Forum is made of up of key bodies, organisations, statutory consultees, private sector representatives who can play a major role in acting as a sounding board on key issues. The DA specifies that Betsi Cadwalader Health Trust will be invited to attend and colleagues from Education will be a key internal consultee within the Council. It would be impractical to invite headteachers and doctors from across the County to such a forum.	No change
Argoed Community Council	Yes Local schools / doctors / chemists / BRAND Remove One Voice Wales	Noted The Key Stakeholder Forum is made of up of key bodies, organisations, statutory consultees, private sector representatives who can play a major role in acting as a sounding board on key issues. The DA specifies that Betsi Cadwalader Health Trust will be invited to attend and colleagues from Education will be a key internal consultee within the Council. It would be impractical to invite headteachers and doctors from across the County to such a forum and it is not clear what role chemists would play in a Key Stakeholder Forum. Whilst BRAND have a role to play throughout the Plan process it would be inappropriate to include a single interest group who, by their very name, are opposed to development in a small part of the County. To include them would create a precedent any number of other such groups.	No change

		The representor provides no explanation as to why One Voice Wales should be removed from the Key Stakeholder Forum.	
Roundhouse Properties (NJL Properties)	No Individual developers should also be represented on the Group.	Noted. The Key Stakeholder Forum is a group of key consultees, organisations and businesses (such as key employers) who are able to act in a more strategic manner as a sounding board on key issues. It would be inappropriate to include individual developers (particularly if they are promoting specific development sites) on the Forum. The house building industry is represented on the Forum by the HBF.	No change
Penyffordd Community Council	Local voluntary organizations and committees, sports scouts and guides, institute, pubs and clubs etc	Noted The Key Stakeholder Forum is a group of key consultees, organisations and businesses (such as key employers) who are able to act in a more strategic manner as a sounding board on key issues. It would be inappropriate to include individual clubs and societies given the size and complexity of the County. The Forum must act in a strategic rather than 'parochial' manner.	No change
Aldi Stores Ltd	No Investors including employers and land owners with interest in Flintshire that fall within the 'private' category in App4 appear to be limited and should therefore be expanded.	Noted The Key Stakeholder Forum is a group of key consultees, organisations and businesses (such as key employers) who are able to act in a more strategic manner as a sounding board on key issues. It would be inappropriate to include individual developers (particularly if they are promoting specific development sites) on the Forum. The house building industry is represented on the Forum by the HBF.	No change

		Similarly, it would be difficult to include Aldi as part of the KSF as to do so, would open up the need to include other food retailers.	
Q11 - Are there any other comments you wish to make on the Delivery Agreement?			
Cllr Hillary McGuill	<p>Yes</p> <p>Please specify sites to be considered – choose brownfield sites near to communities</p>	<p>Noted</p> <p>It is inappropriate for the DA to include information about actual land use planning issues. There will be ample opportunity as the Plan is prepared to look at this issue. Planning Policy Wales sets out a clear preference for brownfield land as part of a sequential site search process and the Plan will be prepared having regard to this guidance.</p> <p>As stated above, guidelines will be issued to inform the submission of candidate sites. A subsequent detailed paper on the assessment of candidate sites will be the subject of a separate consultation exercise to ensure that there is broad agreement as to the methodology to be followed.</p>	
Bryn Residents Against New Development	<p>Yes</p> <ul style="list-style-type: none"> • Site appraisal criteria need to be specified and discussed • Brownfield sites should be given more consideration and priorities when looking to accommodate new development • It would not be appropriate, or democratic, to deny individual objections on issues of wider concern by requiring them to be expressed collectively. 	<p>Noted</p> <p>It is inappropriate for the DA to include information about actual land use planning issues. There will be ample opportunity as the Plan is prepared to look at this issue. Planning Policy Wales sets out a clear preference for brownfield land as part of a sequential site search process and the Plan will be prepared having regard to this guidance.</p> <p>As stated above, guidelines will be issued to inform the submission of candidate sites. A subsequent detailed</p>	No change

		<p>paper on the assessment of candidate sites will be the subject of a separate consultation exercise to ensure that there is broad agreement as to the methodology to be followed.</p> <p>The Council is not seeking to deny the democratic right of persons to submit objections. Rather it seeks to clarify the position to be adopted in respect of petitions and pre-printed letters. The UDP attracted a large number of petitions and standard pre-printed letters which proved to be a huge administrative task in responding to at each stage in the Plans progression. As part of each successive maildrop there were also doubts raised by residents about the validity of such submissions with residents in some cases identifying that signatures had been forged.</p> <p>It is a well-established principle that it is the validity of a planning argument that is important, rather than the number of times it is made. In the light of these considerations, and to ensure that the Plan making process is progressed efficiently, it is proposed that petitions and standard letters will only be accepted and recorded on the system when it is clear that there is a single point of contact. The Council will openly attribute the number of persons on behalf of which the petition is made.</p>	
Girlguiding Cymru	<p>Yes</p> <p>Wondering how this will be implemented</p>	<p>Noted.</p> <p>An important aspect of the Plan's preparation will be for the Council to demonstrate that the Plans policies and proposals are realistic and can be delivered. The Plan will also contain monitoring arrangements to ensure that its</p>	No change

		performance can be evaluated and a review triggered if necessary.	
Cllr Amanda Bragg	<p>Yes</p> <p>Could brownfield sites be looked at thoroughly as a priority in the Plan. Transparency at all stages and welcome objections.</p>	<p>Noted.</p> <p>It is inappropriate for the DA to include information about actual land use planning issues. There will be ample opportunity as the Plan is prepared to look at this issue. Planning Policy Wales sets out a clear preference for brownfield land as part of a sequential site search process and the Plan will be prepared having regard to this guidance.</p>	No change
Argoed Community Council	<p>Yes</p> <ul style="list-style-type: none"> • Site appraisal criteria need to be specified and discussed • Brownfield sites should be given more consideration and priorities when looking to accommodate new development • It would not be appropriate, or democratic, to deny individual objections on issues of wider concern by requiring them to be expressed collectively. 	<p>Noted</p> <p>It is inappropriate for the DA to include information about actual land use planning issues. There will be ample opportunity as the Plan is prepared to look at this issue. Planning Policy Wales sets out a clear preference for brownfield land as part of a sequential site search process and the Plan will be prepared having regard to this guidance.</p> <p>As stated above, guidelines will be issued to inform the submission of candidate sites. A subsequent detailed paper on the assessment of candidate sites will be the subject of a separate consultation exercise to ensure that there is broad agreement as to the methodology to be followed.</p> <p>The Council is not seeking to deny the democratic right of persons to submit objections. Rather it seeks to clarify the position to be adopted in respect of petitions and pre-printed letters. The UDP attracted a large number of petitions and standard pre-printed letters which proved to</p>	No change

		<p>be a huge administrative task in responding to at each stage in the Plans progression. As part of each successive maildrop there were also doubts raised by residents about the validity of such submissions with residents in some cases identifying that signatures had been forged.</p> <p>It is a well-established principle that it is the validity of a planning argument that is important, rather than the number of times it is made. In the light of these considerations, and to ensure that the Plan making process is progressed efficiently, it is proposed that petitions and standard letters will only be accepted and recorded on the system when it is clear that there is a single point of contact. The Council will openly attribute the number of persons on behalf of which the petition is made.</p>	
Trelawnyd & Gwaenysgor Community Council	<p>Yes</p> <p>It is clear that local communities and groups desire greater input to matters affecting their community and area. The close involvement of their T&CC's is vital, but at present is restricted by the DA.</p>	<p>Noted.</p> <p>It is not accepted that the DA seeks to restrict the involvement of T&CC's. See response to other questions.</p>	No change

Appendix 6

Delivery Agreement Approval / Call for Candidate Sites letter dated 26th February 2014

Dear Sir / Madam

Following the adoption of the Flintshire Unitary Development Plan (UDP), the Council is now embarking on the preparation of a Local Development Plan (LDP) for the County. A Local Development Plan is a new style of Development Plan which differs from the UDP in terms of how it is prepared. A key feature of the LDP process is the opportunity for engagement from early on in the process, in order that people can have the opportunity to influence the Plan from the outset as it progresses.

A Draft Delivery Agreement was produced by the Council and put out for consultation in August 2013. As a result of changes in response to representations an amended Delivery agreement was submitted to the Welsh Government who approved the revised Delivery Agreement on 12/02/14. A copy of the approved Delivery Agreement will be made available for inspection on the Council's website, at Council Offices and at all libraries.

The Council is now gathering evidence and assessing issues in order to be able to consider options for the future development in the County. This includes inviting land owners, developers and other interested parties to submit sites for consideration for development. These sites are known as Candidate Sites and can be submitted for all types of development although it is important that they will be available for development within the life of the Plan up to 2030.

Candidate sites can be located anywhere in the County although the Council is likely to follow the search sequence as set out in Planning Policy Wales, Edition 5 November 2012 which is the Welsh Governments most up to date expression of planning policy. In short this means starting by looking to re-use previously developed land and buildings within settlements, then where appropriate settlement extension and then new development around those settlements with good public transport links.

All site submissions will be acknowledged and then placed on a Candidate Sites Register which will be available for public inspection. They will need to be processed and assessed in an open manner having regards to an agreed set of criteria such as compliance with the Plan's preferred strategy, deliverability of the site, proximity to local services and any constraints to development and the process is likely to be subject to a sustainability appraisal. The Council will in due course publish a paper for consultation, setting out a proposed methodology for assessing Candidate Sites.

The preferred method of submission and subsequent correspondence is by e mail although paper submissions will also be considered. A copy of the submission form is enclosed together with a guidance note to assist those wishing to complete the form. These documents are also available on the Council's website www.flintshire.gov.uk/ldp, at Planning Reception in County Hall and at the Council Offices in Flint. It can also be available at the Holywell Connects office and in all libraries. Please feel free to photocopy the form as each site will need its own form. A Welsh version of the form and guidance note is available on the Council's website and on request.

The Call for Candidate Sites period will last for 3 months beginning on Friday 28th February 2014 and ending on Friday 30th May 2014. All comments must be received by 5.00pm on the last day of the consultation period. Please note that the submission of a site does not imply that it will be considered suitable for inclusion in the Plan by the Council.

Completed Candidate Site forms should be returned to the address shown on the front of the form.
Any submissions received after the deadline will not be accepted.

If you have any queries relating to the Candidate Sites process please contact Officers in the Policy
Section on developmentplans@flintshire.gov.uk or on 01352 703213.

Yours sincerely

A handwritten signature in black ink, appearing to be 'A. Jones', written in a cursive style.

Head of Planning

Appendix 7

Flintshire Local Development Plan Candidate Site Assessment Methodology Background Paper Summary of Representations and Responses

Name / Organisation	Comments / Changes Sought	Response	Recommendation
NJL Consulting	<p>Comments regarding criteria in paragraph 3.14 which establish the suitability for inclusion / exclusion of land from settlement boundaries :-</p> <p>Opportunities for infrastructure expansion and/or an increased town centre offer to support the proposed residential development should also be considered.</p> <p>It should be noted that physical boundaries need not necessarily exist at present, as these could be implemented as part of a residential scheme.</p> <p>Allocations carried over from the UDP which have no prospect of genuinely being delivered should not be taken into consideration at this stage.</p> <p>Site specific mitigation should be taken into consideration in relation to constraints.</p> <p>The criterion relating to including brownfield sites should be removed and brownfield and greenfield sites considered individually on their own merits.</p>	<p>Noted.</p> <p>Noted. As a matter of principle it is sensible to use existing physical features as they are constitute readily identifiable features on the ground. However there may be instances where settlement boundaries can be formed as part of a development scheme.</p> <p>Noted. Both the Call for Candidate Sites Guidance Note and the proposed assessment methodology states that current unimplemented allocations will not get carried forward automatically into the LDP and that they will be subject to the assessment process.</p> <p>Noted.</p> <p>Not accepted. National Planning Guidance requires Local Authorities to follow the search sequence approach in relation to new housing development.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

	<p>Site specific mitigation should be taken into account as regards intrusion into the open countryside, ribbon development, fragmented or sporadic patterns of development.</p> <p>There should not be a blanket exclusion of playing fields, playgrounds and other amenity land, as opportunities may exist to replace facilities elsewhere.</p> <p>In terms of para 3.15 sites over 0.3ha located on the edge of settlements should be given priority for residential allocations and considered as part of a settlement boundary review to form part of the second stage of the assessment.</p> <p>Sites should not be assessed on their number of constraints, but rather on the type of constraints and likelihood of any constraints being overcome. Remove paragraph 3.17 from the assessment.</p>	<p>This includes the use of brownfield land inside and on the edge of existing settlements as a starting point. It is accepted that not all brownfield land is necessarily suitable for development and allocations in the plan are likely to utilise greenfield sites.</p> <p>Noted. It is a central tenet of Planning Policy Wales that development in the open countryside should be strictly controlled and in particular the avoidance of sporadic and the creating or extending of ribbon development which can result in unsustainable development patterns. Not all impacts on open countryside can be addressed through mitigation e.g. landscaping.</p> <p>Noted. The criterion is not implying a blanket exclusion of such areas. By their nature playing fields, playgrounds and amenity areas are generally open in character and there is no necessity for them to be included in the settlement boundary. The Council will have regard to the function these facilities offer to the community and the opportunity/need to provide replacement facilities.</p> <p>Noted. Allocating sites on the edge of existing settlements as a matter of principle sits comfortably with the search sequence approach advocated in Planning Policy Wales (PPW). Paragraph 3.9 of the assessment methodology indicates that only sites which are 0.3ha or greater and capable of accommodating 10 dwellings will be considered for their suitability as a housing allocation. This reflects the site size threshold applied in the adopted UDP and the Joint Housing Land availability studies.</p> <p>Part accepted. It is acknowledged in paragraph 3.17 that the type and level of constraint will vary on a site by site basis. Clearly the assessment process must have regard to such constraints some of which it may</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Amend para 3.17 by adding after 'spatial strategy' the words 'the decision as to which sites will be taken forward will</p>
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	<p>Deliverable greenfield sites should be allocated for housing delivery within the first five years of the plan period, particularly in light of the fact that Flintshire have a significant shortfall in housing land supply. This should be considered within the site assessment.</p> <p>The plan strategy should be taken into account within the second stage of site assessment and not as a separate third stage.</p>	<p>be possible to overcome and others which may be insurmountable. It is not considered appropriate to remove the paragraph in its entirety but to amend it to address this point.</p> <p>Noted. Delivering the Plan's preferred strategy in its totality as well as for housing is a critical function of the LDP. The Call for Candidate Sites Submission Form includes a section regarding infrastructure, Utilities and deliverability of the Candidate Site submitted. Furthermore the assessment methodology reflects Welsh Assembly Government guidance that the identification of sites "should be founded on a robust and credible assessment of the suitability and availability of land for particular uses or a mix of uses and the probability that it will be developed". When read in conjunction with the Topic Papers it is clear that the Plan will need to allocate a range of housing sites in terms of location, size and type to ensure that a 5 year housing land supply can be secured throughout the Plan period. An important factor will be to have sites that can come forward quickly following adoption.</p> <p>Noted. The assessment document refers to four logical stages in the methodology and whilst stage 1 seeks to filter the small sites from the large sites (each one of which will be assessed) the methodology is in itself an iterative process as opposed to separate stages. It is entirely appropriate to carry out detailed assessments of the Candidate Sites in order for them then to be assessed for compliance with the Plan's preferred strategy. The objective of stage 2 is to undertake a 'technical' assessment of Candidate Sites to determine which are technically suitable to be taken forward for consideration against the emerging Plan Strategy. It would be inappropriate and inefficient for sites which are technically unacceptable to be assessed against the emerging Plan strategy.</p>	<p>depend on the nature of constraints in terms of whether they can be overcome or are insurmountable'.</p> <p>No change.</p> <p>No change.</p>
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	Sites should not be protected from development unless there are exceptional circumstances to warrant this and it can be demonstrated that a particular set of criteria have been met. A set of stringent criteria should be identified within the document against which to assess sites.	Noted . Where Candidate Sites have been put forward for protection, section 3 of the submission form should be completed with the reasoning as to why the land merits protection. In addition Paragraph 3.28 of the assessment methodology clearly states that land should only be protected from development where it is necessary and appropriate to do so based upon sound planning principles and not merely to prevent development from taking place. The representation has not provided a set of stringent criteria and as a consequence it is difficult to comment further.	No change.
Strutt & Parker (for Rhual Estates)	Sites adjoining Denbigh Road, Gwernaffield Road and Ivy Crescent were put forward as Candidate Sites. Having reviewed the proposed draft methodology and assessment process the sites score highly when considered against the methodology.	Noted. The purpose of the consultation exercise was to invite comments and thoughts upon the proposed assessment methodology and criteria. It was not an opportunity for those who have submitted Candidate Sites to self-assess their sites against the draft methodology. This will be undertaken by the plan making authority.	No change.
Strutt & Parker (for Mrs S Strong & Mrs J Jones)	Sites adjacent to Hendy Road, Mold were put forward as Candidate Sites. Having reviewed the proposed draft methodology and assessment process the sites score highly when considered against the methodology.	Noted. The purpose of the consultation exercise was to invite comments and thoughts upon the proposed assessment methodology and criteria. It was not an opportunity for those who have submitted Candidate Sites to self-assess their sites against the draft methodology. This will be undertaken by the plan making authority.	No change.
Strutt & Parker (for Mr & Mrs Davies – Cooke)	Sites adjoining Rhydymwyn, Buckley Mountain and Sychdyn were put forward as Candidate Sites. Having reviewed the proposed draft methodology and assessment process the sites score highly when considered against the methodology.	Noted. The purpose of the consultation exercise was to invite comments and thoughts upon the proposed assessment methodology and criteria. It was not an opportunity for those who have submitted Candidate Sites to self-assess their sites against the draft methodology. This will be undertaken by the plan making authority.	No change.

<p>J10 Planning</p>	<p>Support the approach contained in stage 2 – Detailed appraisal. Suitability for allocation ought to also consider site availability and general deliverability.</p> <p>Specific observations on the Candidate Site Officer Assessment Form (Appendix C):-</p> <p>Q3 – whether the site would result in the loss of agricultural land : there ought to be some further indication here as to the quality grading of the land and its scale.</p> <p>Q6 to Q8 – distances to facilities : we would suggest that to aid comparative analysis the “actual” distances are included</p> <p>Q9 – whether the site would result in the loss of publicly accessible open space : again there ought to be some discriminating between level of use and its functional quality.</p> <p>Q21 – whether site might be prone to floodrisk : this is rather too simplistic and perhaps what it should be adding is if the site is at risk then are there any likely</p>	<p>Noted. Availability and deliverability are key components of the assessment process and appraisal (para 3.25 and 3.26).</p> <p>Partly accepted. Reference is made in the assessment criteria of Appendix C to the grades of agricultural land. However there is a drafting error in reference to grade 3 land which should read grade 3a. It is also considered that the wording of Q3 could include reference to ‘best and most versatile’ agricultural land. The scale of any agricultural land which is considered to be the best and most versatile land is likely to be self-evident from the area of the Candidate Site submitted.</p> <p>Noted. In the accessibility section of the Candidate Site Submission Form there are 3 questions relating to distances from public transport stops, shops and open spaces which requests details of the actual distances from the Candidate Site. This will allow for a comparative analysis to be made against the distances referred to in the assessment methodology.</p> <p>Agreed. Publically accessible open spaces offer a range of valuable roles to the community including playing fields, visual breaks in a developed area and or areas of nature conservation value. As part of the evidence gathering for the LDP the Council has carried out an open space survey and a play spaces survey which will enable a useful assessment of the use and function of such a space.</p> <p>Agreed. Tan15: Development and Flood Risk (2004) has been adopted by the Welsh Assembly Government in recognition of the increasing frequency</p>	<p>No change.</p> <p>Amend the assessment criteria in question 3 of Appendix C to refer to “grade 3a and above”.</p> <p>Amend the wording of Q3 by adding ‘best and most versatile’ before ‘agricultural land’.</p> <p>No change.</p> <p>No change.</p> <p>Add after Q21 an additional question ‘If the site is within or adjacent to an area at risk of</p>
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	mitigation solutions that could overcome/address such	<p>of flooding. The Environmental section of the submission form asks if the site is in a flood risk area and if so what the category of flood risk is as defined in TAN15. When appraising sites the Council will use the most up to date TAN15 Development Advice Maps (March 2013) and consultation with Natural Resources Wales to assess whether or not the development proposed is both suitable and justified in the flood risk zone having regards to the potential for appropriate alleviation or mitigation measures which could overcome the risk. However, it is recognised that the present wording of Q21 only records whether a site is within or adjacent to an area at risk of flooding and not an assessment of whether this is sufficient to prevent development occurring. It is therefore considered appropriate for an additional question to be added.</p> <p>Not accepted. The character of a settlement is made up from different components such as the settlement form e.g. linear or nucleated and its cultural, architectural or historic functions as well as the character of the landscape in which it sits. A very large residential development would for example have a an effect on the character of a small rural settlement in Flintshire. Similarly a modest development (e.g. 9 or under dwellings) may also adversely effect a settlement if it relates poorly to the existing settlement form or if it constitutes skyline development. It is considered possible to make a professional judgement as to whether a site makes a logical and natural extension to a settlement even in the absence of detailed plans. If a Candidate Site fails as a result of having a detrimental impact on the character of the settlement and the reasons given are considered to be subjective than an opportunity will be available to test any perceived subjectivity at the LDP Examination.</p>	flooding, is the risk of flooding
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	<p>concerns or it is a clear cut “no” there are not.</p> <p>Q23 – whether site would have a detrimental impact upon the character of the settlement: this is very subjective and anyone seeking to oppose development would, by default, argue that it would but to attempt to consider such an impact without the benefit of any detailed plans is implausible at this stage.</p> <p>Infrastructure capacity, in terms of physical or social infrastructure (e.g. education, primary healthcare, highways, drainage, etc), has not been adequately addressed. Recommend that it is to enhance the soundness of the emerging plan.</p>	<p>Not accepted. No reasons are given as to why the question of infrastructure is considered not to have been adequately addressed. Both the Call for Candidate Sites Guidance Note and the proposed assessment methodology have sections and questions that relate to the presence of existing infrastructure such as access to the highway network and the presence of water supply, sewage treatment electricity and gas.</p>	<p>acceptable, having regard to vulnerability of the development proposed.</p> <ul style="list-style-type: none"> • Yes • Yes with mitigation measures • No’ <p>No change.</p> <p>No change.</p>
Dwr Cymru/Welsh Water	<p>Support the proposed assessment of candidate sites against the identified criteria in order to filter out some sites prior to consultation with DCWW. A more meaningful response regarding impacts on DCWW assets can be given once the strategic growth and spatial distribution is known.</p>	<p>Support for the methodology assessment criteria is noted.</p>	<p>No change.</p>

<p>ex Northwest Ltd (on behalf of Mr J. Handley)</p>	<p>Stage 1 – Initial Filtering of Sites and Settlement Boundary Review</p> <p>The assessment process should consider if a site is a logical and natural extension to an existing settlement. In doing so the assessment would be able to discount sites that will result in unsustainable housing developments in isolated locations at an early stage.</p> <p>It is not clear whether the Settlement Boundary Review applies to all sites or “small sites adjacent or in close proximity to existing UDP settlement boundaries”. If the latter, concerned that unsustainable patterns of development would result.</p>	<p>Accepted. The assessment process has regards (see appendix B of the methodology) to the guidance criteria for allocating housing sites as advocated by Planning Policy Wales. Furthermore explicit reference is made at paragraph 3.14 that the inclusion of a site should represent a natural and logical extension to a settlement.</p> <p>For clarification the Call for Candidate Sites was an opportunity for landowners and developers to submit sites anywhere within Flintshire. Therefore every small site (i.e those capable of accommodating 9 or less dwellings) will be assessed. That said the Council does not intend to plan for unsustainable development patterns. To do so would run contrary to established planning policy i.e in respect of the search sequence approach which requires sites within then adjacent to existing settlement boundaries to be considered first.</p> <p>Accepted. Paragraph 3.9 of the assessment</p>	<p>No change.</p> <p>No change.</p>
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	<p>Recommend that only sites with the capacity for more than 10 dwellings that are within or immediately adjacent to an existing settlement should be carried forward as Candidate Sites.</p>	<p>methodology indicates that only sites which are 0.3ha or greater and capable of accommodating 10 dwellings will be considered for their suitability as a housing allocation. This reflects the site size threshold applied in the adopted UDP and the Joint Housing Land availability studies.</p>	<p>No change.</p>
	<p>Stage 2 Detailed Appraisal – Planning Assessment</p> <p>The proposed methodology includes environmental planning considerations. Paragraph 3.16 refers to “safeguarded agricultural land”, although there is no definition for such land. The proposed checklist refers to the Agricultural Land Classifications. It would seem appropriate to be consistent.</p>	<p>Noted. Safeguarded agricultural land in this context is in respect of the best and most versatile agricultural land which is defined in PPW as Grades 1, 2 or 3a which is referenced in Question 3 of the Officer assessment form. However there is a drafting error in reference to grade 3 land which should read grade 3a.</p>	<p>Amend the wording in Q3 as per the response to J10 Planning above.</p>
	<p>Revise paragraph 3.16 to clarify that only the loss of agricultural land that is Grade 1 or Grade 2 (Agricultural Land Classification) will be taken into account in the assessment of sites. Include additional criterion:- 3b – Would more than 2Ha of Grade 1 or 2 ALC be lost? Yes/No</p>	<p>Part accepted. It is considered appropriate to use consistent terminology to clarify what is meant by safeguarded agricultural land. Amend paragraph 3.16 accordingly. It is not accepted that there is a need to add new criteria 3b as the grade of land is referred to in the assessment criteria.</p>	<p>Amend the wording in paragraph 3.16 by deleting “safeguarded” and replace with “best and most versatile” agricultural land.</p>
	<p>The amount of agricultural land and its relationship with the remainder of the holding will also be a consideration. as the loss of a small parcel of land or land that is physically separated would not have as significant an impact as the loss of a parcel of land that forms part of a larger farm. Include additional criterion:- 3c – Is the agricultural land physically separated from a wider/larger holding? Yes / No</p>	<p>Not accepted. The amount of agricultural land that could be potentially and irreversibly lost will be self-evident from the area of the Candidate Site submitted. However in terms of the relationship of that land with the farm and farm holding, the Council would consult with the Welsh Government Agricultural Unit to assess a range of factors in determining whether the loss is acceptable or not. It is not considered the representors wording is appropriate.</p>	<p>No change</p>
	<p>No reference is made to the loss of existing trees. Trees</p>	<p>Noted. It is considered reasonable to include an</p>	<p>Add an additional question ‘Is</p>

	<p>often make a significant contribution towards the character of an area as well as being a natural habitat. Suggest additional criterion:- 13d – Would development of the candidate site result in the loss or potentially impact any trees? Loss of Trees / Potential Impact / No loss or impact</p> <p>Stage 2 Detailed Appraisal - Infrastructure</p> <p>This section implies an assessment of capacity will take place at this stage albeit the detailed assessment checklist does not reflect this. Officers may not have all technical information required to make this assessment. Technical studies are expensive and if required at an early stage, when the development risks remain high, sites being promoted by local land owners and not developers/strategic land companies can be at a significant disadvantage.</p> <p>Proximity to existing connections is an appropriate strategic consideration, but more detailed assessments should be a matter for the Preferred Local Plan Strategy.</p> <p>Paragraphs 3.19 and 3.20 should be changed to reflect that at this stage proximity to infrastructure is the consideration (and not capacity) as it is likely to make the site more deliverable from both a physical and</p>	additional question relating to the potential loss of	there a loss of or threat to
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		<p>trees / hedgerows.</p> <p>Noted. The section is simply commenting that new development may impact upon existing infrastructure. Indeed it is very likely that Officers will not have the technical information and hence the need to engage with those service providers who will have access to such information.</p> <p>Noted. The proximity to existing services is picked up by Q10 of the assessment form. The methodology is an iterative process as opposed to separate stages. It is entirely appropriate to carry out sufficiently detailed assessments of the Candidate Sites in order for them then to be assessed as being technically acceptable and to then go on and be assessed for compliance with the Plan's preferred strategy. It is accepted that when sites are being considered against the Plan Strategy as potential allocations then further more detailed infrastructure information may be required.</p> <p>Not accepted. The section is simply commenting that new development may impact upon existing infrastructure and that it is necessary to undertake an initial assessment of infrastructure capacity to inform which sites go forward to be assessed against the</p>	<p>mature trees or hedgerows within or adjacent to the site?</p> <ul style="list-style-type: none"> • No • within • adjoining' <p>No change.</p> <p>No change.</p> <p>Include a new question Q10b 'Is there a possible infrastructure capacity issue that could act as a constraint to</p>
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	<p>viability perspective.</p> <p>This section should focus on whether there are any known significant infrastructure constraints for example the presence of a gas or water main through the site. Include additional criterion:- 10a – Are there any high pressure gas or water pipelines running through the site that are a constraint to development? Yes / No</p> <p>Stage 2 Detailed Appraisal - Accessibility</p> <p>Pedestrian and cyclist access to services is important. The focus of the methodology is on the distance of the candidate sites from these facilities. Amend paragraph 3.23 to ensure the distances measured are along adoptable highways and areas outside of the preferred maximums will not be taken forward as candidate sites as some candidate sites are extremely large and distances within the site could differ enormously.</p> <p>Amend criteria 6, 7 and 8 to read:</p> <p>6 - Is the site located within 400m or 800m walk along an adopted footpath of an access point to regular (at least 5 services between 7am- 7pm Monday-Saturday) public transport, e.g. a bus stop or train station?</p>	<p>emerging Plan Strategy. The proximity to existing services is picked up by Q10 of the assessment form and it is considered that an additional question should be added to the assessment form after Q10 to identify whether there is any possible infrastructure capacity issue identified as being a constraint to development.</p> <p>Accepted. It would be appropriate to cover this issue by including an additional criterion as recommended in the representation, but to widen it out to 'other' infrastructure as well.</p> <p>Not accepted. The distances referred to are taken from the "Guidelines for Providing Journeys on foot" produced by the Institute of Highways and Transportation. These guidelines are a widely accepted and commonly used set of standards for assessing acceptable walking distances to facilities. It is acknowledged that it will not always be possible to achieve the desirable distances in all instances perhaps due to site constraints or other practicalities. Sites should not automatically be discounted on the basis that they are outside the preferred maximum distances as it may be possible to provide a new bus stop or other facilities on a large site.</p> <p>6, 7 and 8a - It is not clear whether the representor is referring to an 'adopted footway' or a public footpath' A site could be linked to local services and facilities by a variety of existing linkages and potential could exist for new linkages to be provided, particularly as part of</p>	<p>development?</p> <ul style="list-style-type: none"> • Yes • No • Possibly addressed through investigation / mitigation <p>Include additional criterion:- 10c – Are there any high pressure gas or water pipelines running through the site that are a constraint to development? Yes / No</p> <p>No change.</p>
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	<p>7 - Is the whole site located within 400m or 800m walk along an adopted footpath of a shop or selection of shops selling daily living essentials?</p> <p>8a - Is the whole site located within 1000m or 2000m walk along an adopted footpath of a school and other community facilities including recreation open space?</p> <p>8b – How many facilities? <1 or 1-2 or >3</p> <p>Stage 2 Detailed Appraisal – Economic Viability</p> <p>Officers will be making judgements on the issue of economic viability. It is more appropriate that if there are concerns about the viability, due to for example known physical constraints or fragmented ownerships, the assessment should not discount the site but identify if additional information such as a development appraisal (to be provided by the Candidate Site proposer) will be required.</p> <p>The detailed criteria do not deal with the matter of viability or deliverability effectively. New criteria should be added:-</p> <p>25 – Is the site in single ownership? Yes / No</p> <p>26 – Is the Council aware of any imminent development proposal being brought forward by the proposer? Yes /</p>	<p>larger development sites.</p> <p>Not accepted. The commentary section alongside question 8 of the assessment form will allow for the number and type of facilities to be recorded. In addition as part of gathering the evidence base for the plan officers have recently carried out settlement surveys to ascertain the levels of service and facilities in the settlements.</p> <p>Accepted. Paragraphs 3.25 and 3.26 give an indication of the types of considerations that are likely to affect economic viability such as inappropriate adjoining uses or land contamination issues. As part of preparing the Plan, evidence gathering and in particular assessing Candidate Sites the Council will request additional information such as a development appraisal where it is considered necessary and appropriate to do so.</p> <p>Partly accepted. The Candidate Site Submission form contains a series of questions relating to site ownership and deliverability issues such as are there “any abnormal costs that would affect the deliverability or viability of the site “ together with when is it intended to bring the site forward for development. Nevertheless, it is considered that a simplified question could be added to the assessment form</p>	<p>No change.</p> <p>Add a sentence to paragraph 3.26 stating that where there are concerns about the potential economic viability of a site, the assessment will identify whether a development appraisal (to be provided by the Candidate Site proposer) will be required.</p> <p>Add another question to the assessment form ‘Is there any evidence to question the viability or deliverability of the site?</p> <ul style="list-style-type: none"> • No • Yes • Possibly’.
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	No	regarding viability and deliverability’.	
	<p>No reference is made to the need to take into account former uses of the site as a potential development constraint and would recommend specific criteria be added to ensure deliverability of any affected candidate sites are properly assessed.</p> <p>Add new criteria to 24.</p> <p>24b Has the candidate site been a former quarry where land stability issues could impact development? Yes / No / Unknown</p> <p>24c Has the candidate site been used / or does it lie adjacent to a former landfill site? Yes / No / Unknown</p>	<p>Not accepted. In the Candidate Site Submission Form Under the headings “Land Use /Planning History” and “Environmental” there are specific questions relating to previous uses of the site and whether or not the site is previously developed land. The issue of brownfield land is also picked up in question 2 of the Officer assessment form in the methodology.</p> <p>Partly accepted. In the environmental section of the Candidate Site Submission Form there is a specific question asking whether or not there is any history of subsidence on the site or in the locality. It is therefore reasonable to include a question regarding land stability after Q24 which deals with contaminated land.</p> <p>Accepted. It is considered that this an appropriate additional criterion given that it has not been referred to in either the Candidate Site Submission or Officer assessment forms.</p>	<p>No change.</p> <p>Add a new question after Q24 ‘Is the land likely to be adversely affected by land stability issues?’</p> <ul style="list-style-type: none"> • No • Yes • Yes but capable of being addressed through mitigation <p>Add new question after Q24 Has the candidate site been used / or does it lie adjacent to or in close proximity to a former landfill site? Yes / No / Unknown</p>

Emery Planning	<p>The Settlement Boundary review criteria appear acceptable. It is not necessary to draw the settlement boundaries excessively tightly around settlements. Currently many boundaries are drawn very tightly, often excluding residential gardens, which is unduly inflexible. Small housing schemes within and on the edge of villages are capable of contributing to meeting housing needs, especially specific local needs.</p> <p>The planning assessment should take account of not just existing policies, but also should be influenced by (and inform) future policies. A significant extension to the village of Northop is put forward and the potential benefits of the proposal need to be weighed against non-compliance with existing policies. which may result in a different strategic approach being pursued for the distribution of development.</p> <p>Regard should be had to the potential for parts of a site to come forward. If a large site is considered unsuitable due to its scale or a particular issue with part of the site, then consideration should be given as to whether a smaller part of the site would be suitable.</p>	<p>Support for the settlement boundary review criteria is noted. Settlement boundaries are a widely used planning tool, which in planning terms define the extent of the urban areas. It is not accepted that current boundaries are drawn too tightly or are unduly inflexible. Settlement boundaries and the provision for growth were considered by the UDP Inspector and in the main were supported save for one or two revisions suggested by the Inspector. It is acknowledged that small residential schemes can make a contribution to meeting housing needs including specific local needs.</p> <p>The assessment of candidate sites will be primarily undertaken having regards to the criteria and stages contained in the methodology paper. In addition to their individual planning merits regard will also be had to the most up to date local and national planning policy. In addition to the detailed planning assessment, Candidate Sites will be assessed having regards to the Plan's preferred strategy once this is finalised.</p> <p>Accepted. This is recognised at paragraph 3.17 of the planning assessment which states that many sites are likely to have some level of constraint which may reduce the developable area of a candidate site.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>
Wirral Council Regeneration and Planning Service	<p>Paragraph 3.3 identifies that any site which is likely to have a significant effect on a SAC/SPA/Ramsar site must be subject to an appropriate assessment under the Habitats Regulations. A reference to supporting habitat should also be included.</p>	<p>Accepted. Reference to the supporting habitat of these internationally important designations is a relevant addition to the paragraph.</p>	<p>Amend paragraph 3. by including the words "and their supporting habitat" after the words "Ramsar Site".</p>

Cassidy & Ashton Group Ltd	Previously developed land outside (and in particular immediately adjacent to) the settlement boundary should be considered suitable for redevelopment and is best placed to accommodate housing growth. Such an approach can be applied across Category A, B and C settlements.	Accepted. PPW's search sequence advocates this very approach to housing development. Beginning with previously developed land within and then on the edge of settlements. In theory an approach could be applied across the UDP settlement hierarchy however as part of the preparation of the LDP a re-assessment of the settlement hierarchy is being undertaken.	No change.
	Greater emphasis within the methodology should be placed on previously developed brownfield land and the suitability of such land to accommodate housing growth.	Not accepted. The assessment criteria and methodology has regard to the issue of the preference for using brownfield land. Where possible, appropriate brownfield land may be allocated bearing in mind that not all previously developed land is automatically acceptable for new housing development. Furthermore, consideration also needs to be given to the viability and deliverability of brownfield land.	No change.
	<p>The 'Candidate Site Officer Assessment Form' (Appendix C) should be modified in the following way:</p> <p>Q.6 – In respect of rural areas a distance greater than 400m / 800m should be considered appropriate within more rural Category C settlements.</p> <p>Q.7 – In respect of rural areas a distance greater than 400m / 800m should be considered appropriate within more rural Category C settlements.</p>	Not accepted. The distances referred to are taken from the "Guidelines for Providing Journeys on foot" produced by the Institute of Highways and Transportation. These guidelines are a widely accepted and commonly used set of standards for assessing acceptable walking distances to facilities. No reasons or explanations are put forward as to why the distances should be greater. In any event distances to shops, bus stops and schools in Flintshire's rural Category C settlements are very likely to be within those referred to in questions 6 and 7 of Appendix C.	No change.

Cassidy & Ashton Group Ltd (on behalf of Liberty Properties)	The methodology for the assessment of sites put forward as potential Green Barrier should be clearly defined. Areas put forward as potential Green Barriers should be assessed against a range of criteria, guided by Planning Policy Wales, paragraphs 4.8.11 – 4.8.1.3	Accepted. The most recent review of green barriers was undertaken when producing the UDP. As part of preparing the LDP and in particular identifying a preferred spatial strategy, the Council will conduct a further review of existing green barriers in line with up to date advice contained in PPW, whilst having regards to the views of the UDP Inspector. Any proposed green barrier Candidate Sites will also be assessed having regards to the criteria set out in paragraphs 4.8.11 – 4.8.13.	No change.
	<p>The 'Candidate Site Officer Assessment Form' (Appendix C) should be modified in the following way:</p> <p>Q.6 – In respect of rural areas a distance greater than 400m / 800m should be considered appropriate within more rural Category C settlements and sites to the edge of larger settlements within the A and B Categories.</p>	Not accepted. The distances referred to are taken from the "Guidelines for Providing Journeys on foot" produced by the Institute of Highways and Transportation. These guidelines are a widely	No change.

	<p>Q.7 – In respect of rural areas a distance greater than 400m / 800m should be considered appropriate within more rural Category C settlements and sites to the edge of larger settlements within the A and B Categories.</p> <p>Candidate sites are not up for consultation at this stage either on a standalone basis or as part of the consultation as part of the Draft Methodology Assessment Process.</p> <p>It is noted that significant areas of new Green Barrier land are proposed, such as a proposal to enclose the existing settlement boundary of Penyffordd / Penymynydd with Green Barrier Designation (Candidate Site Ref: PEN029 & PEN030). This is of such significance to the settlement of Penyffordd / Penymynydd that it requires representation at this stage, particularly given the absence of assessment procedure for such designations.</p>	<p>accepted and commonly used set of standards for assessing acceptable walking distances to facilities. No reasons or explanations are put forward as to why the distances should be greater.</p> <p>Noted. From the outset the Council made it clear in both the Call for Candidate Sites Guidance Note and the draft methodology and assessment process document that the Candidate Site Register would be made available for information only and the Council will not accept comments on the merits/de-merits of the sites.</p> <p>The Council is not proposing significant areas of new green barrier land to enclose Penyffordd & Penymynydd. Candidate Sites have been submitted which are seeking the designation of land as green barrier around Penyffordd and Penymynydd. As stated above these will be assessed having regards to the criteria set out in paragraphs 4.8.11 – 4.8.13 together whilst having regards to the views of the UDP Inspector.</p>	<p>No change.</p> <p>No change.</p>
Cassidy & Ashton Group Ltd (on behalf of Whitley Group)	<p>Previously developed land outside (and in particular immediately adjacent to) the settlement boundary should be considered suitable for redevelopment and are best placed to accommodate housing growth. Such an approach can be applied across Category A, B and C settlements.</p> <p>A greater emphasis within the methodology should be placed on previously developed brownfield land.</p>	<p>Accepted. PPW's search sequence advocates this very approach to housing development. Beginning with previously developed land within and then on the edge of settlements. In theory an approach could be applied across the UDP settlement hierarchy however as part of the preparation of the LDP a re-assessment of the settlement hierarchy is being undertaken.</p> <p>Not accepted. The assessment criteria and methodology has regards to the issue of a preference for using brownfield land. Where possible, appropriate brownfield land may be allocated bearing in mind that</p>	<p>No change.</p> <p>No change.</p>

	<p>The methodology process for the assessment of sites put forward as potential Green Barrier should be better defined. Areas put forward as potential Green Barriers should be assessed against a range of criteria, guided by Planning Policy Wales, 4.8.11 – 4.8.13.</p>	<p>not all previously developed land is automatically acceptable for new housing development.</p>	
	<p>Buckley for example is a Category A settlement which quite clearly is suitable to accommodate significant growth over the Plan period. However existing Green Barrier allocations to the south of the settlement somewhat limit growth. It is submitted that Green Barrier designation to the south / south east of the settlement is over zealous and controlled growth in this area would not compromise the purposes of such land.</p>	<p>Accepted. The most recent review of green barriers was undertaken when producing the UDP. As part of preparing the LDP and in particular identifying a preferred spatial strategy, the Council will conduct a further review of existing green barriers in line with up to date advice contained in PPW, whilst having regards to the views of the UDP Inspector. Any proposed green barrier Candidate Sites will also be assessed having regards to the criteria set out in paragraphs 4.8.11 – 4.8.13.</p>	<p>No change.</p>
	<p>The 'Candidate Site Officer Assessment Form' (Appendix C) should be modified in the following way:</p> <p>Q.6 – In respect of rural areas a distance greater than 400m / 800m should be considered within more rural Category C settlements.</p>	<p>It is not disputed that Buckley is a sustainable location for development given that it is one of the main towns in Flintshire and having regards to the number and types of services and facilities present in the settlement. The Inspectors at the Alyn and Deeside Local Plan Inquiry and the UDP Inquiry both supported the green barrier in this location. Nevertheless the Council will conduct a further review of green barriers in line with up to date advice contained in PPW, whilst having regards to the views of the UDP Inspector.</p>	<p>No change.</p>
		<p>Not accepted. The distances referred to are taken from the "Guidelines for Providing Journeys on foot" produced by the Institute of Highways and Transportation. These guidelines are a widely</p>	<p>No Change.</p>

	Q.7 – In respect of rural areas a distance greater than 400m / 800m should be considered within more rural Category C settlements.	accepted and commonly used set of standards for assessing acceptable walking distances to facilities. No reasons or explanations are put forward as to why the distances should be greater. In any event distances to shops, bus stops and schools in Flintshire's rural Category C settlements are very likely to be within those referred to in questions 6 and 7 of Appendix C.	
NJL Consulting (on behalf of Grag Hill Estates)	<p>RAF Sealand South Camp", Welsh Road, Deeside, received outline planning permission on 7th January 2013 for the <i>'redevelopment of a strategic brownfield site for an employment led mixed use development with new accesses and associated infrastructure including flood defences and landscaping.'</i></p> <p>Planning conditions are in the process of being discharged and the strategic development management and delivery of the project is being undertaken by Praxis Real Estate Management Limited (PREM) in collaboration with Welsh Government.</p> <p>A reasonable approach is being taken to site assessment. However, clarification is sought over the position of my client's site which does not appear on the candidate sites register.</p>	Noted. Given that the Northern Gateway has the benefit of two outline planning consents plus progress is being made in discharging conditions, combined with the on-going investment in infrastructure to support and deliver development, there is clear evidence that the site is progressing. It is therefore not necessary for the site to be assessed alongside sites which have no planning history or developer interest.	No change.

	<p>Paragraph 2.3 of the Draft Methodology and Assessment Process document states that <i>'land currently allocated in the adopted UDP will not automatically be taken forward into the LDP.'</i> This principle is endorsed, as some UDP allocations which have not been brought forward through the planning process within the timeframe of the UDP may well be unsuitable for development. Such sites may have constraints that cannot be overcome or be unviable. It would be illogical and to the detriment of the Local Development Plan overall to reallocate such sites.</p>		
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	<p>It is clear that some UDP allocations are suitable for development. The fact that the RAF Sealand site has not yet been developed is a result of infrastructure complexities which have taken time to resolve, and is by no means demonstrative of the fact that the site cannot or will not be developed. The Council are aware that the site is being progressed and the development will be implemented as soon as possible.</p> <p>RAF Sealand allocation is the largest strategic release in the county and is located within an Enterprise Zone. Due to the scale of the development, implementation is likely to take place over a 5- 10 year delivery period, during which time future planning applications will be submitted which will be judged against policies contained within the Local Development Plan. In this respect, it is critical that the site's allocation is carried forward to ensure that delivery of the scheme is not delayed. Coupled with this is the fact that there may be a requirement to respond to changing markets and/or the adjacent Deeside Industrial Park which may result in additional planning applications.</p> <p>In light of the above, we would request that the RAF Sealand South Camp is allocated within the Local Development Plan to allow for future flexibility.</p>		
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Appendix 8

Candidate Sites Consultation Letter to internal department sand external organisations (not to members of the public) Dated 27th April 2015

Andrew Farrow

Chief Officer (Planning & Environment)

Prif Swyddog (Cynllunio a'r Amgylchedd)



Your Ref/Eich Cyl

Our Ref/Ein Cyf

Date/Dyddiad 27th April 2015

Ask for/Gofynner am Mrs Victoria Weale

Direct Dial/Rhif Union 01352 703206

Email Vicky.j.weale@flintshire.gov.uk

Dear

Flintshire Local Development Plan.

We are about to start our consultations on the Local Development Plan Candidate Sites and are thinking about how to do this with internal departments and external organisations. We have all the candidate sites (734) on the Councils Website for information purposes only as we are not consulting the wider public on the sites at this stage. But we are consulting the Town and Community Councils.

For consultation purposes we have sieved out the small sites and those sites which have been put forward to be protected so only the larger sites and those put forward for development are included. We will send you this 'sieved list' on a spreadsheet and a CD of all the candidate site information. We therefore only want you to look at those sites on the spreadsheet list and not all of the sites on the CD. In terms of your response, at this stage, we are looking for a brief general response relating to the implications for development. More detailed information will be required when we start to focus in on sites which have realistic chance of being allocated.

There are 555 sites on the spreadsheet, however some these sites are duplicated, some numerous times. Can I suggest that it may be worth responding to us on a settlement by settlement basis and feeding through your responses as and when you consider them, rather than waiting until you have done them all. Can you please give us an idea of how long you think it might take for you to respond?

Also please let me know if you require additional CDs.

Thank you for your assistance.

Yours sincerely,

For Chief Officer (Planning & Environment)

Appendix 9

Flintshire Local Development Plan Topic Papers - Summary of Representations and Responses

Name / Organisation	Comments / Changes Sought	Response	Recommendation
Topic Paper 1 - Biodiversity and Nature Conservation			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	Supports the principle of conserving and enhancing biodiversity and nature given for instance the exceptional coastal environment which is a key visitor attraction, and therefore something Bourne Leisure wish to protect and where possible enhance.	Noted.	No change
	However, the policy objective of seeking to conserve and where possible enhance biodiversity and nature should not mean that appropriate and sustainable development is precluded from coming forward in Flintshire, provided commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts. In this context, pleased to see the Topic Paper includes the reference '...avoid unnecessary constraints on development'.	Noted	No change
	It is important that the Topic Paper sets out a balanced approach to facilitating appropriate development whilst seeking to maintain and enhance biodiversity and nature, which is especially relevant for tourist accommodation and facilities already located in environmentally sensitive locations.	Noted	No change
	Pleased that the Topic Paper recognises that development can also positively impact on biodiversity and nature.	Noted	No change

	Points out that CIL can only be used to reduce or mitigate against impacts on biodiversity where a specific infrastructure project has been identified. Otherwise, s106 obligations remain the appropriate method of delivering funding to mitigate against any site specific impacts.	Noted	No change
Topic Paper 2 – Flooding and Environmental Protection			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Welcomes the Topic Paper regarding climate change and flooding. However, the emerging LDP should recognise that specific uses, such as tourism uses, are often already sited on the coast or in river floodplains and that such uses require to be located adjacent to water in order to continue to attract visitors. The LDP should allow for proposals for the improvement / expansion of existing tourism accommodation and facilities to be considered on a more flexible basis to new developments in such locations.</p> <p>With regard to air, noise and light pollution, tourist facilities are also sensitive to such impacts as it can affect the quality of the holiday experience. The LDP should specifically identify tourist accommodation as sensitive development.</p>	<p>Noted. Policies in the Plan will be drafted in accordance with advice in PPW and technical advice from Natural Resources Wales. Development proposals arising on existing tourism sites where there are flood risk issues will need to be robustly assessed and it would be inappropriate for the Plan to indicate that proposals the expansion of tourism accommodation, which is within the definition of 'highly vulnerable' development, should be treated more 'flexibly'.</p> <p>Noted. As the Topic Paper rightly details, housing, hospitals and schools are generally regarded as 'noise sensitive developments'. Whilst there may be other forms of development which might be sensitive to noise, it would be preferable for these to be treated on a case by case basis, on their individual merits, against a criteria based policy in the Plan. Although there are certain forms of tourism accommodation where one would expect a certain standard of protection from undue noise, there are other forms of tourism accommodation,</p>	<p>No change</p> <p>No change</p>

		particularly in urban areas which are located close to transport hubs, retail parks and other facilities which are themselves, generators of noise, and where satisfactory standards of amenity can only be achieved through engineering measures. On balance it is not considered necessary or appropriate for tourism accommodation to be specifically mentioned in the Topic Paper.	
Topic Paper 4 – Open Space			
Redrow	<p>Supports the implementation of new open space however, any policy in the LDP will need to have regard to the scarcity of developable land and how development proposals should represent best use of land.</p> <p>Considers that a policy to ensure that a minimum quantum of public open space is provided in line with a certain increase in population holds merit, but it should set out the assumption behind new average household sizes and how the number of people per dwelling (and therefore the requirement for open space) will be calculated. Any new policy should state the assumptions made in relation to how the creation of new housing will generate new population and therefore set out a standard for new open space provision (play space, formal and informal). This calculation of new dwellings to population increase should be reflective of the most recent assessment of household sizes and provide a dynamic and robust assessment of how new development will generate a demand for open space.</p>	<p>The Council takes a flexible and pragmatic approach in applying open space standards particularly where a development site is within close reasonable and safe distance of an existing facility and in such circumstances seeks a commuted sum payment to enhance these nearby facilities. This has significant developer benefits for maintaining site viability and ensures that the Council only seeks open space where there is a justified need. Clearly the CIL Regulations pose a challenge to the traditional approach of FCC and may now require that FCC take a more robust approach. Equally all development that is proposed should be sustainable and deliverable, inclusive of the community's need for open space.</p> <p>In developing future LDP policies FCC will consider the issue of development viability and the impact of planning</p>	<p>No change</p> <p>No change</p> <p>No change</p>

		<p>obligations on the viability of a development including residential development. FCC have historically used a open space rate per person which using average occupancy rates has generated a quantitative provision per dwelling.</p> <p>However, FCC in reviewing issues around viability is aware that applying a rate of open space provision by dwelling can cause viability issues particularly when a developer seeks to increase residential density to offset planning obligations. This can result in an escalating need for more open space offsetting more development value. The Council will be considering these issues in detail in the formation of future LDP policy to ensure that a balance between development needs and the valid needs for open space provision are achieved. This could be in the form of revised household occupancy figures or another appropriate approach.</p>	
Topic Paper 6 Minerals			
Minerals Products Association	<p>The Topic Paper is disappointingly brief but the paper covers the necessary ground. The relevance of RTS 1st Review will be vital in keeping a steady and adequate supply of mineral available for working. Flintshire's limestone resources are particularly important not only for the North Wales economy, but also the North West England. Allocations of crushed rock to meet needs plus to a lesser extent, sand and gravel should be a major task of the LDP process.</p>	<p>Noted. The purpose of the Minerals Topic Paper is to highlight the main issues which need to be addressed through the LDP. The evidence base will be expanded upon throughout the course of developing the LDP, as it will for all other aspects covered by the LDP.</p>	No change

	<p>The other essential component is mineral safeguarding, which should include all minerals of economic importance. Concerned about statement that the needs for development must be balanced against the need to safeguard mineral. Suggest that if development is proposed on sites containing economic bearing mineral, that developers will always be required to investigate the potential for prior extraction. Moreover, since minerals can only be worked where they are found, whereas other forms of development are more flexible in terms of location, it is hoped that mineral conservation would be prioritised over development.</p> <p>In this context, there is a difference between the principle of prior extraction and proximal sterilisation. It is often assumed that if a development does not directly sterilise a mineral, or only in small quantities, or involves a common mineral, that this exhausts the objective to conserve mineral resources. This fails to take into account that development often will indirectly sterilise mineral by stopping the working of adjacent resources or severely limiting their exploitation. The same approach to delineating buffer zones around active mineral workings, should be extended to cover all economic mineral resources.</p> <p>The LDP should also include development management criteria for the assessment of non-mineral development in mineral safeguarding areas.</p> <p>The proposed LDP policies for dormant workings, buffer zones, recycled materials, development management criteria and restoration are sensible.</p>	<p>The need for allocations, in line with the RTS 1st Review, is highlighted within the Topic Paper.</p> <p>The LDP has to balance a range of different land use issues, minerals being just one of them. As highlighted within the Topic Paper, much of Flintshire is underlain by mineral of economic importance. The expansion of settlements is therefore likely to result in the loss of some mineral of economic importance. The assessment of candidate sites submitted will consider the presence of mineral underlying a site. Decisions regarding site selection will be based upon a wide range of factors including, but not limited to, flood risk, ecological sensitivity, accessibility, presence of community facilities, and whilst the conservation of minerals will be an important consideration, where the distribution of mineral is extensive it may not be possible to avoid allocating some sites underlain by mineral of economic importance. In such cases, the potential for prior extraction will be investigated.</p> <p>The difference between the principle of prior extraction and proximal sterilisation is well understood. In respect of aggregates, the BGS safeguarding maps include buffers, which are in accordance with MTAN 1. This is the starting point in terms of assessing whether mineral would be</p>	
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		<p>affected by non-mineral development. The Mineral Resource Maps published by the BGS will also be used, particularly in relation to non-aggregate mineral.</p> <p>It is agreed that it will be important for the LDP to include a policy to address safeguarding. The LDP is at a very early stage and development management policies won't be published until the Deposit Stage.</p> <p>Noted</p>	
Wirral BC	<p>Given that a number of Petroleum Exploration and Development Licences have been issued in and around Flintshire for onshore oil and gas exploration, the approach to energy minerals may also need to be identified as an issue for the LDP to address.</p>	<p>The Topic Paper covers oil and gas, specifically highlighting the presence of PEDL licences within and around Flintshire. The policy approach recommended in the Topic Paper is to identify those areas where mineral development will not be acceptable. This would apply to all types of extraction and is considered appropriate in relation to onshore oil and gas because the PEDL licence blocks are so extensive and need is not quantified. This may include the use of criteria based policy.</p>	No change
Topic Paper No. 7 Spatial Strategy			
Cassidy & Ashton Group Ltd	<p>Considers that Coed Talon is a sustainable location for development and has the capacity to support additional growth. Brownfield land is available for development to the south of Coed Talon.</p> <p>A balanced approach to growth should be adopted where growth is not solely directed towards</p>	<p>Noted – The UDP identified Leeswood as a Category B settlement and Coed Talon as a category C settlement. Despite the different categorisation, both settlements had allocated housing sites, although neither has been taken forward. As part of the preparation of the LDP, a re-</p>	<p>Add a new bullet point in the LDP section on p5 of the Topic Paper with the wording 'the need to review the existing settlement hierarchy and categorisation based on an assessment of the services and facilities of each settlement and whether it is a</p>

	category A and B settlements and that category C settlements such as Coed Talon should accommodate some additional growth.	<p>assessment of the settlement hierarchy is being undertaken. It is noted that the two settlements physically adjoin each other and both have the presence of brownfield land. Such factors will be addressed when the capacity of Coed Talon to accommodate further development, is undertaken. In this context it is suggested that a new bullet point is added in the LDP section on p5 of the Topic Paper.</p> <p>As part of the process of determining the Councils preferred spatial strategy a number of different spatial strategies will be identified and tested. This will help determine both the spatial distribution of growth across the County and the relative levels of development between different categories of settlement.</p>	<p>sustainable location to accommodate further growth’.</p> <p>No change</p>
Cassidy & Ashton Group Ltd (on behalf of Whitley Group)	<p>In respect of ‘Issues to be Addressed by the Plan’:</p> <ul style="list-style-type: none"> • Buckley, Mold, Hope and Pantymwyn are considered sustainable locations for development which has the capacity to support additional growth. These settlements have been the subject of growth over the last 10 years and availability of brownfield land is limited. Appropriate greenfield sites adjacent to settlement boundaries should be considered suitable for accommodating strategic growth alongside brown field land within settlement boundaries 	<ul style="list-style-type: none"> • As part of the preparation of the LDP, a re-assessment of the settlement hierarchy is being undertaken. It is evident that Buckley and Mold are sustainable locations for development given that they are main towns. It is also considered that Hope / Caergwrle is a sustainable location for development, given its location on a key transport corridor between Wrexham and Mold and the level of facilities and services present, although the actual level of growth may be lower than main 	No change

	<ul style="list-style-type: none"> • Growth should not focus solely on category A towns and that category B settlements have sufficient capacity and infrastructure capable of accommodating significant levels of growth. Category C settlements such as Pantymwyn should accommodate additional growth • Having regard to the UDP Inspectors comments regarding settlement boundaries and green barriers, it would not be appropriate for the Council to severely limit growth of any settlement including Buckley, by way of excessive green barriers. It is crucial for the Council to review existing green barriers and in some cases remove constrictions to development (e.g. land to south and east of Buckley) 	<p>towns. However, it is not considered that Pantymwyn can be considered in the same context or categorisation as the above settlements.</p> <p>Pantymwyn has few services and facilities and is not considered to represent a sustainable location for the levels of growth advocated.</p> <p>In terms of brownfield land it is not considered sufficient for brownfield land to be 'available' but the key test is whether it is appropriate and deliverable within the Plan period</p> <ul style="list-style-type: none"> • As part of the process of determining the Councils preferred spatial strategy a number of different spatial strategies will be identified and tested. This will help determine both the spatial distribution of growth across the County and the relative levels of development between different categories of settlement. The role to be played by settlements such as Pantymwyn needs careful consideration in terms of permitting a level of development which meets primarily local housing needs, but not at such a level as to represent unsustainable development. • Although a review of green barriers was undertaken as part of the UDP, the Council will conduct a further review of green barriers in line with the advice in PPW and also having regard to the views of the Inspector. 	<p>No change</p> <p>No change</p>
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Cassidy & Ashton Group Ltd (on behalf of Liberty Properties)	<p>In respect of 'Issues to be Addressed by the Plan':</p> <ul style="list-style-type: none"> • Penyffordd / Penymynydd is considered to be a suitable location for development which has the capacity to support additional growth. The settlement has been the subject of growth over the last 10 years and the availability of brownfield sites is limited. As such, greenfield sites adjacent to the settlement boundary and well related to the settlement should be considered suitable for accommodating strategic growth. • Growth should not focus solely on category A settlements and that category B settlements have sufficient capacity and infrastructure capable of accommodating significant levels of growth • It is noted the Council are proposing 2 new green barriers to land immediately outside of Penyffordd / Penymynydd whereas there is no green barrier in the UDP. The Inspector concluded that the amount of green barrier land should be limited and that settlements must have room for growth. As such it would not be appropriate for the Council to encase any settlement, including P/P with green barrier protection. Furthermore, the proposed green barrier surrounding P/P would not be compliant with the defined purposes of green barriers set out in PPW. 	<ul style="list-style-type: none"> • Penyffordd / Penymynydd has and is seeing significant growth as a result as a result of two large allocations in the UDP. The role to be played by settlements such as P/P will be informed by the present review of the settlement hierarchy, having regard to the level of services and facilities in each settlement and whether each settlement represents a sustainable location to accommodate further development. • As part of the process of determining the Councils preferred spatial strategy a number of different spatial strategies will be identified and tested. This will help determine both the spatial distribution of growth across the County and the relative levels of development between different categories of settlement. • The Council is not proposing 2 new green barriers on land immediately adjoining P/P. However, Candidate Sites have been submitted which propose the designation of green barriers around P/P and these will be assessed by the Council having regard to the advice in PPW and the Inspectors comments. 	<p>No change</p> <p>No change</p> <p>No change</p>
J10 Planning (on behalf of various clients)	Few comments to make on the Topic Papers as they provide no real direction.	The Topic Papers are not intended to provide 'real direction'. The Topic Papers represent an early opportunity within the Plans engagement stage for the views of stakeholders and the	No change

	<p>Comments on Spatial Strategy:</p> <ul style="list-style-type: none"> • Acceptance that the UDP has ‘failed’ to deliver the required level of growth that was originally anticipated and that this has been caused by the settlement boundaries being drawn too tight and percentile growth band rates have also not been met • The UDP Inspector and others involved in the Inquiry process raised these concerns • The UDP has failed to deliver the level of affordable housing required 	<p>wider public to be gained on a variety of issues. It would be inappropriate for the Council to present a ‘fait accompli’ so early in the preparation process.</p> <p>In terms of the representors comments on the Spatial Strategy:</p> <ul style="list-style-type: none"> • Although issues have been identified (both by the Inspector and subsequently by the Council) with the UDP approach to a spatial strategy it is not accepted that i) the UDP failed to deliver the required level of housing (the economic downturn was a principal factor) ii) settlement boundaries were drawn too tightly (settlement boundaries and the provision for growth were considered by the UDP Inspector and the Plan supported (with revision) iii) percentile growth band rates have also not been met (the growth bands are not a target and the UDP was clear in that not every settlement would have growth within or at the top of the growth band). • Whilst objectors may have raised concerns, the UDP Inspector recommended that the Plan was appropriate to be taken forward for adoption, with a number of revision to the strategy, policies and allocations. The key comment of the Inspector was that a more fundamental look at spatial strategy was needed in terms of settlement boundaries and green barriers as part of the LDP. 	<p>No change</p>
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	<ul style="list-style-type: none"> • Would support a spatial strategy based upon sustainable distribution <p>Also raises a number of other 'key concerns':</p> <ul style="list-style-type: none"> • The Council has a poor track record in providing adopted plan coverage • No 5 year supply exists • That with a plan due to expire, there will be no plan coverage in place • That despite previous concerns raised during the UDP consultation and inquiry process which urged the Council to undertake a green barrier review and consider extending allocations to other sites, no such review was undertaken and despite the impending expiry of its UDP no steps have yet been undertaken to review them • Previously raised concerns over a number proposed allocations (that have unsurprisingly not 	<ul style="list-style-type: none"> • The Plan has sought to provide affordable housing as part of larger housing developments and the flexible approach taken in bringing about innovative means of affordable housing delivery has been praised. The policy in the UDP was not based on a pre-determined target, but allowed for negotiation on a site by site basis. Revisions to the spatial strategy whereby HSG3 requires local needs housing to be provided in category B and C settlements has also helped deliver local needs housing. • Noted that the representor would support a strategy based on sustainable distribution <p>In terms of the representors other key concerns:</p> <ul style="list-style-type: none"> • It is accepted that the Council took a long time to adopt its UDP. However, compared to other authorities who abandoned their UDP's, the Council persevered with its UDP in order to ensure that it did have an up to date adopted development plan. This approach was supported by Welsh Government. • It is acknowledged that on the basis of the residual method the Council does not presently have a 5 year supply. • For the purposes of s38 of the 2004 Act the UDP will remain the development plan until such time as the LDP is either adopted or 	No change
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	<p>been built out and are now up for re-assessment) during the UDP consultation and inquiry process.</p> <p>Now calls on the Council to take a positive approach to its plan making responsibilities that will involve:</p> <ul style="list-style-type: none"> • Undertaking a green barrier review, which ought to consider identifying 'safeguarded land' for future release • Reviewing existing settlement boundaries that are presently deficient and restrictive • Developing the emergent spatial strategy upon sound sustainable development principles where distribution is proportionate and based upon a sound settlement hierarchy • A step change in growth rates to arrest and reverse the lack of new development, a proactive approach to investment in new housing and infrastructure is taken, which will have a positive impact on reducing out-migration and generate inward economic investment and jobs 	<p>withdrawn. Although the UDP will become time expired at the end of 2015, significant weight can still be attached to it provided that it still accords with PPW.</p> <ul style="list-style-type: none"> • The UDP Inspector assessed the Councils review of green barriers and delineation of settlement boundaries, and although she had some reservations about them going forward, she still considered that the Plan was appropriate to be taken forward for adoption. The review of green barriers and settlement boundaries will be looked at again as part of the LDP. • Despite the representor raising concerns over a number of allocations, they were still recommended for retention as part of the Plan by the Inspector. All allocations in the Plan were included on the basis that they were genuinely available for development. <p>In terms of the Councils actions going forwards:</p> <ul style="list-style-type: none"> • The Council will undertake a green barrier review and consideration can be given to the concept of 'safeguarded land' for future releases (which was undertaken in a few instances in the UDP) • The Council will undertake a review of settlement boundaries • The Council is presently undertaking a settlement review which will inform 	<p>No change</p>
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		<p>the Plan's settlement hierarchy and spatial strategy options</p> <ul style="list-style-type: none"> • The Council will have regard to the factors raised by the representor in identifying the Plans housing requirement, spatial strategy and housing allocations which are sustainable, deliverable and viable. 	
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Given the contribution of tourism to the Flintshire economy, it is crucial for the spatial strategy to recognise tourism as a critically important contributor. The spatial strategy should also explain that there is a need for continued redevelopment / reconfiguration of holiday accommodation, in order to maintain a product that meets changing visitor expectations.</p>	<p>Noted. It is accepted that significant tourism development already exists in the County and that these may need to be improved / expanded during the Plan period. Such eventualities can be assessed against a suite of Plan policies. New tourism development proposals which might arise over the Plan period are 'footloose' compared to many forms of development such as industry and housing where a more informed planned approach can be taken. In this context it is not considered that tourism should form a part of the Plans spatial strategy.</p>	No change
Redrow	<p>Welcomes the list of issues but considers that 'the impact Chester's employment facilities have on housing need in the east of Flintshire' should be added:</p> <p>The relationship between Flintshire and CWAC warrants close attention, in particular how parts of the two areas operate within the same housing market area. Specific regard should be given to how the housing needs in the eastern part of the authority which is part of the Chester housing market may be affected, in particular, regard should be had to how land within eastern Flintshire</p>	<p>Noted. It is considered that a further issue with slightly broader wording than that advocated, could be added to p5 of the Topic Paper.</p> <p>It is accepted that there is a close relationship between the housing markets of Flintshire and Chester. For many years housing provision has been constrained within Chester, with a focus on urban regeneration led apartment developments, which resulted in an overspill of demand for</p>	<p>Add a further issue on p5 of Topic Paper no. 7 to read 'the need to have regard to the close relationship between Flintshire and CWAC in terms of housing and employment'.</p>

	<p>can be used to meet the needs of the Chester housing market.</p> <p>Agrees with the principle of distributing any proposed new land uses in areas which already have infrastructure and are in sustainable locations. The experience of the UDP which had category A, B and C settlements with different percentage growth rates rather than a numeric target, is that it led to ambiguity and interpretation and caused confusion. Considers that the LDP should continue with cat A, B and C settlements, but ascribe a numerical housing target to each of the settlements. This will definitively set the requirement for the number of dwellings each settlement should seek to deliver.</p> <p>If the LDP is to conform to PPW's directive of stimulating economic growth and promoting sustainable development, any policy towards new housing development should be expressed as a minimum level of development in each of the settlement categories, to avoid placing an artificial constraint upon growth in certain areas where there may be a demand beyond the identified thresholds, provided it would not materially impact on the functionality of the existing infrastructure.</p>	<p>family housing into North Wales, particularly Flintshire. However, CWAC is now looking to incorporate higher rates of housing into its Local Plan, accompanied by a substantial release of green belt to the south of the City. In this context, less pressure is likely to be placed on the eastern part of Flintshire to provide for the housing needs of Chester. Although there will always permeability on the housing market across the border, it is not considered appropriate to commence the preparation of the LDP on the premise of using land in the east part of the County to provide for the needs of Chester.</p> <p>It is accepted that the UDP spatial strategy had a number of limitations and that difficulties have been experienced in implementing policy HSG3 with regard to settlement growth bands. The Council is presently undertaking a review of settlements having regard to their services and facilities and whether they represent sustainable locations for further development, and this will inform a settlement hierarchy for the Plan and a number of spatial strategy options. The precise means of quantifying the amount or proportion of development to each category of settlement will be given further consideration, as different approaches could be taken. It is not accepted that each settlement should have a numerical housing target as</p>	
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	<p>The Council should take a 'policy off' approach when distributing the levels of development requires within each of the settlements across the County. In effect the Council should remove any planning policy constraint such as green barrier from the assessment of each settlements capacity and examine each settlement from pure land use management point of view. This would ensure that development creates the minimum encroachment into the countryside and is situated as close to existing centres to safeguard a connection between new development and existing centres</p>	<p>this would be overly prescriptive, and there are settlements which are unable to accommodate growth.</p> <p>There are a number of policy designations and constraints which will need to be considered in drawing up the Plan's spatial strategy and in identifying potential land allocations. Rather than taking a 'hands off' approach and ignoring green barriers, it would be better to undertake the more fundamental review of green barriers advocated by the UDP Inspector. In addition to setting aside green barriers the representor also seems to be inferring that there is other land within settlements which is suitable for development and where planning designations should be set aside. The Council will assess the capacity of land within settlements to deliver new housing and other development but this should not be at the expense of the loss of green space, open space and other designations.</p>	
Strutt & Parker (on behalf of Mr	Agrees with the context and general objectives of the Spatial Strategy which recognises there is a need to strengthen hubs as a focus for investment	Noted	No change

<p>and Mrs Davies-Cooke)</p>	<p>and outside of these hubs, to ensure that communities sustainability is strengthened.</p> <p>For the Plan to be successful the authority need to ensure:</p> <ul style="list-style-type: none"> • The right balance between focusing development towards urban and rural areas • Flexibility is built into the Plan to allow for change • The Plan is deliverable by identifying allocated sites which are free from constraints and put forward by landowners as available in the short term for development. <p>Spatial development focus – The UDP Inspector advised that a strategic review of the settlement hierarchy is undertaken which takes into account connectivity to each other. By way of example, Sychdyn should be placed higher up in the hierarchy of settlements which should deliver some new growth. Sychdyn has strong social and spatial connections with the larger settlement of Mold, meaning that when recognised as a satellite community to Mold, Sychdyn's acceptability to deliver sustainable new development is more apparent. The result of a strategic review in this way will be that there are more settlements within the top tier of the hierarchy where growth should be focused. This should help deliver growth as it will be more in tune with market demand for housing whilst also ensuring that focus remains on delivering development in the most sustainable parts of the County.</p>	<p>Spatial development focus – The Inspectors comments in relation to settlements was in terms of scenarios where there are several adjoining settlement but each having different categories (eg Deeside and Buckley, Drury, Mynydd Isa, Alltami). The Inspector saw this as backward looking and raised the option of these being treated as a single identity i.e. as an urban area. It is also accepted that there are linkages between settlements and that some settlements will act as satellites linking to a larger settlement. In terms of the UDP settlement hierarchy, the only higher category for Sychdyn would be as a category A settlement i.e. on a par with Mold. Whilst recognising the links between Mold and Sychdyn there is a significant difference in the level of</p>	
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	<p>Limited growth should still be allowed in smaller rural settlements, to ensure their future sustainability, in line with PPW, which supports new housing in rural areas to meet local needs. A better strategy to achieve this (in comparison with the UDP) could be to only allow for growth in the settlements where sites have been put forward by landowners or developers, and / or allowing growth in smaller settlements where there is at least one service or amenity to support some additional growth.</p> <p>Flexibility – A reason why the UDP had shortcomings in terms of delivering growth, is due to its rigid nature (settlement boundaries). To ensure the Plan is sound at examination it needs to be flexible to respond to change. The UDP Inspector highlighted that settlement boundaries were too rigid based on historical approaches and failed to take into account the connectivity of settlements and how communities function.</p> <p>To achieve flexibility, settlement boundaries should be widened to allow for additional growth, and a policy is included within the Plan which allows for settlement boundaries to be amended through LDP reviews.</p> <p>Also advocates reviewing green barrier designation coverage which was advocated by the UDP Inspector. There is clear justification for a green</p>	<p>facilities, services and infrastructure in Mold compared with Sychdyn. In this context it is not considered that growth should be focused on settlement such as Sychdyn, but rather that the potential of settlements like Sychdyn is assessed in terms of being able to accommodate a level of growth more akin to its size, character and function.</p> <p>It is accepted that limited growth should still be allowed in smaller rural settlements. However, it would be unduly restrictive to only allow growth in rural settlements where candidate sites have been submitted and equally this is not considered to be a sound planning approach. More flexible policy approaches are needed to enable more modest housing sites to come forward predominantly to meet local needs. It is also unclear whether a settlement which has only one service or amenity could sustainably accommodate additional growth. The present settlement assessment work will assist in considering these issues.</p> <p>Flexibility – Although the UDP Inspector had reservations about settlement boundaries, these were more focused on areas such as Deeside and Buckley where there were several settlements with different categories, but which adjoined each other. The Inspector advocated a longer term more fundamental review</p>	
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	<p>barrier designation at the eastern extent of the County to provide a buffer between Chester and Flintshire settlements. However, to deliver the authority's housing and employment needs the green barrier designation around Mold should be closely reviewed as there are areas of land which do not meet the purposes of designation (e.g. no coalescence of settlements). If released from green barrier, sustainable development could be brought forward on sites which are well connected to existing infrastructure (e.g. residential development on land adjacent to Sychdyn would be within walking distance to County Hall campus).</p> <p>Delivery – To ensure the Plan is sound at examination, it is crucial that the allocated sites are deliverable. Sites put forward during the candidate site process which are within single ownership and available for development in the short term, should be given greater weight. The Council needs to be realistic about the level of growth which can be achieved at brownfield sites, ensuring that there is not an unbalanced focus on such sites, at the expense of discounting viable greenfield sites. Development of brownfield sites is often questionable from a viability perspective due to site remediation costs, and taking on board the Wrexham failed LDP strategy, the authority should be looking to allocate a degree of development on greenfield sites as these are usually less constrained and available for development in a shorter timescale (contributing to housing land supply).</p>	<p>of settlement boundaries and this will be undertaken as part of the LDP. If the Inspector considered that the settlement boundaries in the UDP were too restrictive then she would have recommended significant changes to them. It is a matter of practice and principle that settlement boundaries are reviewed as part of each development plan and it is not necessary for such a policy to be included in the LDP.</p> <p>A review of the green barrier designations will be undertaken having regard to the advice in PPW and the comments of the UDP Inspector. However, in looking at the role of green barriers PPW identifies five purposes of green barrier designation and not just the one (coalescence) referred to by the representor in the context of the Mold green barrier.</p> <p>Delivery – a key part of the LDP will be ensuring that sites are both deliverable and viable. The regeneration of brownfield sites will be a key priority for</p>	
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		the Plan, in line with PPW, but this must be balanced with greenfield sites. A range of sites by type, size and location will ensure that housing can be delivered throughout the Plan period, recognising that brownfield or larger sites will take longer to come forward than smaller greenfield sites.	
Strutt & Parker (on behalf of Mrs Strong & Mrs Jones)	<p>Agrees with the context and general objectives of the Spatial Strategy which recognises there is a need to strengthen hubs as a focus for investment and outside of these hubs, to ensure that communities sustainability is strengthened.</p> <p>For the Plan to be successful the authority need to ensure:</p> <ul style="list-style-type: none"> • The right balance between focusing development towards urban and rural areas • Flexibility is built into the Plan to allow for change • The Plan is deliverable by identifying allocated sites which are free from constraints and put forward by landowners as available in the short term for development. <p>Spatial development focus – Promoting sustainable development should be at the heart of the Strategy and to achieve this, development should be focused to sites in and around the larger</p>	<p>Noted.</p> <p>Spatial development focus – The role of towns such as Mold as being</p>	No change

	<p>settlements, such as Mold which is already defined as a category A settlement in recognition of its range of services and facilities.</p> <p>Flexibility – A reason why the UDP had shortcomings in terms of delivering growth, is due to its rigid nature (settlement boundaries). To ensure the Plan is sound at examination it needs to be flexible to respond to change. The UDP Inspector highlighted that settlement boundaries were too rigid based on historical approaches and failed to take into account the connectivity of settlements and how communities function.</p> <p>To achieve flexibility, settlement boundaries should be widened to allow for additional growth, and a policy is included within the Plan which allows for settlement boundaries to be amended through LDP reviews.</p> <p>Also advocates reviewing green barrier designation coverage which was advocated by the UDP Inspector. There is clear justification for a green barrier designation at the eastern extent of the County to provide a buffer between Chester and Flintshire settlements. However, to deliver the authority's housing and employment needs the green barrier designation around Mold should be closely reviewed to as there are areas of land which do not meet the purposes of designation (e.g. no coalescence of settlements). If released from green barrier, sustainable development could be brought forward on sites which are well connected to existing infrastructure (e.g. residential development on land adjacent to Sychdyn would be within walking distance to Vouny Hall campus).</p>	<p>sustainable locations for growth is accepted.</p> <p>Flexibility – Although the UDP Inspector had reservations about settlement boundaries, these were more focused on areas such as Deeside and Buckley where there were several settlements with different categories, but which adjoined each other. The Inspector advocated a longer term more fundamental review of settlement boundaries and this will be undertaken as part of the LDP. If the Inspector considered that the settlement boundaries in the UDP were too restrictive then she would have recommended significant changes to them. It is a matter of practice and principle that settlement boundaries are reviewed as part of each development plan and it is not necessary for such a policy to be included in the LDP.</p> <p>A review of the green barrier designations will be undertaken having regard to the advice in PPW and the comments of the UDP Inspector. However, in looking at the role of green barriers PPW identifies five purposes of green barrier designation and not just the one (coalescence)</p>	
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	<p>Delivery – To ensure the Plan is sound at examination, it is crucial that the allocated sites are deliverable. Sites put forward during the candidate site process which are within single ownership and available for development in the short term, should be given greater weight. The Council needs to be realistic about the level of growth which can be achieved at brownfield sites, ensuring that there is not An unbalanced focus on such sites, at the expense of discounting viable greenfield sites. Development of brownfield sites is often questionable from a viability perspective due to site remediation costs, and taking on board the Wrexham failed LDP strategy, the authority should be looking to allocate a degree of development on greenfield sites as these are usually less constrained and available for development in a shorter timescale (contributing to housing land supply).</p>	<p>referred to by the representor in the context of the Mold green barrier.</p> <p>Delivery – a key part of the LDP will be ensuring that sites are both deliverable and viable. The regeneration of brownfield sites will be a key priority for the Plan, in line with PPW, but this must be balanced with greenfield sites. A range of sites by type, size and location will ensure that housing can be delivered throughout the Plan period, recognising that brownfield or larger sites will take longer to come forward than smaller greenfield sites.</p>	
Strutt & Parker (on behalf of Rhual Estate)	<p>Spatial development focus – Promoting sustainable development should be at the heart of the Strategy and to achieve this, development should be focused to sites in and around the larger settlements, such as Mold which is already defined as a category A settlement in recognition of its range of services and facilities.</p>	Noted	No change

	<p>Flexibility – A reason why the UDP had shortcomings in terms of delivering growth, is due to its rigid nature (settlement boundaries). To ensure the Plan is sound at examination it needs to be flexible to respond to change. The UDP Inspector highlighted that settlement boundaries were too rigid based on historical approaches and failed to take into account the connectivity of settlements and how communities function.</p> <p>To achieve flexibility, settlement boundaries should be widened to allow for additional growth, and a policy is included within the Plan which allows for settlement boundaries to be amended through LDP reviews.</p> <p>Delivery – To ensure the Plan is sound at examination, it is crucial that the allocated sites are deliverable. Sites put forward during the candidate site process which are within single ownership and available for development in the short term, should be given greater weight. The Council needs to be realistic about the level of growth which can be achieved at brownfield sites, ensuring that there is not an unbalanced focus on such sites, at the expense of discounting viable greenfield sites. Development of brownfield sites is often questionable from a viability perspective due to site remediation costs, and taking on board the Wrexham failed LDP strategy, the authority should be looking to allocate a degree of development on greenfield sites as these are usually less constrained and available for development in a shorter timescale (contributing to housing land supply).</p>	<p>Flexibility – Although the UDP Inspector had reservations about settlement boundaries, these were more focused on areas such as Deeside and Buckley where there were several settlements with different categories, but which adjoined each other. The Inspector advocated a longer term more fundamental review of settlement boundaries and this will be undertaken as part of the LDP. If the Inspector considered that the settlement boundaries in the UDP were too restrictive then she would have recommended significant changes to them. It is a matter of practice and principle that settlement boundaries are reviewed as part of each development plan and it is not necessary for such a policy to be included in the LDP.</p> <p>Delivery – a key part of the LDP will be ensuring that sites are both deliverable and viable. The regeneration of brownfield sites will be a key priority for the Plan, in line with PPW, but this must be balanced with greenfield sites. A range of sites by type, size and location will ensure that housing can be delivered throughout the Plan period, recognising that brownfield or larger sites will take longer to come forward than smaller greenfield sites.</p>	
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Wirral BC	<p>The ongoing status of the West Cheshire / NE Wales Sub Regional Spatial Strategy is unclear, following the abolition of the NW Regional Assembly. The analysis would need to be updated if its conclusions were to remain robust.</p>	<p>Noted. The Sub Regional Spatial Strategy was a key piece of evidence in informing the UDP. Even though it is now somewhat dated, it still forms an important strategic document alongside the Wales Spatial Plan in setting the scene for the LDP. With Wrexham progressing their LDP and CWAC progressing their Local Plan there is little likelihood of this piece of work being revisited. The Wales Planning Bill is moving towards a Strategic Development Plan and a series of Regional Development Plans and these will be the vehicle for looking at regional planning in the sub-region.</p>	No change
Mersey Travel	<p>The strategic direction set by the Plan should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion and help tackle climate change.</p> <p>Development should be focused on areas that are presently well served by existing, sustainable transport and the need to travel should be minimised, so as to allow walking and cycling to become much more prominent forms of transport in Flintshire. There should also be an expectation that developers should contribute to the cost of public transport in areas that are not well served by existing public transport services.</p>	<p>Noted</p> <p>Noted.</p>	No change
Topic Paper 8 – Economy and Employment			

<p>Nathaniel Lichfield & partners (on behalf of Bourne Leisure)</p>	<p>Disappointed that the Topic Paper does not refer to tourism uses as a form of economic development that contributes to the local and regional economy. Whilst agreeing that high value manufacturing is a significant economic contributor to the local area, it is also considered appropriate to refer to tourism due to its significant economic contribution. This approach is in accordance with PPW which states that economic development is more than just B1-B8 uses.</p> <p>Considers that the following addition should be made to the 'issues' section 'seek to preserve and enhance the areas tourist facilities to ensure that their important economic contribution is maintained and increased'.</p>	<p>Noted. The contribution of tourism to the economy is recognised in Topic Paper No. 18 Tourism. It is therefore suggested a cross reference to the Tourism Topic Paper is provided.</p> <p>In the light of the above, this is considered to be adequately addressed by the issues identified within the Tourism Topic Paper.</p>	<p>Add a new third paragraph in the 'Context' section with the wording 'Tourism also makes an important contribution to the local and regional and the issue of tourism is addressed in Topic Paper no 18 Tourism.</p> <p>No change</p>
<p>Redrow</p>	<p>Supports the general identification of issues in relation to the economy and employment provision.</p> <p>However, has concerns over the apparent disconnect between housing and employment land. The link between increasing housebuilding and increasing economic output is well known – 12 net new jobs (7 direct and 5 indirect) are supported when £1m is invested in house building annually. Therefore strange to see little information on how new housing can meet growing housing needs, but also generate jobs to increase living standards.</p> <p>When producing the LDP, the Council must set out a benchmark rate of economic growth over the</p>	<p>Noted</p> <p>The economic importance of housing is not disputed both in terms of supporting economic growth aspirations and direct / indirect impacts i.e. jobs, suppliers, services etc. However, it could be argued that the 'economic' contribution is more of a 'temporary' contribution, primarily through the construction phase. In this sense it does not have same lasting impact on the local economy as would more traditional forms of economic development. The approach to economic development in the Topic Paper is broadly in line with ch7 of PPW, and the latter does not specifically highlight the economic importance of housing. However, it is</p>	<p>Add a further bullet point in the Issues section 'Ensure that there is a close correlation between the economic growth aspirations of the Plan and the provision of housing'.</p>

	<p>Plan period. This must be underpinned by a sound economic forecasting model which takes into consideration socio – economic change and this rate of economic growth should be used as the benchmark for determining overall employment and housing needs. A strong link between housing and employment land needs to be prevalent in the economic policies of the Plan to ensure delivery of appropriate facilities to support that growth.</p> <p>Redrow is supportive of the principle of ‘over-allocating’ land for employment to ensure that there is sufficient flexibility to provide a variety of land uses. Policies should be put in place to easily change use class of employment sites subject to appropriate marketing and demand assessments.</p>	<p>considered that Topic Paper 8 could better set out the link between housing and economic growth.</p> <p>Noted. The Council will be seeking to identify an economic growth strategy over the Plan period which is based on a robust evidence base. There will then be a close correlation between this and the both the level and spatial distribution of housing across the County (see suggested addition to Topic Paper above).</p> <p>Noted. Whilst a case can be made for ‘over-allocating’ employment land in order to provide flexibility over a Plan period, the Plan need to take a more focussed approach to identifying the level of economic growth and the type of economic growth and how this translates into land requirements in terms of location, type, size etc. As part of this approach a detailed review has been undertaken of existing employment sites to assess whether they should be carried over into the LDP. In this context, there should not be a need for over-allocating to be undertaken to the same degree as previous plans. A policy addressing the</p>	<p>See above</p> <p>No change</p>
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		retention of employment sites is already included in the UDP and it is likely that a similar policy will be carried over into the LDP.	
Mersey Travel	Welcomes reference to the importance of the Deeside area in terms of economic growth with its Enterprise Zone and key sites such as DIP and Airbus. However, there must be good transport access to such employment sites. The Plan needs to highlight the importance of cross boundary transport improvements including the Borderlands line. An upgraded station at Hawarden Bridge is of critical importance to help serve DIP and also Hooton rail station (on the Merseyrail Electrics Wirral Line) has an important role as a rail hub for the DIP as well.	Noted. The importance of good transport accessibility to key economic sites is recognised and could be stressed more strongly in the Topic Paper.	Add new bullet Point in the Issues section 'Seek to improve accessibility to key employment sites via a range of means of transport'
Dwr Cymru Welsh Water	Welcomes the opportunity to work with the Council on a Infrastructure Needs Assessment and Delivery Plan as mentioned in the Topic Paper.	Noted	No change
Topic Paper 10 Population, Household Growth and Housing			
Cassidy & Ashton Group Ltd	A range of brownfield sites exist within or immediately adjacent to settlement boundaries and these can contribute towards addressing the identified shortfall in housing land supply. Category C settlements such as Coed Talon are sustainable and sustainable in terms of accommodating growth within the existing settlement boundary and within previously developed land and this approach is consistent with PPW.	Noted. This comment relates more to the spatial strategy Topic Paper than to this Topic Paper (see response to representations on spatial strategy topic paper by Cassidy and Ashton). Nevertheless, it is considered that the issue of brownfield land could be given more emphasis in this Topic Paper, but with a proviso that brownfield land is viable and deliverable over the Plan period. See response to representation by Cassidy & Ashton Group Ltd to Topic Paper no. 7.	That a further 'Issue' be added to the Topic Paper No.10 'the need to identify brownfield land alongside a range of greenfield sites which are viable and deliverable, and which are capable of contributing to maintaining a 5 year supply of land over the Plan period'.

<p>Cassidy & Ashton Group Ltd (on behalf of Whitley Group)</p>	<p>In respect of 'Issues to be addressed by the Plan', it is submitted that Mold, Buckley, Hope and Pantymwyn are sustainable settlements capable and suitable to accommodate future housing growth.</p> <p>Refers to recent Ewloe appeal decision and concludes that this makes clear that the shortfall in housing provision can only be addressed through the release of greenfield sites adjacent to settlement boundaries. Considers that land adjoining settlement boundaries and some land previously designated as green barrier are suitable to accommodate growth. Also comments that previously developed sites are suitable for immediate development, and this approach is consistent with PPW.</p>	<p>This comment relates more to the spatial strategy Topic Paper than to this Topic Paper (see response to representations on spatial strategy topic paper by Cassidy and Ashton on behalf of Whitley Group).</p> <p>The Ewloe appeal decision must be read in the context of addressing the present housing land supply deficiency. The Inspector considered that greenfield sites were more likely to be able to contribute to the next housing land study. In preparing the LDP, the Council must embrace a sequential site search to identifying housing allocations that incorporates the need to identify brownfield sites in preference to greenfield sites wherever possible, in line with PPW. The key is identifying an appropriate mix of brownfield and greenfield sites and this point is recognised in the suggested additional 'Issue' as set out in the previous response.</p>	<p>No change</p>
<p>Cassidy & Ashton Group Ltd (on behalf of Liberty Properties)</p>	<p>In respect of 'Issues to be addressed by the Plan', it is submitted that Penyffordd / Penymynydd is a sustainable settlement capable and suitable to accommodate future housing growth.</p> <p>Refers to recent Ewloe appeal decision and concludes that this makes clear that the shortfall in housing provision can only be addressed through the release of greenfield sites adjacent to existing settlements and that category B settlements have been determined as being suitable.</p>	<p>This comment relates more to the spatial strategy Topic Paper than to this Topic Paper (see response to representations on spatial strategy topic paper by Cassidy & Ashton Group Ltd (on behalf of Liberty Properties)</p> <p>The Ewloe appeal decision must be read in the context of addressing the present housing land supply deficiency. The Inspector considered</p>	<p>As above</p>

		<p>that greenfield sites were more likely to be able to contribute to the next housing land study. The Inspector addressed this issue against the argument of having regard to a site search sequence, whereby other sites, either in category A settlements, or poorer quality land on the edge of category B settlements, but considered that these were unlikely to come forward in sufficient time to make a contribution to housing land supply. The Inspector did not make the quantum leap that category B settlements per se, are appropriate for development, as advocated by the representor. Indeed, earlier in the appeal decision the Inspector noted the range of actual growth rates over the Plan period within each of the three categories of settlements. This is one of the reasons why a robust review of the settlement hierarchy is being undertaken based on the sustainability of each settlement to accommodate growth, rather than a generalised growth band being applied to every settlement (which brings with it an expectation that every settlement will grow).</p> <p>In preparing the LDP, the Council must embrace a sequential site search to identifying housing allocations that incorporates the need to identify brownfield sites in preference to greenfield sites wherever possible, in line with PPW. The key is identifying</p>	
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		an appropriate mix of brownfield and greenfield sites and this point is recognised in the suggested additional 'Issue' as set out in the previous response.	
Graham Bolton Partnership	<p>Does not consider that the statement 'Resisting the false argument that 'undelivered' UDP housing requirement should be 'added on' to the LDP' to be correct for the following reasons:</p> <ul style="list-style-type: none"> • The under or overachievement in meeting previously assessed and planned for housing requirements must be taken into account in assessing and planning for housing requirements in LDP's • The Topic Paper recognises there has been undelivered housing requirement from the UDP 	<p>The Topic Paper is making the point that the undelivered housing when compared against the UDP housing requirement, should not simply be added 'wholesale' on to the housing requirement for the LDP. However, it is accepted that any identified under provision should be considered as part of determining the LDP housing requirement figure.</p> <ul style="list-style-type: none"> • The UDP assessed a level of need for the period 2000-2015 having regard to population and household projections at that time, and taking into account a range of other policy considerations. Given the drastic change in economic circumstances during the latter half of the Plan period, it is questionable whether that level of need realistically still exists, given that i) developers were not building and ii) mortgage constraints were preventing potential purchasers from entering the market. The projected need identified did not materialise into a demand that could be met. The LDP must now provide for a level of housing which uses as its starting point the latest WG population and household forecasts as well as a range of other evidence and policy considerations. Whilst 	<p>Add a further bullet point to the 'sustainability based issues':</p> <p>'Ensuring that the previous under provision of housing is considered as one of the factors in informing the determination of the housing requirement figure'.</p>

	<p>and whether or not this has been as a result of the national economic situation, this has simply delayed the requirement for housing and suppressed household formation. The requirement or need has not gone away and it would be wrong to ignore undelivered housing requirement which is reflected in multiple occupation, higher house prices and a mismatch of requirement to type of housing due to undersupply.</p> <ul style="list-style-type: none"> • While projections are the starting point for assessing local housing requirements (PPW), such projections are forward looking only and do not pick up on existing or unmet requirements. PPW correctly identifies local housing market assessments (LHMA) as the mechanism for informing the 'quantification' of housing requirement, while the document identifies, amongst other things, existing development plans as one of the sources to take into account in assessing housing requirements and in the preparation of new development plans • The guidance on LHMA dates from Mar 2006 pre-recession. It defines 'need' narrowly, meaning those who require housing but are unable to provide for themselves without assistance – this is clearly not applied to the use of the word in the Topic Paper or PPW. The March 2006 guide recognises however, the need to take into account of the cumulative under or over-supply to meet housing 'need', initially requiring historical analysis including of potential concealed households. This clearly indicates that not taking into account the UDP underachievement in policies and quantification of the provision of housing in the LDP is not correct 	<p>there may be an argument for building in a higher level of flexibility allowance to have regard to the UDP under-delivery, this is a different concept from it being 'added on'.</p> <ul style="list-style-type: none"> • As set out above the Council is not ignoring previously unmet housing requirement, but is not prepared to simply add this on to the LDP requirement. • The Council will have regard to these and a wide range of other factors in determining the housing requirement figure in the LDP and is suggesting an amendment to the Topic Paper to make this clear. • The Council will have regard to these and a wide range of other factors in determining the housing requirement figure in the LDP and is suggesting an amendment to the Topic Paper to make this clear. 	
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	<p>The Topic Paper should be amended to reflect the need to take account of past underachievement in the UDP housing requirements if it is to properly inform and guide the assessment of housing requirement in the LDP.</p>		
		<p>The Council accepts the need to consider this as set out above.</p>	
<p>Hourigan Connolly (on behalf of David Mclean Projects)</p>	<p>The Topic Paper acknowledges that the current UDP has failed to deliver the identified housing requirement of 7,400 homes. It places the blame of failure to deliver upon the recession and resultant wariness of the housebuilding industry. This is overly simplistic and a thorough assessment of those sites which have not come forward or development is required in order to avoid reliance on those same sites to deliver new homes when they have already failed to do so.</p> <p>Factors which can affect the rate of delivery of housing on major and smaller sites can include:</p> <ul style="list-style-type: none"> • Time for securing outline, reserved matters, discharge of conditions • Time for appeals • Holding directions such as Highways Agency • Legal challenges • Site conditions – environmental issues and site remediation • Location – can affect availability of labour, materials and build programme 	<p>The Topic Paper does not acknowledge a failure of the UDP to deliver its housing requirement as the Plan has no direct control over delivery. It made sufficient provision to meet its housing requirement through sites that were considered by the Inspector to be suitable. The representor sets out a number of reasons why sites may not come forward for development either at all or at the rate envisaged and these are noted. The housing allocations in the Plan were assessed by the UDP Inspector who found that they were acceptable in planning terms and were based on them being promoted as genuinely available for development over the Plan period by land owners or developers. The fact that sites have not come forward at all or at the rate envisaged (with the exception of Northern Gateway which is a large site</p>	<p>No change</p>

	<ul style="list-style-type: none"> • Local market – demand for and supply of housing • Labour market – availability of skilled trades • Residential density • Type and number of house builders – national firms can generally build at faster rates than local firms • Land owner • Quality of design • Changes to schemes • Infrastructure requirements • Section 106 agreements • New policy requirements <p>Regardless of whether policy or the market is to blame, the identified need remains and any attempt to set that unmet need aside and start again from zero in the LDP, would be to argue that the previous target set out in the UDP was meaningless.</p> <p>The Welsh Government approach is to provide more housing of the right type and offer more choice. We agree that this cannot be achieved by simply having a large bank of sites. The challenge is to identify the right site that will come forward for development.</p> <p>In accordance with PPW, the latest WG household projections should form the starting point to assess Flintshire's housing requirement. Any unmet need from the previous period should be factored in to</p>	<p>with significant infrastructure requirements) is generally down to developers land banking sites in the expectation of improved economic climate or that owners have overinflated values for their land, rather than sites being 'constrained'. Furthermore, it is interesting to note that completions for the period up to April 2014 were 601 compared with an average of 319 over the previous 10 years. This is attributable to improving market conditions rather than to any overcoming of site constraints.</p> <p>It is not accepted that the UDP housing need remains in its entirety and neither is the Council arguing that the UDP housing need is meaningless. Rather, the Council considers that due to changing economic circumstances and the implications for land owners, developers and house buyers, the need as expressed at the beginning of the Plan period, has not translated into demand that could be met in reality. The preparation of the LDP gives the opportunity for the Council to robustly assess the housing requirement figure for the LDP plan period ie 2015-2030. There is no requirement in PPW for unmet housing from a previous Plan period to be added on to the new Plan period. Nevertheless, the Council, will have regard to the fact that housing delivery did not keep pace with the UDP requirement and look at options</p>	
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	<p>these numbers. This is not simply ‘adding on’ undelivered housing but ensuring that the identified need is provided for.</p> <p>In this context regard should be had to TAN1 through integrating the JHLAS and LDP process and consider carefully the deliverability of sites to maintain a 5 year supply of houses but to assist the delivery of homes across the new Plan period.</p> <p>The identification of new sites such as our clients site at Northop (NOR033), with few constraints to delivery is crucial to the process, particularly in Flintshire, where delivery has lagged behind the requirement, and currently a 5 year supply of housing land cannot be demonstrated.</p>	<p>as to how and to what level this can be addressed within the Plan requirement.</p> <p>The Council recognises the need to identify a range of housing allocation by location, type and size to ensure that this is both viable and deliverable within the Plan period.</p> <p>The Council accepts the need to consider this as set out above.</p> <p>A range of sites by location, size and type will ensure that delivery over the Plan period can be assessed to ensure the maintenance of a 5 year supply.</p> <p>PPW and TAN1 both highlight the requirement to (and the benefits of) aligning development plan preparation and JHLAS. However, TAN1 then goes on to prevent FCC from formally undertaking future JHLAS once the UDP is time expired. Furthermore, it offers no guidance as to how the Council can accurately measure land supply in the meantime.</p>	
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		<p>The identification of an ‘un-constrained’ site is not of itself sufficient support its inclusion in the Plan as it must also be accompanied by robust viability and deliverability evidence and intent. This site will be assessed alongside other Candidate Sites and against the emerging Plan Strategy to determine if i) Northop is a sustainable location for housing development and ii) this is a suitable site.</p>	
<p>NJL Consulting (on behalf of Rothschild Trust (Schweiz)AG)</p>	<p>There are various reasons why an undersupply of homes have been delivered in Flintshire compared with the UDP requirement, and that it is not simply a case of developers taking a cautious approach and / or landbanking sites’. When assessing the Plan strategy, the different reasons should be given consideration and an innovative approach to the LDP taken which responds to changing market conditions and positively promotes development.</p> <p>Page 2 of the Topic Paper identifies that population growth is slowing down in Flintshire in comparison with historic trends. Considers that this could well be a result of a lack of homes having been delivered in Flintshire over the lifetime of the UDP. It is logical to conclude that in areas with an undersupply of houses, fewer people are able to move into the area, and likewise those wishing to stay in the area may be forced to move away. The previous under delivery of houses should therefore be taken into consideration when setting a new housing requirement, and population trends should not be viewed in isolation.</p>	<p>Noted.</p> <p>It is unlikely that the under-delivery of housing against the UDP housing requirement, in the period of 15 years, would have resulted in the lower population and household projections produced by WG. These are not just the product of migration trends but also the balance of natural change i.e. births minus deaths. The trends in Flintshire show a slowing down of growth via natural change to the extent that there is little net positive change</p>	<p>No change</p>

	<p>Considers that the Satnam Millennium Ltd v Warrington BC high court decision should be afforded weight when determining the new housing requirement for the LDP. Mr Justice Stewart found that the assessed need for affordable housing had not been taken into full consideration with the objectively assessed need for housing in Warrington's Core Strategy. In this context it is insufficient merely to 'consider a communities need for affordable housing' as set out on p2 of the Topic Paper.</p> <p>Clarification is sought over the housing categories of 'small sites and conversions' and 'windfall's on p4. It is not clear why there is a differentiation between unplanned schemes of less than and more than 10 units as normally schemes of more than 10 units would be allocated in a LDP.</p>	<p>projected. This, coupled with an ageing population structure will impact on household formation rates and will not be affected by housing supply.</p> <p>The Satnam case refers to a challenge to the adoption of the Warrington Local Plan core strategy, where in a late stage in its preparation, a large mixed use development had been included and another site having its strategic site status removed. The High Court judge considered that the Council had erred in that:</p> <p>i) the assessment of full, objectively assessed need for housing had left out the substantial need for affordable housing and also failing to carry out an objective assessment of whether the housing land allocations in the plan would meet the area's need for affordable homes and ii) failing to carry out a SEA or sustainability appraisal in line with EU and domestic law</p> <p>The representor has misread the list of factors in the 'Role of the Plan', by not reading them as a whole. Whilst the seventh bullet point does refer to 'Consider a community's need for affordable housing in formulating its policies' the first clearly references 'Use the Welsh Government housing projections as the starting point for assessing housing requirements'. Furthermore, the reference to a 'communities need ...' is taken directly from advice in para 9.2.14 of PPW.</p>	
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		<p>The categories in the Topic Paper which comprise the Housing Balance Sheet are reflective of those used in the UDP. Further work will be undertaken to inform the likely contribution made by small and windfall sites based on past trend and an assessment of urban capacity. Until such assessment has been undertaken it is appropriate for the Topic Paper to raise the potential for housing delivery based on both small sites and windfalls.</p>	
Redrow	<p>The period of economic recession since 2007 has had a negative impact on the UDPs ability to deliver net new housing during its period and has resulted in an under-delivery of housing. It is therefore assuring that the TP proposes that housing is one of the main components that must be delivered in order to stimulate economic growth. However provides commentary on the sources of evidence that should underpin the LDP's housing needs:</p> <p>Neither the 2011 based household projection data nor the 2011 based population projection data should be the primary bases for the production of housing needs over the Plan period. There is an inherent flaw in the methodology of these datasets as they seek to project forward the trend over the previous 10 years over a 25 year period. This is flawed for planning future housing needs as Britain is only just starting to come out of recession. Therefore the 2011 datasets are artificially deflated due to the impact the recession has had on migration and household formation rates.</p>	<p>Noted. It is the market and development industry that determines the delivery of new housing, not the UDP. The role of the UDP was to make sufficient provision to meet its housing requirement, which it did. The Topic Paper though is not advocating that new housing by itself will stimulate economic growth. Rather, the Topic Paper is advocating that housing and economic growth are planned for in a complementary manner.</p> <p>The point about the limitations of the 2011 based projections being based on trend data which covers a period of recession has been clarified by a Ministerial letter.</p>	No change

	<p>It would seem logical for the Council to examine trends over a 15 year period in order to forward project over a 15 year period. This would also have the effect of reducing the impact of projecting forward recessionary trends. In addition to this there will need to be a degree of uplifting of the LDP housing needs to fulfil unmet demand that has not been met over the UDP period. This would also have the effect of factoring in the Council's desired increased level of annual economic output throughout the duration of the LDP period. Refute that claim that 'undelivered' UDP housing requirement being 'added on' to the LDP as being a 'false argument'. It is essential that the Plan provides for not only the future housing needs of the County but the existing and any unmet needs immediately in order to help achieve economic growth aspirations.</p> <p>When assessing housing land supply over the 5 year and Plan periods, the authority should have due regard to the recently revised TAN1. The authority should seek to conduct a review of all available and suitable land for housing over both periods to ensure that housing need during the short and long terms can be met effectively. Such a review should not rely on the assumptions found within the 2013 JHLAS as this was published in June 2014 and is almost 12 months out of date. The Council should conduct a new assessment of land supply over the Plan period, separate to the JHLAS process (and not utilising any of the assumptions within the JHLAS) to ensure that there is a deliverable supply over the duration of the Plan period.</p>	<p>It is accepted that the Council will need to test a number of scenarios for projections, based on different trends periods and data assumptions. For instance, one option is to utilise the earlier set of WG projections which showed a higher housing requirement for Flintshire. Also, different levels of economic development aspirations will be tested. However, as set out in earlier responses, it is not considered reasonable for the UDP unmet need to be simply added on, but for this factor to be assessed as part of the identification of the Plans housing requirement figure.</p> <p>The Council will undertake a robust assessment of existing housing land and will also assess Candidate Site submissions.</p>	
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<p>Emery Planning</p>	<p>The Topic Paper points to decreasing levels of population / household growth. However, consideration needs to be given to the underlying reasons which are not captured in a trend based assessment. For example, the chronic undersupply of housing has prevented households from forming, and is likely to have also influenced migration patterns. The Topic Paper refers to 'resisting the false argument that undelivered UDP housing requirement should be added on to the LDP'. Whilst it is not the case that unmet requirement should simply be added on to a new requirement, careful consideration must be given to what scale of housing is needed including unmet needs from previous years. Simply planning to meet future household projections can severely under-estimate the true scale of housing need and demand.</p> <p>Turing to the reasons that have influenced past under-delivery, we accept that the economic downturn and lack of mortgage availability has been a factor. However, it is wrong to suggest this is the main reason. The availability of deliverable land was not sufficient to meet the requirement pre-2008, which was a period of significant boom. Also the UDP allocated a number of sites which are not actually deliverable, compounding the problem. The Council has failed to take action to remedy supply to meet the UDP requirement, instead using the past build rates method to assess housing land supply (no longer acceptable under new TAN1). Whilst re-using previously developed land is a valid policy objective, doing so at the expense of meeting housing needs can result in severe, long term socio-economic problems.</p>	<p>It is not accepted that in absolute terms there is a chronic undersupply of housing. The JHLAS 2013 identifies a land supply of 4.1 years which is hardly 'chronic'. Data collected as part of the 2014 Study identifies completions of 601 for the preceding 12 months compared with average completions of 319 over the previous 10 years. This step change in completions is influenced by an improving local housing market rather than a chronic undersupply of housing. Indeed, if as advocated by the representor, the land supply shortage was so chronic, how could such significantly higher completions have been achieved?</p> <p>The Council accepts the need to consider the issue of under provision over the Plan period as set out in earlier responses.</p> <p>The representor has provided no evidence as to which UDP sites were not deliverable nor set out the reasons why. The UDP sites were all assessed by the Inspector in the light of objections and were supported to be included in the Plan, with the Inspector concluding that the Plans supply was sufficient to ensure a 5 year supply. In practice this did not happen, largely due to the economic downturn. The only site where the Council would freely admit that the level of delivery was optimistic was with the Northern</p>	<p>No change</p>
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	<p>Agree that careful consideration needs to be given to economic growth trends and policy. The level of housing growth needs to be carefully considered in the context of supporting planned economic growth and wider policy objectives.</p> <p>References are made to the 'significant landbank of housing land' and the 'relatively low level of housing completions despite the significant availability of housing land'. The simple fact is that much of the supply is not actually deliverable, either because it is not viable or due to other constraints. The LDP needs to provide a sufficient supply of housing, with sufficient flexibility to deal with sites not delivering. Recent delivery trends have shown that the amount of flexibility needs to be significant and much higher than 10%.</p>	<p>Gateway allocation, but even this has been compounded by the site subsequently having two developers and the development parameters changing considerably from that envisaged in the UDP. In terms of JHLAS, past completions have been used only as a comparison against the residual method of calculation. Given that many other authorities in Wales were allowed to measure land supply based on the past completions, on expiry of their UDP Plan periods or following abandoning their UDP's, the Council considered it reasonable, following expiry of the UDP for it to also be able to measure land supply using past completions which would have given it a 5 year supply. However, with the revised TAN1 this is clearly not now possible. In terms of previously developed land, the Topic Paper is not saying that it is focusing on brownfield land, at the expense of meeting housing needs.</p> <p>Noted.</p> <p>The representor has provided no evidence to substantiate the claim that much of the housing land supply is not deliverable, because it is not viable or because it has constraints. Further</p>	
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		commentary on this point has been provided in the response to Graham Bolton Partnership, with the recommendation that an additional point be added to the Topic Paper regarding flexibility.	
N.B. This Topic Paper needs to be updated generally to take into account changes since it was first drafted.			
Topic Paper 11 – Retailing and Town Centres			
Redrow	The Council should seek to maintain and enhance the quality of its town centres and retail offer. Whilst recognising the inherent benefits of promoting the re-use of derelict land and the diversification of existing buildings in town and village centres, it is important to recognise the benefit that development on the edge of towns can have on existing centres in stimulating regeneration.	Noted	No change
Topic Paper 13 – Landscape			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Endorses the Topic Paper as it considers the Flintshire landscape to comprise one of the key attractions for tourists and acknowledges that the natural landscape can bring economic benefits.</p> <p>Stresses that not all development has the potential to negatively impact on key landscape features, public views and open spaces. For example, a number of recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced landscaping and open space.</p>	<p>Noted</p> <p>Noted</p>	The title of the Topic Paper is incorrectly given as 'Landscaping' and should be amended to 'Landscape'.

	<p>Considers that the LDP landscape policies should acknowledge that due to the need for tourist facilities to be located near the coast there is a high probability that they will also be located in sensitive landscape areas. Even for sites in areas of landscape value, appropriate development can come forward, providing that commensurate mitigation measures can be implemented. An additional bullet point should therefore be added in the 'Role of the Plan' section with the wording 'Allow development in sensitive landscape areas where the development either neutrally or positively impacts on the designated landscape'.</p>	<p>The Topic Paper is concerned with 'Landscape' and the manner in which the LDP has regard to it in terms of designations and a suite of land use policies. It seems to be a sweeping generalisation that new tourist facilities need to be located near to the coast, particularly given the trends for short breaks in attractive inland locations, or as part of activity based experiences. It is also unclear what the representation means by 'sensitive landscape areas' as for statutorily protected sites there is clear guidance in PPW about planning within for instance AONB's. The likely policy framework against which proposals for tourism development will be judged is set out in the Tourism Topic Paper.</p>	
Topic Paper 14 – Rural Affairs			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Endorses the Topic Paper which seeks to permit appropriate tourism facilities, attractions and accommodation in rural areas. Tourist facilities form a crucial element of rural communities due to employment opportunities and spin off trade.</p> <p>However the following potential policy should be included 'Permit appropriate new tourism facilities, attractions and accommodation as well as the enhancement of existing facilities, attractions and accommodation'.</p>	<p>Noted</p> <p>The Topic Paper already includes within the list of potential policies 'Permitting appropriate tourism facilities, attractions and accommodation' and it is considered that this is sufficiently flexible to cover the enhancement of existing tourism.</p>	<p>n/a</p> <p>No change</p>
Topic Paper 15 - Energy			

Wirral BC	Supports the recognition that consideration of the cross boundary issue in relation to large scale renewable energy schemes will be an issue to the addressed by the LDP.	Noted	No change
Topic Paper 16 Transport			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	Emerging transport policies should recognise that due to the location of many tourist facilities and attractions, there is often no other feasible option other than the private car. Emerging policies should therefore be consistent with TAN18 ‘..in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific areas...’.	Noted. In terms of tourism, this is more appropriately included with the Tourism Topic Paper.	Include in the Issues section in Topic Paper 18 Tourism the following ‘in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific areas’.
Wirral BC	Supports the identification of improvements to the rail network (Wrexham – Bidston and NW Coast line) for local journeys and the potential for new stations in strategic locations, will be an issue to be addressed by the LDP.	Noted	No change
Mersey Rail	Cross boundary transport links are important for NE Wales and in particular its linkages with areas such as the Liverpool City Region.	Noted	No change
	<p>Network Rail’s recent Wales Route Study consultation document raised the potential for a rebuilt Shotton Interchange rail station serving both the Borderlands line and the NW Coast line. This should be referenced in the document.</p> <p>As highlighted in the TAIH RTP (2009) a rail freight terminal to serve occupiers of Deeside Industrial Park may be something to consider as this could improve its attractiveness to any new businesses wishing to locate in the areas especially if it has access off the NW Coast line.</p>	<p>Noted. This documents and its key findings should be added to the Topic Paper.</p> <p>Noted. Under the ‘Issues’ section, reference is made to ‘Improved rail freight facilities’ but this could be widened to include ‘particularly serving Deeside Industrial Park’. Reference should also be made to ‘and reviewing</p>	<p>Add reference to the Network Rail Route Study Report and its main findings.</p> <p>Add to 5th bullet point under ‘bus and rail’ the words ‘, particularly serving Deeside Industrial Park and reviewing the Shotton Rail Chord which is allocated in the UDP.</p>

	<p>Merseyrail and partners commissioned a demand study on the Borderlands line, completed on Feb 2015. The study outlines options for service enhancements on the line including extending the service to Birkenhead to facilitate better linkages to Liverpool and a major enhancement of Hawarden Bridge station to become an interchange for DIP. Hooton Rail Station has an important role as a rail hub for the DIP as well.</p> <p>Merseyrail and partners has also commissioned a demand study on the Halton curve, completed in Feb 2015. The study shows there is a strong business case for a rail service via the Halton Curve from Liverpool to Chester and beyond to Wales. This project is a capital scheme Merseyrail and its partners are hoping to take forward through the Growth Deal and would encourage Flintshire and other N Wales authorities to support the Liverpool City Region in lobbying the Welsh Government to ensure adequate provision is made in the new Wales and Borders franchise from 2017/8 for the Halton Curve service into North Wales.</p>	<p>the Shotton Rail Chord which is allocated in the UDP'.</p> <p>Noted. In the first bullet point under 'bus and rail' reference should be made to improvements to Hawarden Bridge Station to act as an interchange for DIP.</p> <p>Noted</p>	<p>Add to the 1st bullet point under bus and rail' the words 'e.g. improvements to Hawarden Bridge Station to act as an interchange for Deeside Industrial Park'.</p>
Topic Paper 18 Tourism			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Endorses the fact that the Topic Paper encourages sustainable development that brings considerable benefits for the local economy in the form of inward investment, employment and urban regenerations benefits. The economic contribution of tourism in Flintshire should not be underestimated and full details should be set out in the LDP.</p> <p>Endorses the Topic paper for setting out a clear policy direction for the provision and enhancement of well-designed tourist facilities. It is important that</p>	<p>Noted. However, it is not considered necessary for the LDP to set out full details about the economic contribution as this is clearly documented as part of background evidence.</p> <p>Noted</p>	<p>No change</p> <p>No change</p>

	<p>existing tourist facilities are given policy support to enable them to redevelop and improve.</p> <p>With regard to the proposed policy for Talacre, Gronant and Gwespyr area there should not be a blanket restriction on development within these areas. The policy should recognise that tourist facilities already exist in these areas and there will be a need to develop and enhance these facilities. If a policy is considered necessary for this area, it should facilitate each proposal to be considered on its merits.</p>	<p>Disagree. This policy approach is not a new one, as it is already encompassed within policy T4 of the adopted UDP which restricts further development of new static holiday caravan and chalet sites in the Talacre, Gronant and Gwespyr area. Policy T5 allows for the improvement / extension of existing sites. In her report the UDP Inspector commented 'The open character of the coast and sand dune system around Gronant, Talacre and Gwespyr has already been extensively affected by caravan site development and T4 seeks to restrict new caravan sites in this area. Because of the need to balance the tourism offer and the impact it can have on the landscape and wildlife value of the coast I consider this to be reasonable'. The policy allows for the improvement / extension of existing sites within this area. The Topic Paper is merely referencing the need to review this policy approach.</p>	<p>No change</p>
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Appendix 10

Further Call for Sites Letter Dated 30th June 2017

Ref: LDP/MIN
Date: 30th June 2017
Martha Savage

Telephone: 01352 703298

Email: developmentplans@flintshire.gov.uk

Dear Sir/Madam,

RE: MINERALS AND WASTE FURTHER CALL FOR FLINTSHIRE LDP CANDIDATE SITES

Flintshire County Council is currently preparing a Local Development Plan (LDP) for the County. The LDP will guide development in the County and once adopted will supersede the Unitary Development Plan as the development plan for the area.

As part of the evidence gathering to inform the LDP the Council issued a 'Call for Candidate Sites' in February 2014 inviting the public, landowners and developers to submit details of sites that they wish to be considered for any use or reuse, which includes minerals. Details of the 'Call for Candidate Sites' can be found on the Flintshire County Council website: www.flintshire.gov.uk/ldp

In order that we have sufficiently representative options to consider for the minerals and waste sector, we are extending a further call for sites but only in these areas. Therefore could you please submit potential minerals and waste sites and include the following information:

- Prospective waste sites, including potential extensions to existing sites;
- Prospective extraction sites, including potential extensions to existing sites;
- Areas/locations/sites which should be protected from non-mineral development due to the presence of underlying mineral;
- Areas which should be protected from sensitive development due to the presence of existing mineral extraction;
- After uses for mineral sites;

All submissions should be accompanied by a Candidate Site Submission Form, which is available from the Council's website, and an up to date plan of the site with the site edged with a red line and any adjacent land within the same ownership in blue. **Please provide the details by 11/08/2017.**

In relation to minerals, the following should also form part of the submission:

- For aggregate minerals, how the North Wales Regional Aggregate Working Party Regional Technical Statement First Review has been taken into account;
- For non-aggregate minerals: Need of the industry for the mineral concerned;

In relation to waste, the following should also form part of the submission:

- For disposal and recovery operations, need for the facility concerned, as demonstrated at the regional level.

If you have questions regarding minerals and waste and the LDP please contact me.

Yours faithfully,
Martha Savage (Senior Minerals and Waste Planning Officer)

Appendix 11

Key Message Document Consultation Letter

Flintshire Local Development Plan

Key Messages: Setting the future direction for the Plan – Tell us what you think

I am writing to inform you that as part of the ongoing preparation of the Flintshire Local Development Plan, the Council will be consulting on the above document.

The document sets out the 'Key Messages' for the Plan in terms of the vision for the Plan, the issues to be faced by the Plan and the objectives for the Plan. The intention of the consultation exercise is to ensure that a range of stakeholders, including the general public, are comfortable with the direction that the Plan is heading in.

The document also presents work relating to a survey of settlement services and facilities which examines the sustainability of each settlement. This has informed a review of the approach taken in the UDP regarding settlement categorisation. The consultation therefore seeks views as to whether the approach taken in the UDP is still fit for purpose or whether one of the alternative approaches presented is more appropriate.

The document will be the subject of a 6 week consultation exercise commencing on 18 March and ending at 5.00 on 29th April 2016. The consultation documents include the Key Messages document itself and the supporting settlement audit reports. The Key Messages document comprises three elements:

- The covering section with pre-set questions and answer boxes
- Appendix 1 - sets out the methodology for assessing the sustainability of settlements
- Appendix 2 - sets out several different approaches to settlement categorisation

Supporting the Key Messages document, and in particular Appendix1, is a suite of individual Settlement Audit Reports for each of the settlements surveyed.

The documents will be available on the 'Local Development Plan – Flintshire' webpage and in hard copy at Council Offices, Connects Offices and libraries during normal opening hours.

Your feedback and comments on this document are welcome and should be forwarded to developmentplans@flintshire.gov.uk

Comments arising from the consultation will be reported to Planning Strategy Group and consideration will be given to amending the document where appropriate. This will assist the Planning Strategy Group in considering the formulation of growth and spatial options which will be consulted upon later this year.

Any queries can be directed to the LDP helpline 01352 703213 or by using the e-mail address above.

Yours sincerely



Chief Officer (Planning and Environment)

Appendix 12

Strategic Options - Growth and Spatial Options Consultation Letter

Dear Sir/Madam,

Flintshire Local Development Plan

Strategic Options - Growth and Spatial Options

I am writing to inform you that as part of the ongoing preparation of the Flintshire Local Development Plan, the Council will shortly be consulting on the above document.

This consultation follows on from, and is informed by, the recent consultation on the Key Messages document. The Key Messages document consultation enabled the Council to firm up the vision for the Plan, the issues to be faced by the Plan, the objectives for the Plan, a preferred settlement hierarchy and the key messages emerging.

The Strategic Options document considers the Growth Options for the Plan (the amount of growth to be provided) and Spatial Options (how growth is to be distributed across the County). The outcome of the consultation will help the Council to draw up a 'Preferred Strategy' for the Plan which itself will be subject of a further consultation in the form of a pre-deposit consultation draft Plan.

The 6 week consultation exercise will begin on Friday 28th October 2016 and end on Friday 9th December 2016. The documentation includes:

- A summary leaflet
- An easy read version of the main consultation document
- The main 'Strategic Options' consultation document
- A comments form

Documents will be available on the website www.flintshire.gov.uk/ldp and will available in hard copy at Council Offices and libraries, during normal opening hours. An exhibition will be at County Hall for the duration of the consultation period and also at the following locations, during normal opening hours:

- County Hall, Main Reception – 28/10/16 to 09/12/16
- Buckley Library, Upstairs Gallery – 28/10/16 to 18/11/16
- Deeside Leisure Centre – 28/10/16 to 18/11/16
- Holywell Library – 28/10/16 to 18/11/16
- Broughton Library – 18/11/16 to 09/12/16
- Flint Library – 18/11/16 to 09/12/16
- Mold Library – 18/11/16 to 09/12/16

This is an important stage in preparing the Plan and as part of our continuing engagement and consultation on the Plan we want to hear your views about the level of growth you think is appropriate for the County and how that growth should be distributed across the County. Comments can be made:

- By e-mailing developmentplans@flintshire.gov.uk
- By downloading or printing the comments form and returning it

- By writing a letter

Comments arising from the consultation will be reported to the Council's Planning Strategy Group and will inform the preparation of the Preferred Strategy for the Plan. A summary of comments received during the consultation event and responses to them will be made available on website in due course.

Any queries can be directed to the LDP helpline 01352 703213 or by using the e-mail address above.

Yours sincerely,



Chief Officer (Planning and Environment)

Appendix 13

Equalities Impact Assessment

EIA Quality Assurance Group Meeting

Wednesday 30th July 2014

Present

Steph Aldridge	Melanie Williams
Moirra Owen	Jenny Anne Bishop
Bryan Harrison	Fiona Mocko
Karl Wainwright	Cllr Veronica Gay
Andy Roberts	Gill Stephens

Apologies

Shamima Chowdhury

Overview of the LDP (Local Development Plan)

The LDP is a 15 year plan and is due to be renewed in 2015.

Main issues discussed

- More affordable homes required in Flintshire
- More suitable homes required in terms of pensioner bungalows or flats that have lifts to upper floors
- More 1 or 2 bedrooms properties for couples, small families and single people.
- Take up of empty homes to be extended
- Issues with children in their 30's still living with parents as there cannot afford a mortgage or rent
- Gypsy and Traveller children that have grown up and require their own caravan and pitch.

Issues

- A demand profile would need to be completed to determine what homes are required within the area

- Risk assessment should be carried out to ensure that Welsh Language speaking communities are maintained
- EIA's should be completed before planning permission is given also a copy of the EIA to be given out before they go to the Planning Committee

Other EIA's to be seen

Leisure centres & libraries reviews to be seen on any proposed alterations to services

EIA for online Council services as there would be an issue for access to the internet if there was any alterations or closures of libraries and this is the only access some people have to a computer. Online services could also pose a problem for elderly people who may have never used a computer before.

EIA Quality Assurance Group Meeting
Monday 18th May 2015
Video Conference Suite
2pm

Present

Steph Aldridge	Fiona Mocko
Mel Williams	Jenny Anne Bishop
Christy Jones	Vicky Weale
Jen Griffiths	Bryan Harrison
Gill Stephen	

Apologies

Cllr Veronica Gay

Christy Jones – Planning Officer Community Services

Development Extra Care Facility – Holywell

- Llys Jasmine in Mold and Llys Eleanor in Shotton are for people over the age of 65 and are apartments and it is a tenancy arrangement
- Two similar facilities to be Developed in Flint and Holywell
- Location is to be by Holywell Hospital but could be possible parking issues
- Location was difficult due the landscape of Holywell (Most of the town is located on a hill)
- Training for staff is included and does have both qualities and Welsh Language
- Question regarding access to older people with learning disabilities. Christy said that there was a task group set up regarding eligibility criteria but there could be issue because people with Learning disabilities have links with their area of the service depending on their needs.
- Training on the Welsh Language is essential as older people who are Welsh Speakers as a first language would be more than likely to revert back to the first language if struggling with dementia
- There is a report available on the Internet from Australia and the needs of Trans people.
- Staff awareness of differences of the community in regard to Protected Characteristics – i.e. Gypsies & Travellers
- All couples are agreed with tenants and service provider.
- Information on the “Welsh Language Pod” to Gill – Christy to send information
- BPH said development of a “Fishing Pod” would be a good idea as a lot of people from Flintshire fished on the River Dee.
- Any comments to be send to Christy before the end of May.

Learning Disabilities – Short Term Care

- Provides respite care for families of people with learning disabilities
- Current three houses are open and proposals are to shut Orchard Way facility

- However there will be extra capacity in the remaining two homes to take people who would have used Orchard Way
- Proposal for Orchard House to go from Child to Adult resource to give adults skills for independent living and whilst there the people will have a tenancy arrangement.
- Meeting arranged for people who have an interest in the new service for Orchard Way with idea due to be held on 30th May 2015.
- Consultation event regarding short term with Service users, families and staff to allay any fears and that there are other options to limit the impact.
- In terms of Welsh Language Community services operate the “More than just words” scheme
- Language Line is used if need to communicate with a service user who uses a Language other than English or Welsh.
- Assessment are person centre to ensure that the service is adaptable.

Learning Disability - Supported Living Houses

- There will be some support at these facilities but it is mostly a tenancy.
- There will be re-assessment of all people – people with complex needs may need to source another provided other than Flintshire County Council.
- Quality Standards of Care and monitoring are done by Flintshire County Council
- Flintshire County Council would not go for the cheapest option but would look to the provider with the best value in terms of care.
- Ensure Equality and Welsh Language are part of any proposal

Local Development Plan (LDP) – Vicky Weale

- Brought the document with 734 applications that can be viewed on the website for people to see.

Next meeting

- TBC
- Jennie Williams – Education Schools Modernisation

Appendix 14

Key Stakeholder Forum Minutes

Friday 27th February 2015 – Alyn & Deeside Room Attendees

Name	Organisation	Table
Brian Coleclough	FUW	4
Chris Martin	Clwyd Powys Archaeological Trust	4
Gerry Kitney	50+ Action Group	3
Ann Woods	Flintshire Local Voluntary Council	3
Ashley Batten	CADW	4
Mike Moriarty	CPRW	4
Catherine Morgetroyd	Cheshire West and Chester	3
Andrew Frazer	Wirral MBC	3
Sharon McCairn	North Wales Police	3
Danielle Royce	Wales and West Utilities	2
Steve Jackson	Coleg Cambria	2
Alan Roberts	Leisure Services FCC	2
Nia Lowe	Scottish Power	2
Louise Edwards	Scottish Power	2
Adrian Barsby	Flintshire Tourism Association	1
Mike Pender	HBF	1
David Johnson	Betsi Cadwallader Health Board Trust	1
Linda Sharp	Wrexham BC	1
Dewi Griffiths	Welsh Water	1
Mark Billing	Dee Valley Water	4
Bryn Bowker	Denbighshire CC	4
Chris Nott	North Wales Fire and Rescue Service	3
Niall Waller	Economic Development FCC	2
Apologies		
Colin Brew	West Cheshire and North Wales Chamber of Commerce	
Sue Maughan	Sport Wales	
Christine Artus	Flintshire Tourism Association	
Richard Grundy	Airbus	
David Adams	Airbus	
Angharad Crump	NRW	
Tony Hughes	Clwydian Range & Dee Valley AONB	
John Roberts	Ramblers Association	
Heledd Cressey	WG Planning Directorate	
Nicola Corbishley	Wrexham CBC	

Presentation

Andy Roberts (Planning Strategy Group) introduced the FCC Policy present and all participants introduced themselves. Andy Roberts went through briefly the purpose of the

first meeting of the KSF and sought clarification from participants that there were no concerns about the terms of reference for the Forum. A presentation then followed about the LDP based on the following headings:

- What is the LDP?
- Purpose of the LDP
- How does the LDP differ from the UDP?
- Decision making and the role of the Forum
- LDP key stages
- LDP programme and timetable
- Where are we up to?
- Candidate Sites
- Capacity to deliver the LDP
- Key challenges in delivering the LDP
- What next
- Lessons and learning

Workshops

Andy Roberts introduced the workshops which sought to sesurte feedback on Officer / Member work in terms of a vision for the LDP, the issues facing the LDP and the objectives for the LDP. The issues and objectives had been grouped under 3 broad headings based on the key components of sustainability i.e. i) enhancing community life, ii) delivering growth and prosperity and iii) safeguarding the environment.

Workshop 1 – Vision

‘The LDP is about people and places. It seeks to achieve a sustainable and lasting balance which provides for the economic, social and environmental needs of the County through realising its unique position as a regional gateway and area for economic investment whilst protecting its strong historic and cultural identity’.

Table 1

- OK so far as it is able through the planning system
- Identifying and enhancing the role of settlements
- Capacity for growth
- Little emphasis on rural
- Gateway – can work both ways

Table 2

- Should the vision open with ‘people, places and land’?

Table 3

- Could be more locally distinctive

Table 4

- Opens with ‘people and places’ but then talks about places more than people
- Include natural environment in the last line
- Could include welsh language

Workshop 2 – Enhancing Community Life (issues and objectives)

Table 1

- Objectives missing anything on rural hinterland
- Definition for ‘district’ centre
- How would the Plan facilitate transport and utility infrastructure?

Table 2

- Objective 8 - Strengthen town centre roles as social hubs and service centres
- Objective 8 - Diversifying town centres
- Objective 4 could include opportunities / scope for community renewable energy projects

Table 3

- Emphasised the importance of links to other visions, strategies etc Table 4
- Objective 1 - Considered it was unclear what constitutes ‘communities’
- Objective 1 - Questioned phrase ‘mix of services and facilities’ – ‘appropriate’ might be better
- Should be more focus on ‘regeneration’.

Workshop 3 – Delivering Growth and Prosperity (issues and objectives)

Table 1

- Objective 12 - Concern about the use of ‘appropriate’ as this is subjective
- Objective 9 - Agree with directing growth to viable and deliverable sites
- Objective 6 - Concern re specifying ‘skilled high value employment’ – why not a range of employment?
- Objective 7 - Support regarding economic driver – possible include reference to ‘gateway’
- Possibly include reference to other infrastructure eg schools and health Table 2
- Objective 12 could refer to ‘visitor’ rather than ‘tourism’ i.e. a broader view Table 3
- Objectives 6/7 - Are these underselling Flintshire as the County is already an established economy

Table 4

- Objective 6 should refer to a 'balanced' economy rather than 'diversification'
- Objective 6 - All lps trying to achieve skilled jobs – how realistic?
- Objective 8 - Importance of accessibility to town centres
- Objectives 9 and 10 re housing could be merged.

Workshop 4 – Safeguarding the Environment (issues and objectives)

Table 1

- The need to be locally specific in terms of key environmental features
- Identifying what is unique about Flintshire
- Managing recreational and tourism pressures with the environment Table 2
- Objective 18 – questions the use of 'where appropriate'
- Objective 13 – should 'effects' of climate change be replaced with 'impacts'?

Table 3

- Objective 13 – promote development which respects village 'character' Table 4
-
- Considered 'historic' environment should be included in issues.

Closing remarks

Andy Roberts closed the session and stressed that any additional comments / feedback from the workshops would be welcomed. He advised that notes of the meeting would be discussed by Council's Planning Strategy Group before being placed on web and circulated to participants.

LDP Spatial Options – Key Stakeholder Forum

Notes meeting - Alyn & Deeside Room - 12/10/16

Attendees

Colin Everett, Chief Executive Officer

Andy Roberts, Service Manager, Strategy

Elwyn Thomas, Planning Aid Wales

Officers: Ste James, Adrian Walters, Sandie Lloyd, Vicky Weale, Glyn Jones, Eleanor Carpenter.

Tony Hughes – AONB Joint Advisory Service,

Mike Pender Anwyl Homes and Mark Waite Bloor Homes - Home Builders Federation

Carolyn Fleming and Catalina Peters – Airbus

Mike Moriarty - Campaign for the protection of Rural Wales

Lara Griffiths and Luci Duncalf - Denbighshire CC

Gill Smith – Cheshire West and Chester

Gerald Kitney – 50+ Action Group (Flintshire)

Steve Jackson - Coleg Cambria, Deeside

John Roberts - Ramblers Association Wales

Linda Sharp - Wrexham County Borough Council

David Harding - Mineral Products Association

Andrew Frazer Wirral Metropolitan Council

Dewi Griffiths - Welsh Water/ Dwr Cymru

Niall Waller - Regeneration Flintshire County County

1. Introduction

AR gave an overview of the LDP, setting out the need to establish the core of the plan and to decide upon an amount of growth and the distribution of that growth.

ET (Planning Aid Wales) introduced a discussion on ‘context’ and ‘roles’ asking why are we all here? That we need a range of views from different sectors to get a good understanding of the issues in the county.

Sustainable Development

AR set out the need for the plan to deliver Sustainable Development.

ET introduced a subsequent discussion on Sustainable Development (SD). Participants put forward their understanding of what elements made up SD :-

- **The plan needs to protect and develop land and get that balance right.**
- **Enough land must be available for houses to provide for the broad range of society’s needs.**
- **Brownfield land should be built on before greenfield sites.**
- **Wrexham and Flintshire are seen a hub for economic growth that is emphasised in the Regional Economic Plan and so a regional housing plan is also needed.**

ET grouped these under the three ‘strands’ of sustainability which are

- economy,
- community
- and environment.

ET stressed the need to have regard to this in preparing the Plan.

AR outlined the progress which had been made on the LDP so far; the Delivery Agreement, Call for Candidate Sites, Key Messages and Settlement Hierarchy options.

The outcome is that we have;

- agreed the vision, issues and objectives,
- agreed the key messages,
- agreed the 5 tier settlement hierarchy.

AR briefly set out how each of the growth option had been calculated. Option 1, using Welsh Government statistics, Options 2 and 3 using population forecasting statistics taken from a period of recession and Options 4 and 5 took statistics from a period of economic growth. Option 6 was a ‘reverse engineered approach’ starting with a figure for employment creation and using that to estimate how much new housing would be needed to support that figure. A range of options have been created which are realistic and based on sound evidence.

2. Workshop – Growth Options

ET explained a workshop looking at growth options. Members split into groups on 5 tables and were assisted by Policy Officers in reviewing the 6 growth options.

Feedback:

Following the workshop discussion, each group reported back on which were the most appropriate Growth options and finally which was the Preferred Growth Option. One group felt that option 3, 6 and 4 were realistic options but that they preferred option 6. This was reflected in the other group’s feedback whereby options 4 and 6 were all noted as the preferred options. The groups felt that the mid-range was more likely, realistic and therefore achievable and that the same final figure had come from two different ways of calculation.

Preferred Growth Options

- Option 6 - 6,550 to 7,350 houses (440-490 houses per year)
- Option 4 – 6600 houses (440 houses per year)

3. Workshop - Spatial Options.

AR briefly discussed how initially 10 Spatial options were considered how this was cut down to 5 realistic Spatial options:

- Option 1 - Proportion Distribution
- Option 2 - Focused Urban Growth
- Option 3 - Growth Area

- Option 4 - Hubs and Corridors, along transport routes.
 - Option 5 - Sustainable Distribution plus Refined Approach to Rural Settlements
- Diagrammatical map illustrated each option.

ET facilitated a workshop looking at spatial options. Each table looked at a single spatial option, participants were asked to consider the good and bad points of each option.

Feedback:

Option 1 - Proportion Distribution

- Pros - spreads the benefits, very prescriptive/ certain (planning by numbers).
- Cons - not deliverable, not SD driven, spreads the pain

Option 2 Focused Urban Growth

- Pros – aligns well with existing employment plan and infrastructure, maintains protected landscapes, sustainable transport system, brownfield sites.
- Cons – won't sustain smaller settlements or meet rural housing needs.

Option 3 Growth Area

- Pros – Most Sus dev option existing transport and infrastructure,
- Cons – inflexible, misses large towns outside the growth area, misses small rural villages lots of pressure.

Option 4- Hubs and Corridors

- Pros – some commuting choice, can the Plan strategy align with national infrastructure strategy?
- Cons – too dispersed, not aligned with employment sites, are corridors at capacity, inflexible.

Option 5- Sustainable Distribution plus Refined Approach to Rural Settlements

- Pros – aligns with economic growth agenda, takes account of settlement diversity, range of housing sites, flexible, deliverable, potential to conjoin Options 5 and 4?
- Cons – could lead to unbalanced growth.

AR finalised the meeting by outlining the next steps of the consultation exercise Town and Community Councils meetings to be held 21st, 24th and 25th October and a public exhibition to be displayed in the main libraries in the county from 28th Oct to 9th December.

AR also thanked everyone for their contribution and stated that he would send the notes of the meeting to all attendees.

Meeting Notes 15th November 2017

LDP Spatial Options – Key Stakeholder Forum

Notes meeting - Alyn & Deeside Room – 15/ 11 /2017

Attendees

Andy Roberts, Service Manager, Strategy
Officers: Adrian Walters, Vicky Weale
Martha Savage FCC Minerals
Lesley Bassett FCC Housing Strategy Officer
Cllr Chris Bithell FCC Cabinet Member for the Environment
June Brady - Flintshire Local Voluntary Council
Rachael Byrne - Regeneration Flintshire County County
Andrew Frazer - Wirral Metropolitan Council
Lara Griffiths - Denbighshire CC
Barry Harrison - 50+ Action Group (Flintshire)
Nick Horsley - Mineral Products Association
Tony Hughes – AONB Joint Advisory Service,
Steve Jackson - Coleg Cambria, Deeside
Jami Jennings – North Wales Fire and Rescue service
Alice Jewer – Natural Resources Wales
Chris Jones - Betsi Cadwaladr UHB
Andrea Mearns - One Voice Wales
Mike Moriarty - Campaign for the Protection of Rural Wales
Meryl Read - Natural Resources Wales
John Roberts - Ramblers Association Wales
Mike Roberts - Beech Homes Home Builders Federation
Richard Roberts - Aura Leisure
Linda Sharp - Wrexham County Borough Council
Zoe Wilkinson - Pegasus Group

1. Introduction

AR gave an overview of the LDP, setting out previous consultation over the past 2 years. He outlined the last consultation was on the Strategic Options the feedback from which helped to formulate the preferred strategy.

Presentation. Following the presentation by AR he asked for any questions or comments.

Q - What will be the effect on the emerging National Development Framework ?

AR- The NDF will be a broad planning framework which, it is envisaged the LDP will conform to, the LDP will be subject to review once it has been adopted if there are any changes to national policy, they can therefore be accommodated. The same goes for any changes to the guidance in Planning Policy Wales.

AR- the Delivery Agreement has been reviewed and the Welsh Government are keen to see us make progress and get a plan in place so we would hope they would let us know early on if national policy is revised or if the plan needs to be revised.

Q - Poor broadband connections mean that it is difficult to download the Preferred Strategy document, is there anyway a PDF version can be sent.

AR- we are hoping that people will use the online consultation portal to make comments but we can send you a PDF version if needed.

Q - A major concern is Northern Gateway, with 1300 new houses that is approx. 3000 more people who will be directed to a total of 1.5 existing GP's'. People currently cannot get an appointment for clinical services. What have Welsh Government to say about that?

AR - BCUHB will need to plan for healthcare alongside the LDP, they are part of the KSF and have been aware all along of what level of housing to expect over the next 15 years.

Q - it is an essential element of any plan to ensure there are proper clinical services available.

AR - We do talk to WG all we can do is raise the issue, it is up to the Health board to address.

Q - It is true all over the UK that there is a shortage of GP's

AR - Facilities may be provided and land use allocations made, planning can only do so much, the main problem is a shortage of health care staff.

Q – Strategic Growth will be driven by the demands of the market so developers will only want to build in high value areas, how do you direct developers to build houses in other areas? According to one of the background document you produced with the Preferred Strategy it says Inward migration is low, so the new houses are for people from within the County. Higher levels of dissatisfaction with where people live is seen in some places. Garden City shows a high level of dissatisfaction, a large new development is likely to change the dynamics of the community.

AR- Developers are important stakeholders in the planning process, background studies around viability will be useful. If we allocate in marginal areas, in order for a scheme to be viable there may need to be a reduction in developer obligations to reflect that.

Q – so you do have powers/ mechanisms to make sure housing is delivered in places which are not so marketable?

AR - yes. There is a relatively small portion of the 7,400 which will be on new sites.

Q - Pleased to hear that you do have some levers with developers.

AR- the planning system tries to encourage the development of those UDP sites which are not attractive to the market but we also need to allocate viable sites and demonstrate a 5 year housing land supply.

Q - health care provision and schools are important, Broughton Primary School there were 17 children who could not get into their local school.

AR- there is a policy available to require developers to make a contribution to school places to increase the capacity or provide additional resources. Also the Education Authority should be taking the LDP into account and plan for the future.

Q- Ramblers - development should take a more proactive approach to environmental groups. Particularly Rights of Way, the health benefits of walking along public footpaths should be considered in the plan, developers should not just look at the profits but look at the community benefits of proper access to recreational activities. There has been some success but Construction Management plans should be used more.

AR- the plan will have an integrated approach to green environments, looking at open space, greenspaces and pathways. The policy context has to be right and the preferred strategy does include policies on rights of way.

Q - there are many Amber sites in the Preferred Strategy candidates sites plans, can you say what are all the constraints ?

AR- These amber, red and green are chosen with high level criteria. We have just flagged up which sites adhere to the PS, the red sites will not go forward but it does not mean the green or amber sites will be allocated either.

Appendix 15

50+ Action Group Meeting Notes 16th March 2015

Older Peoples Association Building, Cable Street, Connah's Quay.

Presented by Vicky Weale and Russell Price

Chairman Gerry Kitney

Ella Jackson Engagement Worker for Older People Flintshire & Wrexham Online Watch Link Association

Approx 12 people attended

VW gave a brief talk on the LDP - what is the LDP, Purpose of LDP, Key Stages, Brief outline of the work programme, what we have done so far, the Candidate Sites Register, Key Challenges i.e. level of growth, spatial distribution of growth, provision of infrastructure, what next.

Comments which were made.

Public Transport is an important issue as older people rely more on buses and trains. The bus network in parts of the county is totally inadequate.

The population is becoming older how will the plan deal with that? There will be a greater need for **medical services** and there is no main hospital in the County. People have to go to Bodelwyddan or Wrexham. Looking at the large development at the Airfields Sealand where are the facilities for that.

Response - Deeside has a good range of facilities such as schools, hospitals, shops and particularly employment opportunities Deeside Enterprise Zone.

On the issue of consultation, mention was made of unhappy residents not being consulted at Bagillt where speed bumps have been laid down along the High street. The residents were not asked and they do not want them.

Response - we are here now, consulting you on the LDP.

An empty office building at Ewloe was also mentioned, and a question - why is the green space in front of the Unilever building being developed when the Unilever building is standing empty and is being vandalized.

Response - The site at Ewloe had been earmarked for development for a number of years.

In Denbighshire the residents at Bodelwyddan did not want to have a large site allocated in their village but the Welsh Government wanted it so it went through, it doesn't matter what the public say .

Population projections show that in the next 15 years there will be an increase in the elderly population plus a figure for immigration and a figure for the birth rate level how will the plan deal with the changes to population make up?

Response - For the LDP we are evidence gathering at the moment, i.e. a Housing Occupancy Survey is about to be carried out, a Flood Risk assessment, a Local Housing Market Assessment with Wrexham has been completed which will help make these decisions about where employment, new community facilities and new housing should be located. All these issues need to be taken into account and we need to make sure enough

land is made available to develop the different land uses to provide for all needs. The growth strategy may need to include a level of housing which will help to build the economy.

Education was also mentioned - the importance of having a population with access to decent education with enough school /college places to create an educated workforce.

Main Issues

- Better Public Transport links
- Ensure there are adequate Medical Facilities
- Take into account population changes
- Ensure there are adequate Education facilities

Appendix 16

Planning Aid Wales Workshop Notes 23rd September 2016

LDP Spatial Options - Member Training Event

Alyn & Deeside Room - 23/09/16

Notes and Feedback

Colin Everett (CE) Chief Executive Officer

Andy Roberts (AR) Policy

Elwyn Thomas (ET) Planning Aid Wales

CE set the scene for the meeting by commenting on the importance of the LDP as a strategic document for the County. Talked about the on-going regional discussions re growth and the need for jobs and housing to be provided for. Also commented on Welsh Government work in looking at growth across Wales as part of strategic planning projects. Stressed the need to have regard to the bigger picture.

AR gave an overview of the LDP, setting out the need to establish the core of the plan and to decide upon an amount of growth and the distribution of that growth.

ET (Planning Aid Wales) introduced a discussion on 'context' and 'roles', emphasizing the need for Members to raise their 'gaze' from local issues to higher level strategic issues. He identified a number of points:

- A broader role not a constituency role
- Thinking about higher level strategy
- Leaving the T&CC's to think about local, more parochial matters
- The difference between development planning and development management
- The value of thinking about issues at County level rather than local level (e.g. affordable housing)

Discussion questions from Members included, 'Why not consider an even wider area of North Wales?

AR in agreement, barriers to our borders are not helpful in encouraging employment etc.

A member, stressed the need to supporting infrastructure and facilities for the elderly and that Chester hadn't taken their fair share of housing development in the past. AR explained that Cheshire West and Chester (CWAC) were now looking to provide for their own housing needs and had released some areas of green belt for this.

It was recognised by one member that housing was needed for employment and economic growth.

One member asked, 'what was the Developers' role in this process?

ET replied the developers are the "Doers" whereas the LPA are the 'gatekeepers'. All play an important role in the process.

Concern was expressed by a member, will we have enough education and healthcare to accommodate extra growth?

AR responded that this same process is being gone through with the Key Stakeholder Group, including the Education and healthcare providers.

One member asked what about NIMBYs?

ET advised, we must manage them as part of the LDP process, with early engagement and trying to achieve a consensus.

One member asked are Green Barrier sites in or out of the Candidate Site Assessment process?

AR replied that some candidate sites are in green barriers and that a Green Barrier review is being done as part of the overall process.

One member asked what will happen about residual commitments.

AR replied that where sites have been in the system for a while we will have to start issuing shorter term renewals or if there is no real proof that these sites are going to come forward in the near future we will have to refuse them. Such sites could not reasonably be included as part of the 'commitments' figure in the LDP.

One member stated there is a change in working patterns with more people working from home so a good community at home is more important than transport links.

Another member agreed.

AR said you cannot force people to live near their workplace, you can only encourage them.

AR set out the need for the plan to deliver sustainable development.

ET introduced a subsequent discussion on sustainability and sustainable development.

Members put forward their understanding of what elements made up sustainability and ET grouped these under the three 'strands' of sustainability which are economy, community and environment. ET stressed the need to have regard to this in preparing the Plan.

AR outlined the progress which had been made on the LDP so far; the Delivery Agreement, Call for Candidate Sites, Key Messages and Settlement Hierarchy options. The outcome is that we have;

- Agreed the vision, issues and objectives,
- Agreed the key messages,
- Agreed the 5 tier settlement hierarchy.

AR briefly set out how each of the growth option had been calculated. One option using Welsh Government statistics, two options using population forecasting statistics taken from a period of recession and two options took statistics from a period of economic growth. One further option was a 'reverse engineered approach' starting with a figure for employment creation and using that to estimate how much new housing would be needed to support that figure. A range of options have been created which are realistic and based on sound evidence.

Workshop – Growth Options

ET explained a workshop looking at growth options. Members split into groups on 4 tables and were assisted by Policy Officers in reviewing the 6 growth options and coming up with a short list of the three most appropriate growth options as well as one preferred option.

One member asked if Members could see the meeting material that would be used at the other future meetings e.g. KSF and TCC meetings.

ET informed him that the material and meetings will be the same.

Feedback:

Following the workshop discussion, each group reported back on which were their most appropriate Growth options and finally which was their Preferred Growth Option, One group reported back that the higher growth rate (option 5) was required to ensure economic growth. Two groups felt that the mid-range was more likely, realistic and therefore achievable. One group felt that a hybrid option might be preferred to build in a level of flexibility.

Appropriate Growth Options

- Option 4 - 6,600 houses (440 houses per year)
- Option 6 - 6,550 to 7,350 houses (440-490 houses per year)
- Option 5 – 10,350 houses (690 houses per year)
- Option 3 – 8,250 houses (550 houses per year)
- And a Hybrid option was also put forward (490 to 550 houses per year)
-

Preferred Growth Options

- Option 6 - 6,550 to 7,350 houses (440-490 houses per year)
- Option 5 – 10,350 houses (690 houses per year)
- Option 3 - 8,250 houses (550 houses per year)

Coffee break

Spatial Options.

AR briefly discussed how initially 10 Spatial options were considered how this was cut down to 5 realistic Spatial options:

- Option 1 - Proportion Distribution
- Option 2 - Focused Urban Growth
- Option 3 - Growth Area
- Option 4- Hubs and Corridors
- Option 5- Sustainable Distribution plus Refined Approach to Rural Settlements

Diagrammatical map illustrated each option.

Workshop – Spatial Options

ET facilitated a workshop looking at spatial options. Members on each table looked at a single spatial option with the help of Policy Officers. As there were 4 tables and 5 options, one group were asked to look at 2 spatial options. Members were asked to consider the good and bad points of each option. Several tables also had time to look at the other spatial options as well.

Feedback:

Option 1 - Proportion Distribution

- Pros - Sustains rural communities, Offers choice.
- Cons - is it deliverable, where is the infrastructure?

Option 2 Focused Urban Growth

- Pros – improvements to services provided in the larger settlements, aligns well with the existing transport infrastructure, market sensitive.
- Cons – threatens viability of lower order settlements, deliverable? danger of settlement coalescence.

Option 3 Growth Area

- Pros – Focus on existing employment growth area, pragmatic.
- Cons – over focused, other areas might lose out, increased pressure on infrastructure.

Option 4- Hubs and Corridors

- Pros – makes efficient use of existing transport infrastructure, sustainable development benefits.
- Cons – does the transport infrastructure have enough capacity, unwanted corridor pressures? This group also added that they liked option 5.

Option 5- Sustainable Distribution plus Refined Approach to Rural Settlements

- Pros – settlements are sustainable, aligns well with the economic ambitions, and aligns well with transport sustainability.
- Cons – leave north of county without growth, too focused on the south east. This group therefore suggested a hybrid of option 4 and 5.

AR finalised the meeting by outlining the next steps of the consultation exercise, the Key Stakeholder Forum is to be held on 12th October. Town and Community Councils meetings to be held 21st, 24th and 25th October to which County Councillors are also invited and a public exhibition to be displayed in the main libraries in the county.

AR set out what was expected from Members, as a liaison role, thinking strategically and recognising a realistic level of growth and spatial strategy.

AR also thanked everyone for their contribution and stated that he would send the notes of the meeting to all attendees.

Attendees

Colin Everett, Chief Executive Officer

Andy Roberts, Service Manager, Strategy

Table 1 Officers: Ste James, Andy Farrow,

Members: Jim Falshaw, Cindy Hines, David Williams, Derek Butler.

Table 2 Officer: Adrian Walters,
Members: Paul Shotton, Andy Dunbobbin, Richard Lloyd.

Table 3 Officers: Russell Price, Scott Brett.
Members: Hilary Mc Guill, Gareth Roberts, Arnold Woolley.

Table 4: Officers: Sandie Lloyd, Vicky Weale, Glyn Jones.
Members: Chris Bithell, David Wisinger, Christine Jones, Ian Dunbar

Appendix 17

Strategic Growth Options Summary of Responses

Representative	Comments	Response	Recommendation
General Comments			
J10 Planning	<p>Provides a policy context for submissions:</p> <ul style="list-style-type: none"> • UDP was adopted September 2011 and covered the plan period of 2000 to 2015. It provided for 7,400 new dwellings (493 units per annum) over the 15 year plan period. • The plan has effectively expired, despite still being used for development control purposes, and the latest forecast of housing land supply is that Flintshire presently have just 3.7 years available (according to its last published JHLAS in November 2015 which covered the period to April 2014); although we consider even that the true figure to be closer to 3 years. • TAN1 states that a rolling 5 year housing land supply is required. TAN 1 also states that where there is no adopted Development Plan (which there won't be come September 2015 then the 	<p>Noted</p> <p>The objector appears to be questioning the findings of the Planning Inspector who adjudicated on the 2014 JHLAS, but without providing any evidence to back the objector's assertion that the supply figure should have been 3 years not 3.7 years as recommended by the Inspector and endorsed by WG.</p> <p>The housing land supply figure is not 'zeroed'. The correct terminology as used in para 8.2 of TAN1 is 'Therefore local planning authorities that do not have either an adopted LDP or UDP will be unable to demonstrate whether or not they have a 5-year housing land supply and effectively will be considered not to have a 5-year supply' [my emphasis]. This is quite different from a '0' supply. A '0' supply is</p>	No change

	<p>housing land supply position is “zeroed” thus placing significant pressure upon the Authority to adopt a new plan.</p> <ul style="list-style-type: none"> • The new plan period is 2015 to 2030. • The Delivery Agreement with Welsh Government is out of date and we fear that the plan will not be adopted any sooner than 2020 at the rate the Authority is proceeding ... as such the plan will already be 5 years into its plan period and we would strongly advocate the period is extended to 2035 to accommodate this slippage. 	<p>clearly not the case as the LPA has a landbank of 3438 units.</p> <p>Noted A revised Delivery Agreement has been agreed with Welsh Government and is on the Council's website. The amended adoption date is October 2019. It is quite normal for Plans to be adopted well into their Plan period and there is no justification for extending the Plan period to 2035.</p>	
Anwyl Land Ltd (Hourigan Connolly)	<p>Seeks to demonstrate that Flint is a sustainable location for development, with a number of key services and amenities able to support growth. Given this, growth within Flintshire must allow for an appropriate quantum of development within Flint to ensure the vitality of this sustainable location. Promotes a site at Northop Road, Flint for development.</p>	<p>Noted. Both the Key messages document and the Strategic Options document point to Flint being a sustainable location given that it features as a Main Service Centre within the settlement hierarchy.</p> <p>The site at Northop Road will be assessed alongside other Candidate Sites in Flint. However, the fact that Anwyl are now promoting this site raises concerns as to its delivery when</p>	No change

		Anwyl appear to be struggling to deliver Croes Atti, downplaying its potential delivery to 25 units per annum, given local market conditions. In this context there is a serious concern as to how Anwyl can deliver a second large development within Flint.	
H. Bryn Jones	<p>Within the main issues on page 3 there is no reference whatsoever to the effects of any development and subsequent increase in population on the Welsh language in Flintshire. There is a requirement for Flintshire, in accordance with the wishes of the Welsh Government, to increase the number of Welsh speakers in the county. Welsh Government has set a target of increasing the number of Welsh speakers to a million, and Flintshire has its part to play in achieving this. Any housing development is likely to cause a reduction in the percentage of Welsh speakers as many house buyers come from England because houses are cheaper in Wales. Therefore, as part of any scheme, measures to increase the number and percentage of Welsh speakers should be included as one of the main objectives.</p>	<p>The issues facing the Plan are set out in Appendix 1 of the Strategic Options document and clearly include the Welsh Language and Culture in section 6. The issue of Welsh Language will be looked at in broad terms through the Sustainability Appraisal of the Plan. Where potential issues and impacts arise, particularly in terms of potential housing allocations, a more detailed impact assessment will be undertaken, and this will include the need for potential measures to be put in place. The objector's general assertion that 'any housing development is likely to cause a reduction in the percentage of Welsh speakers' is not accepted. Evidence collected as part of monitoring recent new housing developments shows that the majority of new occupants come from elsewhere in Flintshire rather than from England.</p> <p>CONSULTED EDUCATION</p>	

	<p>As a resident of Mold I am aware that Ysgol Gymraeg Glanrafon is full and that some of the pupils are taught in classes in portacabins. Should further housing come to Mold and the surrounding area it would be very difficult to get places in the school and size of the site means there is limited room for expansion. I therefore believe that the Council should establish a new Welsh medium school in Buckley or the surrounding area.</p> <p>The County should designate one of the schools in Rhoshelyg / Brynfordd / Licswm a Welsh medium school. This would save travelling costs to Ysgol Gwenffrwd and would strengthen the Welsh language in an area which still has a strong Welsh tradition.</p>		
Carla Tellett	<p>Objects to proposals for the Buckley area. As a long term resident of the town i have seen many changes. Unfortunately they have not all been good. We have had major housing developments built but the roads, schools, doctors and infrastructure has not been changed.</p> <p>I was extremely concerned to see the latest candidate sites, that is a</p>		

	<p>great deal of land for yet more housing - and still no plans for updating the infrastructure!</p> <p>I know there are a great deal of people all concerned about the same issue and I wonder if, along with the candidate sites, are there plans for infrastructure? As i cannot find any mention on your website.</p> <p>There is only 1 primary school in buckley with space. The doctors/dentist waiting times are ridiculous. The road networks are full and traffic is heavy. Just to name a few factors.</p> <p>New houses would just ensure that the systems could not continue as they are.</p> <p>I am also concerned about the destruction of yet more green space, loss of heritage and effects on wildlife. We are becoming one big building site and part of my concern is that we will lose the boundary of buckley and just merge into Mold!</p> <p>I look forward to following the LDP and hoping that it evolves to ensure Buckley is not harmed in this way.</p>		
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United Utilities	<p>We have reviewed the document and would like to take the opportunity to make you aware of a groundwater Source Protection Zone (SPZ) situated between Broughton and Chester within your local authority boundary, which will need to be afforded due regard in the future allocation of sites.</p> <p>SPZs identify the groundwater catchment areas of sources of potable water (that is high quality water supplies usable for human consumption) and show where they may be at particular risk from polluting activities on or below the land surface. The prevention of pollution to drinking water supplies is critical.</p> <p>The aim should be to avoid siting potentially damaging activities in the most sensitive locations from a groundwater protection viewpoint. Groundwater SPZ's show where there may be a particular risk from polluting activities on or below the land surface to the water abstraction.</p> <p>When assessing proposals for development within this area, I would urge you to refer to the document 'Environment Agency Groundwater protection: Principles and practice (GP3)' to</p>	Noted	No change
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	ensure any impact of development on groundwater quality in the area is best managed. The document encourages planners, developers and operators to consider the groundwater protection hierarchy in their strategic plans and when proposing new development.		
Natural Resources Wales	Expect the final selection of the growth and spatial option to take into consideration the environmental sensitivities and constraints within the County, which has also been identified in the Plan's objectives, which include 'Conserving and enhance Flintshire's high quality assets including biodiversity, landscape, cultural heritage and natural, historic and built environments'.	Noted	No change
Stuart Davies	Will the new jobs in Flintshire be created within the Construction industry from the building of new homes? Or will these jobs be more sustainable longer-term jobs giving people who may come to live in Flintshire a chance to create a life around a secure future?	The Plan is seeking to bring about permanent jobs whether these are in traditional industry, advance manufacturing, services etc. It is acknowledged that the construction phase of new housing development will also bring about job creation but whether this is 'local' will depend on the operational nature of different developers.	No change
Anwyl Homes	The Council needs to decide whether or not to go for growth in respect of housing and economic development and if it so decides to ensure that the LDP promotes	Noted.	

	<p>and enables such growth – scale, type and location.</p> <p>In respect of housing development, the LDP should be able to deliver housing of to meet demand, housing which is viable and deliverable, and in right locations where people want to live.</p> <p>The Council should not to overload development with too many requirements and too much planning obligations and developer contributions. In this respect, further work is needed on: Viability appraisal to ensure that the developer contributions do not make schemes unviable. Local Housing Market Assessment is also essential and requires additional stakeholder involvement before preparing detailed Planning Policies influencing the scale, location and type, mix of housing.</p> <p>The LDP should combine large strategic site allocations which take longer to deliver with smaller local sites which are quicker/easier to develop; allocate more than the bare minimum of housing land; avoid high density policies which attach higher site capacities but which</p>	<p>Noted</p> <p>Noted.</p> <p>Noted</p> <p>Noted</p>	
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	<p>are undeliverable on the ground taking into account POS, trees, ecology and other policies; reflect the fact that the eastern part of the county is more attractive, marketable and deliverable than the western part, where much slower build rates occur.</p> <p>Supports the Plan's chosen settlement hierarchy of Option 2a i.e. a 5 tier settlement hierarchy adjusted to take account of proximity and functional relationships to higher level settlements. Option 2A is the best way to deliver sustained and beneficial growth.</p>		
Mr J. E. Braybrook	<p>Concerned primarily relate to Hope, Caergwrle and Abermorddu but generally concerned that the end result will be an urban belt developed along the established road and rail links between Wrexham and Deeside that will engulf all the village communities between the two main conurbations.</p> <p>The increased population and thus traffic in the area will see the resuscitation of the Caergwrle bypass project which bisects the communities of Hope and Caergwrle at the very point that they come together.</p> <p>Community facilities are already at full stretch There is a one week wait for appointments at Hope</p>	<p>The consultation document contains no hint of a level of growth that would lead to an urban belt between Wrexham and Deeside.</p> <p>The Hope / Caergwrle Bypass no longer features in the Flintshire part of the Regional Transport Plan. CONSULTED SUE PRICE.</p> <p>The issue of waiting times for appointments at the newly developed Local Health Centre is a matter for the Health Board. Castell Alun High School is programmed for a £4 million pound refurbishment and</p>	No change

	<p>medical centre. None of the schools in the area are operating at under capacity levels. If the new housing is planned for experienced personnel to man new business and industry in the local travel to work area it is likely that many would be relocating with families. This would place local families as well as the incoming families in competition for existing places unless school accommodation and staffing are part of the development plan. The current desperate need for housing in the area is in the public sector rented category and is a need that speculative building will not satisfy. Current speculative building undertaken by developers is not likely to provide for workers on average wages in the area. New industry is likely to be high tech, higher salaried, with a need for fewer, but already qualified staff recruited from a much wider area. In addition these house prices, though beyond the range of the local wage, will attract long distance commuters from Liverpool, Manchester and the West Midlands. The overall result will be a total destruction of the identifiable communities which currently exist. Change must be sympathetic to the needs of the people within</p>	<p>remodelling / extension. In identifying new housing allocations officers will be working closely with Education colleagues.</p> <p>The Plan will specify a certain level of affordable housing that will have to be provided as part of new housing allocations.</p> <p>It is welcomed that the objector recognises that the people of the four villages have always co-existed through a shared concentration of facilities and amenities. It is also accepted that some facilities have been lost such as the HSBC. Nevertheless, there still remains a good range of facilities and services within the four communities. The consultation document does not present HCAC as a 'services provider' nor does it argue that it can be made into a 'service provider' The term 'ervice</p>	
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	<p>Hope, Caergwrle and Abermorddu because they have always co-existed through a shared concentration of facilities and amenities focussed on Caergwrle High Street, however the facilities are being lost. To argue that this community can be made into a 'service provider' by catering for a larger populace whilst vital services disappear is patently disingenuous.</p>	<p>provider' does not feature within the consultation document and has been invented by objectors. The consultation document meely places HCAC in the second tier of a 5 tier settlement hierarchy as a 'Local Service Centre' which is explained as 'Settlements with a local role in the delivery of services and facilities'.</p>	
Welsh Water	<p>Welsh Water has no real preference regarding the options being considered for the amount of new homes to be provided through the Flintshire Local Development Plan 2015-2030. As a provider of water and sewerage infrastructure in the County we are primarily governed by the Water Industry Act 1991 (as amended) whereby we have a duty to extend and improve our assets to accommodate future growth.</p> <p>In terms of where the new homes should go, not every settlement in the County is served by its own Wastewater Treatment Works (WwTW), the catchment areas of some WwTW cover numerous settlements therefore the impact on our assets will be dependent on the amount of growth within the individual catchment areas. We will need to await further</p>	Noted and welcomed	

	<p>information regarding the breakdown of growth between settlements to allow us to make an assessment of the potential impact upon our assets. Where the total growth identified by proposed allocations exceed the theoretical design capacity of the treatment works then improvements to provide further capacity will be required during the Local Plan period.</p> <p>We aim to ensure that sufficient infrastructure exists to accommodate domestic development, however where deficiencies are identified we look to resolve these through capital investment in our Asset Management Plans (AMP). We are currently delivering the AMP6 programme which covers investment for the period 2015-2020, this will be followed by AMP7 for the investment period 2020-25, and AMP8 for 2025-2030. The Flintshire LDP has a timeframe that runs until 2030, therefore any investment required at our WwTWs can be considered for inclusion in future AMPs. Welsh Water has to put forward a business plan for investment for each AMP cycle and as part of this work we require some certainty in terms of growth areas and site allocations. An adopted</p>		
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	<p>Local Development Plan helps strengthen the case Welsh Water can put forward in relation to projects requiring AMP funding as our industry regulator, Ofwat, do not usually provide investment for infrastructure to serve unconfirmed growth.</p> <p>Due to the regulatory, financial and legislative framework that we have to work within, there is potential disparity in the timeframes of our AMP and the Local Plan. There may be instances where 'lead-in' times are required to bring an infrastructure project and associated funding to fruition. As such, where specific infrastructure improvements are required to bring a development site forward in advance of any investment through AMP there are provisions available for developers to make financial contributions, via planning obligations under the provisions of S106 Town & Country Planning Act 1990, to secure the necessary improvements.</p> <p>In some settlements there may be incidents of flooding in the public sewerage system that, depending on their location in relation to site allocations, may need to be resolved to allow development to</p>		
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	<p>proceed. Potential developers can either wait for Welsh Water to resolve these flooding incidents, subject to funding being approved by our regulator Ofwat, or progress the improvements through the sewerage requisition provisions of the Water Industry Act 1991. Hydraulic modelling assessments may be required to determine an adequate point of connection to the public sewer, particularly for strategic development sites, and developers would be expected to fund investigations during pre-planning stages. The findings of a hydraulic modelling assessment would identify the extent of any necessary upgrades to the sewerage network.</p> <p>Potential developers also need to be aware that where sites are crossed by public sewers and water mains, protection measures in the form of easement widths or a diversion of the pipe would be required which may impact upon the housing density achievable on site.</p> <p>We would be pleased to work with your Authority in examining the impact of potential demands on our assets however without knowing the level of growth in each settlement and the specific</p>		
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	location of proposed development sites Welsh Water will not be able to accurately assess the capability of WwTWs and the existing sewerage and water network to accommodate proposed growth, as such an assessment of the impact of development would have to take place once further information is available.		
Rosemary Bormond	<p>There are four villages, Hope, Caergwrle, Abermorddu and Cefn y Bedd, are being coalesced. First, each village will lose its own character, and secondly, Cefn y Bedd should not be linked with the other villages as half of it comes under Wrexham Council.</p> <p>The four villages should not be linked together as a conglomerate and classed as a 'service provider.'</p>	<p>Not accepted. The four villages comprising HCAC are not being 'coalesced'. The villages have been classed 'in planning terms' as a single settlement in the adopted Alyn & Deeside Local Plan and in the adopted UDP and the LDP merely seeks to continue this approach. The UDP Planning Inspector considered objections as part of the UDP and commented in para 11.72.3. of the Inspectors Report 'A <i>settlement boundary is a planning tool and does not necessarily define a community. In this case it encompasses 4 different areas / communities and parts of different community council areas. It encloses an area considered as a single contiguous urban area in planning terms. This is a reasonable approach and it follows that I consider this allocation and all other allocations within this settlement boundary on that basis</i>'. The objector does</p>	No change

		<p>not explain why defining the villages as a single settlement will result in each village losing its own character as that character will still exist. Given that part of Cefn y Bedd falls within Flintshire and adjoins Abermorddu, it is quite rightly included within the settlement and settlement boundary.</p> <p>The villages have not been classed as a 'service provider' – see comments re Braybrook above.</p>	
Wirral Council	<p>Concerned about the selection of any Growth Option that would rely on higher levels of migration that could lead to the further loss of working age population from Wirral.</p> <p>If growth is to take place at the higher rates envisaged, measures should be taken to ensure that any new employment can be easily accessed by the rail and public transport network, to reduce the need for and the impact of any future out-migration from Wirral.</p>		
Mineral Products Association Ltd	Supportive of the Council's sustainable aspirations to enhance community life, deliver growth and prosperity and safeguard the environment. There will be more informed respondents to advise the Council	Noted	No change

	<p>on which option would be most appropriate for the local area in terms of housing delivery and economic growth up to 2030.</p> <p>The varying options for both housing development and employment will, however, have differing demands on infrastructure provision and the associated mineral products required to deliver such. Whichever option is pursued, this should be reflected through the appropriate provision of raw materials, building products, construction and industrial minerals to deliver the objectives of the plan. This will need to be delivered through appropriate minerals site allocations and supportive criteria based policies</p>		
Patricia Edwards	<p>Whilst recognising the need for future growth in the County, Bretton is a very small settlement with no facilities and few services. Any large developments in or around this village would considerably exacerbate the existing major problems, namely:- flooding; poor single road access; inadequate pedestrian footpaths; medical and schooling services in Broughton are under severe pressure; the necessity to preserve green belt between settlements for environmental, wildlife and conservation reasons.</p>	<p>Not accepted. The Key Messages document set out the basis for reviewing the UDP settlement hierarchy and developing alternative approaches, informed by settlement audit work. One of the issues identified from this work was the relationship between settlements where services and facilities are shared. Bretton therefore has the advantage of being located adjacent to Broughton and has access to its wide range of employment, retail and leisure opportunities. In recognition of</p>	

		<p>this, the preferred strategy 'elevates' some settlements within the hierarchy as they are in effect much more sustainable than otherwise be the case.</p> <p>The settlement hierarchy merely provides a framework within which the scope of each settlement to provide development can be assessed. Even if Bretton were to be put further down the hierarchy as a defined village it could still have a role to play in delivering new development. Having regard to the broader location of Bretton on the edge of Broughton, adjacent to the A55, close to Chester and with a range of employment, retail and leisure opportunities, it is considered to be justifiably positioned as a sustainable village.</p>	
Philip Clague	<p>The banding of Caergwrle is wrong. By combining the villages of HCAC into one settlement the decision to make it a service provider has been established. This places HCAC at the top of the settlement list allowing the Council to put a disproportionate amount of new housing in the area. However there are little opportunities for employment within the four villages with people travelling out for employment. The proposed</p>	<p>Not accepted. See response to Braybrook. The settlement of HCAC is not at the top of the settlement list and is not intended to allow a disproportionate amount of new development in the area.</p> <p>There is an existing industrial estate at Cefn y Bedd, commercial businesses at nearby Gwersyllt and a large industrial estate at Llay. More broadly the settlement is well placed to</p>	No change

	approach is against national policy for sustainable settlements which says that settlements should have a range of opportunities for employment within settlements.	access employment further afield in Wrexham,, Buckley, Mold, Broughton etc. Whilst national planning guidance encourages appropriate employment development in settlements and in rural areas, there is no requirement for every settlement to provide employment. It must be noted that there is a range of small shops, services and business in and around HCAC which do provide jobs and contribute wealth to the local economy.	
Dr Claire Jones	Strongly disagrees with the grouping of Abermorddu, Caergwrle, Hope and Cefn Y Bedd. These are distinct, separate villages in which green space is vitally important. Reconsider this assessment and predesignate them as sustainable villages for future discussions.	Not accepted. See response to Braybrook. The grouping of the four villages as one settlement in planning terms does not impinge on green space. The settlement boundary in the UDP was drawn in a manner which excludes areas of recreation, amenity or green space. Scope also exists for a number of such areas within the settlement boundary to be designated as green space. Merely grouping the settlements and having a single settlement boundary does not prejudice green space.	No change
Judith Richardson	There is already long standing problems regarding flooding in Bretton and there are no footpaths in places in Bretton Lane and the lane is very narrow in certain places. The additional number of houses proposed will	The consultation document has merely presented the preferred settlement hierarchy where Bretton is identified as a sustainable settlement, in view of its proximity to Broughton and the range of facilities, services and	No change

	<p>put great strain on the existing doctor's surgery and there is already huge parking problems at the school in Broughton.</p>	<p>employment and good accessibility to other nearby centres.</p> <p>The consultation document does not propose an amount of houses for Bretton. There are a number of Candidate Sites at Bretton which will be assessed against a range of criteria.</p>	
Betsi Cadwaladr University Health Board	<p>The risks identified in relying on projections of the level of housing need from a period of exceptionally poor economic performance are acknowledged but it would be useful to understand the evidence that would be used to base future projections on a significantly more optimistic set of assumptions.</p> <p>The level of growth which is subsequently adopted will - under any of the scenarios - have a significant impact on the health and well-being of our communities. Good, accessible, adequate housing is a significant factor in physical health and well-being as is good housing which can be a protective factor for mental well-being.</p> <p>The nature of the direct impact on the health services will need to be modelled and assessed when details become clearer.</p> <p>Population growth will bring increased demand for health care</p>		

	services which will prove challenging and it is right to plan for population growth and for the demand that will arise from the associated housing growth.		
Cheshire West and Chester	Would like to understand what the implications would be for both Cheshire West and Chester and Flintshire under all of the growth and spatial scenarios, particularly in terms of cross-boundary transport routes and potential highways issues		
Bloor Homes	<p>Consideration must be given to the scale of under-provision that has occurred during the UDP period. Whereas the UDP requirement was 7,500 new homes in this period, only 4800 have in fact been built (2000-2014). This clearly implies that housing supply has in some part constrained household formation. Allied to this is the scale of unmet need evident in the County from the Local Housing Market Assessment. The analysis undertaken by ARC reveals that there is an annual shortfall of 246 affordable dwellings across the County.</p> <p>This demonstrates the magnitude of the housing shortage for a sustained period of time and the corresponding scale of housing need that the Plan should aim to address. In the context of Strategic Objective 11, ensuring</p>		

	<p>that this backlog of housing is met appears to be an entirely appropriate measure.</p> <p>The Local Housing Market Assessment indicates that over the next five years the number of affordable homes that need to be built would need to be an annual requirement of 486 dwellings. This reinforces that the requirement of 490 dwellings should be a minimum and that, at least over the next five year period, this should be increased to address this backlog.</p>		
Clwydian Range and Dee Valley AONB Joint Committee	<p>Supportive of an approach which balances the level of growth with environmental constraints and seeks to ensure that future development can be accommodated within environmental limits. The more modest growth options will be most likely to achieve this objective.</p>		
Hawarden Community Council	<p>The consultation document is confusing to members of the public. The maps are not very helpful and add further confusion to members of the public.</p>		
Cllr Cindy Hinds	<p>Penyffordd is a village, not a town and its category 'B' status should not be changed to urban. It has vastly exceeded our percentage and no longer should villages be increased in size at such a quick rate. Expansion should be only over ten to fifteen years and not</p>		

	<p>like it has just experienced ie 400 houses in five years.</p> <p>Penyffordd has had its fair share but does need certain types of housing. If the Junior School becomes available FCC should build rentable social housing and pensioner's bungalows on Penymynydd Road and the football field to the community. The size of the village as it now stands needs a few more shops and small businesses. There could be a space by the railway station for businesses. Local schools should be for local residents first. Wrexham Maelor needs to be made bigger or a brand new hospital in Flintshire. Residential care homes need to be built. If developers build right across Flintshire then they should provide a care home. Penyffordd is in need of open spaces including a full football pitch and facilities but it is the land that is most important. There is traffic congestion in the village coming off The Groves onto Hawarden Road. Brownfield sites which Flintshire own or private which could be for a smaller or larger businesses. FCC must provide rentable social housing and pensioners bungalows accommodation within Penyffordd. There needs to be a</p>		
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	clear policy on flooding on flood plains and that which developers take on knowing that the fields are under water every time it rains heavy. Most drainage systems across Flintshire are not good enough to take the amount of houses being proposed. The older properties are just left to cope with antiquated systems and this should be changed to making sure everyone has a new system.		
J10 Planning	<p>Based on average completion rate of 353 per annum over the UDP period, there were 1,873 units that have failed to come forward as part of the UDP demonstrating that the UDP failed to deliver and this cannot happen again. It also suggests that this shortfall / backlog must be made up and cannot be discounted in identifying dwelling numbers for the next plan period.</p> <p>Comments on growth options are: Option 1 strongly disagree Option 2 strongly disagree Option 3 agree Option 4 disagree Option 5 strongly agree Option 6 disagree lower range / agree upper range (option 6a)</p> <p>As a starting point we consider that the shortfall / backlog not delivered as part of the previous UDP plan period (estimated to be</p>		

	<p>c. 1,873 dwellings) cannot be disregarded or discounted and must be accommodated in full by any and/or all options now being considered. Thus the baseline will be 1,873 plus the following plan period's growth projections.</p> <p>The UDP aspired to deliver between 207 and 328 ha of employment land however it is unclear as to how much land has actually been developed. The UDP was silent on job creation aspirations but the emerging LDP does place great emphasis upon job growth and Topic Paper 8 (published in February 2015) confirms the desire for the Authority to play its part in delivering economic growth for North Wales; however, it is silent on numbers and states that further evidence will be required (e.g. Economic Forecasting and a revised Employment Land Review) neither of which appear to have been commissioned or advanced. This consultation paper does, however, indicate that between 8,000 and 10,000 jobs are derived from existing aspirations around the Enterprise Zone.</p> <p>This would suggest that Option 6/6a ought to be the very minimum Option that should be</p>		
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	<p>applied to projecting housing growth and as such it follows that all Options with lesser total amounts must be immediately discounted.</p> <p>Thus we consider that only Options 6a, 3 and 5 can realistically be considered and duly assessed.</p> <p>In our opinion, a new Option is needed to be considered that involves using a baseline of Option 6a and adding to this the shortfall of the UDP plan period which would equate to $7,350 + 1,837 = 9,187$ (over 15 years = 612 dwellings per annum). This will involve a step-change in housing delivery but the Authority has managed to achieve high completions in recent years. Therefore, this rate can be achieved and if the Authority is serious about generating economic growth and jobs then it must plan accordingly and deliver housing in the right places that meets not only the aspirations for growth but its baseline responsibilities.</p> <p>Concerned that the assumptions presented by Table 4 in Appendix 2 of the consultation paper (replicated below) for a number of reasons:</p>		
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	<ul style="list-style-type: none"> • the “Option Requirements” are then “less” existing housing commitments and UDP allocations; • if UDP allocations have failed to come forward in the UDP plan period this would suggest that they have failed a “deliverability” test and ought to be closely reviewed and not simply “rolled forward” into a new plan to fail yet again. No evidence is presented to demonstrate that these allocations will indeed come forward. • Whilst planning permission might have been passed on a whole host of sites these will all be subject to “time expiry” 3 or 5 year conditions and without there being any evidence to demonstrate to the contrary none of these can be realistically be put forward as making a contribution to future supply. Indeed, it is naïve to think that any more than 50% of permissions ever get implemented so immediately this reduces this figure of 4,529 to around 2,000. • A small sites (those of less than 10 no. units) windfall allowance of 600 has been applied and a larger sites (those of 10 no. + units) windfall allowance of 750 has been applied; whilst is 		
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	<p>accepted that some larger sites might come forward during the plan period sites of over 10 units should be allocated and not expected to come forward as windfalls.</p> <ul style="list-style-type: none"> • Totalling 1,350 the windfall allowances equate to 90 units per annum; this represents an over reliance on windfall and as a rule windfall should not be any greater than 10% of the total requirement, whereas here it equates to up to 30%. The new plan should be about allocating “deliverable” sites not relying upon windfalls. <p>If we were to believe the table, then Options 1 and 2 would mean that the Authority actually has an oversupply problem. This is pure fantasy and would also undermine any notion of an attempt to deliver much needed economic growth, infrastructure (social, community, environmental and transportation) and affordable housing.</p> <p>It should not be a question of whether which Option is the most appropriate to deliver sustainable development, but whether the Option is the most appropriate to deliver upon the Vision and Objectives of the LDP and it is clear that the Key Messages set</p>		
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	<p>out on page 7 of the consultation document mirror the LDP vision and objectives.</p> <p>That is not to downplay the importance of sustainable development, but the two are not mutually exclusive.</p> <p>WG guidance states that options must be realistic (i.e. deliverable) and sustainable. This rules out any 'zero growth' option as people are living longer, births are increasing and due to economic progression, people will continue to migrate to the County Borough both on a local / national level and also internationally.</p> <p>Indeed, migration is a key driver of population growth in Flintshire and net migration appears to have remained fairly high even during the economic downturn seen after the 2007/08 recession; bucking national trends with the population continuing to grow.</p> <p>So if a zero growth option is ruled out on the basis that the evidence suggests this would conflict with the reality of what happens on the ground, so too then is there a disconnect between any option that proposes less numbers than that of Option 6.</p>		
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	<p>As the economy begins to improve, with the UK now currently benefiting from the highest level of economic growth in Europe, one can readily expect the Borough's economy to significantly improve with a greater net migration likely into Flintshire, putting additional pressure on housing need and demand.</p> <p>The Preferred Option should be based on objectively assessed evidence, not whether some conspiring factors, which have stifled housing delivery across the Borough, are to blame for low historic completions and sites failing to deliver.</p> <p>1. The recession lasted from 2007 to 2014 and is recorded as being one of the longest and deepest global recessions in modern history. A major result of this has been flat-lined housing and employment growth, and is a key reason completions were at their lowest. Now that the economy is bolstering, one can expect growth will be significantly higher, responding to a latent residual demand which has accumulated over almost a decade.</p> <p>2. The Borough's Green Barrier sits tight around key urban</p>		
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	<p>settlements and has restricted development coming forward for a considerable number of years. With the release of Green Barrier sites, there will be surge in development, providing greater housing offer and choice, and this will enable the Authority to serve in-migration.</p> <p>Welsh Government has stipulated the risk of using 2011 based projections reflecting a poor period of economic growth being used as a basis for planning 15 years into the future. Yet even though Circular (CL-01-14) provides a warning, the Council may be swayed by some consultees into using Welsh Government's 2011-based principal projection as a benchmark for future growth. This approach is completely flawed, goes against Welsh Government's advice and conflicts with the need to address economic growth demands.</p> <p>The Household projections for Wales (2011) are founded on assumptions based on past trends, which when collated during a period of recession, undermines the forecasts for a non-recessionary period. Projections produced in this way do not make allowances for the</p>		
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	<p>effects of local or central government policies on future population levels, distribution and change.</p> <p>The OAN has not been presented and nor has any economic evidence base and so without these it is difficult to diverge from the preferred option as identified by this submission.</p> <p>The table demonstrates and reinforces our belief that only Options 6a, 3 or 5 are realistically viable (subject to our comments above).</p> <p>We do agree that a 15% flexibility allowance should be built in as is used by many other Authorities, where there has been a similar history of under-performance and poor delivery.</p> <p>Essentially, the new LDP must be a lot more aggressive in requiring promoters to demonstrate deliverability, but the Authority must also recognise that settlement boundaries will have to be revised and Green Barrier released to facilitate growth.</p>		
Vision			
Bourne Leisure Ltd	Considers that the vision should specifically recognise the vital importance of the tourism and leisure industry for the economic	Not accepted. The vision seeks to embrace a wide range of interests and considerations but within a statement that is focused. The	No change

	growth of Flintshire in terms of employment, expenditure and investment. The vision should be amended to '.... Through realising its unique position as a regional gateway, a tourist destination and area for economic investment....'.	downside of adding to many considerations is that the vision becomes less focussed and increasingly wordy. Given that the vision already includes references to a sustainable balance and to provide for the economic needs of Flintshire, it is not considered necessary for tourism and leisure to be specifically mentioned. This is not to say that tourism and leisure are unimportant. Indeed, these topics are represented in the form of issues and objectives in the Strategic Options document and will feature within the Plans policy framework.	
Objectives			
Bourne leisure Ltd	Supports Objective 14 as it reflects the vital role of the tourism industry.	Noted	No change
Key Messages			
Bourne Leisure Ltd	Considers that the following key message should be added to guide development of the LDP's policies for economic development and the tourism industry 'The tourism industry plays a vital role in the Flintshire local economy, in terms of providing employment, generating visitor expenditure and attracting inward investment'.	Not accepted. The 'key messages' within the Strategic Options document are meant to be key issues which will help inform and determine the emerging strategy for the Plan in terms of the amount of growth and the location of that growth. Although the importance of tourism is accepted, it is not considered to be a determining factor in the overall Plan Strategy.	No change

	<p>In Appendix 1 in the list of issues 'underdeveloped / disjointed tourism industry – outcomes of tourism destination management project' should be replaced with 'Recognising the potential for consolidating and developing the tourism industry in order to maximise the economic benefits that it can bring to the County'.</p>	<p>Not accepted. The issue referred to seeks to put forward a perception of an underdeveloped tourism industry in North East Wales and a disjointed tourism industry in the context of a lack of a clear tourism strategy in terms of attractions, accommodation and activities and how the Plan might respond through allocations or policies. The wording then identifies that the Tourism Destination management project may identify a strategic framework for tourism, against which the Plan can respond. By contrast, the wording suggested reads as a broad aim rather than an issue.</p>	
	<p>In Appendix 1 one of issues is 'safeguarding and enhancing natural and heritage assets i.e. coast, key landscapes etc'. As currently drafted this is not consistent with PPW approach to natural heritage and environment and development plans (para 5.4.5, 5.2.8, 6.1.4, 6.3.4). Seeks to ensure that the Council's approaches to safeguarding and enhancing the natural environment and historic assets are consistent with national policy, proportionate, take a balanced approach taking into account the benefits of a</p>	<p>The first few issues relating to tourism all focus on the changes associated with tourism and the need for flexible policies. The next issue then recognises the need to safeguard and enhance natural and heritage assets and refers to the coast and key landscapes. In essence it is these very natural assets that are important attractors for tourism and therefore need to be safeguarded. The intention is to merely flag this up and is not intended to be read as a 'policy'. The suggested wordings by the objector reads as a policy rather than as an issue.</p>	

	<p>proposal, and provide appropriate opportunities for mitigation and / or compensation measures. Considers the issues should be split and reworded: ‘Safeguard and enhance, where appropriate, the natural environment i.e. coast, key landscapes etc and provide opportunities for appropriate mitigation and / or compensatory measures where conflict can be avoided’. ‘Safeguard and enhance, where appropriate, historic assets, in proportion to their significance’.</p> <p>Considers the LDP should provide support for the retention, provision, maintenance and improvement of a range of holiday accommodation, in order to suit different types of holidaymaker and the ever changing needs of the tourist industry. Criteria based policies should positively promote opportunities to maintain, enhance or develop tourist accommodation and facilities as well as to provide new development’.</p>	<p>The role of the LDP is not to provide ‘support’ tourism projects or the tourism industry. Its role as a land use plan is to set out a policy framework against which to determine tourism proposals or to allocate land where there is a known requirement for a particular tourism development and a suitable site identified. In the absence of the latter being made known to the Council, the Plan can only seek to have a set of appropriate planning policies relating to tourism. Similarly it is not the role of the Plan to ‘positively promote’ opportunities relating to tourism accommodation and facilities.</p> <p>The UDP has a policy provides guidance on the issue of seasonal or holiday occupancy conditions</p>	
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	The LDP should also include a commitment to the principle of extending the tourist season.		
A Parsonage	<p>Has commented using material from the Key Messages Document consultation:</p> <p>In terms of settlement survey work questions how the Council can make a Settlement Audit when the Welsh Government has not produced anywhere near up to date population and household projection?</p>	<p>The formulation of the settlement hierarchy has been informed by a robust, transparent and consistent assessment of some 80 odd settlements. Each of the settlements assessed was accompanied by an individual Settlement Audit Report. The intention of this work was to have a sound evidence base with which to formulate a settlement hierarchy and to identify which tier each settlement slotted into. This process is quite separate to the issue of Welsh Government projections, as we are not yet at the stage of determining exactly what provision for development each settlement will, or will not make. Rather, the Council is seeking to establish the level of development to be provided for over the County (using projections and a range of other considerations) and to then formulate a spatial strategy, based on the work which informed the settlement hierarchy, as to how that growth is to be distributed.</p>	

<p>Ian Abell</p>	<p>Has commented using material from the Key Messages Document consultation: Objects to the deletion of Bretton's category C status because of its "relationship" to Broughton.</p> <p>In the Settlement Services Survey for Bretton, it is suggested that there are 56 dwellings in the village and that "service provision in Bretton is virtually non-existent, however the adjoining retail park and the facilities in Broughton are very nearby and available for use by residents of Bretton". There is no direct road access from the village to Broughton Shopping Park and that a car journey to the shopping park is approximately 2.4km, via the A5104.</p> <p>It is clearly untrue that Bretton and Broughton are "settlements which were once separate entities [and] now form part of a continuous built up area."</p> <p>Bretton has a singular identity and the settlement services survey made no reference to "cohesion" with the community of Broughton, other than the idea that Bretton residents make use of the shopping park, to which they must generally travel by car,</p>	<p>Not accepted. The Key Messages document set out the basis for reviewing the UDP settlement hierarchy and developing alternative approaches, informed by settlement audit work. One of the issues identified from this work was the relationship between settlements where services and facilities are shared. Bretton therefore has the advantage of being located adjacent to Broughton and has access to its wide range of employment, retail and leisure opportunities. Although car journeys between the two settlements must be made via the A5104 there is a pedestrian access between Bretton and the retail park. In recognition of this, the preferred strategy 'elevates' some settlements within the hierarchy as they are in effect much more sustainable than otherwise be the case.</p> <p>It is evident that Broughton and Bretton are two separate settlement, each with their own character and role. The settlement hierarchy merely provides a framework within which the scope of each settlement to provide development can be assessed. Even if Bretton were to be put further down the hierarchy as a</p>	
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	<p>which your survey does not mention.</p> <p>I can find no evidence that this concept of “cohesion” has been investigated or demonstrated. The very separate definition of Broughton and Bretton as individual settlements fully reflects their individual character.</p> <p>Objects Spatial Options 3 and 4. The physical relationship between Bretton and Broughton has been misrepresented, they do not form part of a continuous built up area. Very clearly, there is no coalescence between Bretton and Broughton. Consequently, the removal of the Category C status of Bretton is not in line with the UDP Public Inquiry.</p> <p>The removal of Bretton’s Category C status is simply a means of providing a greater number of Candidate Sites for Broughton, leading to the loss of the distinctive community of Bretton.</p>	<p>defined village it could still have a role to play in delivering new development. Having regard to the broader location of Bretton on the edge of Broughton, adjacent to the A55, close to Chester and with a range of employment, retail and leisure opportunities, it is considered to be justifiably positioned as a sustainable village.</p> <p>This is simply not the case as the Call for Candidate Sites was conducted before the settlement audit work / Key messages document. The number, location and type of Candidate Sites is not within the control of the Council, Rather the task for the Council is devise a Preferred level of growth and spatial strategy and for Candidate Sites to be assessed against the preferred Strategy in order to identify sustainable development site.</p>	
Settlement Hierarchy			
RC Whittaker	Considers that Sealand Village should be classified as a settlement within the hierarchy:	Not accepted. The analysis informing, and the approach to defining settlements was set out	

	<p>Sealand Village was the first to be acknowledged as a Village settlement when the river Dee was canalised in the 1750's. The Church was built at some considerable distance from the river Dee perhaps anticipating that this would be the safest place for people to live. It was also intended to continue to build this new village as land was earmarked for a possible parsonage. There was a phone box a post office and parish Hall, Later a petrol filling station. All these have now gone because of lack of development to sustain them. The only remaining legacy of the intentions of the people many years ago is St. Bartholomew's Church. The land around Sealand Village was first registered as white land and a spot was chosen to put in a pumping station for the anticipated development.</p> <p>Over the years this land has been registered as green barrier, which has led to restrictions on building.</p> <p>Why is it that Sealand Village has been allowed to stagnate, while other villages have been allowed to grow, (many or most on green field sites)</p>	<p>in the Key Messages document. In fig 3 within appendix 1 of that document the list of settlements assessed is presented in terms of a summary of facilities and services. It is clear that Sealand Village has none of the facilities listed and indeed has a church only. In fig 2 within that document the settlements assesses are grouped into 10 'bandings' based on the presence or not of key services and facilities. Sealand Village features in the 10th or bottom banding,</p> <p>A detailed assessment of each settlement looked at was presented in individual Settlement Audit reports. The audit for Sealand Village identifies its small size and lack of facilities and services, with the exception of passing bus services and nearby commercial / retail establishments. However, Sealand itself lacks any of the facilities and services needed to support everyday life meaning that residents would need to travel. In simple terms it is not of a size, nor does it have the character or role of a settlement.</p> <p>Sealand Village also lies with a zone C1 flood risk and is within a strategic green barrier which mirrors the Chester Green belt.</p>	
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	<p>We do have the problem that we are classed in the flood zone but being some distance away from the river and the surface water drainage put in by experts when the river Dee was canalised, I have never known Sealand to flood. If development were to take place then balancing ponds could be created as in many other developments.</p> <p>There is excellent transport facilities along the A548 and the new cycleway. If planners do not recognise the potential for developing Sealand Village then the history associated with this area will be lost. It hasn't even got a Village status sign</p>	<p>Both of these designations represent a significant constraint to development.</p> <p>In summary the evidence base used to inform the settlement hierarchy, does not support Sealand Village being identified as a defined settlement.</p>	
Knights Professional Services Ltd	In connection with land adjacent to Groomsdale Cottage, supports the identification of Hawarden as a Local Service Centre i.e. a relatively sustainable location for new development. However, a review of the settlement boundary and green barrier should be undertaken in view of housing land supply shortage in Flintshire.	Noted. Notwithstanding the present housing land supply shortage in Flintshire, a review of green barriers and settlement boundaries is being undertaken, in conjunction with identifying sufficient land for development to deliver the Plan's housing requirement figure.	No change
A Parsonage	In terms of settlement categorisation supports a continuation of the UDP settlement hierarchy. Considers that the projections were in it were over-optimistic and even 2 years after the planned end of timeframe have not been	The UDP identified a housing requirement figure based on projections and a range of other considerations and also identified a settlement hierarchy which formed the basis for distributing growth and development. The fact that the housing requirement	

	<p>attained. Also considers that the UDP approach recognises most of what is important to the villages of Hope, Caergwrle and Abermorddu i.e. unique economic, environmental and social characteristics.</p>	<p>figure was not 'delivered' was largely due to the economic downturn. As part of preparing the LDP it is now necessary to look at things afresh. It is not clear how the UDP approach recognised the importance of the separate villages comprising HCAC. The approach in the UDP identified HCAC in the second band of a three tier settlement hierarchy as a 'semi-urban / main village' and also identified the four separate villages as single settlement in planning terms (which was accepted by the UDP Inspector). The LDP settlement hierarchy identifies HCAC in the second of 5 tiers as a 'Local Service Centre' (settlements with a local role in the delivery of services and facilities) and the four villages are again classified as a single settlement in planning terms. It is not considered that the two approaches are significantly different, nor is it understood why this is of such concern to the objector.</p>	
	<p>Considers a sustainable approach to settlement categorisation is to recognise that the overdevelopment of the villages of Cefn y Bedd, Caergwrle and Abermorddu in a narrow corridor between mountain and river, with limited</p>	<p>At the end of the UDP Plan period, HCAC saw actual growth of 6.4% (completions of 125 units against a baseline of 1725 dwellings) and there were commitment of 55 units (those will planning consent). In the context of the UDP settlement hierarchy</p>	

	<p>development land, is not sustainable under the Wellbeing of Future Generations Act 2015) as i) it condemns future generations to an increasingly polluted environment along the narrow corridor ii) notes that Wrexham CBC has no plan to improve the A541 or A550 and iii) future development in this corridor would be contrary to para 4.1.1 of PPW.</p>	<p>(which the Objector prefers) which had a growth band of 8-15%, it is difficult to understand that the assertion that the overdevelopment of the 4 villages must be recognised. It is also not clear why the objector sees HCAC as not sustainable in the context of the Wellbeing Act due to pollution levels. Public protection responses on Candidate Sites have not identified any air quality / pollution issues in HCAC.</p> <p>Para 4.1.1 of PPW states <i>‘The goal of sustainable development is to “enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations.”</i> However the same section of PPW goes on to say <i>‘The planning system provides for a presumption in favour of sustainable development to ensure that social, economic and environmental issues are balanced and integrated, at the same time, by the decision-taker...’</i> PPW therefore provides a national context for preparing a development plan, and taking decisions on planning applications to ensure that development is sustainable.</p>	
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		However, there is nothing in the Wellbeing Act or in PPW to support the objectors assertion that development in HCAC would be inherently unsustainable.	
Mr T Holt	Having regard to the Settlement Service Audit, it is considered that the settlement of Gwernaffield has been placed within the incorrect category. It is categorised as a Defined Village, a fourth tier settlement but it has a range of services including a pre school nursery, primary school, mobile library, place of worship and public house and employment sites. The village is served by frequent public transport it is therefore considered that the village should be categorised as a tier 3 Sustainable Village. Gwernaffield has similar facilities to Ffynnongroyw, which is categorised as a tier 3 Sustainable Village and is considered suitable for further growth.		
Appendix 2 – Growth Options Background Paper			
Home Builders Federation	Supports the wording 'important to set the provision of land for housing in context with the other aims and objectives of the plan overall, and in particular the links between housing need and economic growth' in para 1.4 of Appendix 2, Background Paper,	Noted	No change

	Strategic Options – Planned Growth.		
Home Builders Federation	Does not agree with the word 'perception' in para 1.5 of Appendix 2. It is not fair to say 'perception'. The plan has either delivered or not and as it has reached its end can be judged against what it aimed to deliver and what has actually been delivered. What is critical is understanding what has caused this failure and if the plans strategies or policies are either fully or partly to blame then ensuring that the new plan does not make similar mistakes.	Noted. However, the wording of para 1.5 of Appendix 2 is fully justified as representations from the development industry on both the Topic Papers and the Key Messages document emphasised the under-delivery of the UDP and how this should be simply 'added on' to the LDP housing requirement. Recent discussions with Welsh Government have confirmed that there is no case for simply adding the UDP under-delivery onto the LDP housing requirement. The UDP housing need was assessed at a point in time, several years ago and the LDP housing need is being assessed at the present time. To merge two elements of housing need from different time period and different economic and social eras is illogical and perverse.	No change
Home Builders Federation	Does not agree that the economic recession is the only reason which affected demand and this should be stated. It is possible that although enough land was allocated for housing this land was not viable, or in the right places or actually in an ownership that genuinely wanted to bring it forward for development. The blame should not be solely on the economy and the industry in para 1.5 of Appendix 2.	Not accepted. The UDP allocated land that was the subject of scrutiny at public inquiry and where the Inspector considered that both the overall housing requirement figure and the individual elements (allocations, commitments and small site / windfall allowances) were appropriate and deliverable. In many instances site allocations were promoted by landowners and developers as being viable	No change

		and deliverable. Although hindsight has shown that some sites are clearly not deliverable or viable, the fact remains that the major impediment to house construction was the world economic recession.	
Home Builders Federation	Does not agree with para 1.6 of Appendix 2. The calculation method has to be accepted as it is set in legislation (TAN1) and unless changes are made by WG will be the method that the Inspector will require the Council to use. The same calculation is used by all LPA's across Wales. The calculation method was also used and encouraged by the previous version of TAN1 it was just that there was another method which could be used in certain circumstances.	Not accepted. The Council fully accepts that the residual method is required by TAN1. The paragraph does not say that the method is not accepted – rather, the paragraph is making the point that there is a significant supply of land still in existence and that this needs to be factored into the LDP. The statement that the residual method of calculation is used by all lpa's in Wales is rather disingenuous as they have no alternative based on TAN1. There is widespread concern amongst lpa's across Wales.	No change
Home Builders Federation	With regard to assessing significant 'commitments' in para 1.6 of Appendix 2 it is felt that the important issue here is how they are assessed and ensuring the assessment is done with the industry particularly on sites which have only ever been promoted by land owners rather than by developers.	Noted. Sites will be subject to a robust and detailed assessment.	No change
Home Builders Federation	Supports bullet points 1 to 4 of the key messages in relation to the provision of an appropriate level of housing in the plan listed in para 1.7 of Appendix 2.	Noted	No change

Home Builders Federation	Bullet point 5 of para 1.7 of Appendix 2 needs further consideration taking account of the Northern Powerhouse, City Regions and City Deals, as well as move to Strategic Development Plans in place of Local Authority mergers.	Partly accepted. It is presently unclear exactly what implications the Northern Powerhouse etc will have in terms of this Plan period. The issue therefor is to ensure that the Plan has an element of ambition and flexibility in meeting housing needs over the Plan period. The last bullet point is based on evidence from Chester Local Part One Inspectors Report, Flintshire and Wrexham LHMA and Flintshire New Housing Occupancy Survey.	No change
Home Builders Federation	Supports bullet points 4 and 5 of the key messages in relation to the provision of an appropriate level of housing in the plan listed in para 1.8 of Appendix 2.	Noted	No change
Home Builders Federation	Supports para 1.9 of Appendix 2.	Noted	No change
Home Builders Federation	Supports the approach taken in para 1.10 of Appendix 2. Based on the options currently under consideration consider as seen in other recent LDP's a blended option taking account of elements of a number of the current options is likely to be the best way forward for the plan.	Noted	No change
Home Builders Federation	Suggests the wording of PPW is slightly different to that in bullet point 4 of para 1.10 of Appendix 2 in that it offers the opportunity for the LPA to prove this if they think it is relevant, rather than an LPA having to do it.	There are no bullet points attached to para 1.10 of Appendix 2.	No change
Home Builders Federation	Disagrees with the statement in para 2.4 of Appendix 2 that 'the	Not accepted. It is a fact that Welsh Government projections	No change

	Welsh Government projections are usually given significant weight by Inspectors'. The point identified at other recent Public Inquires is that the 2011 figures should be the starting point.	should be given considerable weight as they represent a starting point, alongside a range of other considerations.	
Home Builders Federation	In para 2.7 of Appendix 2 is it fair to say its 'available'? Yes it is on paper but maybe not actually on the ground. Also the process cannot be 'flawed' because it is what the legislation requires.	Not accepted. The opening sentence of para 2.7 mentions the needs for the housing figure to be realistic, sustainable, viable and capable of being delivered, and in this context sites need to be more than just 'available'. There is widespread concern across the majority of lpa's about the present JHLAS process. Just because it is the present prescribed process does not mean that it is without weaknesses.	No change
Home Builders Federation	Shouldn't bullet point 3 of para 2.8 of Appendix 2 refer to a 'slow down' rather than a 'reduction' because household formation rates continue to drop just not at the rate predicted.	Noted. The important point is that the document recognises that household formation rates are not running at previous levels.	No change
Home Builders Federation	Does bullet point 7 of para 2.11 of Appendix 2 apply to private housing or just affordable? Help to Buy Wales statistics would suggest that 3 bed properties are the most popular across Wales.	The bullet point identifies that of the total housing stock, 3 bed properties are well catered for.	No change
Home Builders Federation	Does not agree with the use of the phrase 'limited value' in para 3.1 of Appendix 2. This should be reworded as although part of the preceding text supports this argument other parts contradict it	Not accepted. The Ministers letter effectively states that the WG household projections are of limited value in informing LDP housing requirements. The key point within the document is that	No change

	i.e. weight given to it by Inspectors at Public Inquires.	the projections are a 'starting point'.	
Home Builders Federation	Disagrees with the statement in para 3.1 of Appendix 2 that 'Without useable Welsh Government projections, the Council is left to define a sound policy basis...' It is clear from a number of earlier statements that the 2011 WG figures are the starting point and have been used and supported at all recent plan inquiries. Further PPW makes it quite clear that these figures should be the starting point for any assessment.	Not accepted. It would appear that both the objector and lpa agree that the projections are a starting point.	No change
Home Builders Federation	Supports bullet point 1 of para 3.1 of Appendix 2.	Noted	No change
Home Builders Federation	Does not agree with the approach in bullet point 2 of para 3.1 of Appendix 2 unless a detailed assessment has been carried out with the industry.	Not accepted. It is clear that a robust assessment of housing commitments will need to be undertaken. The bullet point is merely making the point that the best possible use of commitments should be made.	No change
Home Builders Federation	The evidence to support bullet point 5 of para 3.1 of Appendix 2 must be obtained through working with the industry rather than just making assumptions based on past records.	Noted	No change
Home Builders Federation	In response to bullet point 6 of para 3.1 of Appendix 2 the latest WG Viability Study due to report later this year will help identify where 'land banking' occurs.	Noted	No change
Home Builders Federation	In response to para 4.6 of Appendix 2 at a number of recent	Noted	No change

	<p>inquiries, concerns have been raised at the over reliance on 'allowances made for small site development and windfall site development'. Although past trends are often useful, consideration should also be given to proposed new policies in the plan which may affect the delivery of homes.</p> <p>With regard to 'flexibility allowance' The HBF would suggest that 10% flexibility is the lowest level acceptable and one commonly used by other plans. Although a higher level would be acceptable if supported by evidence.</p>		
Home Builders Federation	<p>In para 4.7 of Appendix 2, why has the amount of commitments at the base date of the Plan been decreased by 500 units in each option? This needs to be explained.</p>	<p>Para 4.7 explains that the reduction by 500 units is an indicative figure is 'an indicative figure and will be updated subsequently following a robust review of housing commitments in terms of their likelihood of being delivered'. It is considered that this is self explanatory.</p>	No change
Home Builders Federation	<p>Supports the approach in bullet point 1, para 4.8 of Appendix 2. Confirms the willingness of the industry to work with the Council on this exercise. However it is noted that there were a large number of sites in disagreement in the 2015 JHLAs which were never resolved as the study was withdrawn, the Council's position on these sites needs to be further</p>	<p>Noted. For the record, the 2015 JHLAS was not 'withdrawn'. Rather, it was not progressed by Welsh Government in terms of passing it on the PINS for determination. The lpa will continue to monitor housing land supply and will retain the JHLAS Study Group.</p>	No change

	discussed with the industry. Due to the UDP being time expired there is no longer a requirement for the Council to complete a JHLAs process however in similar situations with other LPA's the HBF have agreed a site trajectory paper which has helped inform and keep up to date the process of monitoring likely delivery over the next 5 years.		
Home Builders Federation	Bullet point 2, para 4.8 of Appendix 2 needs to take account of proposed policies, i.e. a reduction in thresholds for requiring affordable housing may affect delivery of small sites.	Noted	No change
Home Builders Federation	Supports the 15-20% flexibility referred to in bullet point 3 in para 4.8 of Appendix 2.	Noted	No change
Home Builders Federation	Does not agree with para 4.9 of Appendix 2 and are not aware of such and argument having been used before at LDPs and certainly at not such an early stage in the plan. Such and argument has not been used in the recent Cardiff and ongoing Vale of Glamorgan LDPs which are delivering similar numbers in similar timescales. The Flintshire Plan will not be adopted for a number of years and this is considered adequate time for the industry to plan for the housing delivery required by both the Flintshire Plan and the plans of adjoining authorities.	Not accepted. The text is not saying that the development industry cannot deliver sub regional housing requirements but merely questioning this in view of the quantum of development over broadly the same time period within three neighbouring County's.	No change

Home Builders Federation	The information shown in Table 5 of Appendix 2 is misleading because the Wrexham LDP is a preferred strategy stage, it is not adopted so these rates are based on an old UDP plan.	Not accepted. Table 5 includes the most up to date figures from Wrexham and CWAC, given the stages that their respective plans reached.	No change
Home Builders Federation	Does not agree that 'a lack of land availability has curtailed completions'. It is not simply about the availability of land, the issue is wider and includes: is the land available in the right locations? Is it viable taking account of the Council's policies and other factors which affect site viability?	Noted.	No change
Sustainability Appraisal			
Natural Resources Wales	In general agreement with the Sustainability Appraisal of Strategic Options and note that opportunities exist for appropriate forms of mitigation or avoidance to be applied to development schemes to ensure no detrimental impact on the environment and that NRW can comment further on these as the Plan progresses and includes more detailed information.	Noted	No change
Clwyd Powys Archaeological Trust	Welcomes the publication of the strategic options and, broadly supports their aims and consequently makes no objection or adverse comment. However raises a concern relating to the quality of the Sustainability Appraisal.	Noted PASS ON TO ARCADIS	

	<p>The Appraisal of Options appears to make no mention of any real consideration of the vast array of historic environment material contained in the Regional Historic Environment Record. It merely reiterates the same rather anodyne paragraph in each section about ‘...heritage assets being spread throughout the county’s settlements...’ with no specific reference made to any historic environment feature whether designated or not. Whereas the paragraph about the natural environment for each section, for example, at least has the appearance of having been considered against a set of data.</p> <p>The recently published statutory guidance accompanying the Historic Environment (Wales) Act 2016 makes specific reference to the requirement placed on Local Authorities by Sections 35-37 of the Act to have regard to the content of their HER in the exercise of their functions. However the paragraph included on the heritage under each option has the appearance of a cut and paste effort which demonstrates no real thought or any real attempt to consider the position against a set of data.</p>		
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	<p>Similarly, Section 11 of Appendix A contains only references to statutorily designated sites – and if the references to Landscape / Townscape Characterisation or Landscapes of Historic Importance in Section 10 refer to Registered Landscapes of Historic Interest or their characterisation shouldn't there be some mention of Cadw under Source?</p> <p>The omission of a consideration of the HER here, and the rather pre-emptory treatment of the historic environment on the whole, is at odds with the intent expressed elsewhere in the plan documents to consider the broad range of heritage features that exist within the County. More might have been done by the consultants engaged on this task to achieve a rather more holistic approach.</p>		
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Appendix 18

Preferred Strategy Public Notice

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) (Amendment)
Regulations 2015 (Regulation 15)
The Conservation of Habitats and Species Regulations 2010 (as amended 2012)

Notice of Pre-Deposit Public Consultation for a Local Development Plan Flintshire Local Development Plan 2015 – 2030

Flintshire County Council has prepared a Preferred Strategy document for the above plan. The Local Development Plan (LDP) will, upon adoption, replace the current Flintshire Unitary Development Plan and be the basis for land use planning decisions in the County.

The Preferred Strategy document outlines the Plans vision, issues and objectives, preferred level of growth and preferred spatial strategy. It identifies two Strategic Sites and Strategic Policies. The Pre-Deposit Proposals documents are as follows:

- Preferred Strategy
- Integrated Impact Assessment – Interim Report (Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) including a Non-Technical Summary)
- Habitat Regulations Assessment (HRA) Screening Report

The Preferred Strategy is also accompanied by a range of other documents including a summary leaflet and background papers which are all available online.

A Background paper is available in which the sites on the Candidate Sites Register have been assessed in terms of broad conformity with the Preferred Strategy. It also explains that new or alternative sites may also now be submitted for consideration. This Background Paper will be available at consultation and exhibition venues.

Copies of the Pre-Deposit Proposals documents are available for public inspection from Thursday 09 November 2017 until Thursday 21 December 2017:

- On the Council's website www.flintshire.gov.uk/ldp
- At County Hall Main Reception during normal opening hours
- At Flintshire Connects Offices in Buckley, Connahs Quay, Flint, Holywell and Mold and at all libraries, during normal opening hours
- At an exhibition in County Hall Main Reception for the 6 week consultation period
- At the following exhibitions during normal opening hours:
 - Buckley Library, Deeside Library (Leisure Centre), Holywell Library and Mancot Community Library between Thursday 9th November and Wednesday 29th November
 - Broughton Library, Flint Library and Mold Library between Thursday 30th November and Thursday 21st December

Comments on the Pre-Deposit Proposals documents, the Candidate Sites Assessment and other supporting information, as well as the submission of alternative sites must be made in writing and received by the Council by 5pm on Thursday 21 December 2017. All

representations must clearly identify the subject matter, any change sought and the reasoning. Representations can be made by one of the following methods:

- Using the on-line consultation portal (this will require respondents registering to use the Objective Keystone system on the Council's website)
- Using the comments form
- Using the alternative site submission form
- By e-mail to developmentplans@flintshire.gov.uk
- By writing to Andrew Farrow, Chief Officer (Planning and Environment), Flintshire County Council, County Hall, Mold, Flintshire, CH7 6NF

Any queries can be directed to the LDP helpline 01352 703213 or by using the e-mail address above.

The Authority is only required to consider representations made in accordance with this notice. Representations made during this pre-deposit (Preferred Strategy) stage will not be considered by the Inspector appointed to carry out the independent examination.

The next stage of the plan preparation process will be the 'deposit' stage when the deposit LDP will be consulted upon and representations sought.

Appendix 19

Preferred Strategy Consultation Letter dated 31st October 2017



Your Ref/Eich Cyl

Our Ref/Ein Cyf

AR/LDP/PS

Date/Dyddiad

31 October 2017

Ask for/Gofynner am

Andy Roberts

Direct Dial/Rhif Union

01352 703213

Fax/Ffacs

developmentplans@flintshire.gov.uk

Dear Sir/Madam

Pre-Deposit Proposals Public Consultation (Preferred Strategy)

Flintshire Local Development Plan 2015 – 2030

I am writing to inform you that Flintshire County Council is consulting on its Preferred Strategy for the Flintshire Local Development Plan (LDP).

The Preferred Strategy document outlines the Plans vision, issues and objectives, preferred level of growth and preferred spatial strategy. It identifies two Strategic Sites and Strategic Policies. The Pre-Deposit Proposals documents are as follows:

- Preferred Strategy
- Integrated Impact Assessment – Interim Report (Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) including a Non-Technical Summary)
- Habitat Regulations Assessment (HRA) Screening Report

The Preferred Strategy is also accompanied by a range of other documents including a summary leaflet and background papers which are all available online. A Background Paper is available in which the sites on the Candidate Sites Register have been assessed in terms of broad conformity with the Preferred Strategy. It also explains that new or alternative sites may also now be submitted for consideration. This Background Paper will be available at consultation and exhibition venues.

Copies of the Pre-Deposit Proposals documents are available for public inspection from Thursday 09 November 2017 until Thursday 21 December 2017:

- On the Council's website www.flintshire.gov.uk/ldp
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Comments on the Pre-Deposit Proposals documents, the Candidate Sites Assessment and other supporting information, as well as the submission of alternative sites must be made in writing and received by the Council by 5pm on Thursday 21 December 2017. All representations must clearly identify the subject matter, any change sought and the reasoning. Representations can be made by one of the following methods:

- Using the on-line consultation portal (this will require respondents registering to use the Objective Keystone system on the Council's website)
- Using the comments form
- Using the alternative site submission form
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Representations made during this pre-deposit (Preferred Strategy) stage will not be considered by the Inspector appointed to carry out the independent examination.

The next stage of the plan preparation process will be the 'deposit' stage when the deposit LDP will be consulted upon and representations sought.

Any queries can be directed to the helpline 01352 703213 or the e-mail address above.

Yours faithfully



Chief Officer (Planning and Environment)

Appendix 20

Preferred Strategy Consultation Representations

Question 1. The Preferred Level of Growth		
<p>The Preferred Strategy makes provision for a level of growth comprising 8,000 -10,000 jobs through some 223 ha. of employment land, supported by a housing provision for 7,645 new homes to meet a housing requirement of 6,950 dwellings. This represents a mix of Option 4 and Option 6 from the Strategic Options document. Do you have any comments to make on the preferred level of growth?</p>		
Representation	Proposed FCC response	Proposed change
The policy wording should be re-ordered so that it is clear that the housing requirement provides for the needs of the area first and the economic growth aspirations are in addition.	This is counter intuitive to the main thrust of the LDP strategy which has been clearly defined and set out, and reflects a desire by the Local Authority to plan positively for Economic Growth. This aligns with the wider regional growth ambition that Flintshire along with its North Wales and North West of England neighbours are pursuing in relation to growth bids to UK and Welsh Government. This does not mean that housing is not a key part of supporting this ambition, but does ensure that housing on its own does not become a singularly dominant and disproportionate focus for the LDP.	No change
The under delivery of housing in the UDP could have affected the household formation rate and have a negative effect on the LDP housing provision. Further consideration should be given to the impact of the UDP's under delivery.	There is no evidence presented to support either the assertion that household formation was affected in the way suggested, or indeed that the UDP somehow under-delivered housing. In the first instance development plans do not deliver housing – they create the conditions for	No change

	housing to be delivered, by making provision for sufficient housing to be built to meet the housing requirement in the plan. The UDP did this. The fact that not all of the houses that the plan made provision for were built is a factor of the combination of the performance of the construction industry, governed by a severe recession half way through the plan period, general concerns about the capacity of the industry in the North East Wales area, a selective approach to the take up of allocations, and the fact that not all of the assessed housing need materialised as actual demand for housing.	
The LDP is not sufficiently aspirational. This level of housing growth will not be sufficient to deliver economic objectives. The LDP needs to opt for a higher level of housing growth.	There is a general consensus in support of the level of growth proposed, from a number of perspectives including the Welsh Government, the HBF, developers with the ability to think strategically, neighbouring authorities, and other public sector providers including health. All recognise as the Council does, the need to balance an element of aspiration with the importance of being able to deliver that ambition, and the capacity that exists to do so.	No change
Further information is required to illustrate where the additional working age population required to support the LDP is to be drawn from.	The ambition within the strategy is centred on job creation both to improve the prospects for existing residents, but also clearly recognises that to provide the workforce necessary to fill these jobs, and in recognition of Flintshire's border location and role as a regional economic hub, increased levels of in-migration will be	No change

	required as well as changes in commuting patterns.	
A full justification showing the link between the housing levels proposed and jobs growth predicted is likely to be required.	The approach to deriving the housing requirement from job growth was set out in the technical paper “Population and Household Projections with Dwelling and Employment Impacts”. Whilst there is an inherent logic to this, the approach is also deliberately simple given that it is difficult to predict an absolute relationship between jobs and housing, given the amount of variability that exists in trying to predict where people will live and work.	No change
The level of housing provision is low when considered against the growth in jobs over the plan period. The increased letting market in Chester will create demand for housing to buy in Flintshire and will add to the housing land requirement.	This ignores the obvious point that CWAC have proposed significant land releases in their green belt to provide for a significant amount of traditional family housing. This not only balances the letting market referred to but may also create an issue of the capacity of regionally active developers to be able to compete to deliver the housing planned by CWAC, and within similar time frames the planned housing in the Flintshire LDP as well as the Wrexham LDP, that are all on similar plan timeframes.	No change
The overall economic and housing 'growth' level is far too high and not fully justified. Growth should only meet people's needs and not develop more than is necessary to ensure reasonable progress in its future economic strength.	The point made contradicts itself as the essence of Flintshire's economic strength is the role its economy plays in a regional as well as local sense. Flintshire's border location and strong economy mean that it functions as a regional economic hub and with this has to come the reality that it provides employment opportunities for its residents whilst at the same time being reliant on workers who commute into Flintshire	No change

	from elsewhere. To ignore this would be a failure to plan properly for the future of Flintshire's economy and prosperity.	
The proposals create new housing development of highly profitable greenfield housing estates whereas the LDP should focus on improving the quality of the run-down settlements on the eastern, coastal flank of Flintshire.	The Preferred Strategy does not (with the exception of the two strategic sites) identify the scale, type or distribution of proposed development sites as that is the role of the next stage in LDP development, the production of the deposit LDP. The LDP's settlement hierarchy shows the position and role that all of Flintshire's settlements could play in the detailed plan, including eastern coastal Flintshire settlements. Housing sites will be assessed on the basis of their degree of sustainability aligned with the position the settlement they relate to has within the settlement hierarchy. As well as being sustainable, sites must also be viable and deliverable as otherwise the market and development industry will not be interested in bringing them forward.	No change
The LDP should allow flexibility to provide growth in rural areas.	Whilst the LDP spatial strategy is clear that the majority of growth should be provided by the top three tiers of the settlement hierarchy, the plan does not preclude sensitive and sustainable levels of development in Flintshire's rural settlements. Criterion vi. of Strategic Policy STR 11 Provision of Sustainable Housing Sites, sets out to "ensure in rural areas, that genuine and proportionate needs for housing are met in a sustainable manner". This clearly has to be locally needs driven, and the deposit LDP will include policies which define these needs and	No change

	the level of approach to sustainable housing provision in rural areas.	
In order to meet the housing needs of Flintshire there should be a change in the types of housing being built rather than simply increasing the housing stock.	Criterion iii. of Strategic Policy STR 11 Provision of Sustainable Housing Sites seeks to “provide balanced developments through a mix of housing types”. This will be developed into more detailed policies within the deposit LDP.	No change
The preferred level of growth should provide a range of employment land to meet the needs of all occupiers therefore additional employment land should be identified to facilitate the delivery of jobs growth and employment land.	Flintshire has a significant portfolio of employment land and sites available to provide investors and occupiers with a range and choice of sites and locations to meet their various requirements. These have been assessed via an Employment Land Review which has advised on their fitness for purpose to remain within the portfolio of available employment land. Along with the employment opportunities offered by the two strategic sites identified, it is not considered necessary or appropriate to identify additional employment land, unless it is demonstrated that new land is required to meet specific or specialist needs, not available within the existing extensive portfolio of sites.	No change
There are reservations about the capability of the construction industry to deliver housing growth following the under delivery of housing numbers during the life of the UDP.	This is a concern shared by the Authority and is a relevant factor in dismissing objections which claim an under-delivery of housing by the UDP where, as the representation identifies, it is the construction industry that delivers new housing. There are a limited number of developers operating in the Flintshire/N.E. Wales/Cheshire market who will have to face the challenge of the collective planned housing releases in the Flintshire and Wrexham LDPs, as well as the	No change

	Chester LDF. It is unclear what capacity the industry has to deliver this cumulative amount of housing and evidence of current completion levels in the three authorities suggests that the industry is already falling behind this challenge.	
New housing provision should reflect demand in terms of starter homes and empty nesters and not simply the 3 and 4 bedroom houses that seem to constitute the majority of planning applications.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	No change
The employment arising from the two strategic sites is said to be part of the sub-regional growth strategy so there will also be additional jobs coming from other areas. These need to be identified and factored into the calculation of employment growth and housing requirements in order to ensure that growth potential in the County is not constrained. A sustainable approach to employment provision should look to provide opportunities in other locations e.g. Penryffordd.	With reference to Strategic Policy STR 2 The Location of Development, and Penryffordd’s position as a tier 3 settlement, it is not clear what employment opportunities are felt to exist in this settlement, in contrast with the Principle Employment Areas identified within the strategic policy mentioned. No evidence is provided to justify considering Penryffordd as a location for employment.	No change
There is no detailed explanation of how the growth in jobs is translated into housing numbers.	The approach to deriving the housing requirement from job growth was set out in the technical paper “Population and Household	No change

	Projections with Dwelling and Employment Impacts”. Whilst there is an inherent logic to this, the approach is also deliberately simple given that it is difficult to predict an absolute relationship between jobs and housing, given the amount of variability that exists in trying to predict where people will live and work.	
Unclear what the impact of BREXIT will be on jobs and housing provision if the two are linked.	Agree. Until the UK Government negotiate and agree a BREXIT agreement there is no evidence available to show what if any impacts this will have on either jobs or housing provision. In the absence of such evidence or impacts, what is there for the LDP process to take account of at present?	No change
The number of dwellings proposed is not sufficient. Option 5 (i.e. 690 units per annum/a total of 10,350 units) will allow the big housing sites to come forward in the long term while smaller sites will ensure that housing need is met in the short to medium term.	There is no evidence presented to show how simply picking the highest growth option considered by the Council is either sustainable or deliverable. This is also not a view shared by the Welsh Government, HBF, and developers capable of thinking strategically, who support the preferred growth option put forward. The highest level of housing completions experienced recently in Flintshire was 662 units in 2015-16 but this was followed in 2016-17 by a drop to 421. What this shows is an inability of the industry to sustain high levels of development despite there being available sites. How then the industry could sustain a completions rate of 690 units per annum, year on year for the whole of the plan period is not explained or evidenced, and the Council	No change

	considers that this level of growth is neither needed, sustainable or deliverable.	
The Strategic Allocations at Northern Gateway and Warren Hall do not sit at the top of the settlement hierarchy and have failed to deliver development. What does the strategy do to bring benefits to the existing Main Service Centres which need investment? The proposals for the A55/A548 corridor north of Connah's Quay presents a significant opportunity to compliment the Plan. Therefore employment-led growth is supported but not at the strategic locations proposed.	It is assumed that this representation supports land that sits adjacent to the proposed Welsh Government highways improvement, commonly referred to as the “red route”. Whilst a decision in principle has been taken to progress with the red route option, there is as yet no agreed line, no approved design for the route or related junctions, no detailed assessment of the impacts of developing the route and the mitigation required for this, no planning consent, and no timescale for development of the route. Contrary to the point made, the two strategic sites referred to are in an advanced stage of infrastructure development, essential to enabling the subsequent development of the sites. It is not uncommon for there to be long lead in times before strategic sites come forward and it is also naïve to think that simply identifying another strategic site would result in its early delivery. Given the issues identified with the red route above, to allocate a strategic site to ‘benefit’ from proximity to this route is at best premature at present, would deflect from the Council’s stated aims of bidding as part of the Growth Deal for infrastructure investment to support bringing forward existing advanced sites, and would better be reviewed as part of an LDP 2.	No change
The Local Housing Market Assessment found that there is an annual shortfall of 246 affordable dwellings so there should be an increase in the overall housing	The relevance of the LHMA figure is as an indicator of the level of backlog in affordable provision. The need it identifies is compressed	No change

<p>requirement to increase the provision of affordable homes as a proportion of schemes. The flexibility allowance should be 20% to assist in the delivery of an appropriate level of new homes, the delivery of affordable homes and meeting the needs of the housing market.</p>	<p>into a five year period, such is the currency of the LHM assessment before it requires review or update. It therefore serves as a guide for setting an achievable and deliverable affordable housing target for the LDP period. This will also be informed by an update of the LHMA as well as the Council's Local Housing Strategy, which will aim to set such a deliverable affordable target. It does not necessarily follow that more private housing needs to be provided to provide a commensurate level of affordable, as for example the Council's current SHARP house building programme is providing affordable homes directly without the need for a link to private housing delivery. Equally there is no evidence that an increase in the way suggested is deliverable, and may instead result in un-delivered sites as the industry struggle with capacity, or land banking which would not be an appropriate or sustainable use of land.</p>	
<p>Based on the economic growth aspirations, the target of 7,645 dwellings should be viewed as a minimum. In order to ensure that the minimum target figure is met it is important that the plan identifies a sufficient number of sites / housing allocations to meet both the short and longer term development needs.</p>	<p>Noted. Strategic Policy STR 11 deals with the provision of Sustainable Housing Sites and this, along with other aspects of the Preferred Strategy, will guide the identification of suitable sites within the deposit LDP.</p>	<p>No change</p>
<p>A step-change in housing and employment land delivery is required. The LDP must be a lot more aggressive in requiring promoters to demonstrate deliverability. The Authority must also recognise that settlement boundaries will have to be revised and Green Barrier land released to facilitate growth.</p>	<p>It is not clear what is meant by "step change" or indeed how this is evidenced as being either sustainable or deliverable. Unless broad imprecise statements like this can be further clarified it is difficult to take anything useful from the comment. It is already stated and self-</p>	<p>No change</p>

	evident that Green Barriers will be reviewed along with settlement boundaries and candidate sites, as part of developing the housing proposal element of the deposit LDP.	
The Plan fails to address the housing needs of the ageing population. Unless properly planned for there is likely to be a serious shortfall in accommodation for older people, which will impact meeting the housing needs County wide and broader policy objectives.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	No change
A target of 510dpa remains below the level that would be necessary if the 2008 headship rates were applied (or an indexed mid-point between the 2014 and 2008 headship rates). The employment land evidence does not support the housing target, whilst overly optimistic assumptions concerning net out commuting reductions artificially suppresses housing need. The 510dpa target fails to meaningfully address the very high affordable housing target in Flintshire. A housing target at the top of range for Option 6 (490 dpa) plus a 10% uplift, would be the absolute minimum that the LDP should plan for, i.e. around 540 dpa.	2008 headship rates were updated in 2011 not simply to account for the effects of recession, but more importantly because as assumptions it had been found that the 2008 rates were inflated and as such creating artificially high levels of household formation. 2011 rates are therefore both more up to date and statistically reliable. No evidence is provided to show how a higher rate of housing provision is either sustainable, or deliverable.	No change

<p>Concerns over the robustness of the background evidence and therefore the overall housing requirement. The Population Technical Paper sets out a simplistic methodology for converting jobs growth to housing requirements and uses a projected jobs growth of 8,000-10,000 from 2015-2030 as a starting point. Due to its publication date it does not take into account the potential impacts of Brexit or the UK Industrial Strategy White Paper (2017). The Paper cannot therefore be considered up-to-date it is unclear how robust this evidence is for the purposes of informing the jobs requirement or housing numbers in the Preferred Strategy.</p>	<p>Whilst the representation is critical of the basis and updatedness of the evidence underpinning the Council's selected growth rate, it does not as an alternative provide more up to date evidence to either show what the jobs or housing levels should be, or indeed identify what the impacts of BREXIT will be in the future. As such it is difficult to take anything useful from the comment.</p>	<p>No change</p>
<p>Reconsider uplifting the housing target to 10,350 dwellings (as set out in option 5 of the growth options) as a minimum target and the use of 2008 household formation rates (i.e. pre-recession). The Council's own data identifies an annual shortfall of 246 affordable dwellings for at least the next five years. The housing target as set out in Option 5 is in reality too low and should be seen as a minimum in order to provide sufficient flexibility and to address the backlog in housing delivery. The requirement of 695 dpa is too low. The proposed buffer of 10% is insufficient, it should be 20% which would result in a minimum requirement of 12,420 dwellings, which equates to 1,035 dpa. A fundamental review of the Green Barrier is also required, which would accord with the recommendations of the UDP Inspector.</p>	<p>There is no evidence presented to show how simply picking the highest growth option considered by the Council is either sustainable or deliverable. This is also not a view shared by the Welsh Government, HBF, and developers capable of thinking strategically, who support the preferred growth option put forward. The highest level of housing completions experienced recently in Flintshire was 662 units in 2015-16 but this was followed in 2016-17 by a drop to 421. What this shows is an inability of the industry to sustain high levels of development despite there being available sites. How then the industry could sustain a completions rate of 690 units per annum, year on year for the whole of the plan period is not explained or evidenced, and the Councils considers that this level of growth is neither needed, sustainable or deliverable</p>	<p>No change</p>

<p>The Welsh Government is broadly supportive of the preferred strategy; the level of homes and jobs proposed when considered against the range of issues the plan is seeking to address; and the technical work undertaken by the Council in embracing a positive approach to national policy in this respect. There were 14 other comments of support.</p>	<p>Noted</p>	<p>No change</p>
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Question 2. The Preferred Spatial Strategy

The Preferred Strategy is based on Option 5 ‘Sustainable Distribution plus a Refined Approach to Rural Settlements’ whereby growth is directed to the top three tiers of the settlement hierarchy and in the bottom two tiers provision is focussed around meeting local needs. Do you have any comments to make on the Preferred Spatial Strategy?

Representation	Proposed FCC response	Proposed change
At the detailed policy stage within the bottom tiers some flexibility should allow for an element of private housing required to help support the delivery of affordable and local need housing due to viability issues.	Whilst this is detailed policy matter for the Deposit Plan Policy STR2 of the Strategy acknowledges that windfall market housing where essential to deliver affordable housing may be provided in the defined villages but not in the undefined villages.	No change
There are inconsistencies in the settlement categories - Bagillt is a Sustainable village rather than a local service centre whereas neighbouring Greenfield is identified as a Local Service Centre. Range of services in Bagillt is greater than Greenfield including a branch surgery ,community library and a larger number of schools, shops and public houses.	The approach to the settlement hierarchy of the Preferred Strategy is set out in the Key Messages document – setting the future direction for the plan. Each of the settlements have been assessed in terms of their facilities and services and whether it is a sustainable location to support new development. It is not considered that the approach is inconsistent.	No change
Bagillt being classed in a different category would surely restrict potential development opportunities.	As a sustainable village Bagillt together with other settlements	No change

	in that category would having regard to STR2 be a sustainable location for development in light of the strategy regarding the location of development.	
The Plan should be more aspirational and be based on a longer plan period (i.e. beyond 2030). This would allow a co-ordinated approach for a new settlement that would deliver sustainable development and make a significant contribution towards meeting housing need.	Planning Policy Wales requires LDP Plan periods to cover a 15 year period after which (or if necessary before) a review must be undertaken. A new settlement was initially considered as part of a large list of possible spatial options. However PPW adopts a cautionary stance regarding new settlements advising that they are rarely justified in Wales.	No change
Affordable housing only works in the urban areas due to the cross subsidy from new private sector housing. Local and national policies do not enable this to happen at an appropriate scale in the smaller villages. A development of 2 market dwellings and 2 affordable would meet local need.	Noted. However affordable housing in rural areas can be successfully provided as evidenced by a rural exception scheme on the edge of Lixwm village. The explanation to STR2 States that in relation to windfall sites in the smaller villages that scope exists for limited market housing to deliver local needs affordable housing.	No change
The AONB committee reserves further comment until the detailed land allocations, settlement boundaries and related policies are drawn up.	Noted. A further opportunity will be given to comment on the detailed policies and proposals in the Deposit Plan.	No change

The Town Council supports the Preferred Strategy on Spatial distribution.	Noted.	No change
The Spatial Strategy proposes a low level of growth in the rural area which may adversely affect the plans performance in sustaining existing communities. The Spatial Strategy should allow adequate flexibility to provide growth appropriate in the rural area.	Whilst the LDP spatial strategy is clear that the majority of growth should be provided by the top three tiers of the settlement hierarchy, the plan does not preclude sensitive and sustainable levels of development in Flintshire's rural settlements. Criterion vi. Of Strategic Policy STR 11 Provision of Sustainable Housing Sites, sets out to "ensure in rural areas, that genuine and proportionate needs for housing are met in a sustainable manner". This clearly has to be locally needs driven, and the deposit LDP will include policies which define these needs and the level of approach to sustainable housing provision in rural areas.	No change
Need should be the main driver of future development in Northop and Sychdyn not desirability.	Accepted. One of the fundamental purposes of the LDP is to provide for the need of future development in the County be that housing or employment provision.	No change

Options 3 and 5 are the most appropriate way to move forward. Options 3 and 5 seek to focus the majority of new development in the key towns and settlements which are best placed to accommodate the needs and infrastructure over the plan period.	Noted. It is agreed that Option 5 forms the basis for the strategy in directing growth to locations considered to be the most sustainable. However the option also includes a refined approach to the rural areas to ensure that the plan does not preclude sustainable levels of development in the rural settlements.	No change
Buckley as a key town is well suited to meet a significant portion of the housing need for Flintshire	Buckley is one of a number of towns in Flintshire that has been categorised as a Main Service Centre in the settlement hierarchy. These centres can be expected to be the main locations for new housing development.	No change
It seems very strange to announce proposed planned growth within a 15 year period knowing that the actual period will be considerably shorter. .Who defines the terms 'innovative', 'sensitive', or 'refined' ? Will sites currently designated remain on the list even if they do not meet the criteria? Who is responsible for developing the infrastructure to support developments e.g. public transport that is sustainable and environmentally sound?	The plan period will remain 15 years notwithstanding when the plan is adopted within that period. Any housing completions that occur up to the point the deposit plan is produced will be netted out of the overall housing requirement, and the need for new sites to provide the residual requirement. Any undeveloped sites from the UDP will be reassessed alongside candidate sites for their suitability to be	No change

	allocated in the LDP. The plan should act as a guide for the various infrastructure providers in order to allow them to plan for the growth proposed.	
Additional employment land should be identified in order to facilitate the delivery of jobs growth and employment land development.	The Employment Land Review concluded that there is sufficient land available for this use and whilst there is no need to identify further employment allocations STR8 does allow for further employment development in sustainable locations.	No change
The plan does not seem to take into account the rural areas which are not even defined as rural villages. Delivering development in a sensitive needs driven sustainable manner in the Defined and Undefined villages, should include the rural hinterland as well.	Whilst the LDP spatial strategy is clear that the majority of growth should be provided by the top three tiers of the settlement hierarchy, the plan does not preclude sensitive and sustainable levels of development in Flintshire's rural settlements. Criterion vi. Of Strategic Policy STR 11 Provision of Sustainable Housing Sites, sets out to "ensure in rural areas, that genuine and proportionate needs for housing are met in a sustainable manner". This clearly has to be locally needs driven, and the deposit LDP will	No change

	include policies which define these needs and the level of approach to sustainable housing provision in rural areas.	
Unlimited development in Sustainable Villages will only create dormitory settlements rather than enhance current communities.	The Preferred Strategy is not advocating unlimited development in sustainable villages. By contrast it seeks to distribute development sustainably having regards to the settlement hierarchy.	No change
Hope that the growth is evenly spread across the county and that no one town or village be required to take more than its fair share of future development.	The Plan does not seek to apportion development spatially by the use of numerical methods relating to growth bands, targets or quotas. Rather the Plan seeks to distribute development in a sustainable manner having regard to the settlement hierarchy	No change
It is considered that ~Option 2 “ Focussed Urban Growth should be the preferred option for growth. Option 5 “ Sustainable Distribution plus Refined Approach to Rural Settlements is the second preferred option as this also directs development to the top tiers of the settlement hierarchy but directs this to the top three tiers rather than the top two more sustainable settlements.	Noted. It is agreed that Option 5 forms the basis for the strategy in directing growth to locations considered to be the most sustainable. However the option also includes a refined approach to the rural areas to ensure that the plan does not preclude sustainable levels of development in the rural settlements. Option 2 has been discounted on the basis that is	No change

	too rigid and focussed to provide flexibility.	
It is noted that in the proposed settlement hierarchy for the Flintshire LDP has Cadole as a 5th tier settlement with no development boundary. If followed through to adoption, this would create an anomalous situation with the settlement having a different status either side of the County boundary.	Noted. Cadole will no longer have a settlement boundary in the LDP. However, given the policy / constraint context for the settlement in terms of the presence of the A494(T), Cadole Rd and the SAC/SSSI being firm boundaries around the settlement, plus its location within the AONB, it is unlikely to experience much in the way of new development. In this scenario it is not considered that the inconsistency in terms of the presence or otherwise of a settlement boundary will be harmful in practice.	No change
In terms of where the new homes should go, not every settlement in the County is served by its own Wastewater Treatment Works (WwTW), the catchment areas of some WwTW cover numerous settlements.	Noted. The Council will work closely with the statutory providers of the treatment works to ensure systems are able to cope with potential allocations.	No change
Consider the approach to defined villages of allowing some market housing as a means of delivering local needs housing, is unnecessarily constraining as it appears to assume that the only housing needs in smaller villages are from people in need of affordable housing.	By definition, allowing some market housing to cross subsidise affordable housing seems to be capable of catering for more than just the affordable local need market. The development of market housing only in rural villages does	No change

	nothing in terms of meeting local needs however they are defined, and does not appear to be sustainable.	
Despite being individual villages with individual needs, Hope, Caergwrle, Abermorddu and Cefn y Bedd (HCAC) have been grouped together as one settlement and have been done so for some time. It is hoped that consideration will be given to the fact that we have four separate identities when planning developments.	Noted. In planning terms HCAC is one settlement due to its characteristics. A settlement boundary is a planning tool and does not necessarily define a community. In this case it encompasses 4 different areas/communities and parts of different community council areas where there is a dependency on each other for access to facilities and services. The settlement boundary encloses an area considered as a single contiguous urban area in planning terms.	No change
Placing the four villages in the same settlement grouping as e.g. Broughton (which has 7,000 jobs and a retail park) gives the impression that they can support 35-40% growth in housing.	In planning terms HCAC is regarded as one settlement. The approach to the settlement hierarchy of the Preferred Strategy is set out in the Key Messages document – setting the future direction for the plan. Each of the settlements have been assessed in terms of their facilities and services and whether it is a sustainable location to support new	No change

	development. Paragraph 5.2.4 of the document is seeking to explain that Local Service Centres as a whole will take approximately 35 to 40% of the overall growth. It does not mean that each settlement will grow by this percentage.	
Main Service Centres (MSC's) should take a higher proportion of development than Local Service Centres (LSC's) or Sustainable Villages. The two strategic sites identified in STR3 are both within LSC's.	That is how the settlement hierarchy will operate. The two strategic sites are not within settlements as stated and have their own status as strategic sites, hence the specific policy explaining their purpose.	No change
The proportion of development within each of the tiers is not set within the consultation document, it is acknowledged that this may be determined at a later stage of the plan process, and we reserve the right to provide further representations in relation to this.	The preferred strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations to be included in the Deposit LDP. That said paragraph 5.2.4 gives a broad distributional apportionment of growth relative to the settlement hierarchy. Further representations can be made at the Deposit stage.	No change
It is not clear in strategic terms, why settlements are thought to be able to accommodate a series of smaller sites but are unable to accommodate a single larger site providing the same number of dwellings.	The rationale is simply to balance the availability of a range of types of sites to be able to ensure the deliverability of housing and the maintenance of	No change

	a 5 year land supply. It is self-evident that by concentrating allocations in a lesser number of larger sites runs the risk of longer site development lead-in times, non-delivery if a large site develops constraints, a lack of flexibility in the plan, and failure to maintain a five year land supply.	
The Deposit Plan should be clear as to the spatial distribution of all housing components by settlement tier in numerical terms, not just broad percentages. A table demonstrating this would be advantageous.	Noted. It is not necessary to be so specific at the preferred strategy stage. As recognised this information is more appropriately included for the Deposit Plan.	No change
It is unclear how the findings of the LHMA have influenced the scale and location of growth. There should be a clear articulation between the provision in the settlement hierarchy and need, illustrating why growth has been identified at specific locations to maximise affordable housing delivery. Linkages to sustainability issues should also be reconciled, i.e. why it is, or is not appropriate to locate affordable housing in less sustainable communities.	Noted. This will be taken on board as part of developing the deposit LDP and in refreshing the LHMA to inform both the LDP and the update of the Council's Local Housing Strategy.	No change
At this stage it all feels very vague. Any infrastructure provider, housebuilder or indeed residents wishing to purchase or move have no idea where Flintshire plan to build their 7,645 houses, aside from on the Airfields site and Warren Hall.	The preferred strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations to be included in the Deposit LDP. That said paragraph 5.2.4 gives a broad	No change

	distributional apportionment of growth relative to the settlement hierarchy.	
Mold as one of the ~Main Service Centres should clearly be a key focus for new development and make a significant contribution towards the growth of the borough and meeting the target for accommodating 40 - 45% of new development.	Mold is one of a number of towns in Flintshire that has been categorised as a Main Service Centre in the settlement hierarchy. These centres can be expected to be the main locations for new housing development.	No change
Disagree with OPTION 5 and consider that OPTION 3 should be favoured. A variation of OPTION 3 might be to allow for proportionate sustainable growth outwith of the key growth area in those settlements that are more sustainable and thus allow some modest growth in those locations.	This does not accord with the preferred strategy or the consensus view that option 5 is the most suitable option. No explanation, definition or supporting evidence is provided to help the Council understand what “might” means, what “proportionate sustainable growth” is or looks like in lower order settlements, as well as which settlements these are and how their sustainability to receive “proportionate sustainable growth” has been assessed. Without this evidence and explanation it is difficult to see how the proposed alternative is in any way preferable to the preferred spatial option.	No change

<p>Mancot ought to be in Tier 2 rather than Tier 3. It benefits from very good levels of services and facilities with high level of sustainable access and is located in an area which could take advantage of and offer good opportunities for housing growth.</p>	<p>The Council prepared settlement profiles to judge and assess the sustainability of settlements which in turn influenced where settlement should sit on the sustainable settlement hierarchy. No such evidence has been submitted to substantiate the objectors alternative view for Mancot, and it is difficult to judge this from the anecdotal and superficial comments provided.</p>	<p>No change</p>
<p>A small level of growth must be anticipated/expected, but should not over-burden villages such as Northop with newer, larger developments.</p>	<p>Noted. The Plan does not seek to apportion development spatially by the use of numerical methods relating to growth bands or quotas. Rather the Plan seeks to distribute development in a sustainable manner having regard to the settlement hierarchy.</p>	<p>No change</p>
<p>To build so many houses will distort the size of Caergwrle and the community. If Brexit has a negative effect on employment there will be less money in the area.</p>	<p>The preferred Strategy does not propose to build any houses in Caegwrle or in any other settlement. That will be a detailed matter for the Deposit Plan. Rather, the document sets out the spatial strategy in terms of where development can be expected to be sustainably located. Until a Brexit</p>	<p>No change</p>

	agreement is negotiated there is no available evidence to what impact this will have on employment.	
Option 5 at present does not specifically reference the proposals for two strategic allocations elsewhere in Flintshire. It is important that this connection is made because the two issues are related and assumptions on the delivery rates and assumptions at Warren Hall and Northern Gateway will impact on the distribution of development to the three top tiers of the hierarchy under Option 5.	The preferred strategy document needs to be read as a whole. In this context Policy STR3 deals specifically with the two Strategic Sites and what they can be expected to provide. It is not considered necessary to reference this in growth option to make the connection.	No change
Concerns that failure to deliver, particularly on the Northern Gateway site, would result in a continuation of under-delivery of housing in Flintshire.	Contrary to the point made, the strategic site referred to is in an advanced stage of infrastructure development, essential to enabling the subsequent development of the site. It is not uncommon for there to be long lead in times before strategic sites come forward. Development plans do not deliver housing – they create the conditions for housing to be delivered, by making provision for sufficient housing to be built to meet the housing requirement of the plan. It is the construction industry that delivers new housing.	No change

Question 3. Policy STR1: Strategic Growth Do you have any comments to make on Policy STR1 and the level of growth proposed?		
Representation	Proposed FCC response	Proposed change
A higher housing requirement would make a valuable contribution to economic growth - further consideration should be given to Option 5 i.e. 10,350 dwellings / 690 dwellings per annum.	Option 5 is founded on the 2008 headship rates which were found to be outdated and unrealistic in that they were exaggerating actual household formation rates. These rates combined with increased levels of in-migration results in an undeliverable level of housing which is not considered to be realistic or deliverable and potentially harmful to sustainability.	No change
The balance between employment growth and housing growth is not sustainable and an increase in housing land supply is required.	The Strategic Growth Options were the subject of an extensive engagement exercise whereby support was given to Options 4 and 6. In assessing the growth options the Preferred Strategy was clear that a housing figure over 7,645 (6950+10% flexibility) would not be considered to be realistic or sustainable and would result in an unsound Plan.	No change
The Plan needs to define a single figure for the housing requirement, the level of over-provision that would be necessary to meet that figure should be a separate exercise dependent on sites allocated and their particular constraints.	<p>The LDP has set a 'single' total housing provision figure of 7,645 new homes.</p> <p>This requirement will be met in practice through a variety of sources of supply, including commitments that are genuinely capable of being delivered, new allocations and realistic allowances for windfalls. This approach will be refined as the Plan progress and will be detailed in the Deposit Plan, which will contain a housing trajectory setting out how and when housing will be delivered through the Plan period.</p>	No change
If BREXIT has a negative impact on the economy, there is an extremely high risk of	The LDP can only plan for the future growth based upon the evidence currently available.	No change

overdeveloping Flintshire which will impact on services.		
The plan doesn't make adequate provision for housing needs. The figure in STR1 is a midpoint in the range of the preferred options despite past under performance; takes no account of the under-delivery and backlog of housing over the UDP period; a 10% contingency is well below what would be required to ensure delivery; reliance on sites allocated in the UDP that have failed to deliver and the heavy reliance on 2 strategic mixed sites that have delivered no development 3 years after the end of the UDP.	The representation makes reference to past under delivery of housing but expects the LDP to make provision for more housing. The housing growth proposed in the Plan is a result of extensive engagement, the assessment of options, the technical merits of the chosen option and whether it would result in a sound plan. In order to overcome non-delivery, a key function of the LDP is to provide an appropriate and sustainable supply of housing land. The strategic sites together with small to medium allocations will form the Plan's housing allocations. This mix backed up by evidence from developers about viability and deliverability will enable the LDP to secure and maintain a 5 year housing supply.	No change
Greater emphasis should be placed on Connah's Quay as a Main Service Centre for future strategic growth to take advantage of the new strategic highway infrastructure investment proposals.	The LDP's spatial strategy is guided in part by settlement audits and settlement categorisation. Having regard to the spatial strategy Connah's Quay is identified as a tier 1 Main Service Centre having been assessed as one of the County's most sustainable settlements and consequently, along with the other Main Service Centres, will be the main locations for growth.	No change
The Employment Land Review identifies a land requirement in the LDP of 28.50ha. An update assessment concluded the 2 strategic sites could generate up to 10,000 new jobs with the highest net employment land requirement being 39.73ha. However, the Technical Paper increases the employment land requirement further to a range of 56.5-70.7ha. Policy STR1 makes provision for 223ha of employment land although it's unclear	BE Group's Employment Land Review, which is flagged as providing the evidence base for employment land provision, explains that excluding land which is already developed, has significant access constraints, is held for the expansion of individual firms, is proposed for alternative uses or land which has identified ecological issues reduces the net land supply to 223.94 ha (22 sites) in Flintshire.	No change

<p>whether this is the total existing supply or intended allocations. The highest figure in the background evidence of approx. 71ha results in an over-provision of 152ha of employment land. The Deposit LDP should explain how the over-provision relates to the job target. The provision of 223ha should result in a land requirement (in ha) required to deliver the job target of 8-10,000. The policy should list the allocated sites that comprise this required allocation by scale and proposed B-use class use.</p>	<p>Policy STR1 is clear that there will be a detailed deposit plan policy on employment allocations.</p>	
<p>Is there any evidence that these jobs will come forward in the plan period? It is not clear to what extent the reason for the recent non-development of UDP sites stems from TAN1 and the consequent ease with which developers have been able to identify more lucrative and cost effective greenfield sites, outside of the plan. A sufficient level of flexibility is required to allow sites to come forward if allocations are slow being developed. If that is the case, is there a risk that the most commercially viable settlements will consequently carry a disproportionate share?</p>	<p>By their very nature there are no guarantees about the delivery of growth. The Plan can only consider different options in order to arrive at the most sustainable, preferred option. However the job growth ranging between 8,000-10,000 jobs is derived from follow up work to the Employment Land Review, namely Flintshire Further Employment Growth Scenarios Assessment. The likely job yield has been calculated from the two strategic sites at Warren Hall and Northern Gateway but also the general job targets associated with the Deeside Enterprise Zone.</p> <p>In order to overcome non-delivery, a key function of the LDP is to provide an appropriate and sustainable supply of housing land free from constraints and economically feasible for development. A 10% flexibility allowance is applied to the housing requirement figure and will be met through a variety of sources of supply including existing planning permissions, new allocations and windfall sites. The two strategic sites together with small to medium allocations will form the Plan's housing</p>	<p>No change</p>

	allocations. This mix backed up by evidence from developers about viability and deliverability will enable the LDP to secure and maintain a 5 year housing supply.	
Concerned that the level of growth is not high enough. It is important that the plan meets both the short and longer-term development needs and economic growth aspirations of the County. In the short term this is particularly important because the Council is currently unable to demonstrate a deliverable five year housing land supply and due to the under-delivery of housing via the UDP. Given the UDP housing target is a lower annualised figure, this demonstrates the need for the LDP to identify a range of sites that are suitable, viable and deliverable in the short term to address both the under delivery of housing and contribute to the 5YHLS. Identifying a range of sites in sustainable locations with good access to services and facilities should be a primary focus for the emerging plan.	The answer to achieving a 5 year housing land supply is not boosting housing supply but ensuring housing growth is at a realistic level, sustainable and sound in plan making terms. LDPs must provide an appropriate and sustainable supply of housing land free from constraints and economically feasible for development. Proposals must be backed up by evidence from developers about viability and deliverability, which will enable the LDP to secure and maintain a 5 year housing supply.	No change
10,000 jobs is not realistic and is dependent on British Aerospace. Business prefers to be established on existing sites. Up to 5000 houses would be more than adequate.	<p>The job growth ranging between 8,000-10,000 jobs is derived from follow up work to the Employment Land Review, namely Flintshire Further Employment Growth Scenarios Assessment. The likely job yield has been calculated from the two strategic sites at Warren Hall and Northern Gateway but also the general job targets associated with the Deeside Enterprise Zone.</p> <p>Policy STR8 makes provision for the safeguarding of existing employment sites and this provision will be</p>	No change

	<p>further supported by the detailed policies in the deposit LDP.</p> <p>The Preferred Strategy is quite clear in its reasoning that 5000 houses would not be an appropriate level of housing with which to deliver the Plan's economic ambitions and consequently would not result in a sound Plan.</p>	
It is unlikely that the level of new jobs will actually happen therefore 3-4,000 new homes would most likely be adequate. The type of employment provision is as yet unknown e.g. office versus automated industrial production.	The Employment Land Review presented sectorial growth forecast for Flintshire up to 2030, which was based on Cambridge Econometrics and Institute of Employment Research data. Given that the trend period that informed these forecasts coincided with a testing economic environment further work was commissioned to examine the job creation potential of Flintshire's strategic sites at Northern Gateway and Warren Hall. This work demonstrated a cumulative potential for the two sites to yield between 8-10,000 jobs over the plan period. Whilst no certainty can be given to delivery; the Plan can only create the conditions for growth to be achieved based upon the best available evidence or data.	No change
It is not realistic to make broad statements about growth in employment until after Brexit.	Until the UK Government negotiate and agree a BREXIT agreement there is no evidence available to show what, if any, impacts this will have on employment growth. In the absence of such evidence or impacts, it would be wrong not to plan strategically on the evidence that is available.	No change
For this to be feasible, the population would have to increase by 15,000 at least.	It is not clear what this broad statement is based upon. In reality the LDP includes a housing requirement figure of 7,645 which has been formulated using a demographic migration trend. The trend uses a 2014	No change

	population base and as 2011 based headship rate but uses the highest level of in-migration from the last 10 years and projects this forward. This trend sets out the demographic changes that would need to be delivered for economic growth to occur, i.e. returning to more historical levels of in-migration.	
This policy fails to consider or assess the needs of an ageing population.	<p>The needs of a growing but ageing population is identified as one of the key challenges facing the Plan. The LDP should be read as a whole to understand what the Plan is doing to tackle the challenge of the ageing population but also social and communities needs in the wider sense.</p> <p>With regard to policy STR1 it could be said that economic activity and housing growth in sustainable locations has benefits to the County's ageing population. Certainly the policy context to policy STR1 highlights that LDP Objectives 1 and 2 are met, which relate to 'ensuring that Flintshire has the right amount, size, and type of housing to support economic development and to meet a range of housing needs' and 'ensure that housing development takes place in sustainable locations where sites are...supported by the necessary social, environmental and physical infrastructure.'</p>	No change
The housing requirement of 7,645 dwellings does not meet the full, objectively assessed need for housing in Flintshire because there remain some key shortcomings in the approach to align the housing need with economic growth. Concerned that a target of 510 dpa is below the level that would be necessary if the 2008 headship rates were applied (or an indexed mid-point between	The 2008 headship rates were found to be outdated and unrealistic in that they were exaggerating actual household formation rates, which resulted in them being disregarded as they overestimate housing need. No evidence is provided to show how a higher rate of housing provision is either sustainable, or deliverable. The	No change

the 2014 and 2008 headship rates). The employment land evidence does not support the housing target, whilst overly optimistic assumptions concerning net out commuting reductions have been adopted which will artificially suppress housing need. The 510 dpa target fails to meaningfully address the very high affordable housing target in Flintshire. A housing target at the top of the range for Option 6 (490 dpa), plus a 10% uplift, would be the absolute minimum the LDP should plan for i.e. around 540 dpa.	<p>2011 rates are both more up to date and statistically reliable.</p> <p>It does not necessarily follow that more private housing needs to be provided to provide a commensurate level of affordable, as for example the Council's current SHARP house building programme is providing affordable homes directly without the need for a link to private housing delivery. Equally there is no evidence that an increase in the way suggested is deliverable, and may instead result in un-delivered sites as the industry struggle with capacity, or land banking which would not be an appropriate or sustainable use of land.</p>	
Additional sites should be identified to contribute to the housing supply within the County rather than the continued allocation or identification of sites which have failed to come forward for development over a considerable period of time.	The Preferred Strategy does not (with the exception of the two strategic sites) identify proposed development sites. That is the role of the next stage in LDP development, the production of the deposit LDP. Housing sites will be assessed on the basis of their degree of sustainability aligned with the position the settlement they relate to has within the settlement hierarchy. As well as being sustainable, sites must also be viable and deliverable as otherwise the market and development industry will not be interested in bringing them forward.	No change
It is prudent to go for a lower less ambitious jobs growth figure and target limited resources into supporting those sectors identified as being less reliant on EU related markets, partners and labour. Allocation of employment land relates to projected jobs growth. New housing should be close to any new employment sites to encourage	The LDP strategy sets an ambitious growth target, which reflects a desire by the Local Authority to plan positively for Economic Growth. This aligns with the wider regional growth ambition that Flintshire along with its North Wales and North West of England neighbours are pursuing in relation to growth bids to UK and Welsh Government.	No change

sustainable travel i.e. Northern Gateway and Warren Hall.	The Plan has adopted a 5 tier approach to settlement categorisation in order to guide development growth to the most sustainable locations to encourage more sustainable forms of travel choices as people go about their everyday lives.	
Housing sites often experience non-delivery for a multitude of reasons such as lapsed permissions or individual landowners with no immediate desire or need to see a site delivered and therefore a 10% allowance is likely to under-estimate the scale of under-delivery.	<p>Development plans do not deliver housing – they create the conditions for housing to be delivered, by making provision for sufficient housing to be built to meet the housing requirement in the plan. The UDP did this. The fact that not all of the houses that the plan made provision for were built is a factor of the combination of the performance of the construction industry, governed by a severe recession half way through the plan period, general concerns about the capacity of the industry in the North East Wales area, a selective approach to the take up of allocations, and the fact that not all of the assessed housing need materialised as actual demand for housing.</p> <p>There is no evidence that an increase in the way suggested is deliverable, and may instead result in un-delivered sites as the industry struggle with capacity, or land banking which would not be an appropriate or sustainable use of land.</p>	No change

Question 4. Policy STR2: Location of Development

This policy directs new development to:

- **Allocated sites**
- **Principal Employment Areas**
- **Sustainable settlements based on the first 3 tiers of the settlement hierarchy:**
- **Main Service Centres – the main locations for new housing development which reinforces and contributes to sustainable settlements**
- **Local Service Centres – the location for more modest levels of housing growth**
- **Sustainable Villages – the location for housing development related to the scale, character and role of the settlement**

Representation	Proposed FCC Response	Proposed Change
The proposed wording seems over repetitive.	Noted. However, the policy is seeking to provide clear guidance for each tier in the settlement hierarchy.	No change
Why are windfall sites restricted to market housing only.	Noted. It is anticipated that most windfall housing proposals will be 'market' but it is acceptable that this is not always the case. It is therefore appropriate that 'market' is removed from the relevant criteria for a, b, and c. The scenario in defined villages is slightly different as criteria i) allows windfall housing , but only where it is essential to deliver local housing need units.	Delete 'market' from the windfall wording in criteria a, b and c.
A fourth point should be added and refer to the bottom two tiers of villages as limited development is being allowed in these as well as the upper tiers.	Noted. The policy seeks to allow proportionate development based on the settlement hierarchy which is underpinned by sustainability assessments.	No change
The Plan should make specific reference to the delivery of a new Garden City at Watersmeet.	Noted. However, Watersmeet is not a strategic allocation in the Plan. Candidate Sites which proposed development at	No change

	'watersmeet' will be assessed as part of preparing the Deposit Plan, although they score RED as part of the assessment of the sites against the Strategy.	
Gwernaffield and Pantymwyn do not have the infrastructure to deal with a significant housing development.	Noted. Policy STR2 specifies that in Defined Villages, housing development will be only be permitted related to the scale, character and role of the settlement and will need to deliver local needs affordable housing. No specific housing allocations are to be proposed in defined villages. The policy therefore does not seek to facilitate significant development in these two settlements.	No change
The preferred spatial strategy adopts a balanced and realistic approach to the distribution of development in the rural areas.	Noted	No change
Additional flexibility should be included within the policy for the development of sites on the edge of the key towns and villages	Noted. In line with PPW the policy allows for small scale rural exceptions housing schemes on the edge of Local Service Centres, Sustainable Villages and Defined Villages in order to provide affordable housing.	No change
The allocated sites, and in particular the two strategic sites, should not have preference over unallocated sites, due to uncertainties over their delivery. There should be no sequential hierarchy within Policy STR2 as set out in points i., ii., and iii. relating to the location of new development.	Noted. The two strategic allocations in the Preferred Strategy are both sites where the principle of development has been secured through outline planning consents but where it is vital to revisit both sites in different ways to ensure that they come forward. Being strategic sites both are central to the Plan's economic aspirations and it is right that their importance to the	No change

	Plan's strategy is highlighted. It is also appropriate to set out the Plan's approach to the location of new development in a sequentially preferable way.	
Employment-led growth is supported but not at the strategic locations currently proposed.	Noted. However, the two strategic sites are located within the growth triangle embodied in the Wales Spatial Plan. Both sites are in sustainable locations and seek to build upon previous and ongoing infrastructure investment.	No change
Greater emphasis should be placed on Main Service Centres in identifying the location of growth in the County.	Noted. However, the greater concentration of development in Main Service Centres was one of the spatial options previously consulted on in the Strategic Options document. That option was not taken forward into the Preferred Strategy as it had a number of drawbacks.	No change
In relation to the growth within Mold and we would refer you to the Mold Town Plan which was approved on 15 March 2017 and details supported housing growth within identified candidate sites.	Noted. Policy STR2 seeks to provide a framework, based on the settlement hierarchy, whereby growth can be distributed in a sustainable manner. Mold is in Tier 1 and is a Main Service Centre and is a sustainable location to provide for some new development. The next stage of plan preparation will narrow down which settlements and which sites are able to sustainably deliver development. The Council is aware of the recommendations within the Mold Town Plan.	No change
Greater emphasis should be placed upon Mold as a primary focus for new development given its status in the settlement hierarchy.	Noted. Policy STR2 seeks to provide a framework, based on the settlement hierarchy, whereby growth can be	No change

	distributed in a sustainable manner. Mold is in Tier 1 and is a Main Service Centre and is a sustainable location to provide for some new development. The next stage of plan preparation will narrow down which settlements and which sites are able to sustainably deliver development.	
Concern that no definition of scale has been provided, whether it should be in percentage terms, relate to a single development or a village as a whole.	Noted. The Preferred Strategy seeks to avoid the overly mechanistic approach in the UDP. A guide is given to the broad range of growth to take place in each tier of the settlement hierarchy. The Plan then seeks to take a more qualitative approach to the identification of which settlements will deliver growth, based on sustainability rather than numerical means. The Plan seeks to move away from the idea that every settlement can and should grow.	No change
The provisions for housing and employment are not sufficient. The problem is that the LDP (through this and other policies) provide no alternative Plan B in the event the Plan A strategy fails.	Noted. One of the key determinants in preparing the Plan is the formulation of a Preferred Strategy which has inherent flexibility built into it.	No change
Development must fit within the village boundary to avoid scattered housing developments, be small scale to avoid changing nature of the villages and must provide housing to meet range of needs but with greater concentration on affordable housing/council let properties.	Noted. These are all relevant considerations that have been incorporated into strategic policies or will be integrated into subsequent detailed policies.	No change
The Community Council are trusting in the local authority to recognise and allocate	Noted. The Council is preparing a Plan which brings with it a new Plan period and	No change

housing in consideration of the UDP and LDP contributions already made and consider that after that development the settlement has made its contribution, in accordance to the Penyffordd Place Plan and no further sites should be brought forward.	there is a need to provide an appropriate and sustainable amount and distribution of development. The level of growth experienced in the UDP plan period will be a factor as will be any development that has occurred in the early years of the Plan period	
It is vital that the green barrier is maintained in order to preserve the identity of Northop Hall.	Noted. All green barriers will be subject of a robust and consistent review against the criteria in PPW.	No change
Additional employment land should be identified in order to facilitate the delivery of jobs growth and employment land development.	Noted. However, the Employment Land Review has concluded that there is more than sufficient landbank to provide for a choice of sites by way of location, size and type.	No change
Support the idea of hierarchy and UDP Policy STR1 New Development of the current Flintshire UDP be carried over to be included in the STR2.	Noted	No change
Objects to any future proposed housing development in Higher Kinnerton.	Noted. Higher Kinnerton is in tier 3 of the settlement hierarchy which is a sustainable village. The level of growth experienced in the UDP plan period will be a factor as will be any development that has occurred in the early years of the Plan period	No change
In terms of growth of Mold, we need to avoid further erosion of the few green barriers or wedges around the town and thus cause the coalescence to the East towards Mynydd Isa, New Brighton and Sychdyn.	Noted. All green barriers will be subject of a robust and consistent review against the criteria in PPW.	No change
Cadole is currently a village with a development boundary in both the Flintshire	Noted. Cadole will no longer have a settlement boundary in the LDP. However,	No change

UDP and the Denbighshire LDP, but the proposed settlement hierarchy for the Flintshire LDP has Cadole as a 5th tier settlement with no development boundary. This would create an anomalous situation with the settlement having a different status either side of the County boundary. Denbighshire would welcome further discussion on this point.	given the policy / constraint context for the settlement in terms of the presence of the A494(T), Cadole Rd and the SAC/SSSI being firm boundaries around the settlement, plus its location within the AONB, it is unlikely to experience much in the way of new development. In this scenario it is not considered that the inconsistency in terms of the presence or otherwise of a settlement boundary will be harmful in practice.	
We note the inclusion of windfall sites and would draw attention to the need for early sight of significant windfall development proposals in order to factor these into our plans. We would hope that any new housing development is based on homes for life, suitable for families throughout the life-course.	Noted. The allowance to be made for windfalls will be firmed up in the deposit draft Plan.	No change
Agree that Mynydd Isa and Drury have the level of services and facilities appropriate to a Local Service Centre.	Noted	No change
Where the total growth identified by proposed allocations exceed the theoretical design capacity of our water assets then improvements to provide further capacity will be required during the LDP period.	Noted	No change
The approach to defined villages, allowing some market housing as a means of delivering local needs housing, is unnecessarily constraining as it appears to assume that the only housing needs in smaller	Noted. It is common for development plans to focus on the delivery of local needs affordable housing in small rural settlements as local people are often unable to compete in the housing market due to high prices. These settlements are	No change

villages are from people in need of affordable housing.	also the least sustainable locations for growth in the County. The approach in STR2 is a relaxation from the approach in the UDP (local needs housing only) in that it recognises that there could be cases where the delivery of local needs affordable housing can be assisted by some market housing, in order to address viability issues.	
HCAC does not have the capacity to take 35 to 40% of planned development.	Noted. This section of the document is seeking to explain that Local Service Centres as a whole will take approximately 35 to 40% of the overall growth. It does not mean that each settlement will grow by this percentage.	No change
The LPA should assess any sites to ensure that any constraints to development, such as mine entries which may impact on site capacity, are identified early in the site selection process.	Noted	No change
Residents of Hope, Caergwrle, Abermorddu and Cefn y Bedd have raised concerns about being grouped together as a Local Service Centre within the settlement hierarchy. Placing the four villages in the same settlement grouping as eg Broughton is wrong. There is clearly a need for a further differentiation within the category of Local Service Centre or a form of banding within the category of Local Service Centre.	In planning terms HCAC is one settlement due to its characteristics. A settlement boundary is a planning tool and does not necessarily define a community. In this case it encompasses 4 different areas/communities and parts of different community council areas where there is a dependency on each other for access to facilities and services. The settlement boundary encloses an area considered as a single contiguous urban area in planning terms and on this basis it	No change

	is appropriate to consider HCAC as one Local Service Centre.	
Direct development towards the more sustainable settlements and employment areas, such as Broughton Mill, Broughton is supported.	Noted.	No change
All communities but especially defined villages need growth to sustain them, restriction to affordable houses only will not necessarily allow sufficient investment for that to occur and will be likely to threaten other existing residents' quality of life.	Noted. It is common for development plans to focus on the delivery of local needs affordable housing in small rural settlements as local people are often unable to compete in the housing market due to high prices. These settlements are also the least sustainable locations for growth in the County. The approach in STR2 is a relaxation from the approach in the UDP (local needs housing only) in that it recognises that there could be cases where the delivery of local needs affordable housing can be assisted by some market housing, in order to address viability issues.	No change
Are the planners alone deciding on sustainability of each settlement or are other statutory consultees being involved? In reviewing the colour coding of the Candidate Sites, it would be useful to understand better what criteria have been used and how those criteria have been applied in relation to the Spatial Plan, because the numbers do not reflect the wording of the strategy.	Noted. The Council consulted on approaches to defining a settlement hierarchy and the supporting settlement audits in the Key Messages document. The chosen settlement hierarchy was also presented in the Strategic Options consultation document as it fed into a number of the spatial options presented.	No change
It is considered that growth should be directed to the top two tier of the settlement hierarchy	Noted. However, the greater concentration of development in Main Service Centres	No change

is order to achieve sustainable. As such criterion c. Sustainable Villages should be removed from clause iii. akin to the Defined Villages and Undefined Village statements.	was one of the spatial options previously consulted on in the Strategic Options document. That option was not taken forward into the Preferred Strategy as it had a number of drawbacks.	
If HCAC is taken as one entity there are definite errors in the alleged level of services to be considered.	Noted. The settlement audits were a point in time assessment but can and will be updated as and when required. The settlement is still considered to fall comfortably within the tier 2 Local Service Centres.	No change
The settlements identified within each tier of the hierarchy are considered to be appropriate and will help ensure that housing development takes place in sustainable locations where sites are viable and deliverable.	Noted	No change
Caergwrle / Abermorddu / Hope are separate villages that would like to keep their personal ambience.	Noted. However, this issue has been considered as part of the UDP and in both the Key Messages and Strategic Options consultations for the LDP. In planning terms it is right and proper for the four villages to be presented and treated as a single 'settlement'. The settlement is still considered to fall comfortably within the tier 2 Local Service Centres.	No change
The proposed approach set out within Policy STR2, to direct development towards the more sustainable settlements and employment areas, such as those in and around Flint, is supported.	Noted	No change
The identification of Local Service Centres as a hierarchy tier where housing allocations will	Noted. The level of growth as a result of allocations in a particular settlement is a	No change.

be made is supported. The Policy should recognise that settlements such as Abermorddu, due to the range of services and facilities presently available and connectivity with transport networks, could include greater housing allocations than other smaller settlements in this same tier.	matter for the next stage in Plan making. The Preferred Strategy merely provides a framework for such considerations and it be inappropriate to highlight particular individual settlements.	
It is disappointing that there is such a high level of proposed candidate sites for housing development in Mold. I urge FCC to go back to the Mold Town Plan and incorporate the recommendations relating to Mold into the LDP.	Noted. The Council is merely presenting and assessing the candidate sites which were submitted by landowners, developers etc. This is a legitimate and indeed required part of Plan making. Regard will be given to the Mold Town Plan in preparing the deposit Plan.	No change
We generally support the preferred spatial strategy in so much that it seeks to direct growth towards settlements in the top three tiers of the settlement hierarchy.	Noted	No change

Question 5. Policy STR3: Strategic Sites

Do you have any comments to make on Policy STR3 and the provision it makes for two strategic sites at Northern Gateway and Warren Hall/?

Representation	Proposed FCC response	Proposed change
Significant concerns at the heavy reliance on one large site - the 'Northern Gateway' strategic site. Site was allocated in the adopted UDP, however the site has not delivered any dwellings to date. Retain the allocation as a mixed use regeneration site but reduce the number of homes on the site. Need to allocate additional new housing sites to replace any reduction in numbers on this site.	Whilst it is acknowledged that there has been a significant lead in time for the Northern Gateway site to become 'development ready', significant infrastructure works are now either complete or are in progress, and have been supported by the Welsh Government given the site's enterprise zone status. This site is also a key component of the North Wales Growth Deal bid for infrastructure funding to enable the site to move forward. This is also the case for the Strategic site at Broughton where an element of residential has been added to the mix of uses. Both sites are now attracting direct interest from investors, with pre-application discussions taking place regarding residential on Northern Gateway. The Council will seek to allow this site to deliver as intended during the LDP period and is fully aware of the need to be able to demonstrate a 5 year land supply from the strategy it employs in the plan.	No change
Although Northern Gateway is in an excellent location in terms of sustainable transport, thought must be given to how the design of the site will achieve the aspirations of	STR4 links and draws directly from the intentions within the Deeside Plan for transport and accessibility which takes a comprehensive	No change

STR4 Principles of Sustainable Development and Design. The lack of existing transit infrastructure near to this strategic site is cause for concern given the aspiration to deliver sustainable transport links.	approach to addressing the needs for improved transport and connectivity to, in, and around the Deeside area.	
The policy should be modified to include Watersmeet (Site Ref. SAL004). The site offers a rare opportunity to bring forward a mixed-use development that would comprise of a significant level of housing to meet the varying needs for the area.	This is a large candidate site which has previously been rejected in two development plan processes. Whilst the assessment of candidate sites is ongoing, this clearly indicates that the site presents significant locational and physical challenges and constraints. No evidence has been presented as to why this site is either a comparative or better strategic site than either Northern Gateway or Warren Hall, how major constraints have been acceptably overcome or mitigated, its degree of site readiness, the need for development at this scale in this location, and the ability of the site to contribute development during the LDP and help maintain a 5 year land supply	No change
Northern Gateway Mixed Use Development Site is crossed by a NG high voltage electricity transmission overhead line. NG prefers that buildings are not built directly beneath its overhead lines.	Noted. The Council will have regard and where required adhere to the National Grid guidelines when considering detailed planning applications for the site.	No change
The development at Warren Hall is supported subject to a comprehensive assessment being carried out to establish the impact on the sustainability of Higher Kinnerton including the impact on current water and drainage provision, local schools (given capacity constraints) and community cohesion.	Noted. These are all valid components of the next logical step in developing the detailed allocation of this site in the deposit LDP. Significant work will need to be carried out by the Council and with the owners to assess the detailed mix of appropriate development for the site and how this can be accommodated by the local infrastructure, or what is required to	No change

	ensure such infrastructure can be improved or provided to achieve this. This will also involve seeking the views of key stakeholders at the appropriate time.	
It is noted that the two major strategic sites identified in the proposals (Northern Gateway and Warren Hall) are effectively committed. Cheshire West has previously identified concerns in relation to potential impacts on the A road network especially the A55 / A483 junction (Warren Hall) and the Sealand Road / A540/ A5117/ A550 and onward routes (Northern Gateway).	Noted. Joint working is ongoing between Flintshire and Cheshire West to develop a better understanding of how mutual requirements for development such as Warren Hall or the large green belt release of land near to the post house roundabout can be accommodated both on the local and strategic highway network.	No change
This policy that identifies only two strategic sites at the Northern Gateway and Warren Hall is supported and this will focus market demand from potential occupiers and ensure early delivery of these sites.	Noted.	No change
Both strategic allocations have planning consents, but their delivery has been stalled due to a variety of factors. The LDP seeks to reinvigorate the delivery of the sites, and the proposed reinvigoration of the STR3B site specifically is supported.	Noted.	No change
There are potential implications for health service providers on both sides of the border as a result of the location of the two Strategic Sites. Significant population growth in these areas is likely to increase demand on both primary and secondary care services	It is accepted that population growth may result in an increase in demand for the care services. The identification of Strategic Sites and other locations for future development will assist the health service providers formulate their plans for future provision.	No change
Very concerned to see the proposals relating to the potential use of Warren Hall site together with an extension to the site area.	Whilst a specific concern is not clearly expressed, Warren Hall has been a committed development site for a number of years now. This includes significant highways infrastructure works already completed to	No change

	facilitate access to and from the site. The LDP simply seeks to promote the site to come forward and deliver in a mixed use manner, sustainable development.	
The figure of 1300 new homes should be amended to 1,495 homes to reflect PGNGLS current Section 73 planning application, which is seeking to secure permission for a further 170 dwellings on their site, resulting in a total of 770 dwellings. Policy criteria vii.) should be amended as follows: Provision of land and / or a contribution to extending Sealand CP School.	Noted. As the s73 has not yet been determined, the wording will be amended to say “at least” 1300 new homes. The point in relation to criteria vii) is accepted and “/or” will be added after “and”.	Amend wording of policy STR 3 as per FCC response.
Support the concept of strategic sites and the contribution they can make to sustainable development.	Noted.	No change
Northern Gateway is a large scale site requiring significant infrastructure. It is felt that the proposed housing delivery strategy will be overly reliant on the delivery of the 1,300 homes on STR3A. Further delays in this site coming forward could considerably impact on the overall housing trajectory and housing supply in Flintshire. The 1625 units identified on these two sites exceeds the remainder of the residual requirement. It represents 53% of the overall remaining requirement totalling 3077. The housing element of the Northern Gateway site should be reduced in scale and that a wide range of other housing sites are also required in order to maintain delivery. These homes should be reapportioned elsewhere, in conformity with the strategy. Also consider that the housing element of STR3B is inappropriate as this is not an urban extension or a new settlement with facilities being provided. The occupiers of housing here will be reliant on car use.	Whilst it is acknowledged that there has been a significant lead in time for the Northern Gateway site to become ‘development ready’, significant infrastructure works are now either complete or are in progress ,and have been supported by the Welsh Government given the site’s enterprise zone status. This site is also a key component of the North Wales Growth Deal bid for infrastructure funding to enable the site to move forward. This is also the case for the Strategic site at Broughton where an element of residential has been added to the mix of uses. Both sites are now attracting direct interest from investors, with pre-application discussions taking place regarding residential on Northern Gateway. The Council will seek to allow this site to deliver as intended during the LDP period and is fully aware of the need to be	No change

	able to demonstrate a 5 year land supply from the strategy it employs in the plan. The addition of housing to the mix of development proposed at Warren Hall is considered to be appropriate and sustainable given the mix of facilities that will be part of the site, as well as the site's close proximity to Broughton which is a major centre of employment and also has the retail park.	
Castell Alun School and both local GP surgeries at Hope and Broughton are full. The local primary school will be over- subscribed given the level of housing proposed.	There are as yet no housing proposals in the LDP for this area. The capacity of infrastructure such as schools and health provision will be considered as part of producing the deposit LDP in consultation with the relevant responsible bodies.	No change
Hope that if housing is going to grow pro-rata to jobs (mainly manufacturing ones) houses being built will be affordable for this cohort of people who are likely to want to buy them.	The LDP will endeavour to provide a range of new housing including affordable housing in both the urban and rural areas.	No change
Warren Hall and Northern Gateway have considerable potential to facilitate a diverse range of skilled employment opportunities. Hope that, whilst recognising the crucial role of the aerospace industry in the local economy, encouragement could be given to the creation of jobs which prevent over-reliance on that industry.	In addition to the aerospace industry LDP objective 8 seeks to facilitate growth of the local economy together with an increase in skilled jobs in other key sectors.	No change
Whilst we do not object to these sites being allocated they will require considerable infrastructure and investment before any development, let alone housing can be delivered. On this basis and due to the lack of any delivery during the UDP period is it realistic to assume that all 1600 will be delivered by the end of the plan period.	Yes, as this is one of the main drivers for the LDP strategy. Overprovision of sites elsewhere will deflect from this purpose.	No change

Warren Hall and the Northern Gateway strategic sites are situated in Local Service Centres, settlements which are second in the settlement hierarchy. This approach neglects to direct investment to the eight Main Service Centre settlements higher up the settlement hierarchy, such as Connaught Quay. Both the Strategic Sites have planning permission but have not yet been developed. There are eight Main Service Centres) that can better deliver this growth; of which Connaught Quay is one of the most prominent.	The sites are referred to as 'strategic' due to their size and location. It would not make sense or be appropriate to consider such a scale of development in each main settlement. There is nothing in the LDP Strategy that will prevent main service centres from being considered for development and reference to strategic policy STR2 indicates the priority to locate development sustainably throughout the top 3 tiers of the settlement hierarchy beginning with main service centres.	No change
Of the 3,077 dwellings proposed for allocation in the plan, over half (at least 53%) will be located on 2 strategic mixed-use sites; the Northern Gateway (1325 units) and Warren Hall (300 units) the remainder of the housing to be identified on small to medium sized allocations (LDP, paragraph 7.1.3). The delivery of the strategic sites is integral to the delivery of the plans strategy for home and jobs. These sites will need to be accompanied by clear evidence that sets out infrastructure requirements and their associated cost as well as an indication of key timings, phasing and funding mechanisms/partners to ensure the necessary infrastructure is deliverable, when required. Explaining how the strategic sites will be phased should support the delivery of the strategy.	Noted. Detailed work to support the sustainability and deliverability of the strategic sites will inform how the sites are allocated in the deposit plan, including the production of development briefs where appropriate.	No change
If new housing is built, a new transport policy / links are needed. Bus and cycle provision should link with the Northern Gateway and the proposed Deeside Parkway. Bus services should be timed with shift changes.	STR5 of the Preferred Strategy aims to facilitate an integrated transport system involving road and public transport modes of travel. The LDP is unable to influence the co-ordination of bus services and shift changes.	No change

Advocate that a positive approach is taken to provide appropriate accommodation to meet the needs of an ageing population. The best approach is one that encourages the delivery of specialist forms of accommodation e.g. sheltered / retirement housing and Extra Care accommodation.	The LDP will endeavour to provide new housing to meet a range of housing needs. The explanation to STR11 at paragraph 7.1. 9 explicitly refers to these specialist forms of accommodation.	No change
Object to the proposed level of housing growth support the commitment to delivering smaller allocations to meet housing need in the County.	Noted.	No change

Question 6 Policy STR4: Principles of Sustainable Development and Design This policy includes ways to deliver sustainable development		
Representation	Proposed FCC Response	Proposed Change
It should be made clear which sustainable design criteria are referred to, is it the ones listed below in the policy or is it some others such as those listed in the Well Being and Future Generations Act.	Noted. The policy wording includes a list of criteria which together provide the basis for bringing about sustainable development and design. The policy is not considered to be unclear.	No change
The Council should reinstate the Bowling Green on the Bailey Hill to encourage people into the Sport.	Noted. This is not a matter for the LDP and is more appropriately dealt with through the Leisure Department.	No change
Achieving sense of place will be critical to the delivery of vibrant and sustainable places and should be encouraged within this policy.	Noted.	No change
For this policy to work, there needs to be a significant shift in the culture of development management and decision makers. They need to respond to new ideas and innovative design and break out of the regulatory box ticking mentality.	Noted. However, the same should also apply to architects, agents, applicants etc. If the development management process is to bring about innovative design then all those involved need to be on board and working to the same objectives.	No change
It is important that draft Strategic Policy STR4 provides sufficient flexibility to respond to the specific characteristics of each development proposal, as not all criteria will be relevant to all development. In order to provide this flexibility, it is proposed that draft Strategic Policy STR4 is amended.	Noted. It is not considered that replacing 'should' with 'may' or 'wherever practicable' is acceptable as this begins to weaken the policy. However, it is considered appropriate that 'all' is replaced by 'new'. There will clearly be instances where a particular criteria cannot be met by a proposed development and it is for the	That in the sentence preceding the criteria, 'all' is replaced with 'new'.

	applicant to demonstrate and the LPA to assess whether a particular criteria can be waived.	
The policy must not be market-led it must be based on need. Sustainable development and design should be organic. An explanation from FCC of what exactly it means by sustainability would be helpful.	Noted. Sustainability is defined in PPW and the Well-Being of Future Generations Act and a brief explanation is provided in para 1.0.4 of the Preferred Strategy.	No change
Supportive of all the ways outlined to deliver a sustainable development but do we take into account of who is to profit from sale of land on candidate sites / are some landowners seeking to make a short term gain from sale of agricultural farmland which may be less profitable to work.	Noted. The LDP is concerned with ensuring that new development is viable, deliverable and sustainable. It is quite appropriate for a landowner and developer to seek to make a profit from bringing forward development. A housebuilder would be unlikely to be able to obtain finance to develop if the scheme was able to make sufficient profit.	No change
We are supportive of the general principles, but the devil will be in the detail of implementation.	Noted	No change
The integrated impact assessment acknowledges the current pressures on healthcare services in Flintshire, we welcome this acknowledgement and look forward to working together to mitigate or respond to these pressures.	Noted	No change
Sustainable development should ensure that the design is sympathetic with the existing environment.	Noted	No change
Further explanation is required as to what is envisaged at vii in relation to on-site energy efficiency and renewable energy generation.	Noted. However, this is a strategic policy which is seeking to flag up key policy requirements. Further detail can be added	No change

	in subsequent policies in the deposit Plan if appropriate.	
Many large houses have been built that do not appear to fit in with the principles of the needs of an ageing population, I have major concerns on the impact on traffic and there appears to be no plans to increase public footpaths/train/bus services or other methods which would decrease traffic congestion.	Noted. The Plan will seek to provide a mix of housing on new development so that it meets a range of needs. The impact of new development on traffic will be assessed and where improvements to transport infrastructure are necessary and achievable, these will be sought. New development will also be directed to locations where it is possible to reduce car based travel.	No change
STR4 is underpinned by principles which seek to establish a balance between the different and competing needs in order to ensure sustainable development, an approach which is supported by a wider policy context.	Noted	No change
The current wording of point vii) goes beyond prescribed national policy and exceeds existing building regulation requirements and could impact on the viability of schemes. We therefore recommend that part vii) is removed / reworded to focus more on developing on plot delivery and reflect Planning Policy Wales.	Noted. The criterion specifies on-site energy efficiency and renewable energy generation where possible. This will be supplemented by detailed policies which will have regard to the findings of the Renewable Energy Assessment.	No change
A policy to ensure sustainable development and design is supported on the whole but it is necessary for there to be an element of flexibility when assessing some proposed developments.	Noted.	No change
All communities but especially defined villages need growth to sustain them. Without it, their	Noted. It is common for development plans to focus on the delivery of local needs	No change

ability to attract new or keep existing facilities viable. Restriction to affordable houses only will not necessarily allow sufficient investment for that to occur.	affordable housing in small rural settlements as local people are often unable to compete in the housing market due to high prices. These settlements are also the least sustainable locations for growth in the County. The approach in STR2 is a relaxation from the approach in the UDP (local needs housing only) in that it recognises that there could be cases where the delivery of local needs affordable housing can be assisted by some market housing, in order to address viability issues.	
Clearly sustainable development is a fundamental principle of Planning Policy Wales, more detail is needed.	Noted. However, this is a strategic policy. Consideration will be given to what additional detail may need to go into the Deposit Plan.	No change
This policy is in general conformity to the NPPF in regard to sustainable transport.	Noted	No change
Agrees with the criteria set out in Strategic Policy STR4.	Noted	No change
Future developments should be based on need, not desirability i.e. not market-led by developers.	Noted. The Plans housing requirement is based on meeting housing needs. A range of housing will need to be provided to meet different needs but market provision is a legitimate part of housing delivery.	No change
To ensure that housing requirements can be met in the event that the strategic sites do not come forward for development it is important that sufficient land is allocated in the LDP and that it includes policy mechanisms for the release of additional land. This will help	Noted. Consideration will be given, as part of preparing the deposit plan, to a housing trajectory and likely maintenance of a 5 year housing land supply. Whether this necessitates mechanism for the release of	No change

ensure that a 5 year housing land supply is maintained, and that the Councils affordable housing need (246 dpa) is provided.	reserve sites will need to be carefully considered.	
Supports the sustainable development principles set out in the Policy STR 4. But considers that the text should be amended to account for the fact that the provision of infrastructure is often the responsibility of a third party, such as a statutory undertaker or highway authority, and may be delivered to accommodate the development.	Noted. The issue of infrastructure is addressed within Policy STR6	No change
Eco houses need to be built that are sympathetic to the local design. Houses should be smaller and more affordable.	Noted. The Plan will need to meet a variety of housing needs and to do this in a sustainable manner.	No change

Question 7. Policy SRT5: Transport and Accessibility		
Policy STR5 aims to facilitate an integrated transport system and ensure sustainable and accessible development. Do you have any comments to make on Policy STR5?		
Representation	Proposed FCC response	Proposed change
All the sub points apart from (iv. & vi.) use the words 'facilitate, promote or support'. Object to the use of the word 'provide' at point (vi). Not all developments will be able to do what is required by the wording of the policy for various reasons, accordingly the word 'provide' be changed to 'promote' as with nearly all of the other requirements of the policy.	The policy text before the criteria uses the terminology 'where appropriate' and 'should', which address the concern that all development will need to 'provide' walking and cycling routes.	No change
Policy could be strengthened if it more clearly identified the park and ride potential of Deeside Parkway station. Two opportunities which may merit further consideration are a railway linking Chester and Wrexham via Broughton and Penyffordd; and a Waterbus service on the Dee (potentially between Mostyn Dock and Chester).	Transport initiatives can be delivered through other mechanisms and whilst the text refers to them in setting the context it is not the role of the LDP to detail these schemes. The role of the Plan is to identify those schemes where land is required to be safeguarded, which isn't the case for Deeside Parkway station; a railway linking Chester and Wrexham; and a Waterbus service.	No change
Sections iii) and iv) relating to highway improvements should be sensitive to the need to conserve and enhance the character and appearance of the AONB.	The policies need to be read together. Policy STR13 provides guidance for the AONB however a detailed deposit plan policy is likely to address the need to conserve and enhance the character and appearance of the AONB.	No change
A sustainable integrated transport system is needed.	As referred to in the Strategy, policy STR5 aims to facilitate an integrated transport system and ensure sustainable and accessible development.	No change
The roads infrastructure needs developing in order to provide access to major routes without 'rat running'	The policy seeks to facilitate accessibility; promote an integrated transport system, promote	No change

through villages. The public transport provision should be reviewed in order to reduce the dependency on the car.	road and rail improvements; ensure the local highway network can accommodate sustainable levels of development; etc. The Strategy is promoting a sustainable pattern of development to reduce private car dependency.	
LDP to include strategy of including community based transport systems and a policy of active encouragement of such community based transport for access to commerce, employment, services and facilities to prevent social exclusion for people without cars.	The policy provides the framework for community based transport systems and seeks to prevent social exclusion.	No change
LDP encourages greater use of the public transport network for environmental purposes but intends to cluster developments such as Warren Hall near the road networks. Approach is detrimental to the environment and contributes to the problems arising from climate change.	The policy seeks to ensure the delivery of sustainable and accessible development. Warren Hall is close to the tier 2 local service centre of Broughton and by facilitating an integrated and efficient transport system and pattern of use the Strategy is promoting a sustainable pattern of development to reduce private car dependency.	No change
LDP should emphasis safe routes for pedestrians, cyclists, and more frequent bus and train services.	The Plan through LDP Objective 3 promotes a 'safe transport system' whilst policy STR5 endorses the provision of walking and cycling routes through new development. Public transport services are not influenced by the LDP, it can only provide the land use mechanisms for it to operate in.	No change
Be wary of assessments of public transport as a measure of sustainability, without assessing the full extent of the services. It would good to see this policy refer to active travel, so that the principle becomes ingrained in policy.	Public transport provision is only one element of a multi-faceted assessment of sustainability that underpins the LDP's formulation. The reasoned justification to the policy refers to the Council's Active Travel initiative and whilst the LDP can signpost schemes and initiatives it can only encompass them in policy when there is a land use implication, or proposal.	No change

<p>If there is no overall integrated plan, the scattered residential developments away from the areas of employment will lead to a big increase in road traffic. The land along the Wrexham-Bidston railway needs to be protected to enable future expansion of the line / new stations. Links with the Chester-Holyhead line need to be strengthened and expanded.</p>	<p>The LDP must work with the pattern of development that exists now, or is committed to happen during the Plan period. The role of the LDP is therefore to identify sustainable locations for new development and to control the siting, layout and design of development in order to work towards achieving an integrated and efficient transport system and pattern of land use. The improvements to the Wrexham – Bidston line is one of a number of transport proposals in the Deeside Plan however there is no land use expression of this initiative at this time so it would be inappropriate to safeguard this route.</p>	<p>No change</p>
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Question 8 Policy STR6: Services, Facilities and Infrastructure This policy aims to ensure that new development is supported by necessary and adequate infrastructure whether through CIL or planning obligations		
Representation	Proposed FCC Response	Proposed Change
<p>The question mentions CIL and S106 however this is not referred to in the policy, suggests it would provide clarity if they are referred to as the most likely way such requirements will be secured.</p> <p>Objects to the word will in the second paragraph and suggests that it is replaced by the words 'should aim to' as not all development will have to contribute in the way suggested.</p> <p>Also the current wording does not make it clear that this policy does not require a development to provide all of the items listed in the policy, the wording should be amended to make this clear.</p>	<p>Not accepted. The wording of the second paragraph clearly states that 'new development will contribute to the provision of a range of key infrastructure, where necessary to mitigate the effects of new development...'. If a particular development, by virtue of its location, scale or nature, does not result in such effects then it won't be necessary for them to be mitigated. The suggested amendments would weaken the objective and reading of the policy and are not appropriate.</p>	<p>No change</p>
<p>New development will not be able to support the required infrastructure identified in STR6. Land values will simply not sustain such large contributions and planners must be significantly more aware and knowledgeable about developer economics.</p>	<p>New developments are not expected to support all the infrastructure listed. The policy identifies a range of infrastructure which may require developer contributions. They will need to be well related and proportionate to the development concerned, and have the objective of mitigating the effects of development. The policy is upfront in highlighting the range of possible requirements so that they can be factored into a development scheme from the outset. Further work on viability will be undertaken to ensure that new allocations</p>	<p>No change</p>

	are both viable and deliverable and that developer contributions generally are reasonable in terms of likely scheme viability.	
Higher Kinnerton is categorised within the Preferred Strategy and emerging LDP as a "sustainable village". With the proposed development of Warren Hall being a possible source of entertainment, shopping and employment for village residents, the current link road of Lesters Lane is unsuitable for any increase in traffic numbers and this needs to be addressed as part of the transport and strategic site provision.	Noted. Further work will be undertaken on the Warren Hall strategic allocation in the form of a development brief / masterplan to accompany the deposit Plan.	No change
The plan should be clear that viability can be a critical factor and that onerous obligations or infrastructure requests should not delay otherwise acceptable development.	The Plan clearly signals throughout that viability and deliverability of development will be an important consideration. The issue of viability will be looked at further in terms of informing the Deposit Plan. The policy is clearly worded that infrastructure contributions will only be required where necessary to mitigate the effects of development. It is not accepted that the Plan is seeking to be onerous.	No change
Infrastructure does need to be adequate but planning obligations need to be better enforced.	Noted	No change
Consideration needs to be given to improving existing infrastructure services such as broadband; power and gas supply; surface water; sewerage; school; and community facilities. What impact will Brexit and austerity	Noted. However, it is not the role of development plan to 'make good' existing deficiencies in infrastructure, as these are the responsibility of existing service providers. The role of the Plan is to	No change

measures have on the above? Such facilities can reasonably be available only where greater concentrations of dwellings exist. Undefined and defined villages are likely to receive few of these facilities.	address the infrastructure requirements arising from new development.	
We are supportive of what STR6 is to accomplish. Agree with 1 - 10 as supported by Infrastructure Levy or Planning obligations.	Noted	No change
The health board is keen to be involved in discussions with regard to community infrastructure levy to ensure sufficient facilities are available in future. We therefore welcome inclusion of health facilities within Policy STR6.	Noted	No change
Infrastructure provided through CIL and planning obligations should be adequately monitored to ensure that they are relevant and delivered according to the agreement in order to reduce the impact of new developments on communities.	Noted	No change
It would be useful to clarify whether a CIL or S106 planning obligation approach is to be used at an early stage as this may have an impact on viability and deliverability of sites.	At the present time Section 106 legal agreements are used to negotiate contributions for specific infrastructure needs from individual developments. Further work on viability will be undertaken to inform the deposit plan and this will investigate further the approach regarding CIL.	No change
Endorses the principle underlying the approach of draft Strategic Policy STR6.	Noted	No change

<p>Welcome the intention to include a strategic policy STR6 relating to infrastructure. Due to the regulatory, financial and legislative framework that we have to work within, there is potential disparity in the timeframes of our AMP investment and the Local Plan.</p>	<p>Noted. Further discussions will need to take place to identify potential issues so that new development is not unduly held up by infrastructure improvements.</p>	<p>No change</p>
<p>Agree that new development should make appropriate contributions towards infrastructure, but only where the contribution is necessary in relation to the development and in accordance with paragraph 3.5.7. of PPW.</p>	<p>Not accepted. The wording of the second paragraph clearly states that ‘new development will contribute to the provision of a range of key infrastructure, where necessary to mitigate the effects of new development...’. If a particular development, by virtue of its location, scale or nature, does not result in such effects then it won’t be necessary for them to be mitigated. The suggested amendments would weaken the objective and reading of the policy and are not appropriate.</p>	<p>No change</p>
<p>In HCAC affordable housing has been seriously overlooked, there is a lot of potential for tourism/ramblers/walkers/cyclists, but there is not one cycle path and none of the footpaths that have been challenged have been opened and sewerage is a huge problem.</p>	<p>Noted. Affordable housing will have been addressed as part of the planning applications on the UDP housing allocations. The issues relating to tourism, walking and cycling routes are more appropriately pursued through the Active Travel initiatives. The LDP would have a role to play if land needed to be safeguarded to deliver a scheme, or if a new housing development could contribute to the delivery of a scheme.</p>	<p>No change</p>
<p>The key infrastructure improvements detailed in the Policy through CIL or planning</p>	<p>Noted</p>	<p>No change</p>

obligations, are largely as expected and standardised with the requirements of other authorities.		
Whilst the use of CIL and planning obligations is supported, it is done so with some caution, and we reserve the right to provide further representations on the details of CIL charges and planning obligations to be sought.	Noted	No change
All communities but especially defined villages need growth to sustain them. Without it, their ability to attract new or keep existing facilities viable. Restriction to affordable houses only will not necessarily allow sufficient investment for that to occur.	Noted. This is addressed in policy STR2 where the policy does seek local needs affordable housing in defined villages but provides additional responsibility over and above UDP HSG3 to allow for some market housing where it is necessary (due to viability evidence) to deliver local needs housing. The policy approach reflects the fact that defined villages are much less sustainable than settlements higher up the settlement hierarchy.	No change
The Welsh Government supports this approach to evidence the delivery of sites over the plan period. The Authority should be certain that with pooling restrictions on S106 agreements and uncertainty on whether development in Flintshire could support a CIL charge (Topic Paper 12), funding is available to deliver the necessary infrastructure, at the appropriate time in the plan period.	Noted	No change
Communities are dependent upon CIL payments which are best allocated by Town and Community Councils who are in turn responsible for consulting the Community.	Noted. The detailed arrangements for the collection and spending of monies is dependant on the type of infrastructure improvement and who is responsible for its	No change

	implementation. It would not be appropriate for the policy to specify that all monies are given over to Town and Community Council's.	
STR6 considers a future CIL mechanism however it shys away from identifying any schedule, possible thresholds, or £/sqm requirements.	At the present time Section 106 legal agreements are used to negotiate contributions for specific infrastructure needs from individual developments. The issue of viability and CIL will be addressed further as part of developing the deposit Plan. It would be unreasonable for the LPA to be expected to present detailed CIL schedules as part of a higher level Preferred Strategy consultations.	No change
This policy is in general conformity to the NPPF in regard to infrastructure provision.	Noted	No change
Scattered residential developments will not lead to CIL or planning obligations in any substantial manner. The cumulative effect though will place strain on public services.	Noted. However, the key principle of the policy is that seeks to mitigate the effects of new development. As a general principle the Preferred Strategy is seeking to resist 'scattered' residential developments, by focussing growth in the most sustainable settlements, according to the principles in policy STR2.	No change
Appropriate infrastructure needs must be considered with any future development proposals	Noted	No change

Question 9. Policy STR7: Economic Development, Enterprise and Employment		
Policy STR7 seeks to ensure a healthy, vibrant and diverse local economy. Do you have any comments to make on Policy STR7?		
Representation	Proposed FCC response	Proposed change
A more enlightened approach is required to meet the needs of the rural areas and a move away from the 'thou shalt not' mentality.	The Plan recognises and supports the rural economy. Given that much of the County is rural the Plan seeks to ensure that the economic needs of rural areas are provided for in a sustainable way. In line with national policy guidance, the LDP takes a positive approach to rural development (e.g. rural diversification initiatives), where these proposals are sustainable and contribute to wellbeing.	No change.
The plan should recognise that support is needed within sustainable villages to scope out how to put employment opportunities within the community and not just in strategic sites.	Policy STR7 takes a holistic approach to the delivery of employment opportunities by seeking to ensure a healthy, vibrant and diverse local economy across the County not just in the two strategic sites.	No change
Considers that agriculture is important to the whole economy, not just the rural economy. It is also vital that policy STR7 recognises the role, contribution and changes in all sectors in the "rural" economy (including but not limited to forestry, rural SMEs, tourism/leisure, local housebuilders, other enterprises and rural based land uses).	The importance of agriculture to the County's economy is acknowledged in the Strategy. Policy STR7 recognises the role and contribution that the rural economy makes and it seeks to support wider rural enterprise. The Strategy indicates that there will be a detailed deposit plan policy covering other sectors in the rural economy i.e. 'rural enterprise development'.	No change.

There really seems little enthusiasm to provide employment in rural areas. The suggestion of rural enterprise and diversification is not very meaningful.	Policy STR7 makes specific reference to supporting the rural economy. It recognises that much of the County is rural and affirms that the Plan must ensure that the economic needs of rural areas are provided for in a sustainable manner.	No change.
The preferred level of growth should take into account the need to provide a range of employment land to meet the needs of all occupiers within Flintshire. Accordingly, additional employment land should be identified in order to facilitate the delivery of jobs growth and employment land development.	The supporting text is clear in the ideology of the policy, namely 'it is...essential that Flintshire has an adequate employment land provision to accommodate future market demand while allowing choice and flexibility to meet the varying nature of future employment needs and demands.'	No change.
Concerned to see mention of an extension to the site area of STR3B.	The concern raised has not been substantiated however the area of the Warren Hall site has been extended to include housing development a broader range of supporting uses including retail, as part of a commercial hub with the aims of improving the viability and thus deliverability of the site.	No change.
The aim of delivering 8,000-10,000 new jobs over the plan period to 2030 is contingent on the Northern Gateway and Warren Hall strategic sites being brought forward. There are serious concerns over the deliverability of these two sites, and therefore their ability to deliver the expected economic and wider benefit to the County	<p>The job growth ranging between 8,000-10,000 jobs is derived from follow up work to the Employment Land Review, namely Flintshire Further Employment Growth Scenarios Assessment. The likely job yield has been calculated from the two strategic sites at Warren Hall and Northern Gateway but also the general job targets associated with the Deeside Enterprise Zone.</p> <p>In order to overcome non-delivery, a key function of the LDP is to provide an appropriate</p>	No change.

	<p>and sustainable supply of housing land free from constraints and economically feasible for development. A 10% flexibility allowance is applied to the housing requirement figure and will be met through a variety of sources of supply including existing planning permissions, new allocations and windfall sites. The two strategic sites together with small to medium allocations will form the Plan's housing allocations. This mix backed up by evidence from developers about viability and deliverability will enable the LDP to secure and maintain a 5 year housing supply.</p> <p>Contrary to the point made, the two strategic sites referred to are in an advanced stage of infrastructure development, essential to enabling the subsequent development of the sites. It is not uncommon for there to be long lead in times before strategic sites come forward.</p>	
<p>In Penyffordd there are increasing numbers of self-employed and small businesses with few affordable, local facilities available for new businesses to locate to. Warren Hall is not likely to bring forward office or workshop space suitable for small growing businesses or start-ups.</p>	<p>The policy seeks to facilitate a range and choice of sites in terms of, amongst other things, type. This is sufficient to cater for all types of employment provision.</p> <p>If there is a deficiency in a certain type of employment provision then the strategy is supportive of proposals arising from the demand of market forces. The Strategy follows guidance in TAN23 and acknowledges that market forces do not always conform to land</p>	No change.

	use designations or boundaries and whilst the LDP will take a positive approach to such proposals it will only do so if the proposals represent sustainable development.	
In criterion v. it is considered that the Local Service Centres should also be recognised in the supporting role they play in providing a range of employment, retail, leisure development and services and facilities that are accessible to the wider communities they serve.	The Main Service Centres are highlighted as having a 'strategic role in delivery of services and facilities.' It is not the case that Local Service Centres have a strategic role so they should not be recognised in the strategic economic development policy.	No change

Question 10. Policy STR8: Employment Land Provision		
Policy STR8 makes provision for a range of employment land and premises. Do you have any comments to make on Policy STR8?		
Representation	Proposed FCC response	Proposed change
Stronger emphasis to encourage small starter units.	It is not necessary to be so specific at this strategic stage. The ELR did not highlight that small starter units was a strategic issue for the LDP to address. The policy seeks to facilitate a range and choice of sites in terms of, amongst other things, type. This is sufficient to cater for all types of employment provision.	No change
Candidate site WHI005 has the potential to deliver a mixed use employment, rural enterprise, village hub and housing site that could become an exemplar model of sustainable rural development. The policy text and para 6.2.6 should be amended to facilitate delivery of such a model.	Whitford is a Tier 4, Defined Village, consequently the Plan is seeking to foster small scale development appropriate to the scale, character and role of the settlement. Therefore it would not be appropriate to amend the LDP to cater for this site, particularly when little information has been submitted in its support. The merits of this proposal will be dealt in terms of the Candidate Site process.	No change
The policy should take into account the need to provide a range of employment land to meet the needs of all occupiers within Flintshire. Additional employment land should be identified in order to facilitate the delivery of jobs growth and employment land development.	The supporting text is clear in the ideology of the policy, namely 'it is...essential that Flintshire has an adequate employment land provision to accommodate future market demand while allowing choice and flexibility to meet the varying nature of future employment needs and demands.'	No change
Land and sites outside settlement boundaries should not be developed except where there is locally generated need, or, of existing brownfield sites.	The Strategy follows guidance in TAN23 and acknowledges that market forces do not always conform to land use designations or boundaries	No change

	and whilst the LDP will take a positive approach to such proposals it will only do so if the proposals represent sustainable development.	
A lot of development seems to be clustered around the A55/A494 corridor to the detriment of this area. Para 6.2.5 effectively suggests that employment and housing takes priority over everything else.	Whilst the para. 6.2.5. refers to economic uses bringing benefits and it is clear that proposals must be sustainably located and benefits must outweigh any adverse impacts of the development.	No change
There is a valuable role for employment development outside of the categories identified, without limiting such opportunities to previously developed land.	Noted. The policy is clear that outside designated and allocated areas sustainable employment can be delivered through the re-use of 'suitable' buildings and land.	No change
The projected land take represents a substantial surplus of existing employment land and can have a detrimental impact on the deliverability of the Northern Gateway and Warren Hall strategic sites. The wording of the policy could be revised, to provide further clarity and emphasis on the potential and importance of land and sites outside settlement boundaries which can deliver employment generation and economic development.	The LDP emphasises the importance of the two strategic sites via policies STR3 and STR7. Whilst policy STR8 states that the re-use of suitable buildings and land outside settlement boundaries, allocated sites and Principal Employment Areas will be allowed to deliver sustainable employment development.	No change
The policy relies upon existing old employment commitments to deliver new jobs. The employment land review has failed to grasp the nettle and review these commitments and demand they demonstrate deliverability. There is no allowance for real growth of new sites or expansion of existing enterprises.	The ELR conducted a robust review of existing employment sites and concluded that they were viable and deliverable. However policy STR8 acknowledges that the market forces have an impact on demand and it will foster sustainable employment development so as to not constrain economic growth by a lack of land.	No change
There is an over-reliance upon the strategic sites, which is dangerous given their infrastructure needs and inherent uncertainties to deliver them. Combined with an over-protectionist policy of existing employment sites; this policy removes any ability for flexible alternative uses to be considered.	To the contrary there is a substantial surplus of employment land in the County and whilst there is no need to identify new employment allocations policy STR8 does support sustainable market led proposals in line with TAN23. The ELR examined Flintshire's extensive portfolio of existing	No change

	employment sites and concluded that there was not a need or indeed significant opportunity to consider other uses for undeveloped employment land. A detailed deposit plan policy will seek to provide protection to employment land and buildings from other uses but will allow their loss if their retention is unnecessary.	
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Question 11. Policy STR9: Retail Centres and Development		
Policy STR9 seeks to support, district and local shopping centres as multifunctional hubs for local communities. Do you have any comments to make on Policy STR9?		
Representation	Proposed FCC response	Proposed change
In view of the changing nature and role of town centres it is suggested that additional wording is added to refer to residential development as a type of development which would also be supported by the policy.	Policy STR9 affirms that town and district centres are the preferred location for new retail, leisure, office, social and other town centre uses. To include reference in the policy to residential development would underplay the role of town and district centres in being a focus for retail and commercial development. The reasoned justification highlights the multifunctional make up of town and district centres in respect of retail, commercial and residential uses - this reference to residential is considered sufficient and appropriate at this strategic level.	No change
Retailing and commercial uses change at a far quicker rate than the development plan system can cope with. Detailed policies need to move away from tight control to much more flexible and responsive approaches.	Noted. This comment can be explored further when the detailed policies are developed and consulted upon at the deposit plan stage.	No change
It is considered that the policy does not adequately reflect the particular needs of rural areas in respect of village shops and associated community facilities.	The importance of village shops and associated community facilities is not ignored by the strategy. The reasoned justification to Policy STR9 recognises the important role village shops and smaller local centres play in top up shopping. It also recognises the economic and social role community facilities, such as pubs, can have.	No change

	<p>The justification is also clear that Policy STR9 will need to be supported by detailed deposit plan policies acknowledging the role of local facilities in rural settlements.</p> <p>Furthermore the ‘detailed policies’ section of policy STR9 indicates that there will be a detailed policy on the ‘retention and provision of local facilities (single policy incorporating existing similar community facilities policy)’.</p>	
<p>The intention to declare Broughton Retail Park a town centre is noted whereby unrestricted retail and leisure development could take place. Cheshire West would like to further understand this thinking given Broughton Retail Park is more similar in nature to the out of centre Sealand Road, Chester and out of town Coliseum Retail Park, Ellesmere Port.</p>	<p>The reasoned justification to the policy explains the Plan’s thinking on Broughton Shopping Park. ‘The scale and composition of the shopping park has changed since its inception with the sub-division of retail units and a broader shopping offer. It has also seen recent major investment in leisure development in the form of a cinema and accompanying restaurants and planning permission exists for a hotel and further restaurant uses...It is also the case that the defined retail centres in the Retail Hierarchy have also changed, with a greater emphasis on a range of uses rather than solely functioning as retail destinations...In this context there could be further scope for Broughton Shopping Park to incorporate other uses which enable it to function more akin to a town centre...Given its accessibility to a significant local population, there is scope for the role of the Park to be reconsidered from being an add-on to the community, to</p>	<p>No change</p>

	performing more like a traditional town centre at the heart of a growing and vibrant community.'	
Flint, Mold and Connah's Quay need to remain viable as shopping centres to enable Northop and Sychdyn to be serviced by them.	Noted. The central thrust of the policy is to seek to maintain and enhance the vibrancy, viability and attractiveness of all the County's town centres.	No change
With regard to the table after paragraph 6.3.10 of the supporting text that refers to The Retail Hierarchy in Flintshire, in the column for District Centres, the Northern Gateway Airfields site should be identified as a District Centre, albeit proposed.	It would be wrong for the policy to list a centre that does not exist. Policy STR3 refers to 'District Centre(s) to serve the local convenience needs' and this is deemed inappropriate at this stage of the Northern Gateway's development.	No change
Paragraph 2 refers to 'Major development will need to comply with the town centres first principles within PPW.' Aldi recognises the objectives of the PPW and indeed the guidance within TAN 4 (Town Centres and Commercial Development (2016)). It is however unclear what is meant by 'major development'. It is therefore requested that the Council makes clear what it considers to be 'major development' to ensure that it sits in line with the PPW and TAN 4.	The 'detailed policies' section of policy STR9 indicates that there will be a detailed policy relating to 'new major development' in the deposit LDP. Therefore it is logical that this policy explains what is meant by 'major development'.	No change
The concept to concentrate shopping and cultural activities in town centres ignores the problem that it is necessary to use private vehicles and parking in town centres is a major problem. Those who live in the rural areas have no option but to use private vehicles and so out of town parking in shopping parks is preferred.	The concept of concentrating retail and complimentary uses within town centres and other local service centres follows guidance set at the national level. In doing so the aim will be to create more reason why people should visit such centres and by locating these uses in centres will encourage a reduction in the use of private vehicles.	No change

	The policy is supportive of retail and commercial uses and recognises the importance of village facilities for top up shopping. In instances where there is a need to travel further for shopping then the Plan seeks to encourage other forms of travel but ultimately it promotes a sustainable pattern of growth so that the majority of new development occurs in the larger settlement settlements which have retail and commercial centres, which underlines why it is important for the policy to support these centres.	
Given the Shopping Parks key role within the shopping hierarchy and importance in terms of Flintshire local economy, the recognition afforded to Broughton Park as a "town centre" in the County's shopping hierarchy as identified in the Preferred Strategy (Strategic Policy STR9), is welcomed.	Noted.	No change
There is an urgent need to support retail and other community based enterprise in our local town centres. Retail is changing forever with the shift to online purchasing and town centres have been decimated, particularly smaller centres such as Buckley.	Noted. Policy STR9 and the forthcoming detailed deposit plan policies aim to maintain and enhance town centres in order to prevent their decline.	No change
Large existing shopping centres and local town shopping centres are vital to sustain villages.	Noted.	No change
Shops and a bank in Caergwrle have closed and the centre is dead. Hope and Abermorddu do not have 'centres' as such.	The settlement of HCAC is noted in policy STR9 as having two village centres in Caergwrle and Hope.	No change

Question 12

Policy STR10 Tourism, Culture and Leisure

This policy sets out a number of principles to be applied in considering different tourism, leisure and cultural development proposals

Representation	Proposed FCC Response	Proposed Change
Recognition of the value of the Countys natural environment, including specific reference to the AONB, as a sustainable tourism asset is welcomed (section ii). The inclusion of safeguards to balance such development with conservation and enhancement of the natural, built and cultural heritage of the area is also supported.	Noted	No change
The policy should also seek to safeguard and protect existing facilities. To support the objectives of the Future Generations Act, the Trust believes the LDP should support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities.	As a land use plan the LDP has restrictions on what it can influence. However Strategic Policy STR 13 Natural and Built Environment, Green Networks and Infrastructure identified that conservation of historic assets is essential.	No change
Happy to see the inclusion of 'maintenance and diversification of a sustainable rural economy with, conserving and enhancing our cultural heritages'.	Noted	No change
Accessibility to Flintshire's natural, cultural and historic assets should include specific emphasis on increasing user base of marginalised and socially excluded	As a land use plan the LDP has restrictions on what it can influence. However alongside the LDP, Supplementary Planning Guidance is produced to support and add detail to the policies in the plan.	No change

communities and people with physical or mental disabilities.	SPG No 12 Access For All includes the principles of 'Inclusive Design' which have been adopted by Welsh Government, which are that it: - places people at the heart of the design process - acknowledges diversity and difference - offers choice where a single design solution cannot accommodate all users - provides for flexibility in use - provides buildings and environments that are convenient and enjoyable to use for everyone.	
Please note: the full title is Clwydian Range and Dee Valley AONB.	Noted	Ensure all reference to the AONB is Clwydian Range and Dee Valley AONB.
Draft paragraph 6.4.3 should better reflect the wording and intention of proposed Strategic Policy STR10 in recognising the need for flexibility in relation to the location of new tourism proposals. Also considers that the proposed "more detailed criteria-based policies" for tourism, culture and leisure development to be included in the deposit Plan should provide the flexibility to respond appropriately to the details of each scheme and to the location of the proposed development.	Noted. These will be developed into more detailed policies within the deposit LDP.	No change
Considers that draft Strategic Policy STR10 criterion iv should provide flexibility to respond to the specific characteristics of each proposal in relation to Flintshire's natural, built and	Noted. These will be developed into more detailed policies within the deposit LDP.	No change

cultural heritage, including reference to the consideration of proposed mitigation measures.		
HCAC has potential for walkers / cycling / ramblers and general tourism. Park in the Past if it is successful has the potential to generate a huge amount of tourism for the area.	Noted	No change
We completely endorse the principles underpinning STR10.	Noted	No change
We consider the sites location, directly off the proposed upgraded A55/A548 route, offers the opportunity to deliver new roadside services to the north-western end of Connahs Quay.	It is assumed that this representation supports land that sits adjacent to the proposed Welsh Government highways improvement, commonly referred to as the “red route”. Whilst a decision in principle has been taken to progress with the red route option, there is as yet no agreed line, no approved design for the route or related junctions, no detailed assessment of the impacts of developing the route and the mitigation required for this, no planning consent, and no timescale for development of the route. Given the issues identified with the red route above, to allocate a roadside services site to ‘benefit’ from proximity to this route is premature.	No change
There is potential for a commercial site at Penyffordd train station, which would suit businesses serving passing 4x4, cycling and motorcycle traffic heading for the AONB and National Parks.	Noted. This will be addressed as part of the consideration of specific Candidate Sites.	No change

Although Flintshire has a rich heritage, very little is actively promoted. There should be walking and cycling routes to link Flintshire's castles at Caergwrle, Mold, Ewloe and Flint.	Strategic Policy STR 5 Transport and Accessibility includes criterion' vi. Provide walking and cycling routes, linking in with active travel networks and green infrastructure networks;' These issues will be developed into more detailed policies within the deposit LDP.	No change
Caergwrle has the ruin of an old castle that could help with tourism and leisure.	Noted	No change
Tourism, culture and leisure are vital to any communities.	Noted	No change
While Policy STR10: Tourism, Culture, and Leisure is positive, the policy should also seek to safeguard and protect existing facilities.	As a land use plan the LDP has restrictions on what it can influence. However Strategic Policy STR 13 Natural and Built Environment, Green Networks and Infrastructure identified that conservation of historic assets is essential.	No change

Question 13

Policy STR11 Provision of Sustainable Housing Sites

This policy sets out the approach to and principles to be applied in making provision for viable and deliverable housing development to meet general, affordable and specific housing needs.

Representation	Proposed FCC Response	Proposed Change
<ol style="list-style-type: none"> 1. The HBF object to the words 'expected to' as it is considered too prescriptive it should be changed to 'aim to'. 2. Point v. should be reworded to be clearer as follows: Provide or contribute to existing physical, environmental and social infrastructure necessary to integrate new development into communities. 3. The HBF notes that the final paragraph states. The availability of housing land will be monitored and maintained over the plan period as part of the Annual Monitoring Report (AMR) process his should also include reference to the JHLAS which is also a way of monitoring. 4. The HBF are concerned that the final sentence states This will involve maximizing the delivery of sustainable and viable commitments already within the landbank, balanced against the allocation of sustainable, viable and deliverable new 	<ol style="list-style-type: none"> 1. Not accepted. If development sites are sustainable, viable and deliverable then these are not unreasonable expectations. 2. Not Accepted. The criterion explains that new development can either 'provide' new or contribute to existing infrastructure. The suggested amendment is not necessary or appropriate. 3. Not Accepted The JHLAS process is essential evidence that will inform the AMR. Reference to the AMR is therefore adequate and encompassing of the point about JHLAS 4. Not Accepted This does not state or imply an approach to phasing. Instead in merely recognises that sustainable commitments within the existing supply should be capable of making a contribution 	<p>No change</p>

<p>sites which suggests that the Council will impose some type of phasing policy which would favour sites which already have planning permission. Although how such a policy would operate in practice is not clear from the policy the HBF object strongly to the suggestion of such phasing. There is no further explanation of this phasing suggestion in the supporting text either</p>	<p>to housing supply alongside new allocations</p>	
<p>With regard to the table which follows the policy at paragraph 7.1.4 includes a line less commitments. Note that this assessment has been prepared without any consultation with the HBF who normally would be consulted on the JHLAs process and that the last completed JHLAs was in 2014 so any evidence from these studies is now out of date.</p>	<p>TAN1 requires that a Formal Joint Housing Land Availability Study be carried out on an annual basis which included the involvement of bodies such as the HBF. But where a local planning authority doesn't have an adopted Unitary Development Plan or Local Development Plan (LDP), it is considered not to have a 5-year supply and cannot publish a Joint Housing Land Availability Study, and this is the current situation in Flintshire. However the Authority has continued to carry out an informal housing land monitoring in a similar way so that the figures can be kept up to date.</p>	<p>No Change</p>
<p>With regard to STR11 vi the planning authority will need to adopt a significantly different approach if it is to meet local affordable housing need in the rural area. The policy needs to be much clearer as to how it intends to deal with the housing and care needs of the growing older population.</p>	<p>Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: "facilitate the provision of affordable</p>	<p>No Change</p>

	housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	
Higher Kinnerton is lacking in availability of affordable homes for local people and that the affordable housing criteria applied to the Cae Babylon development failed to ensure affordable homes were genuinely affordable. The LDP should ensure criteria can be established which results on the construction of truly affordable homes in the village.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	No Change
The role of small housing sites and rural landowners capable of acting as developer to deliver small sustainable housing sites in rural communities should be recognised along with their ability to retain housing and cross-subsidise it. The rural housing strategic policy should strongly support housing development	Whilst the LDP spatial strategy is clear that the majority of growth should be provided by the top three tiers of the settlement hierarchy, the plan does not preclude sensitive and sustainable levels of development in Flintshire’s rural settlements. Criterion vi. Of Strategic	No Change

that offers opportunities to rebalance and sustain rural life and communities.	Policy STR 11 Provision of Sustainable Housing Sites, sets out to “ensure in rural areas, that genuine and proportionate needs for housing are met in a sustainable manner”. This clearly has to be locally needs driven, and the deposit LDP will include policies which define these needs and the level of approach to sustainable housing provision in rural areas.	
Careful consideration of needs and of the appropriateness of candidate sites Do they meet criteria of being genuine and proportionate?	The Council published a Draft Methodology and Assessment Process document setting out the methodology by which the LDP Candidate Sites will be assessed. This assessment includes a detailed Assessment Form of 28 site specific questions and extensive consultation with statutory organisations.	No Change
Northop Hall has reached capacity and needs major infrastructure improvement to support any significant future development.	The preferred strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations to be included in the Deposit LDP. Infrastructure capacity will be taken into consideration when allocations are made in the deposit Plan.	No Change
A general comment would be to make the point that new housing should always be designed to minimise impact on the environment and take into account climate change.	Noted Policy STR 4 states “To promote and create new sustainable places, all development will be designed to a high standard in line with the sustainable design principles and should achieve local distinctiveness, be inclusive and accessible, and mitigate and adapt to climate change. These will be developed	No Change

	into more detailed policies within the deposit LDP.	
Housing is central to people's lives. So is green space. I am very concerned at the plan to remove so much valuable green space. Builders continue to build properties that are anything but affordable, only putting in the absolute minimum of affordable.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: "facilitate the provision of affordable housing relative to local needs"; "provide balanced developments through a mix of housing types"; and "make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units". These will be developed into more detailed policies within the deposit LDP. Policy STR13 seeks to protect green spaces and to provide new open space as part of new housing development. It is not explained by the objector how the Preferred Strategy is removing so much green space, as it contains no detailed proposals.	No Change
According to Rightmove there are 1,194 properties for sale in Flintshire. I appreciate some of these may be people moving on within the county but even so, it does not suggest the shortage that the council has calculated. Even Welsh Assembly estimates of housing requirements are lower and it	There is a general consensus in support of the level of growth proposed, from a number of perspectives including the Welsh Government, the HBF, developers with the ability to think strategically, neighbouring authorities, and other public sector providers including health. All	No Change

demonstrates that an excessive approach is being taken here.	recognise as the Council does, the need to balance an element of aspiration with the importance of being able to deliver that ambition, and the capacity that exists to do so. The existence of a certain number of properties being empty or for sale is built into the household projections.	
Housing provision should absolutely be according to need and not according to developer's preferences.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: "facilitate the provision of affordable housing relative to local needs"; "provide balanced developments through a mix of housing types"; and "make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units". These will be developed into more detailed policies within the deposit LDP.	No Change
Experience from Denbighshire has demonstrated that a heavy reliance on housing numbers from strategic sites can be detrimental if these sites are slow to come forward. Housing numbers from these large sites may be best allocated to later phases of the plan period to avoid a decline in the housing land supply being recorded if completion levels fall below those anticipated.	Noted. The two strategic sites referred to are in an advanced stage of infrastructure development, essential to enabling the subsequent development of the sites. It is not uncommon for there to be long lead in times before strategic sites come forward. For this reason the LDP includes policy STR2 which sets out the preferred spatial strategy for the Plan which seeks to direct	No Change

	<p>new development to the top three tiers of the settlement hierarchy. This, it is hoped, will ensure that the plan does not over rely on the Strategic sites. If the Strategic sites do not come forward in an appropriate timescale this will be monitored as STR11 states 'The availability of housing land will be monitored and maintained over the plan period as part of the Annual Monitoring Report (AMR) process, to ensure a continuous and adequate supply to enable the delivery of the overall housing requirement'.</p>	
<p>Developers constantly undertake marketing research in order to establish market demand, whereas there is increasing experience of authorities looking to influence housing mix with almost no evidence to justify such an approach, we hope that Flintshire will avoid such problems. We do not understand point vi, it appears to be a principle that is applicable across all housing developments (?).</p>	<p>It is the role of the LDP to promote a mix of housing types to ensure all sectors of society can access the housing market. Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: "facilitate the provision of affordable housing relative to local needs"; "provide balanced developments through a mix of housing types"; and "make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units". These will be developed into more detailed policies within the deposit LDP.</p>	No Change

	In terms of criterion 'vi. Ensure in rural areas, that genuine and proportionate needs for housing are met in a sustainable manner.' That is applicable accross all housing development but emphasised here for rural areas, to show that careful consideration must be given to the effects of new development on smaller rural communities.	
Flintshire has not met its goal in the last LDP of ensuring 30% of all houses being built are affordable/specific and developers appear to be exploiting the current situation by overdeveloping the county with larger houses.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: "facilitate the provision of affordable housing relative to local needs"; "provide balanced developments through a mix of housing types"; and "make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units". These will be developed into more detailed policies within the deposit LDP.	No Change
We are also concerned about the issue of speculative development which has emerged as a result of Welsh Governments TAN1. Such speculative development is giving rise to housing development which does not necessarily address the housing needs of local communities and which, in spite of CILs,	The issue of Speculative developments has emerged since the County has not been able to demonstrate a 5 year housing land supply due to the expiry of the UDP. Once the LDP is adopted this should no longer be an issue.	No Change

are not addressing infrastructure issues. They are, on the contrary, sometimes adding to the burden on the infrastructure.		
The principles underlining the Policy are supported.	Noted	No Change
The deliverability of the strategic sites is clearly in question, and therefore so is the ability to address the Countys identified affordable housing need, in addition to market and specific housing needs.	The two strategic sites referred to are in an advanced stage of infrastructure development, essential to enabling the subsequent development of the sites. It is not uncommon for there to be long lead in times before strategic sites come forward. For this reason the LDP includes policy STR2 which sets out the preferred spatial strategy for the Plan which seeks to direct new development to the top three tiers of the settlement hierarchy. Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	No Change

The intention of Policy STR11 to monitor and maintain the availability of housing land throughout the plan period is fully supported.	Noted	No Change
All communities but especially defined villages need growth to sustain them. Without it, their ability to attract new or keep existing facilities viable. Restriction to affordable houses only will not necessarily allow sufficient investment for that to occur.	STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	No Change
The Welsh Government does not object to the level of flexibility in the plan. It will be for the Council to demonstrate why 10% is appropriate, including how the flexibility relates to all housing components, delivery and phasing over the plan period. The authority should demonstrate there is sufficient flexibility throughout the plan period to deal with any pinch points and unforeseen circumstances. A trajectory will assist in demonstrating this.	Noted. These will be developed into more detailed policies within the deposit LDP.	No Change
STR11 is concerned with the need to deliver affordable housing however, this policy shys away from identifying any thresholds or	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good	No Change

percentile requirements, despite the evidence base which shows a massive need to deliver affordable housing.	quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	
This policy is supported subject to the Preferred Spatial Strategy being amended to direct growth to the top two tier of the settlement hierarchy in order to achieve sustainable growth in accordance with Planning Policy for Wales.	STR2 sets out the preferred spatial strategy for the Plan and seeks to direct new development to the top three tiers of the settlement hierarchy. This, is to ensure that the plan does not over rely on the Strategic sites and that development is located in sustainable settlements which have capacity to allow new growth. A settlement audit of each settlement has been carried out as part of the preferred strategy which	No Change
Whilst generally supporting of the objectives of policy STR11, it does not agree with either the net quantum of housing identified in the policy (see comments re Policy STR1) or the identification of preferred sites.	There is a general consensus in support of the level of growth proposed, from a number of perspectives including the Welsh Government, the HBF, developers with the ability to think strategically, neighbouring authorities, and other public sector providers including health. All recognise as the Council does, the need to	No Change

	balance an element of aspiration with the importance of being able to deliver that ambition, and the capacity that exists to do so.	
There should be no isolated developments. There should be walking and cycling links between and through developments so people can move more freely without having to use a car.	Strategic Policy STR 5 Transport and Accessibility includes criterion' vi. Provide walking and cycling routes, linking in with active travel networks and green infrastructure networks;' These issues will be developed into more detailed policies within the deposit LDP.	No Change
Glad that some sites in HCAC are considered not appropriate. Overall the preferred strategy could mean over 400 houses for HCAC which would swamp the area. Broughton is the same classification and can absorb housing.	The Preferred Strategy document sets out the spatial strategy in terms of where development can be expected to be sustainably located. Apart from the strategic sites, there are no specific housing allocations this detail will be set out the deposit LDP.	No Change
Not enough effort is put into building affordable houses for first time buyers. It seems the builders are trying to avoid building these.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: "facilitate the provision of affordable housing relative to local needs"; "provide balanced developments through a mix of housing types"; and "make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units". These	No Change

	will be developed into more detailed policies within the deposit LDP.	
We would advocate that the Council take a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population within the Plan.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	No Change
Supports the flexibility towards the provision of affordable housing and the mechanism in Policy STR11(i). It is considered that the policy wording is innovative and flexible however we are concerned that Policy STR11 does not clearly identify the mechanism for the identification of additional housing land in the event that allocated and committed sites do not deliver a five year housing land supply.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These	No Change

	will be developed into more detailed policies within the deposit LDP. The LDP Manual produce by Welsh Government, sets out that once and LDP is adopted an Annual Monitoring Report and within 4 years a more extensive review of the LDP be carried out. Any shortfall in housing land supply can be identified and addressed at that time.	
There have already been a large number of new builds in Caergwrle / Abermorddu / Hope over the past few years and feels that the area has already had its quota.	The preferred strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations to be included in the Deposit LDP. The settlement of HCAC experienced only modest growth over the UDP Plan period.	No Change
All houses being built at present are too big.	Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.	No Change

Policy STR11 sets out the approach to and principles to be applied in making provision for viable and deliverable housing development to meet general, affordable and specific housing needs. The principles providing affordable housing, an appropriate density and mix of housing, providing developer contributions and infrastructure, are supported in principle. Details of the specific requirements which will underlie these principles will be key to ensuring a sound LDP.	Noted	No Change

Question14 Policy STR12 Provision for Gypsies and Travellers This policy sets out the approach taken in providing for the needs of gypsies and travellers.		
Representation	Proposed FCC Response	Proposed Change
The need/demand for such sites in the AONB would be very limited and that the provision of such sites in the protected landscape would be unlikely to be compatible with conservation and enhancement of the area. Note that Denbighshire's adopted LDP recognises this constraint in Policy BSC 10, and the committee would suggest that a consistent cross boundary approach is required.	Noted, cross boundary discussions with Denbighshire will take place before the production of the deposit LDP. STR13 provides guidance for the AONB however a detailed deposit plan policy is likely to address the need to conserve and enhance the character and appearance of the AONB.	No change
Cheshire West and Chester has recently provided two pubic Traveller sites that are now largely occupied and would therefore wish to see a range of sites (public and private) provided in Flintshire to ensure needs are fully met.	The Deposit plan will identify suitable and deliverable Gypsy and Traveller sites (transit and permanent) in order to meet the level of need identified in the GTAA. The GTAA is also being updated to ensure that the LDP is being prepared in the light of the most up to date information. It is not appropriate for Flintshire to provide for the needs arising in CWAC.	The need identified in STR12 to be updated to reflect revisited GTAA
Support STR12 and the needs for gypsies and travellers.	Noted	No change
We recognise the legal responsibility of the Authority to plan in order to ensure accessibility for all members of the community so that there is access to housing, health,	The Deposit plan will identify suitable and deliverable Gypsy and Traveller, transit and permanent sites, to meet the need identified in the GTAA. This will a mix of allocations and sites recently, or presently	The need identified in STR12 to be updated to reflect revisited GTAA

education and leisure. Once again this requires infrastructure provision.	being considered through the development management process. Each allocation / planning application will be considered on its merits against a range of criteria including infrastructure.	
Clarify from the Gypsy Traveller Accommodation Assessment (GTAA) the immediate 5 year need as there is a discrepancy with the Preferred Strategy stating the need is -5 pitches (paragraph 7.2.4) whereas, the GTAA 2016 (paragraphs 5.52 and 6.23) records the need as 4 pitches. The Deposit plan must ensure suitable and deliverable sites are identified to address the level of need when required.	Noted. The manner in which the identified need can be met is complicated by the existing temporary and unauthorised sites and permissions, and planning applications presently under consideration. An update of the GTAA is presently being undertaken to add further clarity and this will be fed into the Deposit Plan. The Deposit plan will identify suitable and deliverable Gypsy and Traveller sites (transit and permanent), to address the level of need identified.	The need identified in STR12 to be updated to reflect revisited GTAA

Question 15. Policy STR13: Natural and Built Environment, Green Networks and Infrastructure		
Policy STR13 encompasses a number of strands in seeking to protect both the built and natural environment. Do you have any comments to make on Policy STR13?		
Representation	Proposed FCC response	Proposed change
It is extremely unlikely that most developments would be able to meet the requirements of the policy which currently reads as if all development has to achieve all the criteria - this policy needs to be reworded to be clear that this is not the case.	Policy STR13 provides a strategic context to the subject of the natural and built environment, green networks and infrastructure. It does not require proposals to meet all the requirements. It encompasses a number of strands in seeking to protect both the built and natural environment.	No change
Well designed and located development can co-exist perfectly well with wildlife and their habitat but recognise that community and economic needs are also important, particularly in the rural areas.	The policy is clear in its approach to balancing the sometimes conflicting demands in a sustainable way.	No change
Emphasis should be given to actively promote opportunities to enhance the AONB as part of any new development proposal.	The policy seeks to enhance the AONB by promoting good design that is sensitive and contributes to local distinctiveness.	No change
It is important to protect the natural environment by protecting green barriers.	Criterion ii. seeks to protect the open character and appearance of green wedges/barriers. However, existing green barriers will be the subject of a review as part of preparing the deposit draft LDP.	No change
Strongly objects to criteria i) because the requirement that all development protects the open countryside conflicts with PPW para 4.6.3. The wording should make it clear that the countryside is place where people live, work and enjoy as a resource and capable of accommodating and absorbing appropriate development.	The criteria is completely justifiable in the context of para 8.1.2 which states 'this policy recognises the intrinsic character and beauty of the countryside...and aims to conserve and enhance the environment and local landscape'.	No change
In order to meet the housing and employment land requirements there will be a requirement to develop	The Plan needs to be read as a whole. Other policies provide guidance on development proposals. It would	No change

portions of countryside and Green Barriers and this needs to be appropriately reflected within the policy. There needs to be strong protection of our natural habitats and agricultural resources and as such there should be strong priority afforded to strengthening those plan policies which seek to protect them.	be inappropriate to detail housing and employment development proposals within a policy seeking to protect the built and natural environment. Detailed policies will be forthcoming on the protection of the open countryside, biodiversity, etc.	
Utterly unachievable when it is evident that employment and housing are prized considerably more than the environment. Concerned at the plan to remove so much valuable green space.	The LDP seeks to balance many competing demands and policies need to be read as a whole. The detailed justification to policy STR13 states that 'the Plan will seek to ensure that existing playing fields and open space are protected from development.' It is unclear how the Preferred Strategy proposes the removal of so much valuable green space when it contains no detailed proposals.	No change
It is important that existing green barriers are taken into account in relation to new housing, creating sustainable communities in which to live, reducing urban sprawl, and safeguarding an important carbon sink.	Noted. Criterion ii. promotes the protection of the open character and appearance of green wedges/barriers.	No change
The policy should be revised to provide greater flexibility to respond to the specifics of each proposal. As drafted, the emerging policy applies the same requirements to every development proposal.	The policy is strategic and it would be inappropriate for it to be so detailed that it takes account of the specifics of each proposal. The place for such policies is in the detailed deposit plan policies.	No change
Heritage buildings should be protected as far as is reasonable, affordable and practical. The natural environment is equally as important.	Noted. The policy STR13 provides an appropriate level of protection at the strategic level and in due course it will be supported by detailed deposit plan policies on listed buildings, buildings of local interest and conservation areas.	No change
Scheduled Ancient Monuments should be protected.	The policy promotes the protection of the historic environment with para 8.1.5 providing context.	No change

Playing fields should not be encroached upon especially in narrow valleys where there is not much flat green space for walking / playing on. Parking near playing fields should be kept untouched by development.	The policy is clear in criterion xi. that playing fields and open space will be protected from development. Para 8.1.6 provides further detail.	No change
There are no large playing areas suitable for a football pitch in Caergwrle, Abermorddu or Cefn y Bedd. There are several council estates and when they were built they provided small areas for swings etc., however these are only small and nowadays not fit for purpose.	Policy STR13 is a mechanism to ensure the provision of new open space and playing fields as part of new housing development.	No change
It is vital to protect the green barriers and thereby the natural environment. This protection should also include agricultural land and nature woodland areas with their associated wildlife.	The policy offers protection from development to green barrier land, open countryside, the natural environment and biodiversity.	No change
Criterion (ix) is unduly onerous because it is not clear how the impact upon the conservation status of key environmental assets would be measured or how financial contributions could be calculated against any impact. It is therefore considered that criterion (ix) should be deleted.	The level of detail in criterion ix. is appropriate at the strategic level. Detailed deposit plan policies or supplementary planning guidance are the appropriate mechanism to provide the clarity the objector is raising.	No change

Question 16. STR14: Climate Change and Environmental Protection		
Policy STR14 sets out the ways in which the Plan can help address Climate Change and also deals with other aspects of environmental protection such as flood risk, pollution and energy generation. Do you have any comments to make on Policy STR14?		
Representation	Proposed FCC response	Proposed change
Developing sites which have ground water issues moves the flooding off site and fails to address the wider problem.	The policy is clear in seeking not to increase risk of flooding elsewhere.	No change
Unachievable when it is evident that employment and housing are prized considerably more than the environment	The Plan seeks to facilitate growth in a sustainable way supported by policy STR14. The Plans policies are to be read as a whole.	No change
No development should take place on land where there is a risk of fluvial or ground water flooding either on the site or off-site as a consequence of the development.	PPW and TAN15 do not limit growth in this way. The approach is to steer highly vulnerable development away from flood risk areas, to assess the implications of development in flood risk areas and to ensure new development does not increase the risk of flooding elsewhere.	No change
Criterion (i) should be amended to recognise that not all development can be located to reduce the need to travel by private car. There are many factors that will influence the location of new development, such as it being an extension of an existing use, proximity to facilities, accessibility, and wider sustainability considerations.	The Plan's approach to reducing car use is locating development in settlements or key employment locations which are sustainable and people can access the services and facilities they require. It would be wrong for the Plan not to plan in a way which reduces travel by the private motor car.	No change
Development of flood risk sites may have cumulative adverse health impacts on local communities. While there is clear aspiration to protect and improve local air quality and limit greenhouse gas emissions, it is important that, alongside national measures, local leadership commits to develop and implement	Noted. The policy seeks to minimise the causes and impacts of climate change.	No change

integrated action plans. It would be useful if, going forward, air pollution is regarded as a strategic priority but, whether this is the case or not, actions to reduce air pollution and health risks can play a critical role in supporting work to address other local health and wellbeing priorities.		
No sites for highly vulnerable development should be allocated within flood zone C2 and that the relevant justification tests have been appropriately applied for all other development (where appropriate).	The reasoned justification to the policy explains that the approach is to steer highly vulnerable development away from flood risk areas.	No change
More emphasis is needed on the protection of established trees and hedgerows on solar farms sites.	The importance of protecting the natural environment and its associated features are recognised in policy STR13 however the key is to balance these conflicting roles in order to achieve a sustainable balance.	No change
Land for housing and industry needs to be kept away from areas prone to flooding.	The reasoned justification to the policy explains that the approach is to steer highly vulnerable development (e.g. housing) away from flood risk areas. The same approach is not taken to industry, however the policy seeks to assess the implications of development in flood risk areas and to ensure new development does not increase the risk of flooding elsewhere.	No change
Some proposed development sites may have to take into consideration flood risk and high water levels due to possible climate change.	The approach is to steer highly vulnerable development away from flood risk areas, to assess the implications of development in flood risk areas and to ensure new development does not increase the risk of flooding elsewhere. The Council is presently working on a Strategic Flood Consequences Assessment which will feed into the deposit Plan.	No change

<p>There is some duplication of policy between draft LDP Policies STR14 & STR4 which should be reduced e.g. the wording of criterion (vii) of Policy STR 14 is very similar to criterion (i) of Policy STR 4. Criterion (iii) of Policy STR 14 and criterion (ix) of Policy STR 4 deal with similar matters. Criterion (v) of Policy STR 14 and criterion (vii) of Policy STR 4 both deal with energy efficiency and renewable energy generation.</p>	<p>STR4(i) highlights the need of development ‘to respond to climate change’. STR14(vii) expands on this point by saying ‘development to be adaptable and resilient to future effects of climate change’, which is entirely appropriate. Again STR14 (iii) expands on the point made in STR4 (ix) and STR14(v) expands on STR4 (vii). Other criteria in policy STR4 are given more detail in other strategic policies.</p>	<p>No change</p>
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Question 17. STR15: Waste Management

Policy STR15 seeks to ensure a sustainable approach to managing waste within the County. Do you have any comments to make on Policy STR15?

Representation	Proposed FCC response	Proposed change
The AONB is not an acceptable location for waste facilities, which should be referenced in this strategic policy. Note that Denbighshire adopted LDP recognises such a constraint in Policy.	Noted. Whilst it is agreed that the AONB is not a suitable place for large scale waste facilities small, community based facilities could potentially be acceptable. The Denbighshire LDP directs waste management uses to existing and allocated industrial estates/sites outside the AONB and directs composting and disposal away from the AONB. It does not impose a complete moratorium on waste management facilities within the AONB. Detailed policies at the Deposit stage which will direct waste management uses towards the most appropriate locations. Criteria based policies will also be used.	No change.
It is important to focus on reducing waste as much as possible.	Noted. Detailed policies at the Deposit stage will ensure that waste management requirements are considered during the construction and operational stage of all development.	No change
Support STR15 of particular importance is the avoidance of the movement of plastics and non-biodegradable material into the water environment.	Noted.	No change

Considers that STR15 should provide protection against any adverse impacts of waste development for users of neighbouring land. Caravans in particular are vulnerable to negative impacts which can arise from nearby waste development.	Noted. Detailed policies will be included at the Deposit stage to direct waste management uses to the most appropriate locations and to protect the amenity of users of adjacent land.	No change
The ambition to significantly reduce and manage waste streams is supported.	Noted.	No change
The importance of a policy of eliminating the need for landfill sites is recognised and the principles which underpin STR15 are supported.	Noted.	No change
In line with criterion iv of STR 15, the authority must assess and indicate which employment sites are suitable and appropriate to accommodate waste management facilities (TAN 21, paragraph 3.22).	Noted. Detailed policies will be identified at the Deposit stage which will include the identification of locations which are deemed suitable for waste management uses. Criteria based policy will also be used to enable uses which cannot be accommodated within allocated sites or sites with an existing B2 use to be assessed.	No change
Wales and Flintshire have an excellent record in encouraging household recycling, but this can be further enhanced through designs which allow for space for recycling bins and receptacles.	Noted. Detailed policies at the Deposit stage will ensure that waste management requirements are considered during the construction and operational stage of all development, including space for recycling bins and receptacles.	No change
Closing the recycling site at HCAC has not helped waste management with tipping and burning of rubbish having increased.	The closure of household waste recycling centres is an operational decision which has been taken by the Council in its capacity as a Waste Collection and Disposal Authority. The focus has been on improving provision at a smaller number of sites and rolling out	No change.

	kerbside and bulky collections, reducing the need for people to travel to such centres. The LDP will ensure that any spatial requirements of the Council in this respect are met through the LDP, however, such operational decisions are outside the scope of the LDP.	
Re-using rather than re-cycling should be the aim. HCAC is classed as a local service centre yet has lost its waste / skip site. Re-establishing this would reduce road journeys. If additional housing is built, this need grows.	The closure of household waste recycling centres is an operational decision which has been taken by the Council in its capacity as a Waste Collection and Disposal Authority. The focus has been on improving provision at a smaller number of sites and rolling out kerbside and bulky collections, reducing the need for people to travel to such centres. The LDP will ensure that any spatial requirements of the Council in this respect are met through the LDP, however, such operational decisions are outside the scope of the LDP.	No change
Reducing waste by any means is always essential.	Noted. Detailed policies will be included at the Deposit stage to encourage waste reduction.	No change

Question 18. STR16: Strategic Planning for Minerals

Policy STR16 sets out the ways in which the Plan will sustainably manage minerals resources and activity. Do you have any comments to make on Policy STR16?

Representation	Proposed FCC response	Proposed change
Protection of the nationally important landscape of the AONB should be explicit at both strategic and detailed policy levels. Denbighshire's adopted LDP states that future mineral extraction will not be permitted in the AONB (Policy PSE 17), and the need for a consistent cross boundary approach is emphasised.	Planning Policy Wales, paragraph 14.3.2 makes it explicit that mineral development should not take place in AONBs save in exceptional circumstances. The strategic policy makes it clear that places where mineral extraction will not be acceptable will be identified and which would include the AONB, in line with national policy. This matter will be addressed at the Deposit stage.	No change.
The strategic minerals policy would be better located within Section 6 of the Preferred Strategy, Supporting a Prosperous Economy as minerals supply is fundamental to economic growth.	Noted. Minerals make an important contribution to the economy of Flintshire and will continue to do so over the Plan Period. The fact that minerals is recognised as a strategic policy is in itself recognition of the importance of the issue as well as the contribution. To not recognise the planning balance that has to be struck between developing minerals in the	No change.

	national interest and how the local environmental impacts are considered, would fail to recognise the relevant considerations the LDP has to balance in developing future detailed deposit plan policies.	
At point iii, the proposed statement is not a true reflection of the Regional Technical Statement which requires new allocations totalling at least 1.4 million tonnes of sand & gravel and at least 3.84 million tonnes of crushed rock.	The purpose of the policy is not to set a ceiling but to make it clear, at the strategic stage that Flintshire and Wrexham are working collaboratively to meet the requirements of the RTS. An allocation/s will be included at the Deposit stage which will set out detailed policy/criteria to deal with applications on both allocated and unallocated sites.	No change.
The policy as worded does not accord with current RTS requirement as the statement “through the extension to existing quarries” may prove overly restrictive and may limit potential sites being brought forward for allocation.	There are a number of operational quarries which it is considered offer potential to meet the identified in the RTS whilst minimising the impact on the environment and local communities. Part of the justification behind adopting a collaborative approach is that these existing quarries offer potential to secure the longer term viability of existing sites. During the Call for Sites, no	No change.

	<p>sites were put forwards in Wrexham and no new sites were put forwards in Flintshire: only extensions to existing quarries were submitted. The local authority would therefore not be able to demonstrate the deliverability of a new quarry. An allocation/s will be included at the Deposit stage which will set out detailed policy/criteria to deal with applications on both allocated and unallocated sites.</p>	
<p>It is not clear how the Council will address non-aggregate minerals within the plan and needs addressing.</p>	<p>Policy STR16 is a strategic policy which is intended to act as a hook for more detailed policies at the Deposit stage. These detailed policies will address both aggregate and non-aggregate minerals.</p>	<p>No change.</p>
<p>Seems adequate for the County and not applicable for the Trelawnyd and Gwaenysgor area.</p>	<p>Safeguarding is relevant to large parts of the County including Trelawnyd and Gwaenysgor. The area is underlain by an outcrop of limestone which has been worked in the past at Dyserth in Denbighshire. It is important that consultees understand that the minerals policies do not just deal with mineral extraction, particularly given the extensive nature of</p>	<p>No change.</p>

	mineral across the County and the potential implications of a safeguarding policy.	
Object to the idea that minerals can be sustainably managed, given that minerals are a finite resource, the policy should therefore refer to minimising the extraction and the impacts of the minerals industry	Sustainable development is about enabling society to meet its own needs without compromising the needs of future generations. The supply of mineral is fundamental to achieving the growth required across Wales and the UK. Whilst minerals are a finite resource it is considered that they can be planned for in a way that minimises adverse impacts and maximises opportunities. Failure to meet the need for mineral will have an adverse impact on both the economy and growth.	No change.
Considers that the policy should specifically provide protection against any adverse impacts from mineral development .and proposes that the following provision is added to STR16: “The LDP will only allow mineral development proposals where they are compatible with adjacent uses”.	Policy STR16 provides the strategic hook for more detailed policies at the Deposit stage. The policy sets out that it will reduce conflict between mineral and sensitive development through the use of buffer zones. Detailed policy will be identified at the Deposit stage.	No change.
It is important - with operational mineral sites - that buffer zones are established and would be prudent to highlight any (if appropriate) dormant mineral sites that	Policy STR16 provides the strategic hook for more detailed policies at the Deposit stage.	No change.

could become operational during the specified time period and establish clear community engagement to allay public concern.	<p>The policy sets out that it will reduce conflict between mineral and sensitive development through the use of buffer zones. Detailed policy will be identified at the Deposit stage.</p> <p>The strategy for dealing with dormant sites will be identified at the Deposit stage as will specific criteria against which proposals for extraction will be assessed.</p>	
This Policy is supported which acknowledges the importance of minerals within the Flintshire area and identifies that prior extraction of minerals should be considered were possible in order to ensure minerals are not needlessly sterilized by development proposals.	Noted.	No change.
There is a need for close monitoring of operations by the Authority and also for a community liaison group to be established so that local concerns can be addressed. Need to ensure that land profiles which result from the extraction of minerals are such as to maximise the potential for restoration which support biodiversity and the provision of community benefits.	Noted. The authority actively monitors quarries and will continue to do so under the provisions of Regulation 14 of the Town and Country Planning (Fees for Applications, Deemed Applications and Site Visits) (Wales) Regulations 2015. Specific criteria against which proposals will be assessed will be identified at the Deposit stage.	No change.
STR16 iii appears to be framed as a ceiling figure which is not an appropriate approach. If a development proposal for the winning and working of minerals is	The purpose of the policy is not to set a ceiling but to make it clear, at the strategic stage that	No change.

otherwise acceptable and represents sustainable development, the fact that that development may result in the release of more than 3.84 million tonnes of limestone within the Plan period should not be relevant.	Flintshire and Wrexham are working collaboratively to meet the requirements of the RTS. An allocation/s will be included at the Deposit stage which will set out detailed policy/criteria to deal with applications on both allocated and unallocated sites.	
Capacity for the production of limestone aggregates products within Flintshire is concentrated in a small number of high volume units. The loss of any of these units within the Plan period would seriously hamper the Council's ability to continue to contribute to regional aggregate supply.	Noted. Close working with operators will be essential to ensure that the Deposit LDP does not have unintended consequences.	No change.
The wording of item (iii) of STR16 is not sufficiently positive and doesn't fully reflect the evidence base that lies behind it, nor PPW. The stated figure of 3.84m tonnes of crushed rock should be prefixed with the wording "at least" to accurately reflect the material contained in the Regional Technical Statement for the N.Wales and S.Wales Regional Aggregates Working Parties (2014). Our suggested amendment would avoid this interpretation and bring the policy in line with the evidence base document that informs it.	The purpose of the policy is not to set a ceiling but to make it clear, at the strategic stage that Flintshire and Wrexham are working collaboratively to meet the requirements of the RTS. An allocation/s will be included at the Deposit stage which will set out detailed policy/criteria to deal with applications on both allocated and unallocated sites.	No change.
It is noted the authority intends to meet the requirements of the RTS 1st Review and maintain the required land bank of both sand and gravel and crushed rock through the extension of existing quarries. The Deposit plan	Noted. Specific allocations will be identified at the Deposit stage accompanied by detailed policy/criteria to deal with	No change.

must provide specific allocations in order to satisfy national policy requirements.	applications on both allocated and unallocated sites.	
In relation to criterion iv, it is not a national policy requirement to identify areas where mineral extraction would not be acceptable. The authority should clarify its intention, for example, does it apply solely to areas where coal working would not be acceptable (PPW, paragraph 14.7.11) or does it relate to the application of mineral buffer zones?	Paragraph 14.7.1 requires Development Plans to 'provide a clear guide to where mineral extraction is likely to be acceptable and include policies which protect sensitive environmental features and provide environmental and resource protection'. Paragraph 14.7.11 requires Development Plans to 'state where such operations would not be acceptable' in relation to coal. The intention is to take a similar approach to Wrexham in their LDP and identify Extraction Exclusion Areas. This would provide greater certainty to members of the public and to the mineral industry. Inevitably such a policy would contain exceptions given that mineral can only be worked where it occurs.	No change.
The Deposit LDP should: - Set out the broad strategy for mineral working over the plan period; - Safeguard mineral resources, including primary and secondary coal resources; - Maintain a land bank for sand and gravel and crushed rock in line with the RTS 1st Review; - Set buffer zones around permitted and proposed mineral	Noted. Policy STR16 provides the strategic hook for more detailed policies at the Deposit stage which will address the matters identified, in line with national policy and guidance.	No change.

workings, supported by policy;- Identify areas where future coal working is not likely to be acceptable; - Assess the likelihood of dormant sites being worked and if appropriate set a clear strategy and provide clarification on serving prohibition orders; Encourage the prudent use of natural resources and promote the use of recycled, secondary aggregates or waste materials to reduce primary resource extraction		
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Question19

Policy Suggestions

Are there any other strategic policies that should be included?

Representation	Proposed FCC Response	Proposed Change
Note throughout the documents that the official designation of the AONB is Clwydian Range and Dee Valley AONB. Provision must be made for the National Development Framework policies. Town and community plans where available should be taken into account.	Noted. Welsh Government has begun work on the National Development Framework for Wales which will in time replace the Wales Spatial Plan. Once it is produced, the LDP will take that into account when it is reviewed. Although they will be considered as part of the LDP process, Town and Community plans should adhere to the LDP not the other way round.	Amend Preferred Strategy to refer to AONB as Clwydian Range and Dee Valley AONB.
Cycling policies should be included to create more emphasis on cycling provision by opening up disused railways for cycling and walking purposes. Increase and develop cycling routes for commuters as well as for leisure.	The Plan through LDP Objective 3 promotes a 'safe transport system' whilst policy STR5 endorses the provision of walking and cycling routes through new development. The delivery of schemes and initiatives will be a key part of the Active Travel project	No change
There should be a Strategic Policy which acknowledges the joined-up thinking involved in the work being carried out by all 5 North Wales Authorities, in relation to the North Wales economy with bids for a Growth Deal and other bids to improve road, rail and digital connectivity and health provision. There should be a Strategic Priority which acknowledges that dialogue is taking place	Chapter 1, Introduction of the Preferred Strategy details the fact that the LDP considers regional and National Plans and consults widely with key service providers and stakeholders as well as developers to ensure joined up thinking. The Preferred Strategy has referenced several such economic groupings and initiatives and these have informed its preparation.	No Change

between Flintshire County Council and BCUHB. Also the issue of inadequate infrastructure to address issues of drainage and sewage disposal, it should be a strategic priority to work towards solutions to problems with Dwr Cymru or, at least, to acknowledge that such work is already going on.	The issue of health is referenced throughout the document as is the need for a range of infrastructure to serve new development. Dialogue is taking place with a variety of stakeholders including BCUHB.	
New developments should incorporate the use of grey water for flushing toilets etc	SPG Note 29 Management of Surface Water for New Development gives advice on this stating that 'Flintshire County Council advocates that surface water run-off should be controlled as near to its source as possible.' And setting as a 'Priority Level 1: Surface water runoff is collected for use' paragraph 1.8 Page 5. Also the Plan through LDP Objective 19, promotes 'safeguarding natural resources' whilst policy STR4 endorses the provision infrastructure in order to ensure measures to reduce water use and to conserve water should be incorporated into new development.	No change
Sewage - due to earlier practice, foul, grey and surface water are disposed of as one. New buildings of a quantity larger than 0.3 ha should follow the modern practice of separation both on and off site.	SPG Note 29 Management of Surface Water for New Development gives advice on this stating that 'Flintshire County Council advocates that surface water run-off should be controlled as near to its source as possible.' And setting as a 'Priority Level 1: Surface water runoff is collected for use' paragraph 1.8 Page 5. Also the Plan through LDP Objective 19, promotes 'safeguarding natural resources'	No change

	whilst policy STR4 endorses the provision infrastructure in order to ensure measures to reduce water use and to conserve water should be incorporated into new development.	
Include policy in relation to large lorries and low bridges.	The Plan through LDP Objective 3 promotes a 'safe transport system' whilst policy STR5 states "initiatives will and are being undertaken as transport schemes in the context that they can be delivered through other mechanisms and legislation and for instance are within adopted highways land. The role of the LDP is to identify those instances where there are schemes which require land to be safeguarded and protected to enable them to be delivered during the Plan period.'	No change
We would like to highlight the advice provided in the Housing in Later Life: Planning Ahead for Specialist Housing for Older People toolkit. Whilst we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council.	Noted. Policy STR11 Provision of Sustainable Housing Sites cite that where there is an established need and on appropriate sites new development will be required to provide specialist needs housing in relation to an ageing population. More detailed policies on this will be included in the Deposit plan.	No change

Question 20. Any Other Comments

Do you have any comments on other aspects of the Preferred Strategy including supporting documentation?

Representation	Proposed FCC response	Proposed change
Network Rail would be extremely concerned by the impact any future development would have on the safety and operation of level crossings.	Noted. It is not possible at the strategic level to assess the impact of future development on the safety and operation of level crossings. The Council has a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or change in the character of traffic using a level crossing over a railway. Network rail will be given a further opportunity to comment on the Deposit Plan which will include details of new housing allocations.	No change
It is difficult to comment constructively any further when the information contained in the LDP is lacking in substance.	The Preferred Strategy document sets out the strategic context by virtue of objectives and a broad spatial strategy. Each strategic policy set out links to subsequent detailed policies and was accompanied by a question to prompt comments in response to the specific questions. A further opportunity to comment on detailed land use policies and proposals will be available when the LDP is placed on Deposit.	No change
Without clarity on where within the key settlements the Council are proposing to develop, it is not possible to	The preferred strategy provides the strategic context for the preparation of more detailed	No change

assess the need for the release of greenfield sites for development, The Council should provide an indication of growth areas for consideration and comment at the earliest opportunity.	policies, proposals and land use allocations to be included in the Deposit LDP. That said paragraph 5.2.4 gives a broad distributional apportionment of growth relative to the settlement hierarchy. Further representations can be made at the Deposit stage.	
The vision is not sufficiently detailed in how the Council envisage the County to be at the end of the plan period, including a lack of detail on development targets and objectives against which the vision can be assessed when the Plan is under review.	The Preferred Strategy contains a number of objectives and Strategic Policies that are linked to the vision for the LDP together with ambition for growth. The Strategy seeks to avoid the overly mechanistic approach in the UDP. A guide is given to the broad range of growth to take place in each tier of the settlement hierarchy. The Plan then seeks to take a more qualitative approach to the identification of which settlements will deliver growth, based on sustainability rather than numerical means.	No change
Sites which have been identified for non- development (e.g. recreation, protection etc) do not appear in Appendix 1 of Preferred Strategy can you explain how we can comment on such sites e.g. NH 017, NH 019?	Candidate sites put forward for protection are listed in Appendix 2 of the Preferred Strategy Background Paper – Consideration of Candidate Sites against the Preferred Strategy/Invitation for Alternative Sites. An opportunity to make comments was available during the six week consultation period between November and December 2017.	No change
Announcement of the Red Route as the preferred option provides opportunities for long term network improvements as well as economic and social benefits	Agreed. However whilst a decision in principle has been taken to progress with the red route option, there is as yet no agreed line, no planning consent and no timescale for development of the route.	No change

The strategic context section of the emerging LDP should recognise the potential for growth in the tourism and leisure industry in Flintshire.	Bullet point 3 Paragraph 2.4.3 recognises the importance of improving the quality and diversity of the economy with a focus on a high quality year round tourism sector. The fact that Tourism is recognised as a Strategic policy (STR10) is also recognition of the key role tourism has to play in the economy of Flintshire.	No change
The proposed review of the green barriers throughout Flintshire is welcomed however it should not only be undertaken in the context of future housing development.	Noted. A green barrier review will be undertaken having regards to the functions they fulfil as set out in Planning Policy Wales.	No change
Penyffordd village should have stability with no requirement for further extensions or increase in housing provision. An inappropriate and insensitive LDP can have potentially devastating consequences that will be impossible to reverse.	Noted. The Council is preparing a Plan which brings with it a new Plan period and there is a need to provide an appropriate and sustainable amount and distribution of development. The level of growth experienced in the UDP plan period will be a factor as will be any development that has occurred in the early years of the Plan period.	No change
The need for parallel infrastructure and community facilities improvements at the same time as housing developments and expansion is of prime importance to ensure a sustainable environment and community.	The Preferred Strategy directs new development to locations that benefit from good access to services and facilities. Strategic Policy STR6 recognises the importance of providing the necessary infrastructure to support new development. This will require the Council to work in partnership with the public and private sectors.	No change
It is logical that Hope and Caergwrle could be classed together as one area, but Abermorddu and Cefn y Bedd should not be classed in this manner. In recent years, they have lost services.	In planning terms HCAC is one settlement due to its characteristics. A settlement boundary is a planning tool and does not necessarily define a community. In this case it encompasses 4 different areas/communities and parts of different community council areas where there is a dependency on each other for access	No change

	to facilities and services. The settlement boundary encloses an area considered as a single contiguous urban area in planning terms	
The Preferred Strategy has a number of commendable features which include recognition of the need for economic diversification and appropriate provision for retail outlets.	Noted.	No change
Considers that the Preferred Strategy should place emphasis on directing growth to the Main Service Centres first.	That is how the settlement hierarchy will operate. Policy STR2 states that Main Service Centres will be the main locations for new housing development.	No change
The economy of the Deeside Area could significantly improve and job opportunities and access significantly improved and the well-being of Deeside residents could significantly improve if the Bidston to Wrexham was electrified as a first stage to the proposed Pen-y-fford Hub with a new Shotton Station providing access to a proposed new Deeside Industrial Park Station.	Policy STR5 seeks to facilitate accessibility by promoting road and rail improvements. However transport initiatives such as the electrification of railway lines are the responsibility of the relevant service provider. The role of the Plan is to safeguard land and or sites where these are known proposals for a particular scheme.	No change
The plan should list the principal employment areas in a Safeguarding Policy and identify these areas spatially on the Proposals Map.	The supporting text to Policy STR8 highlights Principal Employment Areas as being subject to a detailed policy in the Deposit Plan and the individual PEA's are listed in the supporting text to STR2. It is envisaged that a similar approach will be taken as in the UDP whereby these area are identified on the Proposals Map.	No change
The Deposit plan must develop renewable energy policies in line with PPW and the Welsh Governments Toolkit for Planners (2015) it should demonstrate how renewable energy and low carbon opportunities have informed the scale/location of allocations.	Noted. In drawing up detailed policies regards will be given to the toolkit as well as advice contained in PPW/TAN8 – Renewable Energy.	No change

The Deposit plan should, if considered appropriate, include appropriate policies in respect of Welsh Language.	Flintshire has a relatively small but strong and distinctive Welsh community. LDP Objective 6 is aimed at protecting and supporting the Welsh Language. The accompanying text to Policy STR6 highlights the Welsh Language and Culture as being subject to a detailed policy in the Deposit Plan should this be deemed necessary.	No change
The Deposit plan should evidence any proposed allocations and demonstrate that any loss of BMV land is minimised, in accordance with PPW.	In recognition of the importance of high quality agricultural land, the Candidate Site Assessment Methodology asks the question regarding the loss of the best and most versatile agricultural land as part of assessing Candidate Sites for potentially suitable allocations in the Deposit Plan	No change
It is vital that the monitoring framework includes key triggers and action points so that appropriate action can be in place in advance to avoid a situation of non-delivery.	It will be the intention of the Council to monitor the effectiveness of policies and proposals of the Plan. The triggers and action points for this will be included in the Deposit Plan.	No change
No affordable housing targets/ranges or affordable housing policy to show a direction of travel based on this work is included in the Preferred Strategy.	Noted. The Strategy under STR11 states amongst other things that the delivery of new housing will be expected to provide for affordable housing. It is not necessary to be so specific at the preferred strategy stage in terms of targets. This information is more appropriately included for the Deposit Plan.	No change
The Deposit Plan should be clear as to the estimated contribution of affordable housing by settlement tier. A table demonstrating this would be advantageous.	Noted. This will be taken on board as part of developing the deposit LDP and in refreshing the LHMA to inform both the LDP and the update of the Council's Local Housing Strategy.	No change
The phasing, timing, funding mechanisms and delivery of sites will be critical to ensure the LDP delivers the scale of growth in locations to meet the needs across the plan period. The Deposit LDP would benefit from	Noted. Consideration of the degree of information to support housing allocations in the Plan, will be given in preparing the Deposit Draft LDP. The Preferred Strategy is clear in setting out the	No change

setting out site specific details for allocations that includes general phasing timescales, key infrastructure and planning principles, developer requirements, constraints and developer and infrastructure requirements where appropriate. The Council need to demonstrate that both individual sites and sites in combination are genuinely available and deliverable. It's important that site promoters continue to be involved in the process and understand the importance of demonstrating delivery, specifically in relation to the strategic allocations.	objective of securing viable and deliverable allocations.	
It is reasonable to say that Penyffordd need not accept any further allocations. But the village is realistic and acknowledges that some further growth may be necessary to meet local demand. There needs to be some more clarity around the criteria used to assess sites.	Noted. The Council is preparing a Plan which brings with it a new Plan period and there is a need to provide an appropriate and sustainable amount and distribution of development. The level of growth experienced in the UDP plan period will be a factor as will be any development that has occurred in the early years of the Plan period. The methodology for assessing sites is set out in the Background Paper - Candidate Sites Assessment Methodology.	
When looking at further development of Mold and other urban areas could provision be made for walking and cycling routes to link to the outdoors away from the urban area for recreation, health and wellbeing.	LDP Objective 3 promotes a sustainable and safe transport to reduce reliance on the car. Whilst STR5 endorses the provision of walking and cycling routes through new development both of these activities assist in improving health and wellbeing.	No change
Our assessments conclude that there are key issues of soundness that will need to be addressed before the Plan moves forwards any further.	Ultimately the Plan will be examined by an Independent Inspector who will decide whether or not it meets the procedural, consistency and effectiveness tests. The Council do not intend to submit an unsound LDP for examination.	No change

Controlling specific types of developments such as A3 (Hot Food Takeaways) proposals within the county is not a positive approach to planning. The suggested restrictions, take an ambiguous view of A3 uses.	Bullet point 6 in paragraph 1.19 of Appendix 1 is one of a number of issues the Council feel it is relevant to consider as part of healthy living concerns expressed by the Welsh Government. The LDP will recognise that Hot Food shops, restaurants and cafes are appropriate uses within town, district and local centres given their importance to both the day an evening economies of existing centres.	No change
The expansion and development of the Welsh language within the County should be included as part of the Plan. In order to do so the number of Welsh-medium schools within the County must be expanded.	LDP Objective 6 is aimed at protecting and supporting the Welsh Language. The explanation to STR10 recognises that part of Flintshire's cultural identity manifest itself through the demand for Welsh language education. If the Local Education Authority are proposing the construction of Welsh medium schools the LDP where necessary can safeguard land for that purpose.	No change
The development of a cycle route such as from Buckley to Denbigh along the old railway line could be included to promote the health and living standards of residents.	LDP Objective 3 promotes a sustainable and safe transport to reduce reliance on the car. STR5 endorses the provision of walking and cycling routes through new development. It is likely that the Deposit plan will include a policy aimed at safeguarding disused railway lines e.g. for cycling, walking and horse riding. However, a development plan should only safeguard land where it is evidenced that the project is deliverable.	No change
Of the two population projections, the first is the largest and has been referred to in comments, the second is much lower.	Noted.	No change

<p>Well located and designed specialist housing for older home owners is a highly sustainable form of housing. There should be more of a positive policy supporting older people accommodation in the same way that affordable housing is given a high priority.</p>	<p>Strategic Policy STR 11 Provision of Sustainable Housing Sites, seeks to provide communities with sufficient, good quality, affordable housing to meet a range of needs. The policy also sets out that the delivery of new housing in this way should: “facilitate the provision of affordable housing relative to local needs”; “provide balanced developments through a mix of housing types”; and “make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units”. These will be developed into more detailed policies within the deposit LDP.</p>	<p>No change</p>
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