

Key Issue:

Has the Flintshire LDP been properly prepared?

d) Is the LDP consistent with Future Wales: The National Development Framework, which is likely to be finalised shortly?

HBF are concerned that the plan is not aspirational enough in terms of meeting its growth potential because of its status as a National Growth Area in the recently published National Plan. HBF notes that at Policy 20 it states:

‘Wrexham and Deeside will be the main focus for growth and investment in the North region. Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure.’

It is important to note that additional weight was given to this statement compared to earlier drafts of the document which stated:

‘Strategic and Local Development Plans across the region should recognise the National Growth Area as the focus for strategic economic and housing growth;...’

The importance of its relationship with Cheshire West and Chester and the North West of England are also highlighted and the need to manage the likely development pressures from these areas.

e) How will the LDP be updated in the light of the revocation of TAN1? Will this lead to significant changes in LDP policies?

HBF do not consider that the revocation of TAN1 affects the plan other than the need to produce a housing Trajectory in line with the Welsh Government Guidance, which the Council have done. Wording within the monitoring section [SO11 & SO15] will need to be amended to remove the reference to a five-year land supply.

i) Does the HRA take account of NRW’s recently published interim advice regarding phosphate levels in river SACs.

HBF does not consider that it does as the HRA predates the issue being made public by NRW. It is important that the impact of the most recent interim policy advise issue by NRW is fully understood in terms of how it might impact on the delivery of sites and the Councils trajectory. HBF are currently working with Monmouth Council who are also affected by this announcement to understand the impact on new development. We have tried to engage with NRW to get further clarification on their position but to date this has not been possible. HBF are aware that Welsh Government are also due to set up a working group to look at the issue.