LDP-KSD-PS1

Flintshire Local Development Plan 2015 - 2030

Preferred Strategy Consultation Document

Preferred Strategy Main Document

November 2017



Foreword

Foreword



I am pleased to present to you this important milestone in the preparation of the Local Development Plan (LDP) for Flintshire.

The Preferred Strategy represents the transition between the previous informal engagement and consultation stages and the more formal consultation stages in progressing the Plan towards adoption.

The Council has invested a considerable amount of time and resources in engaging with a wide range of stakeholders as the Plan has progressed. The Call for Candidate Sites was quickly followed by a comprehensive range of Topic Papers. Engagement with Town and Community Councils was undertaken on a huge number of settlement audits, to ensure that the Plan is based on an understanding of each of the settlements within the County. The Key Messages document sought to present key aspects of the Plan including the vision, issues facing the Plan, objectives and settlement hierarchy.

This was followed by the Strategic Options document which sought to present growth options and spatial options.

The investment in engagement and the phased and regular presentation of key aspects of the Plan should ensure that there are no surprises in the Preferred Strategy. The process of securing consensus as the Plan progresses is important to the Council as it enables the Preferred Strategy to be presented for consultation with confidence.

The preparation of the Plan comes at an exciting yet uncertain time. The economy is still recovering from the economic downturn and the full effects of Brexit are still unclear. However, there are clear signs of economic recovery in Flintshire with job creation as a result of the Deeside Enterprise Zone and housing completions at their highest level for many years. This reflects the positive initiatives being pursued at a sub-regional and regional level to deliver economic growth.

Economic growth is effective when it can be delivered alongside environmental protection and where its positive effects can be felt throughout the communities of Flintshire. The Plan therefore adopts a holistic approach of seeking sustainable development whereby economic development is balanced alongside environmental and community concerns. The increasing importance of Well-being goals in Wales emphasises the need for the LDP to have 'cohesive communities' as one of its core principles.

The need to progress the LDP to adoption as swiftly as possible cannot be underestimated given continuing pressure on settlements arising from speculative housing developments, in the light of TAN1. However, it is also important to get the Plan right in the sense that it meets the needs of the economy, the environment and its communities.

Foreword

At the next stage in the Plan's preparation, the deposit draft LDP will contain detailed policies as well as housing allocations. The process of identifying housing allocations is always difficult and emotive but the Plan has to make provision for new housing development to meet the County's needs. The role and value of the Preferred Strategy is to ensure that it provides a logical way to bring forward housing developments in sustainable locations.

I look forward to receiving your comments on the Preferred Strategy.

Yours sincerely,

Cllr Chris Bithell

Cabinet Member for Planning and Public Protection

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1 Introduction

- **1.0.1** The Flintshire Local Development Plan (LDP) provides the sustainable framework for land use planning in the County up to the year 2030, and a platform for development thereafter. It will shape Flintshire's future physically and environmentally, and influence it economically and socially. It will respond to the needs of a growing population and regionally important economy, in making provision for new jobs, homes, infrastructure and community facilities, but it must do this in a way that ensures the well-being of its communities is maintained, and the impacts of the development and use of land are managed and mitigated sustainably.
- **1.0.2** The context is set by national legislation and planning guidance which requires local authorities in Wales to prepare and maintain a **development plan** that deals with the land use aspects of the challenges above, and does so in line with the sustainable development Duty embodied by the Well Being of Future Generations Act (2015).
- 1.0.3 The Council is therefore engaged in preparing the Flintshire Local Development Plan which will cover the time period between 2015 and 2030, providing the framework to facilitate the sustainable delivery of growth and development. The Plan period runs from 01/04/2015 to 31/03/2030 because this allows the Plan period to co-ordinate with yearly Joint Housing Land Availability Studies.
- **1.0.4** The LDP embodies a positive and responsible approach to development in Flintshire and aims to create more high quality sustainable places at all levels, and in both urban and rural settings. A sustainable place is one that has sufficient social, economic and environmental infrastructure to meet the needs of its people, but is also resilient and adaptable in the face of future challenges.
- **1.0.5** Once adopted the LDP will replace the existing Flintshire Unitary Development Plan (UDP), and will become the framework against which decisions on planning applications are taken.

The Purpose of the LDP Preferred Strategy

- **1.0.6** The **Preferred Strategy** is the first and principal part of the Flintshire LDP and is important in setting out how Flintshire is expected to evolve over the period to 2030. It represents the completion of a period of pre-deposit plan preparation and engagement, the outcome of which has had a clear influence over the selection of the Preferred Strategy (Figure 1.1).
- **1.0.7** The Preferred Strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations that will subsequently be included in the Deposit LDP, which will be prepared in due course.
- **1.0.8** The Preferred Strategy sets out the Council's vision, strategic objectives and broad Spatial Strategy to guide the chosen level of future development and growth in Flintshire, defined through a set of strategic policies that deal with the main priorities for the Plan. Its aim is to guide not only the aspirations of the Council, but also other key service providers and stakeholders, as well as developers, whose collective response will be essential to the successful implementation of the Plan.

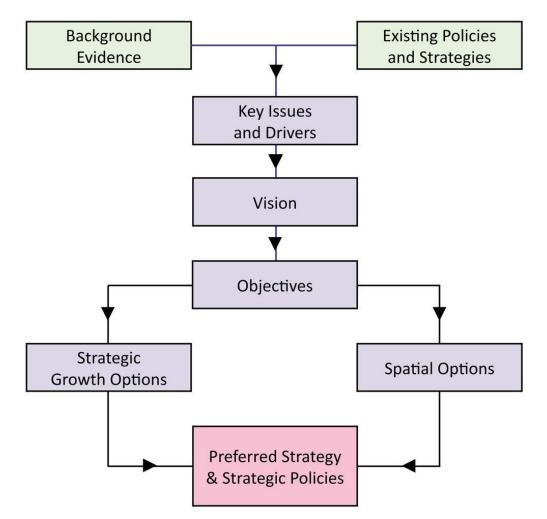
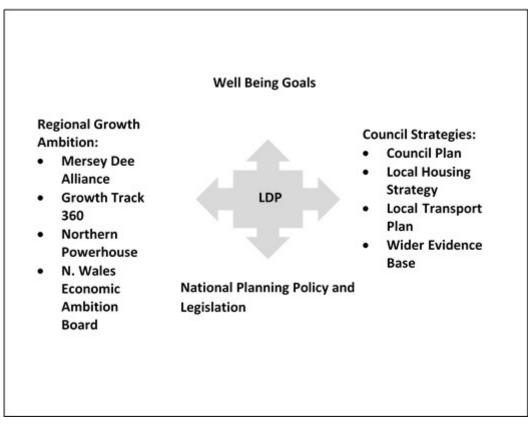


Figure 1.1 How the Preferred Strategy was prepared

- **1.0.9** The preparation of the Preferred Strategy has been guided by a framework of key inputs (Figure 1.2) that comprises:
 - National legislation and policy;
 - Local and regional policies and strategies;
 - An evidence base relating to key issues for the Plan to address.





- **1.0.10** In defining the strategic context and direction for the Plan, the Preferred Strategy will:
 - Explain the main focus for the Strategy and the drivers for this;
 - Define a vision and set of strategic objectives that are a response to the drivers for change;
 - Identify the likely level of future development and how this will be distributed across the County;
 - Translate the vision and objectives into broad strategic policies, which also set the framework to develop the Deposit Plan;
 - Identify key strategic development sites.
- **1.0.11** At this stage of Plan preparation, with the exception of a small number of strategic sites, the Preferred Strategy will not include reference to the identification of any site specific allocations. This will be done as part of drawing up the Deposit LDP, once the Preferred Strategy has been agreed, where only those candidate sites that have the potential to go into the deposit Plan, and that accord with the Preferred Strategy, will be selected. The Candidate Sites Register identifies all sites so far considered, and the register is accompanied by a schedule to indicate the potential conformity of sites with the Preferred Strategy.

Supporting Documents

1.0.12 There are a number of supporting documents that have been produced to inform and shape the Preferred Strategy. These are listed below along with their role and purpose, and should be read alongside the Preferred Strategy.

	Supporting Document	Purpose
1.	Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) - Initial SA Report	To identify, from an assessment of reasonable alternatives, whether the LDP will have any significant impacts on the environment and also determine whether the Plan will deliver sustainable development.
2.	Habitat Regulations Assessment (HRA)	To ensure that no harm happens to a Natura 2000 site from a Plan or project.
3.	Topic Papers	These provide supporting information and a rationale for the Preferred Strategy. These focus in more detail on the main issues relevant to Flintshire, and therefore the LDP.
4.	Revised Delivery Agreement	To provide a project plan for preparing the LDP and to set out the measures within the Community Involvement Scheme in terms of consultation and engagement
5.	Review of Candidate Sites against Preferred Strategy	To provide an initial assessment of the degree to which Candidate Sites against the emerging Preferred Strategy.
6.	Alternative Sites	To provide an opportunity for any alternative sites to be put forward for consideration in preparing allocations / settlement boundary changes as part of preparing the Deposit Draft Plan
7.	Welsh Language, Equalities and Health Impact Assessments	To provide a broad commentary in the form of background papers on the likely impacts of the Preferred Strategy on the Welsh language, health and equalities considerations.
8.	Household Projection Technical Paper	A technical background paper to explain the growth options in more detail and the chosen growth option.
9.	Further Employment Growth Scenarios Assessment	A background paper explaining the rationale behind the employment led housing projections.
10.	Consideration of Consultation Responses on the Strategic Options	A background paper setting out responses to the consultation comments on the Strategic Options and an accompanying commentary as to how the Council has arrived at the preferred growth and spatial option.
11.	Local Housing Market Assessment	A study which seeks to understand the housing market and local housing need/demand in order to inform policy and strategy in the LDP.

Supporting Document	Purpose		
12. Gypsy Traveller Accommodation Assessment	A study which identifies the likely need for gypsy and traveller pitches over the short term (5 years) and the Plan period.		

Community Engagement and Consultation

1.0.13 The Council published two key documents during 2016 entitled:

- Key Messages Document this identified the key messages emerging from an assessment of the relevant evidence and translated these into a draft vision and set of objectives. This document also presented options for reviewing the Sustainable Settlement Hierarchy;
- Draft LDP Strategic Options this presented a range of options for how much development the Plan should make provision for, as well as options for different ways to distribute that growth around the County.
- 1.0.14 The representations received during consultation on these documents have been assessed, and have formed a consensus view that has influenced the selection of the Preferred Strategy. A summary of the representations received on the Key Messages document is available in the Key Messages section of the Council's website whilst the comments on the Strategic Options document is available in a separate Background Paper, as part of the consultation documents on the Preferred Strategy.

What is in this document?

- **1.0.15** The structure of the Preferred Strategy has been designed to reflect the core elements of sustainability and sustainable development, grouping the Strategic Objectives against this framework. The Strategic Policies then follow this framework, grouped logically by the element of sustainability they are aimed at delivering. Each policy is in turn is cross referenced to the relevant Plan objectives, as well as the Well-Being goals that it contributes to.
- **1.0.16** The Preferred Strategy will be made available for public consultation, aimed at engaging with communities, businesses, developers, interest groups and individuals across Flintshire, in line with the Community Involvement Scheme, to seek endorsement and consensus for the proposals.
- **1.0.17** What is **NOT** included in this Preferred Strategy:
 - Site specific allocations or settlement boundaries, for example housing or employment sites. These will be identified in the Deposit LDP;
 - **Detailed planning policies** additional and more detailed policies to support the Strategic Policies will be developed and included in the Deposit LDP; and
 - A detailed evaluation of individual Candidate Sites the Preferred Strategy document is accompanied by a separate background paper identifying only the general performance of Candidate Sites against the Preferred Strategy i.e. whether or not each Candidate Site broadly accords with the Preferred Strategy. A detailed assessment of Candidate Sites will not be published until the Deposit Draft Plan consultation stage.

1.0.18 The full Sustainability Appraisal of the Preferred Strategy is provided in a separate document accompanying the Preferred Strategy consultation document.

How to have your say

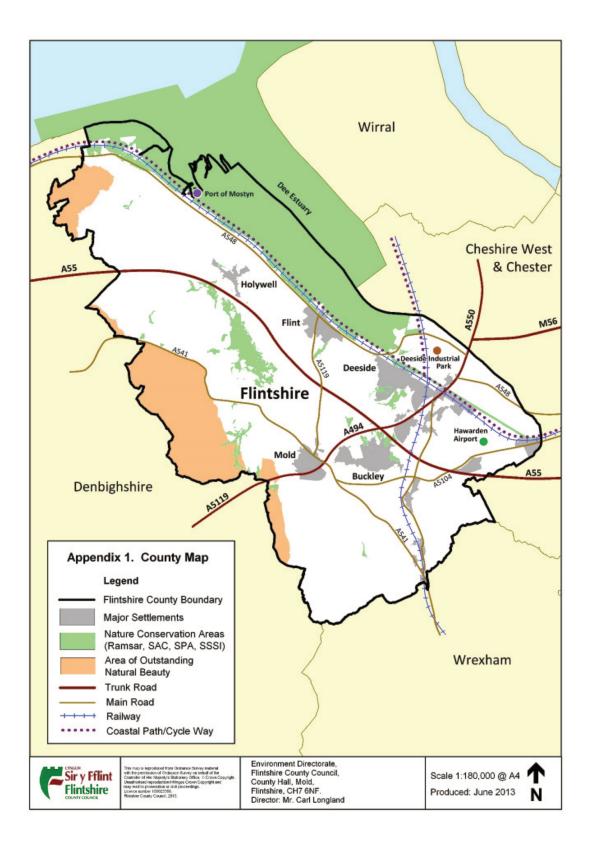
- 1.0.19 Flintshire County Council would like to hear your views on this LDP Preferred Strategy and a consultation will be held from 9 November 2017 to 21 December 2017. Please feel free to make any comments on this document either in writing or by e-mail. The document is available on the Council's website, and copies are available for inspection during normal opening hours at Council Offices and libraries. Alternatively a hard copy is available on request from the LDP team.
- 1.0.20 The closing date for the submission of comments on the Flintshire LDP Preferred Strategy is 5pm on 21 December 2017. Please forward your comments to:-Andrew Farrow Chief Officer (Planning and Environment) Flintshire County Council County Hall Mold Flintshire CH7 6NF
- 1.0.21 Or by email to <u>developmentplans@flintshire.gov.uk</u>
- **1.0.22** Further information and advice can be obtained from the Planning Policy team by emailing <u>developmentplans@flintshire.gov.uk</u> or contacting the LDP helpline on 01352 703213.
- 1.0.23 Please note that this consultation relates to issues and topics discussed in the Preferred Strategy and is not an opportunity to make detailed comments on individual Candidate Sites. Guidance on how to comment on whether Candidate Sites accord with the Preferred Strategy is available in a separate Background Paper.

2 Strategic Context

Area Profile / Overview

- 2.0.1 The County of Flintshire occupies a unique border location in the North East corner of Wales, serving as the principle gateway to the North Wales Region from North West England. Flintshire boasts a significant and prosperous industrial heartland anchored by a vibrant advanced manufacturing sector which is far from typical of other areas in Wales or of the rest of the United Kingdom. The County is recognised nationally as being a key area of employment and economic activity with national and sub-regional importance in Wales but as also having wider economic importance to the North West Sub-Region.
- **2.0.2** The County is characterised by its diverse towns and villages, large employment parks and attractive rural, upland, estuarine and coastal landscapes (See Figure 2.1). As a Welsh County Flintshire benefits from a distinct culture and language which is most apparent in the rural North, South and West as well as the towns of Holywell and Mold. The County comprises clusters of settlements such as the Deeside and Buckley areas, beyond which is a dispersed pattern of towns and villages of varying sizes and traditional and modern characters. Two thirds of the population (almost 100,000 people) live in the East of the County near the English/Welsh border. Outside the main population centres the County is relatively undeveloped and rural in character, with a broad range of rich landscapes, diverse habitats and rare species of local, regional, national and international importance. The County also has a rich built heritage as reflected by its 31 Conservation Areas and 868 Listed Buildings.
- 2.0.3 Within the County there are key economic drivers which are the Deeside Enterprise Zone together with key employment parks, the County's town centres and Broughton Shopping Park. The economic focus of the County is located along the key roads which are the A548, A494 and the A55 and generally located to the East of the County near the border with England. This spatial pattern is no co-incidence given the important cross border economic activity between England and Wales which is of fundamental importance to Flintshire communities and businesses. This spatial make-up of the County reflects the growth triangle or hub concept embodied within the Wales Spatial Plan.
- 2.0.4 The County is one of great variation in terms of its landscape and environment. The coastal strip in the north of the County is set against the backdrop of the Clwydian Range and Dee Valley AONB. The linear Clwydian Hills comprise a backbone along the western edge of the County bordering Denbighshire. The Dee Estuary and River Dee are of international wildlife importance and are an important recreational asset. This is also in an area of Flood risk and parts of the coastal strip still bear the legacy of the County's industrial past, with significant areas of contamination. In the Sealand area is one of the most important agricultural resources in Wales, with the presence of best and most versatile agricultural land. This is the land which is most productive which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals.

Figure 2.1 County Map



2.1 Population

- 2.1.1 In 2001 Flintshire had a recorded population of 148,600. By 2011 the population had increased to 152,500 a modest increase of 2.6%. It is projected by Welsh Government that by 2030 the population may reach 157,553 (3.2% increase). The County has a large and growing elderly population as evidenced by Census data. In 2011 the ratio of older people per 100 people of working age who have dependents was 32.7. This is high compared to the UK average and is a significant factor that is projected to increase by 2039 when 29.2% of the population could be over 65 and 6.6% over the age of 85. People are benefiting from significant improvements in community and personal health and are living longer. An elderly population has many benefits however there is a need to maintain a healthy balance between those of working age and those who are retired. A growing elderly population will continue to place pressure on existing infrastructure, services and facilities within the County.
- 2.1.2 The challenge of meeting the needs of the elderly together with wider community needs in the County is made difficult by the spatial distribution of towns and villages and the clear lack of a single dominating County town. This means that service and facility provision has to be distributed across the County in several key towns and villages. This continues to present challenges for service providers and for the local communities reliant upon these services. It is not surprising that given the semi-rural character of the County and the distances people are expected to travel to access employment and services that there is a high proportion of Flintshire households reliant upon private transport. There are benefits from maintaining a balanced community and at the present time it is clear that the challenge is posed by a growing elderly population and a smaller proportion of people of working age.

2.2 Economy

- 2.2.1 Flintshire has developed as a major economic centre where manufacturing remains at the heart of the local economy, providing 34% of all jobs (UK is 13%). This is contrary to the national trend which is showing the manufacturing sector contracting. High value manufacturing is central to the economy with aerospace, automotive components, specialty chemicals, food and paper and packaging. Airbus UK plant at Broughton now employs 7,000 people and is understood to be the largest manufacturing plant in the UK. This facility is an internationally important site which is a key mainstay of the local economy. The UPM Kymenne paper plant at Shotton supplies 25% of the UK demand for newsprint and is located alongside the Toyota UK engine plant, which is a European Centre of Excellence.
- 2.2.2 Flintshire is also home to a growing IT and financial services sector, with moneysupermarket.com and Unilever's Global IT Service Centre both located at St Davids Park, Ewloe and DARA (Defence Avionics Repairs Agency) at Sealand. Sustainable energy generation is becoming a more significant part of the local economy with the Port Of Mostyn, accommodating an offshore wind servicing and support centre.
- **2.2.3** An example of the economic activity in the Flintshire area is that the 2011 Census recorded significant cross broader commuter flows amounting to one million journeys per month. Significant daily flows are estimated to be 24,000 people coming in to

work in North Wales to Chester and Cheshire to Merseyside and to Greater Manchester and 20,000 commuting from North Wales / Flintshire to work outside of the County.

2.3 Settlement Pattern

2.3.1 Flintshire has several key towns and these are generally located in the South and East of the County e.g. Buckley, Connahs Quay, Mold, Queensferry, Shotton, and Saltney. The Deeside area is a clustering of several settlements and industrial areas which form the economic hub of Flintshire which is recognised in the Wales Spatial Plan as forming part of a growth triangle with Chester and Wrexham. Outside of these areas are the closely related albeit individually distinctive towns of Mold, Buckley and Flint. In the rural north is the historic market town of Holywell which plays an important role for a wider rural area. Despite diagram 4 illustrating that two thirds of the population are within the growth triangle, there is no single dominant settlement. The County therefore contrasts sharply with Chester and Wrexham. The majority of the County is rural in character with a large number and range of villages from small hamlets to larger villages. Flintshire's surrounding natural environment provides an attractive rural setting in relative close proximity to key economic centres both within and beyond the County.

2.4 Policy Context

2.4.1 The Plan has been prepared in the context of a wide range of plans, programmes and strategies ranging through international, national, regional and local. The 'Documents and Evidence' Section on the LDP pages on the Council website references a large number of documents. The key documents are summarised below.

People, Places, Futures – The Wales Spatial Plan (2004) and 2008 update

- 2.4.2 In the Wales Spatial Plan (WSP) Flintshire forms part of the North East Wales Border and Coast region. It identifies Deeside as a Primary Key Settlement within the Wrexham, Deeside and Chester hub. Deeside and Flint are identified as Key Regeneration Areas and the Deeside Industrial Estate is shown as a Key Business Sector Area.
- 2.4.3 The WSP recognises that for Flintshire, Wrexham and Denbighshire, the national connectivity linkages to the wider area of Chester and West Cheshire are crucial. This strategic hub area also includes Broughton and extends to Ellesmere Port. Whilst these centres in the hub have different characteristics, in combination they bring strength to the cross border region. For example in Flintshire the aerospace and automotive manufacturing enterprises are of local, national and international significance. The key elements of the vision for North East Wales are:
 - Strengthening key hubs as a focus for investment in future employment, housing, retail, leisure and services.
 - Developing sustainable accessibility between hubs, coastal and border towns and rural parts of the area.
 - Improving the quality and diversity of the economy, with a focus on high quality manufacturing and services, including a high quality year round tourism sector.

- Developing, in a focussed and strategic manner, the skills and education of the current and potential workforce.
- Promoting sustainable development, which is at the heart of the strategy, in part driven by the wealth of natural and built heritage within the area
- 2.4.4 Part of the WSP strategy focuses on improving the wellbeing of communities through social, physical and economic improvements. For Flintshire identified regeneration settlements include communities in Flint, Holywell, Mold, Shotton, Mostyn, Ffynnongroyw and Gronant.

Planning Policy Wales (Edition 9 November 2016)

- 2.4.5 National Planning Policy regarding the preparation of Local Development Plans (LDP's) is contained in Planning Policy Wales (PPW). PPW amongst other things requires LDP's to show how places are expected to change in land use terms to facilitate development needs over the plan period 2015 2030.
- 2.4.6 Flintshire County Council must prepare a LDP as part of carrying out sustainable development in accordance with the Well-being of Future Generations (Wales) Act 2015. This is to ensure that the development and use of land contribute to improving the economic, social, environmental and cultural well- being of Wales.
- 2.4.7 Further national planning policy requirements relating to planning for sustainability is set out in Chapter 4 of PPW. LDP's should reflect the policy objectives of the WSP and have regard to both urban and rural areas in securing a sustainable settlement pattern. In devising a settlement strategy consideration should be given to the extent to which the LDP strategy and new development is consistent with minimising the need to travel and increasing accessibility by modes other than the private car.

Flintshire Improvement Plan 2012 – 2017

- 2.4.8 The Plan, which is presently under review, sets out three priorities with the Council's partners at County level and eight priorities for the Council itself. The latter are accompanied by detailed sub priorities for action. Some of these may have direct land use implications for the LDP for example:-
 - Facilitating the creation of jobs and strengthening town centres
 - Providing appropriate and affordable homes
 - Protecting our local environment through sustainable development and environmental management.

Assessment of Local Well-being for Flintshire 2017

2.4.9 The Well-Being of Future Generations Act (Wales) 2015 is a new piece of legislation which aims to further improve the social, economic, environmental and cultural well-being of Wales now and for the longer term. The Act is underpinned by seven 'well-being' goals i.e. a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities, a Wales of vibrant culture and thriving Welsh Language and a globally responsible Wales. In April 2016 the Flintshire Public Service Board was set up (to replace the Local Service Board) to ensure a continued collaborative and partnership working approach. The Council has published a series of Area Profiles whereby the County was split into seven distinct geographic

community areas and a range of information provided for each. The Council has also published its Assessment of Well-being in the form of a full document and summary document.

West Cheshire – North East Wales Sub Regional Spatial Strategy 2006

- 2.4.10 This document sought to look beyond local authority or national boundaries, by defining a sub-regional approach to North East Wales and West Cheshire. The Strategy informed the Flintshire UDP and had a close symmetry with the Wales Spatial Plan. Although the document is somewhat dated, many of the principles as summarised below are still relevant in providing a context for the LDP:
 - Create a clear identity for the sub-region whilst safeguarding the distinctive characteristics within it;
 - Strengthen existing settlements and communities and help combat social exclusion;
 - Ensure that the essential infrastructure and the community facilities required to support and complement new developments are provided;
 - Reduce the need to travel within the sub-region through the careful location of housing, employment, and retail;
 - Enhance the external competitiveness of the sub-region by building on existing successes and identifying future opportunities to widen the economic base;
 - Further develop the skills base of the labour force;
 - Take proactive steps to improve the environment through the redevelopment of brownfield sites and major environmental improvements along the Dee Estuary;
 - Protect and enhance the environmental assets of the sub-region, including the natural, built and coastal environments;
 - Promote and develop an integrated transport system for the sub-region, and connecting into the wider area, with an important role for public transport;
 - Give attention to rural regeneration where this is needed.

The Deeside Plan 2017

- 2.4.11 Deeside is a major contributor to the economic prosperity of Flintshire and is one of the most important employment hubs in North Wales. The Deeside Plan articulates how the growth ambitions for North Wales and for the Mersey Dee area can be realised and how they can be harnessed for the greatest benefit for local people.
- 2.4.12 New roads are being constructed to open access onto the Northern Gateway, one of the largest development sites in the UK. Furthermore Welsh Government is working closely with the council to plan and improve the transport network in and around Deeside will need sustained action with a long term focus from across different sectors and all levels of government. The Deeside Plan therefore provides an overarching framework to guide this action over the next thirty years.
- 2.4.13 The underlying objectives of the Deeside Plan are contained within five core themes of economic growth, transport, housing, skills and employment and environment. Outlined below are some of the key objectives from each core theme.
 - Reinforce Deeside's role as a major economic driver for the Northern Powerhouse.

- Use transport infrastructure investments to unlock further economic growth opportunities.
- Ensure that future planning frameworks facilitate growth, drive innovation and provide for supporting housing and infrastructure.
- Increase and maintain skill levels of workforce to meet evolving industry needs and facilitate progression.
- Support delivery of a mix of uses to enhance the function and viability of the Deeside high street areas.

Flintshire Regeneration Strategy 2011

- **2.4.14** The Council has a Regeneration Strategy for the period 2009 to 2020. The Strategy is based on three strategic objectives which are:
 - A competitive Flintshire To develop a sustainable, world class, modern economy, based on business enterprise and a highly motivated, well trained workforce supported by modern technology, which maximises the County's physical and human assets.
 - Sustainable Communities Strengthen the rural economy through encouraging diversification and revitalise towns by developing them as successful local centres, each with their own distinctive character which complement each other and the wider retail offer across the County and neighbouring Counties.
 - Employment and Skills Develop a range of initiatives aimed at local people who are suffering poverty, disadvantage and hardship. The most deprived communities will be helped to give them an equal opportunity of benefiting from the future economic success of Flintshire.

Wales Transport Strategy (Welsh Government 2008)

- 2.4.15 One Wales: Connecting The Nation sets out the Welsh Government's national strategy for transport. The fundamental goal is to promote sustainable transport networks that safeguard the environment while strengthening the economic and social life for the people of Wales. It sets out a number of high level outcomes together with the steps for their delivery. A good transport system can contribute to sustaining a vibrant economy as it is essential for many aspects of daily life. The strategy deals with the development of all modes of transport which includes the road network, railways, coaches and buses, air and water travel. In doing so it specifies the outcomes and strategic policies that link the Wales Spatial Plan and development of plans at the local level.
- **2.4.16** The national transport strategy identifies five key priorities where there is a need to make significant progress. These are:
 - Reducing greenhouse gas emissions and other environmental impacts;
 - Improving public transport and better integration between modes;
 - Improving links and access between key settlements and sites across Wales and strategically important all Wales links;
 - Enhancing international connectivity; and
 - Increasing safety and security.

National Transport Finance Plan (Welsh Government 2015)

- 2.4.17 The first National Transport Plan was published in 2010 and expired in 2015. Following consultation on the new draft National Transport Plan the document was renamed as the National Transport Finance Plan and published in 2015.
- 2.4.18 The Plan is prepared in the light of the framework provided by the Wales Transport Strategy and identifies those schemes which will be delivered across the different areas of transport for which the Welsh Government is responsible for. The Plan's purpose is to:
 - Provide the timescale for financing schemes undertaken by the Welsh Government
 - Provide the timescale for delivering these schemes and detail the estimated expenditure required to deliver the schemes
 - Identify the likely source of financing to allow delivery to take place
- **2.4.19** Schemes are a combination of "scheme specific "proposals and others where further investigatory or development work is required. Annex A of the plan sets out the delivery schedule for the schemes which fall into the following timescales:
 - Within the five year period April 2015 to March 2020
 - In the medium term (beyond April 2020)
- 2.4.20 The Welsh Government lead on the delivery of many of the schemes contained in the National Transport Finance Plan and the delivery schedule will be reviewed and updated as the delivery profile for specific schemes becomes clearer.

North Wales Joint Local Transport Plan 2015

- 2.4.21 The Local Transport Plan (LTP) has been jointly prepared by the six North Wales Local Authorities of Conwy County Borough Council, Denbighshire County Council, Flintshire County Council, Gwynedd Council, Isle of Anglesey County Council and Wrexham County Borough Council. The Plan is a statutory document for transport in the region. The key issues which the LTP seeks to address for North Wales are:
 - The ability of the strategic road and rail corridors to provide the necessary good connectivity, for people and freight, within North Wales, to the ports and to the rest of the UK to support the economy and jobs, including tourism;
 - The lack of resilience of the road and rail networks to planned and unplanned events including extreme weather;
 - The need for good access to and between the three Enterprise Zones in North Wales;
 - The lack of viable and affordable alternatives to the car to access key employment sites and other services; and
 - The need for good road links to/from the trunk road network into the rural areas to help retain the viability of local businesses and support the Welsh language and culture.

2.4.22 A detailed programme of schemes is included in the plan for the period 2015 – 2020 together with a framework for schemes until 2030. Some proposals are applicable across all the authorities whilst others are locally based. Whilst the LTP identifies issues and opportunities for all aspects of transport, the programme of schemes is confined to those which are within the Local Authorities remit and do not include for example schemes relating to the rail or trunk road network in North Wales. These aspects are dealt with by the National Transport Finance Plan.

Key Issues and Drivers

- 2.4.23 In drawing up the Preferred Strategy a number of issues have been identified which need to be addressed as the Plan is progressed. Each of the earlier Topic Papers (available on the Council's website) set out a number of issues and also the growing evidence base has resulted in further issues being identified. The key issues have been grouped under the general themes of sustainable development i.e. **enhancing community life**, **delivering growth and prosperity** and **safeguarding the environment**. Under each of the three themes are a number of 'headline' issues and each of these refers to a number of key issues or considerations. The issues were consulted upon as part of the Key Messages document and amendments have been made to a number of issues and these too can be inspected on the Council's website in the form of an amended Key Messages document. By grouping and identifying key issues under 'themes' and 'headline' issues, it begins to form the basis for addressing them through the subsequent formulation of objectives and policies. The issues are set out in Appendix 1.
- 2.4.24 The vision for the Plan, the issues and the objectives need to be read alongside the emerging evidence base in order to begin the process of devising a Plan Strategy which identifies the amount of growth for the Plan, the spatial distribution of that growth and the formulation of strategic policies and proposals. In conjunction with this is the need to review the lessons learned from the UDP. These key messages were consulted upon as part of the Key messages document and amendments have been made. The key messages emerging to date can be briefly summarised as follows:

Key Messages

The County is seen as an economic driver for the economy of the North East Wales sub – region alongside the West Cheshire and Chester sub-economy, as reflected in the designation of the Enterprise Zone.

The job growth and economic development ambitions for the County should form the basis for identifying and delivering a supporting level of housing development.

The 2011 based Welsh Government household projections underestimate future housing requirements as they are based on a period of economic downturn and should be used only as a starting point, alongside a range of other considerations.

Whether and the extent to which the under-delivered housing over the UDP Plan period should feed into the new housing requirement figure.

The County, in conjunction with Wrexham forms a self-contained local housing market area. Although there are key movements in the north east of the County with Chester (which has also been recognised as a self-contained local housing market area and capable of meeting its own housing needs in the Inspector's Report on the Local Plan – Part One) the Plan needs to primarily provide for its own housing needs.

The Wales Spatial Plan identifies a key triangle of growth comprising the Wrexham, Deeside and Chester area

The County has a number of market towns and a larger urban area focussed on the various settlements comprising Deeside, together with a wider rural hinterland.

The County has extensive areas of brownfield land but this is generally located in and around the River Dee and Dee Estuary, in areas at risk of flooding and / or of international nature conservation importance and this is likely to result in the need for greenfield site allocations.

The County has a range of physical and environmental constraints in the form of the AONB, Dee Estuary and areas at risk of flooding.

The County has an ageing population with particular housing needs and a continuing need for affordable housing and the implications of such a trend longer term in ensuring a supply of skilled labour to meet the needs of modern employers.

The need to assess the comments of the UDP Inspector who considered that the approach to defining settlement boundaries based on individual settlements rather than identifying urban areas was backward looking and also considered that the time was rapidly approaching whereby a fundamental review of open countryside and green barriers in parts of the County was needed.

The need for new development to be in the most sustainable locations and bring with it necessary infrastructure improvements.

The need for new housing sites to be viable and deliverable in terms of contributing to housing land supply and other Plan objectives.

The need for some development in rural communities to help retain service provision.

The provision of affordable housing to meet evidenced local needs and to continue to do this in an innovative and flexible manner.

- 2.4.25 In summary, the County is a key gateway to Wales and an important part of a regional economic hub. The Plan needs to consolidate and build upon that economic role by providing for a level of economic growth that is aspirational but realistic. This needs to be supported by an appropriate amount of housing development which is appropriate in terms of location and type in order to support economic growth whilst at the same time providing for the housing needs of the County.
- 2.4.26 A strategic focus for the Plan is therefore the growth zone between Deeside, Wrexham and Chester, but this should not be at the expense of the remainder of the Plan area. The Plan needs to ensure that the benefits of economic growth are distributed to sustainable settlements and locations throughout the County. Given that much of the County is rural the Plan must ensure that the economic and housing needs of rural areas are provided for in a sustainable and innovative manner.

3 The Growth Ambition

3.1 The Challenges Flintshire Faces

3.1.1 Flintshire's LDP Preferred Strategy has been prepared in the context of ensuring that, in a land use sense, environmental, social and economic change is managed sustainably and in the interests of the well-being of the communities of Flintshire, and the people in them. Looking forward to 2030, and in planning for the economic "Growth Ambition" of the Council, the key issues and challenges that need to be addressed through the Preferred Strategy and LDP as a whole, are set out below:

In Flintshire, we need to plan for:

The needs of a growing but ageing population with specific housing needs, and a general need for more affordable housing

The need to ensure a supply of diversely skilled labour to meet the job growth and economic ambitions of the County

A strong and prosperous economy, that acts as a driver and hub for the wider economic sub-region

Supporting infrastructure, including housing, to meet this growth ambition

A mix and type of housing to meet the range of needs and aspirations of communities

The need to locate development in the most sustainable locations, and for it to be viable and deliverable

The need for some development in rural communities to help retain community vitality

Development that is functional, well designed, reduces its carbon footprint, and mitigates and adapts to climate change

Sustainable and cohesive communities, recognising the role and function of our urban area, market towns, villages, and rural hamlets within the sustainable settlement hierarchy, and the relationships between them

Improved transport infrastructure and facilities which offer improved modal choice and accessibility to communities

The protection and enhancement of our natural, built, and historic environment, its character, quality and diversity, and local distinctiveness

Opportunities for the people in our communities to lead active, healthy, safe and secure lives

3.2 LDP Vision

3.2.1 The LDP vision plays an important role in defining the main purpose of the Plan and in doing so, sets the framework against which the Preferred Strategy and subsequent detailed policies are developed.

- **3.2.2** The vision distils the main priorities and drivers summarised above for Flintshire, as well as drawing on the priorities set by national policy and other relevant local strategies.
- **3.2.3** A draft vision supported by strategic objectives have already been the subject of community and stakeholder engagement and consultation via the Key Messages document in the Spring of 2016, and the feedback received from this has influenced the final vision and objectives presented below. These have also been the subject of the SA/SEA process.
- 3.2.4 The LDP's vision is:
- 3.2.5 "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 Flintshire and its residents, through realising its unique position as a regional gateway and area for economic investment, whilst protecting its strong historic and cultural heritage."

3.3 LDP Strategic Objectives

3.3.1 A number of strategic objectives have been developed to translate the vision into a framework which defines the broad focus for the plan. The objectives are clear statements of intent which focus in on how the LDP vision will be delivered. Like the vision, they take the key challenges facing the County and align them with the three themes of sustainable development:

Strategic Objectives

Enhancing Community Life

Delivering Growth and Prosperity

Safeguarding the Environment

One of the key challenges of producing a sustainable Plan is to ensure that a reasonable balance is achieved between these elements of sustainability. This will need to minimise the potential conflicts that will arise from such a broad ranging set of Plan objectives. This process has been aided by consideration of the objectives via the SA/SEA process, the outcome of which has been used to refine the objectives and reduce the areas of potential conflict. The objectives will also form part of the basis for monitoring the implementation of the Plan, once adopted and operational.

3.3.2 The LDP Objectives are as follows:

Enhar	ncing Community Life		
1.	Ensure communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly		
2.	Encourage the development of town and district centres as the focus for regeneration		
3.	Promote a sustainable and safe transport system that reduces reliance on the car		
4.	Facilitate the provision of necessary transport, utility and social / community infrastructure		
5.	Facilitate the sustainable management of waste		
6.	Protecting and supporting the Welsh Language		
7.	Create places that are safe, accessible and encourage and support good health, well-being and equality		
Delivering Growth and Prosperity			
8.	Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors		
9.	Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region		
10.	Redefine the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport		
11.	Ensuring that Flintshire has the right amount, size, and type of new housing to support economic development and to meet a range of housing needs		
12.	Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure		
13.	Promote and enhance a diverse and sustainable rural economy		
14.	Support the provision of sustainable tourism development		
Safeg	uarding the Environment		
15.	Minimise the causes and impacts of climate change and pollution		
16.	Conserve and enhance Flintshire's high quality environmental assets including landscape, cultural heritage and natural and built environments		
17.	Maintain and enhance green infrastructure networks		
18.	Promote good design that is locally distinct, innovative and sensitive to location		

19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land

3.4 Strategic Growth and Spatial Options Appraisal

- **3.4.1** A key part of plan making requires the consideration of different options in order to arrive at the most sustainable, preferred option. These options relate to determining the appropriate level of growth or development that the Plan should make provision for, as well as the most sustainable way to distribute this growth spatially, around the County. The outcome of this process is central to the Plan as it sets the context for identifying the amount of development land that is required, for housing and employment purposes, as well as the most appropriate or sustainable places to identify this land. Whilst this is a matter of judgement, this has to be informed by the main purpose of the Plan, set by the vision and objectives above, as well as the context and evidence for the needs to be met.
- **3.4.2** In terms of growth options, these are informed by demographic trends and projections, as well as an assessment of the ability of the market and development industry to deliver the development that the Plan will make provision for. This is a judgement call as there are external influences that are beyond the control of the Plan or the Local Planning Authority. These influences include the economic conditions prevailing, availability of development finance, or the capacity of local and regional developers to respond to the provision made by the Plan, set against a sizeable local landbank as well as a significant amount of land being made available by Flintshire's neighbours, in England and Wales, at a similar point in time. The key is to ensure that growth is ultimately viable and deliverable.
- 3.4.3 In terms of the sustainable distribution of this growth, this has to go hand in hand with the appropriate level of growth, identifying a framework or hierarchy of sustainable settlements and the best way to use this hierarchy to locate the growth identified in the Plan. This is again based on the drivers that influence the vision and strategic objectives of the Plan, which focus on the needs of Flintshire's economy and communities, balanced against the need to respect and protect the environment and ensure the well-being of Flintshire's current and future generations.
- **3.4.4** Growth and spatial options have been developed and tested that are considered to be both realistic and sustainable. These have been the subject of engagement and consultation as part of the Strategic Options consultation carried out in late 2016. These options were presented with no preference identified by the Council for any particular option, instead presenting the key assumptions and evidence behind each, as well as highlighting 'pros and cons' for each, to give guidance on the factors that may be used to judge each option. The feedback from this consultation has been assessed and used to develop a consensus view to feedback into the Council's decision making process, to assist in selecting its preferred option.
- **3.4.5** Whilst the options appraisal presented here is a summary, further information is provided in a short background paper that expands on the method and considerations given to assessing the various options.

3.5 Assessment of Growth Options

- **3.5.1** A principal element of the Plan's strategy is to determine how much growth the Plan should make provision for, particularly in relation to housing. Local demographic, housing and economic information has been used to derive six different growth options, based on realistic and sustainable projection scenarios. The first of these options comprises the latest Welsh Government population and household projections (2011) for Flintshire, which the Council is required to use as a starting point for considering future growth.
- **3.5.2** That said, the latest Welsh Government household projections showed in general, and particularly for Flintshire, a low level of population and household growth given their use of negative recession-based trend data, and were accompanied by Ministerial guidance advising authorities like Flintshire not to project recessionary trends forward throughout their plan periods. Whilst emerging updated Welsh Government projections (2014 based) indicate slightly higher household growth than the 2011 figures, this can easily be accommodated within the options generated for assessment.
- **3.5.3** The Council recognises that to simply rely on a relatively low level of projected household growth would not provide a sound basis to develop and support an employment led strategy for the LDP, triggered by the need for economic recovery and job growth, capitalising on Flintshire's location and role in the local and wider sub-regional economy. This is recognised through Flintshire's Enterprise Zone status, its pivotal role in both the North Wales Economic Ambition, as well as the ongoing cross-border collaborative ambition to highlight the growth opportunities in the wider Mersey Dee sub region, and the links and role they can play in supporting the Northern Powerhouse principle.
- **3.5.4** Similarly, evidence from Flintshire's Employment Land Study, carried out jointly with Wrexham, does not provide reasonable or positive assessments of employment land need or job growth to support Flintshire's economic status or ambition, again due to the sector based projections of need relating to the recessionary period, with commensurate flat or negative growth trends in key sectors. The strategy instead highlights key employment sites in Flintshire, which are central to the North Wales and Sub-regional Growth Ambitions, and focusses on ensuring their delivery through the Plan period, identifying the level of jobs that will be created and the level of housing needed to support that level of growth.
- **3.5.5** The six options that have been the subject of engagement and consultation are shown in the following table. Five are demographic based projections, where projected population growth is then converted into household growth, and then into dwellings. The options have been derived by varying key assumptions about migration levels and household formation rates. The sixth option is employment led and has been derived by projecting the population, households and dwellings required to produce a job growth ranging between 8,000 and 10,000 jobs. This range derives from follow up work (Flintshire Further Employment Growth Scenarios Assessment) relating to the Employment Land Study, where the likely job yield has been calculated from two key strategic employment sites that are part of Flintshire's sub-regional growth ambition and that the plan aims to ensure are delivered during the plan period. A separate Background Paper: Population and Household Projections is available which explains the projections in more detail.

3.6 LDP Strategic Growth Options

Growth Option	Explanation	Household Growth	Households To Dwellings	Annual Figure		
Option 1 - 2011 based 10 year migration trend		3,600	3,750	250		
	Selected as it is the higher variant Welsh Government projection and therefore a starting point or baseline for comparison with other scenarios.					
Option 2 - trend	- 2014 based 15 year migration	4,650	4,800	320		
	Uses the same assumptions as in option 1 except uses 2014 population base and a longer 15 migration trend as recommended by the RTPI research and in line with the LDP plan period.					
	Option 3 - 2014-based 15 year migration trend – 2008 headship rates8,0008,250550			550		
Uses the same assumptions as for option 2 except substituting the latest 2011 based household formation rates with the previous 2008 rates, which were rolled forward from the 2001 Census. This is to illustrate the over-exaggerated expectations around household formation (particular smaller households) embodied in the 2008 rates, that didn't materialise empirically and as expected when the rates were recalculated using 2011 Census data. This also assists in understanding how assumptions made about household formation and growth that informed the UDP housing requirement, did not materialise into demand.						
Option 4 - migration	- 2014 based 10 year highest trend	6,400	6,600	440		
This option uses a 2014 population base and 2011 household formation rates but for migration, takes the highest level of net migration experienced in the past ten years, and projects forward at this level for the 15 year LDP plan period. This would be a radical change in the migration component of population change and difficult to maintain for the whole plan period, particular given the profile of migration over the preceding 15 years.						
-	2014-based 10 year highest trend – 2008 headship rates	10,050	10,350	690		
Uses the same assumptions as for option 4 except replacing the latest 2011 based household formation rates with the previous 2008 rates, rolled forward from the 2001 Census. This is to again illustrate (as per options 3 and 4) the significant and compounding impact on the outcome of using outdated and/or unachievable assumptions.						
Option 6 - Employment-led projection 8-10,000 new jobs		6,350-7,100	6,550 – 7,350	440 - 490		

This is an employment-led projection where the projections model is essentially run in reverse. The target of 8-10,000 new jobs is derived from existing aspirations around the Enterprise Zone and the need to ensure key strategic employment sites (Northern Gateway and Warren Hall) deliver significant employment during the LDP plan period, as well as the wider Flintshire economy.

- 3.6.1 The Strategic Options were the subject of an extensive engagement exercise involving Members, Town and Community Councils and Key Stakeholders with events facilitated by Planning Aid Wales. This culminated in a 6 week consultation exercise which ended on 9th December 2016. The intention of presenting a number of growth options was to illustrate the effects of using different data sets and assumptions in terms of the resultant housing requirement figure. Whilst it is accepted that not all of the options are in themselves likely to result in a 'sound' Plan, they were presented as part of 'telling the story' of the Plan and to give interested parties the full range of growth options on which they could comment and make representations.
- 3.6.2 In looking at the growth options the engagement event feedback and consultation comments generally favoured Option 4 (2014 based 10 year highest migration 2008 headship rates 6,600 dwellings / 440pa) and Option 6 (employment led projection 8,000-10,000 jobs 6,550 to 7,350 dwellings / 440-490pa). Although feedback on the options is an important consideration, the assessment of options and identification of a preferred option needs to be based on the technical merits of each option and whether it would result in a sound plan. The following paragraphs set out a summary assessment of each option, with a fuller explanation in the accompanying Background Paper: Consideration of Strategic Options Consultation and Assessment of Options.

Summary Assessment of Growth Options

Option 1– 2011 based 10 year migration trend

[3,750 dwellings / 250pa]

This Option represents no more than a baseline position in that the Welsh Government has confirmed that the 2011 based household projections should be treated with caution as it is based on a period of economic recession, and therefore underestimates future housing need. Such a low dwelling requirement would do little to support the growth ambitions within the Plan and would perform poorly in delivering market and affordable housing. Option 1 would not result in a sound Plan and is discounted.

Option 2 – 2014 based 15 year migration trend

[4,800 dwellings / 320pa]

This Option is similar to Option 1 with the only differences being an updated population base and a longer migration trend. It produces a slightly higher dwelling requirement than option 1 but this would not be an appropriate level of housing with which to deliver the Plan's economic ambitions and would not result in a sound Plan. Option 2 was also discounted.

Option 3 – 2014 based 15 year migration trend 2008 headship rates

[8,250 dwellings / 550pa]

This Option is similar to Option 2 but uses 2008 headship (household formation) rates. It produces a much higher dwelling requirement figure because the 2008 headship rates have since been found to be outdated and unrealistic in that they were exaggerating actual household formation rates. It is not considered, even with the improving local and national economy, that household formation rates are so dynamic so as to be able to respond and increase so quickly. Until further updated household formation rates are available, it is not considered to be based on credible and realistic evidence and it would not result in a sound Plan, as it overestimates housing need. Option 3 is discounted on this basis.

Option 4 – 2014 based 10year highest migration trend

[6,600 dwellings / 440pa]

This option is similar to Option 2 in that it uses a 2014 population base and a 2011 based headship rate but uses the highest level of in-migration from the last 10 years and projects this forward. It provides a corroboration of Option 6 which proposes two employment led growth scenarios, by setting out the increased migration necessary to achieve a level of housing growth that would support economic growth in order to enable job creation to occur. Option 4 was considered to have merit in supporting Option 6.

Option 5 – 2014 based 10 yr highest migration trend 2008 headship rates

[10,350 dwellings / 690pa]

This Option is similar to Option 4 except that it also uses the 2008 headship rates. The appropriateness of the 2008 headship rates is set out in Option 3 above and the over-exaggerated effect, combined with the increased levels of in-migration, results in an undeliverable level of housing considerably in excess of that arising from the employment growth led scenarios. Such a high level of growth is not considered to be realistic or sustainable and would not result in a sound Plan. Option 5 is discounted on account of its potential harm to sustainability.

Option 6– Employment Led Projection 8,000 – 10,000 jobs

[6,550-7,350 dwellings / 440-490pa]

This option adopts a different approach by taking the findings of the Further Employment Growth Scenarios Assessment and the target of 8,000 – 10,000 jobs to be created for the County, focussing in particular on the strategic sites at Warren Hall and Northern Gateway, but also the general job targets associated with the Deeside Enterprise Zone. This was then converted into housing requirement of between 6,550 and 7,350 dwellings. The option is corroborated by Option 4 which sets out the demographic changes that would be needed to deliver this economic growth i.e. returning to more historical levels of in-migration. In the context of the economic growth aspirations for the County and sub-region Option 6 represents a sound approach to setting the Plan's housing requirement.

3.6.3 The demographic migration led housing requirement in Option 4 (6,600 units / 440pa) is broadly in line with the employment led projections in Option 6 (6,550-7,350). These two sources of evidence clearly present a direction of travel which underpins the Plan whereby there is a close link between housing and employment within the context of an overall growth agenda. In setting the Plan's housing requirement figure it is important to show ambition in providing a level of housing which matches and supports economic growth aspirations. Option 6 has an upper and lower figure and it is considered that a mid-point of the two represents an ambitious yet realistic and sustainable level of growth. This results in a housing requirement figure of 6,950 or 463 per annum and on top of this a 10% flexibility would be applied which results in a total housing provision of 7,645 or 509 per annum. This level of housing provision is double that of the baseline position in Option 1.

Question 1

The Preferred Level of Growth

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?

3.7 Assessment of Spatial Options

Overview

- **3.7.1** A fundamental role of the Local Development Plan (LDP) is to consider the need for growth and development, and to make appropriate provision for this growth, in the most sustainable locations.
- **3.7.2** A number of growth options have been identified based on an objective assessment of 'need'. These involve a range of projection based scenarios as well as an employment led scenario. The growth options are presented as County wide options and it is necessary to consider how these growth options might be expressed 'spatially' i.e. how growth will be distributed across the County.
- 3.7.3 The Spatial Strategy is guided by the following:
 - LDP Vision and Objectives;
 - Sustainability objectives identified in National Planning Policy;
 - the assessment of spatial options in the SA;
 - an understanding of the context for and development potential of the County including the Wales Spatial Plan, on-going work around the Mersey Dee Alliance and the North Wales Economic Ambition Board, and the earlier North East Wales West Cheshire Sub Regional Spatial Strategy which was developed as a non-statutory framework for greater cross-border co-operation and development between North East Wales and West Cheshire over the period 2006-2021;
 - Settlement Audits carried out in 2014/15 from which the Settlement Hierarchy is derived as set out in the Key Messages document.
- 3.7.4 There is also a limited supply of deliverable brownfield sites within or close to existing settlements. Many of these sites are located in areas of flood risk, suffer from contamination and are close to areas of international nature conservation protection. Although brownfield sites will be brought forward wherever possible, it will be necessary to bring forward greenfield sites on land adjoining existing settlements in the most sustainable locations to address the identified housing and employment land needs over the Plan period.

3.8 Key Messages Document and Settlement Categorisation

- **3.8.1** As part of the earlier Key Messages document the Council consulted upon and firmed up the vision for the Plan, the issues to be faced and the main objectives. The Key Messages document sought to ensure that the future direction for the Plan in terms of its progression to date, was soundly based and evidenced.
- **3.8.2** In particular, the Key Messages document introduced work undertaken in respect of settlement audits which involved some 80 plus settlements, ranging from main towns down to small hamlets, being assessed in terms of their services and facilities and their role, character and accessibility. This in effect gives a realistic and practical measure of the sustainability of each settlement.
- **3.8.3** The settlement audits informed the development of a 10 tier banding based on the relative levels of key services and facilities. This was then used to inform the identification of a number of alternative methods of categorising settlements which were compared against the existing UDP approach. The settlement hierarchy option are explained in detailed in the Key Messages document and in brief were:

	Settlement Hierarchy Options		
Option 1	The existing UDP approach		
Option 1a	The existing UDP approach amended for certain settlements		
Option 2	A five tier approach		
Option 2a	A refined five tier approach amended to have regard to settlement relationships		
Option 3	Urban areas		
Option 4	Hybrid approach of option 3 and the lower three tiers of option 2a		

3.8.4 Following consideration of representations and responses on the Key Messages document, the Council agreed that Option 2a (a 5 tier settlement hierarchy adjusted to have regard to settlement relationships) was the option which best reflected a flexible and sound basis to distribute growth. The Strategic Options main document (consulted on in Autumn 2016) sets out in section 8 an assessment of the settlement hierarchy options (previously published as part of the Key Messages consultation in Spring 2016) and the reasoning for the choice of Option 2a. Given that the spatial strategy for the Plan needs to embrace the principles of sustainable development, then both the settlement audits and the settlement categorisation are an important consideration in the identification of spatial options. The settlement hierarchy is presented below:

3.9 LDP Sustainable Settlement Hierarchy

A Refined Five Tier Approach to Settlement Categorisation & Defining Settlement Relationships

1. Main Service Centres Settlements with a strategic role in delivery of services and facilities			
Aston & Shotton Connah's Quay Holywell Queensferry			
Buckley Flint Mold Saltney			

	 Local Service Centres Settlements with a local role in the delivery of services and facilities 			
Broughton	Garden City	Hawarden	Mynydd Isa	
Ewloe	Greenfield	Hope, Caergwrle, Abermorddu & Cefn y Bedd		

	Sustainable Village Settlements which benefit from some services and facilities and are sustainably located				
Alltami Coed Talon / Mancot Penyffordd / Penymynydd					
Bagillt	Drury & Burntwood	Mostyn (Maes Pennant)	Sandycroft		
Bretton	Ffynnongroyw	New Brighton	Sychdyn		
Brynford	Gronant	Northop	Treuddyn		
Caerwys	Higher Kinnerton	Northop Hall			
Carmel	Leeswood	Pentre			

4. Defined Village

Settlements which benefit from some facilities and facilities with which to sustain local needs

Cilcain	Nannerch	Rhydymwyn	Whitford
Flint Mountain	Pantymwyn	Nercwys	Ysceifiog
Gwernaffield	Pentre Halkyn	Trelawnyd	
Gwernymynydd	Pen-y-Ffordd	Trelogan & Berthengam	
Lixwm	Rhosesmor	Talacre	

Settlements whi	5. Undefined Village Settlements which have few or no services and facilities and which are not of a size or character to warrant a settlement boundary			
Afonwen	Dobshill	Llanfynydd	Rhewl Mostyn	
Cadole	Gorsedd	Pontblyddyn	Rhes-y-Cae	
Cymau	Gwaenysgor	Halkyn		
Ffrith	Gwespyr	Llanasa		

3.10 Sustainable Settlement Pattern

3.10.1 Planning Policy Wales states that Development Plans should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health. In relation to this the Key Messages document considered the main factors important in defining a sustainable settlement pattern, which includes locating development to reduce the need to travel by car by maximising accessibility to employment opportunities, services and facilities by walking, cycling and public transport. Development should be directed to existing urban areas which are well served by public transport, and which benefit from concentrations of jobs, facilities and services. It is also important to recognise within the context of delivering sustainable development, that there are differing priorities for urban and rural areas which also need to be reflected in the Preferred Strategy.

3.11 Spatial Options

- **3.11.1** An expanded comprehensive list of spatial options was first developed, and following an initial high level assessment was reduced to 5 realistic and potentially deliverable options which were presented for consideration during the Strategic Options consultation. A number of the initial spatial options were dismissed as being not in accordance with the guidance in PPW or considered not to be appropriate for the County and the rationale for this initial assessment can be found in Appendix 3 of the Strategic Options document. The remaining 5 options have been tested against the SA framework.
- **3.11.2** It was acknowledged that there could be potential to arrive at a Preferred Strategy that combined an element of more than one Option presented, or indeed an alternative option if identified through the consultation process.
- **3.11.3** The table on the next page provides an explanation of each of the spatial options as presented during the Strategic Options consultation. The approach to formulating and presenting the spatial options is set out in detail in the Strategic Options consultation document.

Spatial Options

Option 1 – Proportional Distribution

Description

Utilising the settlement hierarchy to allow for a proportional distribution of development based on sustainability principles

Spatial Expression / Settlements Affected

This option is based on the 5 tier settlement hierarchy

Option 2 – Focussed Urban Growth

Description

Directing all development to urban centres i.e. the upper two tiers of the settlement hierarchy

Spatial Expression / Settlements Affected

This option is based on the top 2 tiers of the 5 tier settlement hierarchy

Option 3 – Growth Area

Description

Development would be focused by directing all development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan.

Spatial Expression / Settlements Affected

This option is based on delineating a boundary in map form which is based on the growth area triangle in the Wales Spatial Plan.

Option 4 – Hubs and Corridors, Settlements along Transport Routes

Description

Development would be distributed based on a strict interpretation of key road and rail transport hubs and routes.

Spatial Expression / Settlements Affected

This option is based on identifying the settlements at key strategic transport hubs and on corridors and would focus on both public transport and key roads.

Option 5 – Sustainable Distribution plus Refined Approach to Rural Settlements

Description

Development would be focused on the first three tiers of the settlement hierarchy, based on identifying the most sustainable settlements and sites. In the rural settlements a more refined policy approach would be developed to ensure that a more flexible approach is taken to bringing about and delivering local needs housing.

Spatial Expression / Settlements Affected

This option is based on the first three tiers of the settlement hierarchy

3.11.4 The Strategic Options consultation document identified the 'large' list of possible spatial options along with a short commentary as to which options were carried forward into a 'small' list for more detailed assessment. Five spatial options were presented with each option comprising a description, list of settlements affected, pros and cons and a summary plus an illustrative map. The objective was to present a range of different options and to bring about engagement with stakeholders. In looking at the engagement feedback and consultation comments, the favoured option is Option 5 (Sustainable Distribution and Refined Approach to Rural Settlements) although there is some support for Option 4 Transport Hubs and Corridors. The following paragraphs set out a summary assessment of each option, with a fuller explanation in the accompanying Background Paper: Consideration of Strategic Options Consultation and Assessment of Options.

Summary Assessment of Spatial Options

Option 1 – Proportional Distribution

This option is similar to the UDP approach except that it uses the preferred 5 tier settlement hierarchy. In order to spread growth proportionately amongst settlements, based on the settlement hierarchy, it is necessary to have some form of numerical formula whether this be growth band, target, or minimum growth level.

The preferred 5 tier settlement hierarchy is far more robust than that used in the UDP, as it is based on an up to date settlement audit process whereby the position of a settlement in the hierarchy reflects its relative sustainability. The settlement hierarchy should be well placed to deliver a sustainable pattern of development. However, Option 1 functions on the basis of apportioning specific amounts of development to different tiers. It leads to the assumption every settlement must grow and can sustainably accommodate a specified level of growth. In practice this is simply not the case, as some settlements in a hierarchy are affected by particular constraints or designations. The Plan would be based on a 'planning by numbers' approach rather than sustainability. Growth would also be spread too thinly across the County.

Conclusion - In the context of a Plan where the evidence base is demonstrating a need for the strategy to be based on sustainability, Option 1 represents a rather dated, crude and regimented means of apportioning development across the County. It is not considered to be suitable basis on which to formulate the Plans spatial dimension. Option 1 is therefore discounted.

Option 2 – Focussed Urban Growth

This option directs all development to urban centres i.e. the upper two tiers of the settlement hierarchy (Main Service Centres and Local Services). It seeks to reflect the findings of the settlement audits whereby the top two tiers are generally the most sustainable settlements.

At first glance, focussing growth in upper two tiers, appears to be a sensible and sustainable way forward in that it concentrates growth in the most sustainable settlements. However, in practice it ignores the potential of the third tier i.e. sustainable villages and is not a County Wide option as it ignores the rural part of the County. Furthermore, given the number of tier 1 and 2 settlements, compared with the number of Sustainable Villages in the third tier, it is unclear whether all planned growth could be accommodated within the Main Service Centres and Local Service Centres. In recognising that some settlements are limited in their ability to sustainably accommodate development, due to physical, environmental, infrastructure or policy based constraints, increased pressure would be placed on the remaining settlements, possible resulting in 'overheating'.

Conclusion - Bearing in mind that a key principle in identifying the preferred spatial option, is to ensure flexibility to withstand subsequent changes, this option is far too 'rigid' and focussed to provide flexibility. Option 1 is not considered to provide a sustainable basis for the Plans Spatial Strategy and is discounted.

Option 3 – Growth Area

This option focusses development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan. All settlements falling within the growth triangle would be treated the same, irrespective of their position in the settlement hierarchy. The option benefits from being based on the growth triangle / hub concept from the Wales Spatial Plan and appears to tie in well with the various regional and national growth agenda's and designations.

The Option assumes that all settlements in the growth area are able to support growth. Focussing all growth into one part of the County could place too much pressure on certain settlements, especially given that some settlements are affected by infrastructure capacity or other constraints. It does not represent a County wide spatial strategy as it ignores all areas and settlements outside of the growth area. The option also treats all settlements the same, regardless of their position in the settlement hierarchy with the result that small rural settlements within the growth area would need to accommodate development, without having the services, facilities and infrastructure to support it. On balance, the Option is not considered to have sufficient merit to be the sole basis for the Plans spatial strategy, but

could be a higher level consideration, in conjunction with the preferred option. In a similar manner to option 2 it is not considered to have sufficient flexibility to withstand changes as the Plan progresses, or to sustainably stand up on its own.

Conclusion - It is evident that a spatial strategy focused on the growth area in the Wales Spatial Plan, has some merit. However, this option has a number of deficiencies in that it is not a strategy for the whole County and is too focussed and inflexible. Rather than being the basis for a spatial strategy, Option 3 is better being considered as a higher level consideration alongside the preferred option.

Option 4 – Hubs and Corridors

In this option development would be distributed based on key road and rail hubs and routes. All settlements located on key transport corridors or at key hubs would be treated the same, irrespective of their position in the settlement hierarchy. The option of focussing development in these settlements appears to be quite sensible but produces mixed results in that it is based on both key rail corridors as well as key road corridors.

The established pattern of settlements has not always evolved based solely on key transport routes and hubs. Some communities perceive that they have seen significant growth without accompanying investment in road and other transport infrastructure. Therefore, focussing growth on key transport corridors does not always target the most sustainable settlements. The Option has no regard to the settlement hierarchy so if a settlement lies on a key transport route then, under this option, it is suitable for growth. In reality, not all settlements along transport routes will have the necessary infrastructure, services or facilities to be able to sustainably accommodate development.

Similarly, there are settlements elsewhere in the County which have the capacity to sustainably accommodate growth, yet would be unable to do so under this Option as they do not lie on a key transport route or hub. As with Option 3, this Option is one that could be considered as a higher level consideration alongside the preferred spatial option. In this context the need for growth to be in settlements which have good accessibility to key road and rail corridors and hubs, as well as public transport more generally, is a sound planning consideration that should be applied as part of any preferred spatial option.

Conclusion - Identifying a spatial strategy which has regard to key transport corridors and hubs clearly has merit. However, this option has a number of deficiencies in that it is not a strategy for the whole County, does not have regard to the settlement pattern on the ground, and is too focussed and inflexible. Rather than being the basis for a spatial strategy Option 4 is more appropriately considered as a higher level consideration alongside the preferred option.

Option 5 – Sustainable Distribution plus Refined Approach to Rural Settlements

In this option development would be focussed on the top three tiers of the settlement hierarchy i.e. Main Service Centres, Local Service Centres and Sustainable Villages. In the lower two tiers a more refined and innovative approach will be developed to deliver local needs housing in sustainable rural settlements. The option is not based on numerical controls or parameters, but on the broad position within the settlement hierarchy and identifying the most sustainable settlements.

This option is based on the Settlement Audits sustainability information which informs the settlement hierarchy. It identifies the most sustainable settlements to accommodate growth, rather than relying on numerical means of apportionment. It is therefore a 'tailored' and 'sensitive' approach which has regard to the particular characteristics of each settlement. It is also a sensible approach whereby it focuses growth in the top tiers of the settlement hierarchy i.e. those tiers of settlements that are considered to be sustainable settlements. Most of the settlements in the upper three tiers are either well placed to be accessible to key transport routes and hubs and also employment opportunities, or perform the role of acting as service centres for a rural areas. The option therefore sits comfortably with the 'higher level considerations' of the growth area in Option 3 and transport corridors and nodes in Option 4.

Furthermore, it recognises the smaller settlements in the rural part of the County (the lower two tiers of the settlement hierarchy) by seeking to take a more innovative approach to rural settlements than that adopted in the UDP in order to deliver local needs affordable housing through enabling some market development. Option 5 is also flexible in that it has the potential to withstand change as the Plan Progresses e.g. a need to identify additional allocations at examination or significantly revised Welsh Government forecasts.

Conclusion – Option 5 is considered to represent a logical yet flexible approach to distributing growth by focussing on the most sustainable settlements based on the first three tiers of the settlement hierarchy and recognising the need for a more innovative approach to rural settlements.

- **3.11.5** As part of the consultation feedback, a number of alternative spatial strategies were put forward for consideration and each of these is assessed below:
- 3.11.6 Focus on Smaller Villages Development should be focused in smaller villages and not towns – The evidence which informed the settlement hierarchy demonstrates that generally speaking the smaller rural settlements are the least sustainable settlements as they have fewer services and facilities and often have limited or no public transport which means that residents are essentially car dependent. A spatial strategy which seeks to direct most development to such villages would not represent a sustainable approach and would be unlikely to be found to be sound.
- 3.11.7 New Town this was assessed as part of the 'large' list of possible spatial options but was not considered to have sufficient merit to be short listed for further consideration. PPW adopts a cautionary stance towards new settlements advising that they will rarely be justified in Wales. A new town would not assist in the Plan

seeking to achieve a 5 year housing land supply due to the lead in and construction timescales for a new settlement and the quantum of need is not sufficient to warrant such an approach.

- **3.11.8 Brownfield Sites** It is noted that PPW supports the preferential use of brownfield land but also that not all brownfield is suitable for development. However, the Plan also recognises that much of the brownfield land in Flintshire is constrained by flood risk, contamination or ecological issues. Whilst the Plan will seek to allocate suitable and appropriate brownfield sites, it would be wholly inappropriate to have a spatial strategy based on brownfield land. The issue of brownfield land is a general principle to be applied throughout the Plan's preparation, rather than a spatial strategy in its own right. Furthermore, a policy of requiring the development of brownfield sites ahead of green field sites would not assist in achieving a 5 year housing land supply.
- **3.11.9** Option 5 is considered to be the most 'well rounded' spatial option in that it is based on a soundly evidenced settlement hierarchy and seeks to direct growth to the most sustainable settlements whilst not ignoring the needs of rural areas. Rather than being based on numerical or mechanical means to apportion growth it seeks to take a more informed approach to each settlement, utilising information in the settlement audits, to identify which settlements are sustainably able to accommodate development. The broad scale of development would be based on the position of a settlement within the settlement hierarchy and based on the particular characteristics of settlements as well as the availability of sustainable sites. Option 5 is therefore considered to represent the most suitable spatial option with which to formulate the Plans Spatial Strategy.

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.

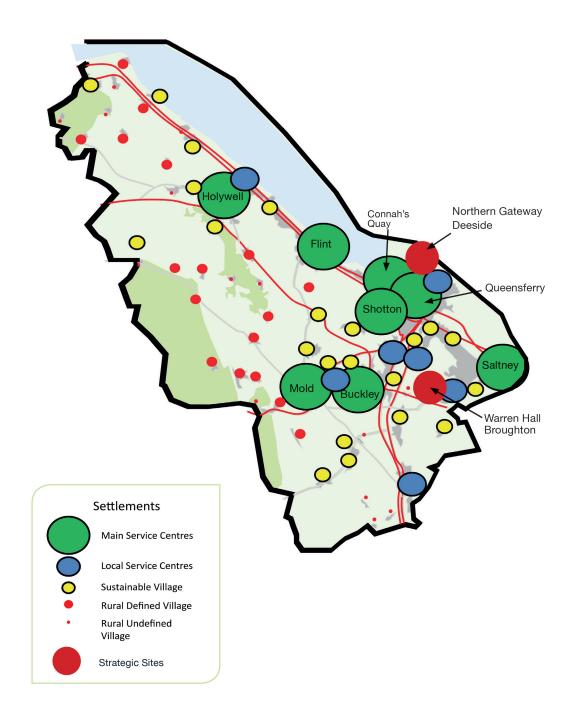
Do you have any comments to make on the preferred spatial strategy?

4 The Preferred Strategy

- 4.0.1 Sections 2 and 3 have provided the strategic context and growth ambition and an outline of the Council's Preferred Growth and Spatial Strategy for the Local Development Plan over the period 2015 2030. The key components of the LDP Preferred Strategy therefore comprise:
 - Provision for 7,645 new homes to deliver a requirement of 6,950;
 - Provision of opportunities to deliver 8 -10,000 jobs in the County;
 - Provision of 223 ha of employment land; and
 - Application of Spatial Option 5 Sustainable Distribution plus Refined Approach to Rural Settlements:
 - Concentration of development in the following sustainable locations Main Service Centres and the Key Strategic Sites of Northern Gateway and Warren Hall (Broughton); Local Service Centres; and Sustainable Villages - in accordance with the settlement hierarchy and Sustainability Appraisal;
 - Delivering development in a sensitive needs driven sustainable manner in the **Defined and Undefined Villages.**

4.0.2 The Key Diagram below helps to demonstrate the Council's Preferred Strategy.

Picture 4.1



4.1 Strategic Policies

- **4.1.1** Following the summary of the preferred strategy as set out above, the following four sections set out the Strategic Policies which form the framework for implementing and delivering the Council's Preferred Strategy. The Strategic Policies that follow, are logically grouped according to the three elements of Sustainable Development Community, Economy (which is further subdivided into employment growth and housing growth) and the Environment. The four sections of the Preferred Strategy that define the Council's Strategic Policies are therefore:
 - Creating Sustainable Places and Communities
 - Supporting a Prosperous Economy
 - Meeting Housing Needs
 - Valuing the Environment
- **4.1.2** It is inevitable that there will be a degree of overlap between the themes and policies; they need to be read in conjunction with one another in order to gain an understanding of the overall policy direction of the Plan. Each section highlights the relevant strategic policy, the reason justification for the policy and the summary table at the end of the strategic policies provides a link back to the relevant LDP objectives. An outline of how the Deposit Plan will respond with further criteria or topic based policies where relevant is also included. The 'delivery and monitoring section' at the end of each policy will be developed as part of the Deposit Plan.
- **4.1.3** The Wellbeing of Future Generations (Wales) Act 2015, places a duty on all public bodies to 'carry out sustainable development' in order to achieve the Well Being goals of:
 - A prosperous Wales;
 - A resilient Wales;
 - A healthier Wales;
 - A more equal Wales;
 - A Wales of cohesive communities;
 - A Wales of vibrant culture and thriving Welsh Language; and
 - A globally responsible Wales.
- **4.1.4** The LDP needs to link into these goals and provide a policy context that allows for the goals to be met. Each strategic policy is therefore referenced to these Wellbeing Goals which relate most to its purpose and implementation.

- **5.0.1** The creation of sustainable places is an important principle that underpins the strategy of the LDP. Sustainable places are created from a balance of environmentally friendly, economically vibrant, and socially inclusive characteristics, that aim to benefit not only current inhabitants but also future generations.
- **5.0.2** The aim of such places is that they:
 - Meet the needs of all members of their community;
 - Provide access to opportunities;
 - Make available services, infrastructure, and support;
 - Provide a range of quality, affordable housing;
 - Are resilient and adaptable to change.
- **5.0.3** In seeking to create such places that are sustainable both now and into the future, it has to be acknowledged that some places have more potential than others to be sustainable. That is why the Plan has sought to identify and differentiate between the sustainability of places by developing its sustainable settlement hierarchy. This reflects Flintshire's historical and functional pattern of settlement and seeks to achieve more sustainable places in a number of ways. As such, in this section the Preferred Strategy:
 - Directs the majority of development to places that already have good infrastructure, services and facilities, or where this capacity can be provided, specifically through policies:
 - STR1 Strategic Growth
 - STR2 The Location of Development
 - STR3 Strategic Sites
 - This does not ignore the need for sensitive development in rural locations in order to maintain communities and their future cohesion, and meet locally specific needs for growth and development. This rural development strategy approach sits alongside the main focus for the spatial distribution of development, to the first three tiers of the settlement hierarchy.
 - Ensures that all development is well designed and helps deliver more sustainable places, specifically through policies:
 - STR4 Principles of Sustainable Development and Design
 - STR5 Transport and accessibility
 - STR6 Services, Facilities, and Infrastructure
- **5.0.4** These policies are aimed at facilitating the delivery of all of the Plan's strategic objectives, whilst at the same time providing broad conformity with the range of Well-Being Goals.

5.1 Policy STR1: Strategic Growth

Strategic Policy STR 1

Strategic Growth

In order to meet Flintshire's economic ambition between 2015 and 2030, the Plan will make provision for:

- i. 8,000 10,000 new jobs;
- ii. 223 hectares of employment land
- iii. 7,645 new homes to meet a housing requirement of 6,950.

The focus of this development will be at sustainable employment locations and in accordance with the sustainable settlement hierarchy and spatial distribution strategy.

Question 3

Policy STR1: Strategic Growth

Do you have any comments to make on Policy STR1 and the level of growth proposed?

Explanation

- 5.1.1 The Preferred Strategy of the LDP is focused on promoting and enhancing Flintshire's role as an economic hub and driver for growth both locally, regionally, and in a national context. The strategy is therefore deliberately employment-led, focused around the need to secure continued economic recovery and resilience following a severe period of economic recession and austerity. It is about taking control of the County's future prospects and economic destiny, by creating the conditions in a land use context, to allow for growth and investment to occur.
- **5.1.2** The Council has defined this economic ambition via an intention to create a significant level of new jobs over the plan period. This is based on Flintshire's strategic location and role as a sub-regional economic hub, the attractiveness of this to workers and investors, a wider recognition of the economic importance of Flintshire demonstrated for example by its Enterprise Zone status, and not least the availability of key strategic employment sites that need to be enabled to fulfil their potential.
- **5.1.3** Flintshire's economic aspirations are also important in the twin regional contexts that Flintshire sits between:
 - Flintshire is key to the North Wales Economic Ambition being jointly promoted by all of the North Wales Local Authorities which seeks to deliver strategic sites and infrastructure, based around employment, housing, and sustainable transport;
 - Because of the economic role it fulfils with its neighbours in the North West of England, as part of the Mersey Dee Alliance, Flintshire is committed to ensuring

that it can and should play its part in attracting strategic infrastructure funding and investment to support the mutual ambition being expressed.

- **5.1.4** The level of job growth therefore drives the strategy and sets the context for determining the housing requirement in the Plan. This is a robust and sensible approach for two reasons: firstly the provision of houses, whilst meeting a need for homes per se, is part of the infrastructure required to support and facilitate the achievement of economic growth; secondly, reliance on Welsh Government household projections to set a housing led strategy would fall short of providing the necessary homes to support the economic growth target. This is because the projected trends are low for Flintshire, based as they are on a recessionary period, and do not reflect a sufficiently positive intent over the plan period.
- **5.1.5** The ambition reflected in this strategic approach is also intended to be deliverable. Whether through the evidence gained from the Employment Land Review, or the development of a sustainable settlement hierarchy, the Plan aims to recognise the role Flintshire's urban and rural areas can play in delivering this strategy. This will also require a partnership approach between the Council, Government, infrastructure providers, developers and investors, and communities to allow this to happen.

Policy Context

LDP Objectives	8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors
	9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region
	 Ensuring that Flintshire has the right amount, size, and type of housing to support economic development and to meet a range of housing needs
	2. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure.
PPW	Paras 9.2 Development plans and new housing
	Paras 7.5 Development plans and the economy
Well Being	A prosperous Wales
Goals	A resilient Wales
Key Evidence	PPW
	Flintshire and Wrexham Employment Land Review
	Flintshire Further Employment Growth Scenarios Assessment
	Population and Household Growth Projections Background Paper

	Topic Paper 10 – Population, Household Growth and Housing
	Topic Paper 7 – Spatial Strategy
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed Policies	Housing allocations
	Employment allocations
	Development zones and principal employment areas

5.2 Policy STR2: The Location of Development

Strategic Policy STR 2

The Location of Development

New development will be directed to the following locations:

- i. Allocated Sites;
- ii. Principal Employment Areas as detailed in attached table;
- iii. Sustainable settlements based on the first three tiers of the settlement hierarchy, as detailed in the attached table:
- a. **Main Service Centres** will be the main locations for new housing development which reinforces and contributes to sustainable settlements. Provision will include:
 - i. Allocations
 - i. Windfall market housing
 - ii. Affordable housing on sites above an area / units threshold
- b. Local Service Centres will be the locations for more modest levels of new housing development. Provision will include:
 - i. Allocations
 - ii. Windfall market housing
 - iii. Affordable housing on sites above an area / units threshold
 - iv. Small Scale Rural Exceptions Schemes for Affordable Housing adjoining settlement boundaries
- c. **Sustainable Villages** will be the locations for housing development related to the scale, character and role of the settlement. Provision will include:
 - i. Allocations
 - ii. Windfall market housing
 - iii. Affordable housing on sites above an area / units threshold
 - iv. Small Scale Rural Exceptions Schemes for Affordable Housing

In Defined Villages housing development will only be permitted related to the scale, character and role of the settlement and which delivers local needs affordable housing. Provision will include:

- i. Windfall market housing (only when essential to delivering affordable housing)
- ii. Local needs affordable housing
- iii. Small Scale Rural Exceptions Schemes for Affordable Housing

In Undefined villages housing development will be limited to small scale and sensitive infill development or rounding off where local needs affordable housing only is provided.

Question 4

Policy STR2: The Location of Development

Do you have any comments on Policy STR2 and in particular the approach it takes to directing new development?

Settlement Hierarchy

Settlement Tier	Main Service Centres	Local Service Centres	Sustainable Villages	Defined Villages	Undefined Villages
Description	Settlements with a strategic role in delivery of services and facilities	Settlements with a local role in the delivery of services and facilities	Settlements which benefit from some services and facilities and are sustainably located	Settlements which benefit from some facilities and facilities with which to sustain local needs	Settlements which have few or no services and facilities and which are not of a size or character to warrant a settlement boundary
Settlement boundary	Yes	Yes	Yes	Yes	No
Settlements	Aston & Shotton Buckley Connah's Quay Flint Holywell Mold Queensferry Saltney	Broughton Ewloe Garden City Greenfield Hawarden HCAC Mynydd Isa	Alltami Bagillt Bretton Brynford (Calcoed & Dolphin) Caerwys Carmel Coed Talon / Pontybodkin Drury & Burntwood Ffynnongroyw	Cilcain Flint Mountain Gwernaffield Gwernymynydd Lixwm Nannerch Nercwys Pantymwyn Pentre Halkyn Pen-y-Ffordd Rhosesmor	Afonwen Cadole Cymau Dobs Hill Ffrith Gorsedd Gwaenysgor Gwespyr Halkyn Llanasa Llanfynydd

Settlement Tier	Main Service Centres	Local Service Centres	Sustainable Villages	Defined Villages	Undefined Villages
Tier			Gronant Higher Kinnerton Leeswood Mancot Mostyn (Maes Pennant) New Brighton Northop Northop Hall Pentre Penyffordd / Penymynydd Sandycroft	Villages Rhydymwyn Talacre Trelawnyd Trelogan & Berthengam Whitford Ysceifiog	Villages Pontblyddyn Rhes-y-Cae Rhewl Mostyn
			Sychdyn Treuddyn		

Principal Employment Areas

1	Ewloe Barns (Industrial Estate), Alltami	Small, scheme of trade and workshop properties, prominently located off the A494 accommodating a range of occupiers, including some 'bad neighbour' uses. Most of the land within the area is used for vehicle parking and open storage. Key Occupiers: Flintshire Steel Supplies, Thorncliffe Building Supplies, Thorncliffe Skip and Waste Management.
2	Alltami Depot, Alltami	Rural employment area comprising a roadside depot for Flintshire County Council, several smaller units and a large (6,412 sqm) warehouse prominently located on the A494. There is a substantial area of undeveloped land (some 3.5 ha) which could provide further development opportunities. Key Occupier: Flintshire County Council (Streetscene Services)

3	Manor Industrial Estate, Bagillt	Large, linier established local employment area running parallel to the A458, between Flint and Bagillt serving the Flint Coast and comprising a range of workshop schemes and mid-sized industrial units. In particular, it is a key source of budget and moderate quality workshop space for local micro businesses. Key Occupiers: MG Engineering, Thames Valley Controls
4	Broughton Mill, Broughton	Small, linear industrial estate of moderate quality light industrial units and waste processing depots serving Broughton and the south east of the County. In particular it accommodates a number of 'bad neighbour' waste processing uses which could not be housed on nearby Hawarden Industrial Park. Key Occupier: Montgomery Tomlinson
5	Catheralls Industrial Estate and Pinfold Industrial Estate, Buckley	Catheralls Industrial Estate is an established scheme of mid-sized, good quality industrial and trade units in the north of the Buckley settlement area. Includes a larger trade unit for Jewson in the south. Pinfold Industrial Estate comprises some 35 smaller, moderate quality workshop units in a Council-owned scheme. Key Occupiers: Rooms and Views, My Storage Pod, N W T Horseshoes, Jewson, Protech Supplies
6	Drury Lane Industrial Estate, Buckley	A small, linear group of, moderate quality industrial and warehouse units, most in retail and trade use, in a primarily residential area. Key Occupiers: Flintshire Car and Commercial, Gem Retail
7	Little Mountain Industrial Estate, Buckley	Premises for two large employers, with some smaller premises to the south east, in an edge of settlement location close to Buckley Railway Station. Key Occupiers: Glen Dimplex, Buckley Foods.
8	Spencer Industrial Estate, Buckley	A scheme of industrial premises, of varying ages and levels of quality, along Standard Road to the south west, along Globe Way as Globe Business Park. Key Occupiers: Spencer Industrial, Lester Fabrication & Cladding Co., Concept Oils.
9	Evans Business Centre, Chester West	Western portion of the larger Sealand Industrial Estate, most of which is in Chester. The section within Flintshire comprises the modern, Evans Business Centre (34 office suites and 23 workshops) plus several larger, good quality, self-contained office and industrial properties to the south east. Key Occupiers: Quality Hydraulic Power, We Buy Any Car, NHS

10	Dock Road, Connah's Quay	Budget quality riverside employment area, surrounding a brownfield employment site, north of the main Connah's Quay settlement. This Principal Employment Area primarily provides car garage and motor trade services. Key Occupiers: Lee's MOT's, Hallcrest Ltd, Deeside Motorcycles and Scooters, Insanity Extreme Strength and Conditioning.
11	St Davids Park, Ewloe	Group of large, self-contained HQ office buildings, prominently located off the A494. There are minimal opportunities for new development. Key Occupiers: Redrow, HSBC, Moneysupermarket.com
12	Ashmount Industrial Estate, Flint	Major industrial estate on the Flint Coast, accommodating several major employers, and also providing a diverse range of smaller business accommodation, including self-contained and serviced office suites in the east around Aber Road and Ashmount Enterprise Park in the south east. Three further development plots also exist within the employment area boundary. Key Occupiers: Flint Refurbs, Nice-Pak International, Aber Grange
13	Castle Park/Ashmount Industrial Centre, Flint	Older industrial estate of some 34 mid-sized, mostly budget and moderate industrial premises in a backland location between the railway and the Dee Estuary. A couple of sites exists for new development including a development site of some 1.40 ha which is on the market, to let, in the north of the estate. Key Occupiers: Celtic TY, Lex Machinery Sales, Instant Crusher Spares
14	Greenfield Business Park, Greenfield	Large established industrial area divided into four sections by the railway and raised access roads. Includes a scheme of smaller industrial premises in the north west and larger logistics/manufacturing properties elsewhere. Key Occupiers: Kingspan, Saffil Automotive, Westbridge Furniture, Hall's Drinks, R J Jones Group.
15	Hawarden Industrial Park and Chester Aerospace Park, Hawarden	Major manufacturing facility for Airbus including active airport facilities. The area also includes a modern industrial estate on Manor Lane which is continuing to grow, in part at least, as a supplier park for Airbus and general industrial estate on Broughton Mills Road. Key Occupiers: Airbus, Davis Bakery, SIRA Test and Certification, AL Control Laboratories, Marshalls.
16	Broncoed Industrial Estate, Mold	Small, modern and successful local employment area. A small scheme of some 13 industrial units which provide reasonable quality workshop premises to a range of local firms. Of particular value are the and two multi-let office properties in an extended courtyard to the rear of the Principal Employment Area. Despite their backland position, these are a relatively unique property resource in Mold. Key Occupiers: GLS Coatings, Non Stop, Whitley Estates

17	Mold Business Park, Mold	Compact office and industrial park, prominently located off the A494. This Principal Employment Area is a key office centre in Mold, which is increasingly established as the centre Flintshire's office market. Of particular value is its stock of self-contained office properties. Key Occupiers: NHS, Eisteddfod, GP Fire and Security
18	Mold Industrial Estate, Mold	The main employment area for Mold, meeting both local needs and accommodating a number of larger businesses. This established business park and industrial estate is split into two sections along Queen's Lane. Key Occupiers: Wittur, NWN Media,
19	Mostyn Docks, Mostyn	The Port extends to some 50 ha, with a large facility for Warwick International to the south. Existing facilities include a riverside quay (with 24 ha of adjacent land) and a Ro-Ro transhipment facilities for the movement of Airbus A380 wings from Dee barges (shipped from Broughton) to larger ocean-going ships (with 6 ha of adjacent paved land). The Port also has the long term aspiration to develop some 12-16 ha of land to the north for a renewable energy manufacturing (and energy generation) park. Key Occupier: Warwick International
20	Pentre Industrial Estate, Pentre	Established industrial location that includes modern industrial and office accommodation that straddle both sides of the railway line along Factory Road and Chester Road, south of the A494. The area comprises a range of larger manufacturing facilities and warehouses in the west and light industrial units, plus substantial areas of cleared brownfield land, in the east. The Principal Employment Area includes some large employers but is also a focus for 'bad neighbour' waste processing uses in Deeside, due to the availability of land and budget industrial space here. Key Occupiers: SP Energy Networks, Veolia.
21	Queensferry Industrial Estate, Pentre	Established industrial estate, part of the wider industrial centre of Chester Road accommodating a number of large manufacturing and logistics occupiers, south of the A494. Key Occupiers: Headland Group Manufacturing, Knauf Insulation
	Expressway Business Park, Queensferry	Low density rural industrial estate, comprising five modern industrial units, most in trade use, backing on to the A494 Key Occupiers: Huws Gray, Queensferry MOT Testing Station

22	Antelope Industrial Park, Rhydymwyn	A Linear employment area comprising a small group of moderate quality, mid-sized industrial units in a low density estate, serving the rural west of the County where there are few other employment areas. Key Occupiers: CRT Recycling, The Mold Hygiene Chemicals Company.
23	Brynmau One, Two, Three and Four Estates, Saltney	Group of established industrial schemes in a backland location on the Chester boundary. The location of the employment area and the nature of the local road network means that these schemes more naturally serve the Chester market rather than Flintshire. Some options for further infill development remain. Four adjacent, moderate quality schemes of terraced workshops along with various larger units and open storage sites, in a backland location between the railway line and the River Dee. Key Occupiers: Go Outdoors, EPC
24	Glen Industrial Estate, Saltney	Group of three older industrial premises, including a large bakery, centrally located in Saltney and adjacent to retail. A planning application was submitted in 2016 for residential development on the Allied Bakeries site and remains undetermined. Key Occupier: Deeside Metals Ltd
25	The Borders Industrial Park and Chesterbank Industrial Park, Saltney	Group of established industrial schemes in a backland location on the Chester boundary. The location of the employment area and the nature of the local road network means that these schemes more naturally serve the Chester market rather than Flintshire. Some options for further infill development remain. Some 77 small workshop units, including recent developments, plus further development land and two larger depots in a backland location between the railway line and the River Dee. Borders Industrial Park also extends to include a large area of Greenfield development land in the west, accessed separately from Saltney Ferry Road. Key Occupiers: First Line Digital, Bostin
26	Engineer Park and St Ives Park, Sandycroft	Modern industrial and office park in established industrial location, part of the wider industrial centre of Factory Road, which is the focus for smaller industrial and office premises in Deeside, south of the A494. Includes a large factory for Promens and several logistics units Key Occupiers: Promens, Parcelforce, Fedex
27	Glendale Business Park, Sandycroft	Established industrial estate, one of a series that extend along Factory Road and Chester Road, south of the A494.Comprises a series of larger manufacturing and logistics occupiers warehouse units, including a 39,000 sqm warehouse for Great Bear Distribution. Key Occupiers: Lingar, Howden, 2 Sisters Food Group, Great Bear Distribution

28	Sandycroft Industrial Estate,	Backland industrial location within the wider Factory Road and Chester Road employment location. As such it includes a number
	Sandycroft	of waste management companies and lower value open storage uses. However, the area continues to serve a useful function in accommodating these uses. Comprises a large vehicle storage compound and older workshops north of Prince William Avenue along with larger, more modern industrial and office units to the south. Key Occupiers: Copart UK, J R Webster and Co, Delta Rock North West, Recyclo Skip Hire
29	Deeside Industrial Park and DARA Site, Sealand	Generally comprises major industrial and infrastructure complexes in the west with a range of smaller industrial units in the east and a large mixed-use development site in the south east. Key Occupiers: UPM Shotton, Toyota, BASF, Tata
30	Rowley's Drive, Shotton	Established employment area, centrally located in the Queensferry/Shotton settlement areas and comprising modern office and industrial units in the south east, some in trade/motor trade use, and smaller, older workshops and offices to the north west. Key Occupiers: Direct Line Communications, Epryn, Landranger Deeside

Explanation

- 5.2.1 The Plan seeks to distribute development spatially across the County having regard to the Spatial Strategy outlined earlier. PPW emphasises the need for a settlement strategy to provide the basis for a spatial pattern of housing development, balancing social, economic and environmental needs. Most development will be directed to the top three tiers of the settlement hierarchy. In the remaining two tiers of the settlement hierarchy a more refined approach is taken towards providing for local needs based housing in rural areas. The spatial location of development will enable the Plan's strategy in terms of the amount of growth, to be realised in a sustainable manner.
- **5.2.2** A key element in providing for new development is the identification of allocations, and this includes housing, employment, retail, waste and minerals. In the case of housing, only those sites which are capable of accommodating 10 or more units will be allocated, as this ensures consistency with the Joint Housing Land Availability Study definition of large and small sites. In addition, the Plan identifies Principal Employment Areas which are based on existing employment development and where opportunities exist for further windfall development. With the exception of the strategic mixed use allocations at Warren Hall and Northern Gateway, the remainder of the Plan's allocations will be identified in the Deposit Draft Plan.
- **5.2.3** The preferred spatial strategy for the Plan seeks to direct new development to the top three tiers of the settlement hierarchy through a sustainable distribution of development. It is these settlements which are evidenced as being the most sustainable settlements in terms of the settlement audits i.e. size, form, character, role and level of services and facilities.

- 5.2.4 The Plan does not seek to apportion development spatially by the use of numerical or mechanistic methods relating to growth bands, rates, targets or guotas. Rather, the Plan seeks to distribute development in a sustainable manner having regard to the settlement hierarchy and by identifying the most sustainable settlements and sites. The Plan intentionally avoids creating a perception that every settlement in every tier must contribute towards growth through having a housing allocation. Instead, the Plan looks at each settlement on its merits to determine whether if it is able to sustainably accommodate an allocation. The Main Service Centres will be the main locations for growth whereas Local Service Centres will be the location for more modest levels of growth. Sustainable Villages will be the location for housing development related to the scale, character and role of the settlement. The degree to which these three tiers interrelate is also important. A broad brush distribution of housing, based on the settlement and spatial strategy is set out below. This is indicative at present, being based on completions during the first two years of the LDP period, commitments as at April 2017 and the initial results of the assessment of Candidate Sites against the preferred Strategy. The broad apportionment of growth may be further refined as the Plan progresses.
 - Tier 1 Main Service Centre 40-45%
 - Tier 2 Local Service Centre 35-40%
 - Tier 3 Sustainable Villages 15-20%
 - Tier 4 Defined Villages 1-2%
 - Tier 5 Undefined Villages 0-1%
- **5.2.5** The policy provides broad guidance on the scale and type of development in each tier. All of the upper three tiers will provide for allocations, windfall market housing and affordable housing on sites above thresholds of units / area that will be set by policies in the Deposit Plan. In addition, Local Service Centres and Sustainable Settlements will also be potential locations for small scale rural exceptions schemes for affordable housing on the edge of defined settlement boundaries.
- **5.2.6** A more refined approach is taken towards the bottom two tiers of the settlement hierarchy, which are predominantly rural villages. In Defined Settlements new development will be related to meeting proven local needs for housing, whether on windfall sites within a settlement boundary or small scale rural exceptions schemes on the edge of defined settlement boundaries. However, in the case of windfall sites, scope exists for limited market housing where it is necessary to deliver local needs affordable housing. The additional flexibility arising from allowing market housing should help improve the viability of local needs affordable housing.
- 5.2.7 In Undefined Settlements new development will be limited to small scale infill development or rounding off where local needs affordable housing is provided. As these settlements do not have a defined settlement boundary the policy allows for both infill development and rounding off in the form of small scale development. In these lower tier settlements, development needs to be sensitively conceived and designed so as to meet local needs for affordable housing and to respect the character and appearance of the site and its surroundings.
- 5.2.8 The strategic policy will need to be read alongside STR1 Strategic Growth, STR3 Strategic Sites, STR7 Economic Development, Enterprise and Employment, STR8 Employment Land Provision, and STR11 Provision of Sustainable Housing Sites. It

will also need be supported by subsequent detailed policies addressing a range of policy issues and in particular housing development outside settlement boundaries in open countryside.

Policy Context

LDP Objectives	8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors
	9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region
	11. Ensuring that Flintshire has the right amount, size, and type of housing to support economic development and to meet a range of housing needs
	12. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure
	13. Promote and enhance a diverse and sustainable rural economy
PPW	Para 4.3/4.4 Sustainable development 'principles' and 'objectives
	Para 4.6 Priorities for urban and rural areas
	Para 4.7 Sustainable settlement strategy: locating new development
	Para 9.2 Development plans and new housing provision
	Ch 7 Economic Development
	Ch 10 Planning for Retail and Commercial Development
Well Being	A prosperous Wales
Goals	A resilient Wales
Key Evidence	PPW
	Topic Paper 7 – Spatial Strategy
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed policies	Settlement boundaries - Development inside and outside settlement boundaries
	Housing allocations and supporting policies

Affordable Housing: Site area / units threshold and level of provision Infill development in small groups of houses in open countryside Employment allocations and supporting policies Principal employment areas Retail Allocations

5.3 Policy STR3: Strategic Sites

Strategic Policy STR 3

Strategic Sites

The majority of new development in Flintshire during the Plan period will be provided by a combination of commitments and new sites located in accordance with to the sustainable settlement hierarchy. Two key strategic sites will make an important contribution to the overall provision for growth in Flintshire over the Plan period:

STR3A Northern Gateway Mixed Use Development Site: Employment, housing, commercial, community facilities:

- i. Approximately 1,300 new homes, including affordable
- ii. Approximately 100 hectares of B2/B8 employment land
- iii. Commercial development hub adjacent to A550
- iv. District Centre(s) to serve local convenience needs
- v. Strengthened and raised River Dee flood defences
- vi. Provision of internal road infrastructure
- vii. Provision of land and a contribution to extending Sealand CP School
- viii. Sustainable drainage/flood management solution
- ix. Provision of green infrastructure network
- x. Sensitive re-use of John Summers Listed buildings and grounds

STR3B Warren Hall Mixed Use Development Site: Employment and housing:

- i. Approximately 300 new homes, including affordable
- ii. B1 and high quality B2 employment land
- iii. Commercial hub involving hotel, leisure, local centre and retail
- iv. Strategic landscaping and green infrastructure network
- v. Sustainable transport links with nearby settlements

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?

Explanation

5.3.1 The settlement audit work which underpinned the settlement hierarchy reflects the geography of the County in that there are a large number of settlements ranging from smaller towns to small rural hamlets. The County is unlike many others in Wales as there is no single settlement which is dominant in terms of size and function. Instead

there are towns and the urban areas of Deeside where a number of settlements are in close proximity to one another. The Candidate Sites have also, as a general rule, not brought forward suitable or acceptable strategic sites. The combination of geographical make up and Candidate Sites results in only two strategic sites being identified within the Preferred Strategy.

- **5.3.2** The relative lack of strategic sites, compared to other LDP's in Wales, should not necessarily be seen as a weakness. The experience of other large sites in Wales suggests they can be difficult to get off the ground and are not delivering development as anticipated. This can have a negative effect on securing and maintaining a 5 year housing land supply from adoption onwards. The adjoining LPA's of Wrexham and CWAC both have planned strategic urban extensions delivering the bulk of new housing in Wrexham and as part of the green belt release on the south western edge of Chester. Further afield, Denbighshire also has a large urban extension at Bodelwyddan. The bulk of the 'new allocations' or residual requirement element of the Plan's overall housing provision will therefore be delivered by a range of housing allocations from tens of units to several hundred units. This should enable sites to be delivered and ensure a 5 year housing land supply at adoption and through the Plan period.
- **5.3.3** 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 and contribute to the economic growth of the County and meet its housing needs. The Northern Gateway site is a mixed use strategic site at the heart of the Enterprise Zone and the Wales Spatial Plan Growth Triangle. The mix and quantum of development has changed since the allocation in the UDP because the two halves of the site are in separate ownership and are being promoted separately. It is considered that a fresh allocation as part of the Preferred Strategy for the LDP is required to promote the sites which will result in increased market confidence in the scheme, on the back of considerable public sector infrastructure investment.
- **5.3.4** The Warren Hall site has had planning permission for a business park for a number of years and has seen considerable public sector investment comprising junction improvements at the interchange of the A5104 and A55(T). The delivery of the site has been held up by the effects of the global recession and also the availability of sites elsewhere. However, the site is in a strategic location and is crucial in promoting economic growth over the Plan period. In order to improve the viability and deliverability of the development, the site is being re-presented as an allocation for mixed use development comprising employment, housing and commercial hub as well as an extension to the site area.
- **5.3.5** The Northern Gateway site represents a large area of brownfield and under-utilised land adjacent to Deeside Industrial Park and Garden City. The site is located adjacent to the A494 Trunk Road and in close proximity to the Wrexham Bidston and North Wales Coast railways lines. It therefore sits at the heart of a sub-regional economic hub and at the Gateway to Flintshire and Wales. The site forms a key part of the Deeside area, being designated as an Enterprise Zone. The promotion of the site as a mixed use development enhances the sustainability credentials arising from its location.

- The mixed use site provides for approximately 1,300 new homes and will include 5.3.6 affordable housing. The site benefits from two outline permissions and is a 'commitment' but the 1,300 dwellings will be included as a strategic allocation within the housing balance, rather than as a commitment, in order to avoid double counting. In terms of employment land the site will deliver some 100ha of B2 and B8 employment land, which reflects the general nature of employment development in the locality and the fact that high quality employment land is available elsewhere in the County. In order to support the employment and housing development the scheme will provide a commercial hub and district centre adjacent to the A550. Land will also be provided along with a financial contribution to enable the provision of an extension to the existing primary school. Infrastructure investment has taken place by strengthening and raising the River Dee flood defences and internal access roads are also being delivered by Welsh Government. A sustainable drainage and flood management scheme will also be secured as part of the detailed design of the scheme.
- 5.3.7 The Warren Hall site is located on the south side of the A55(T) and Broughton and is located on the south side of the A5104 which runs between Chester and Penyffordd / Penymynydd. The site presently has outline planning consent for a 76,395 sqm business park comprising of B1 units as well as a hotel and leisure facilities. As part of this allocation the mix of land uses has been amended and site area extended to 57ha to also include housing development and a broader range of supporting uses including retail as part of a commercial hub. The mixed use element will improve the viability and deliverability of the site. The employment element will still comprise B1 development and will need to be of high quality in terms of siting, form, design and materials which respects the setting of the site. Delivery of the scheme will need to be phased so that employment development is delivered in conjunction with the release of housing.

Policy Context

LDP Objectives	8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors
	9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region
	10. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure
PPW	Para 2.16.3 mixed use development Para 4.6.2 mixed use development Para 4.1.7 mixed use development Para 7.2.4 mixed use development Para 7.5.1 Development plans and the economy Para 8.6.2 mixed use development Para 9.1.2 mixed use development
Well Being Goals	A prosperous Wales A resilient Wales
Key Evidence	Flintshire and Wrexham Employment Land Review Study Flintshire Further Employment Growth Scenario Assessment PPW TAN23 Deeside Plan Topic Paper 7 – Spatial Strategy Topic Paper 8 – Economy and Employment Topic Paper 10 – Population, Household Growth and Housing Planning Permissions
Monitoring of	The following indicators will be used to monitor policy effectiveness: tbc
Detailed Policies	This strategic policy will need to be read alongside a broad range of detailed policies on relevant and specific issues.

5.4 Policy STR4: Principles of Sustainable Development and Design

Strategic Policy STR 4

Principles of Sustainable Development and Design

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.

To achieve this, all development should:

- i. Be designed to be adaptable, safe and accessible, to respond to climate change, and for housing, adapt to changing needs over time;
- ii. Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;
- iii. Be accessible and connected, allowing ease of movement;
- iv. Make the best use of land, materials and resources;
- v. Contribute to the well-being of communities, including safeguarding amenity, the public realm, provision of open space and recreation, landscaping and parking provision in residential contexts;
- vi. Incorporate new, and connect to existing green infrastructure, promoting biodiversity;
- vii. Incorporate where possible on-site energy efficiency and renewable energy generation;
- viii. Ensure there is capacity and availability of infrastructure to serve new development
- ix. Manage water and waste sustainably.

Question 6

Policy STR4: Principles of Sustainable Development and Design

Policy STR4 includes ways to deliver sustainable development. Do you have any comments to make on Policy STR4?

Explanation

5.4.1 Sustainable development is development that meets the needs of the present, without compromising the ability of future generations to meet their own needs. Sustainable development can be interpreted in many different ways, but the key principle is that development should seek to balance different, and often competing needs, against an awareness of environmental, social and economic limitations. The implications of not living within environmental limits can be seen with the increasing impacts of climate change and planning has a role to play in minimising and mitigating these

impacts. Whilst the environment is a key factor, sustainable development is also about ensuring a strong, prosperous, healthy and fair society which meets the needs of all.

- **5.4.2** The LDP is subject to a statutory Sustainability Appraisal (SA). The purpose of the SA is to appraise the environmental, social and economic impacts of the LDP and to find ways to mitigate these to improve the Plan's overall sustainability. It is an on-going process carried out at various stages and looks at the overall plan strategy and individual policies and proposals to ensure that these fit in with the principles of sustainable development. The SA also incorporates a Strategic Environment Assessment (SEA) which enables the LDP to be formally assessed in order to manage the impact on the environment.
- **5.4.3** It is therefore a fundamental principle that sustainable development should form the basis of planning policy. In a planning context Planning Policy Wales defines sustainable development as the process of improving the economic, social and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals. The Well Being of Future Generations (Wales) Act 2015 contains seven goals that public bodies must work towards and are integral to planning policies and decisions as it brings an enhanced duty for Local Planning Authorities. These goals are set out in para 4.5 and each LDP policy sets out which goals are relevant.
- **5.4.4** Taking into account sustainable development and the purposes of the Well-Being Goals, the LDP policies must ensure that development takes place in locations that are appropriate for its scale and nature, and that development is built to ensure positive economic, social, environmental and cultural outcomes. Development should be delivered in such a way that it provides a safe, attractive, cohesive and inclusive environment which is sustainable and minimises that impact on the environment, as well as mitigating the impacts of climate change.
- **5.4.5** This policy, and the more detailed policies that will follow in the Deposit Plan, are intended to ensure that development proposals can achieve positive economic, social, environmental and cultural outcomes, and can minimise adverse ones. They will form the basis of all planning decisions, and indicators will be developed as part of the Plan's monitoring framework to show the effectiveness of the policies.
- **5.4.6** It is important that people live in places which are attractive and distinctive, and incorporate the changing requirements of those living there. This means that high quality, well thought out and sustainable design which improves the environment and people's health and well-being is essential. This can be achieved by ensuring that new developments incorporate the principles of good design and sustainable development, and that the character of existing built development is conserved or enhanced. Development should and achieve high standards of design and layout, incorporating basic principles such as parking requirements, whilst supporting local distinctiveness, character and sense of place.
- 5.4.7 Flintshire contains many historic settlements and a rural landscape with a high quality built environment which it is important to protect. The LDP will contain detailed policies relating to the protection of heritage assets from loss and damage. These historic assets include listed buildings, conservation areas, archaeological sites, historic

parks, gardens and landscapes, as well as unprotected assets which add character and significance to the County. The design of new development should reflect this and be of a good design which has regard to local distinctiveness and site context.

- **5.4.8** There are national targets for the production of energy from renewable sources which need to be met. In terms of resources and energy, development should seek to minimise the use of these, both in construction and afterwards, and should take into consideration the embodied energy of materials. Site locations and layout should take into account such matters as solar gain and microclimate in order to reduce the energy needed for light and heating. In some instances it might be appropriate to install renewable energy technologies on a site which serve the development as a whole. In other cases, the incorporation of renewable energy technologies should be considered, and in all instances, development should seek to attain the highest level of energy efficiency possible.
- 5.4.9 Similarly, measures to reduce water use and to conserve water should be incorporated into new developments. It should also be ensured that developments do not increase run off and flooding, decrease water quality or affect water courses detrimentally. Development also requires infrastructure in the form of roads, community facilities, open space etc. and there can be infrastructure constraints which inhibit the scale and location of development. In order to meet the well-being and sustainable development goals it is important that new development is well served by infrastructure and the Deposit LDP will therefore contain policies which require the provision of new infrastructure.

Policy Context

LDP Objectives	 15. Minimise the causes and impacts of climate change and pollution 16. Conserve and enhance Flintshire's high quality environmental assets including landscape, cultural heritage and natural and built environment 17. Maintain and enhance green infrastructure networks 18. Promote good design that is locally distinct, innovative and sensitive to location 19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land
PPW	Chapter 4 – Planning for Sustainability 5.4.1 – Development Plans and the Conservation and Improvement of the Natural Heritage 5.4.3 – Landscape features of major importance for wild flora and fauna 5.4.4 & 5.4.5 – Conservation and enhancement of locally designated nature and landscape areas

	5.4.5 – Conservation and enhancement of all statutorily designated nature and landscape areas and sites
	5.4.5 – Areas of open space of conservation value
	Chapter 6 – The Historic Environment
	7.1.3 – Economic and employment growth
	8.1.1 – Transport and sustainable development
	8.1.5 – WG objectives for transport planning
	9.1.1 – housing
Well Being	A globally responsible Wales
Goals	A healthier Wales
	A Wales of cohesive communities
	A more equal Wales
Key Evidence	TAN12 Design
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed policies	General development requirements / considerations Design Landscaping Public art Advertisements Protection and provision of open space and outdoor recreation areas Housing density and mix Resource efficiency and renewable energy proposals Infrastructure and development proposals including community facilities Protection and enhancement of the historic environment and character including archaeology Protection and enhancement of nature conservation / landscape / biodiversity / green wedges

5.5 Policy STR5: Transport and Accessibility

Strategic Policy STR 5

Transport and Accessibility

Sustainable economic growth and development can only be delivered by the maintenance and enhancement of an integrated, accessible, usable, safe and reliable transport network. The development of Flintshire's transport infrastructure therefore underpins the Council's economic ambition and in turn, informs the provision of a sustainable pattern of development. Where appropriate new development and associated transport infrastructure should therefore:

- i. Facilitate accessibility to employment, homes, services, and facilities by locating development in places with access to integrated transport infrastructure, thereby reducing the need to travel;
- ii. Promote the implementation of an integrated transport solution in Flintshire, involving road, rail, bus, park and ride / share and active travel improvements;
- iii. Promote road and rail improvements to support Flintshire's sub-regional role as a strategic gateway and hub;
- iv. Ensure that the local highway network either has, or can be upgraded, to provide capacity to accommodate sustainable levels of development;
- v. Facilitate improvements to the quality, attractiveness and availability of public transport options;
- vi. Provide walking and cycling routes, linking in with active travel networks and green infrastructure networks;
- vii. Adopt a sustainable approach to the design, function and layout of new development, including providing appropriate levels of parking.
- viii. Support the movement of freight by rail or water

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?

Explanation

5.5.1 Land use planning and development is closely linked with transport. The location of development can have a significant influence on transport choice in terms of the way in people go about their everyday lives. However, the historic pattern of development and the accompanying transport network and infrastructure is a given in that it cannot change so the Plan cannot start afresh, therefore it must work with what exists now, or is planned to happen during the Plan period. The role of the Plan 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.

- **5.5.2** The Plan is being prepared at a time of change with the focus on achieving growth and economic prosperity both at County level and at sub-regional and regional levels. Deeside has been designated as an Enterprise Zone and the County is involved in a number of economic growth initiatives including Northern Powerhouse, the Mersey Dee Alliance and Growth Track 360. A key part of the Enterprise Zone is the Northern Gateway Strategic Site and this is receiving transport infrastructure investment by Welsh Government along with a range of other transport improvements in the Deeside area to improve accessibility to employment. The sub-regional and regional initiatives recognise the need for investment in transport to help deliver continued economic growth. In the longer term Welsh Government has announced plans for a Metro system for North East Wales involving a network approach across a range of transport modes and projects.
- 5.5.3 The Preferred Strategy is being prepared against a backdrop of uncertainty over the outcome of the Welsh Government consultation on options for improving the A494(T) / A55(T) / A548 Deeside Corridor. In March 2017 Welsh Government consulted on options for a blue and red route. The blue route involves widening the A494 and A55 with junction improvements at Ewloe, and a range of associated improvements. The red route involves increased capacity along the existing A548 and a new road between the A55 and A548 and modifications / improvements to junctions. In responding to the WG consultation, the Council's clear preference is for the red route but with key improvements required along the blue route to the existing network.
- **5.5.4** The Deeside Plan, recently published by the Council, is useful in setting out a range of transport measures in the short, medium and long term. The Transport objectives for the Deeside area are to:
 - Maximise benefits of regional transport infrastructure investment
 - Use transport infrastructure investments to unlock economic growth opportunities
 - Support modal shift from the private car to more sustainable means of movement
 - Devise solutions to reduce congestion and ensure transport, economic growth and housing are considered in parallel
 - Encourage active travel through green infrastructure corridors and investment in cycling and pedestrian infrastructure
- 5.5.5 Some of the key transport proposals in the Deeside Plan include:
 - Deeside Parkway development of a lorry park, new railway station and bus station to serve the northern part of DIP.
 - Garden City new bus interchange to serve Northern Gateway and southern part of DIP
 - Shotton / Hawarden Bridge improvements to railway stations
 - DIP / Northern Gateway shuttle bus services
 - Wrexham Bidston line service improvements and light rail / tram service
 - Active travel pedestrian and cycling infrastructure improvements

- **5.5.6** The Deeside Plan provides further detail on each aspect of the key transport proposals and references the need for a forward looking transport solution which captures available funding opportunities and ensures that all transport interventions lead towards the central goal of an integrated transport system.
- 5.5.7 Most of these 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. At present there are no projects, or where projects have not progressed in terms of sufficient detail, to be certain at this stage whether they would require safeguarding as part of this strategic policy. As projects are developed further, those which do require provision to be made for them through a safeguarding policy will be added as part of the Plan's detailed policies. An important consideration is Broughton where further assessment is needed to examine how junction 36a can be upgraded, or other options investigated, to improve access to the settlement, the shopping park and Airbus.
- **5.5.8** The focus on Deeside in the commentary above is not to divert attention away from the rest of the County. Rather, it reflects the fact that it is Deeside which has the most challenging transport issues whereby the performance of strategic through routes is being affected by congestion which is hampering journey to work times. It also reflects the fact that schemes and projects are being drawn up in the Deeside area as part of existing and emerging economic initiatives. Transport interventions and schemes throughout the County are set out in the North Wales Joint Local Transport Plan 2015.
- **5.5.9** In the rural part of the County a key concern is that of social exclusion in terms of accessing services and facilities and employment, which can be difficult in the absence of a private car. This is particularly so in the context of continuing budget pressures for the Council and the impact on bus services. Although other transport initiatives are being pursued such as community based transport schemes, this emphasises the need for new development to be located in those rural settlements which are genuinely accessible by means other than the private car and which have the necessary services and facilities to sustain everyday needs.
- **5.5.10** The Council is also developing its Active Travel initiative. A network of walking and cycling routes has been identified proposals formulated to add missing links to or extend this network. These routes seek to improve linkages between homes and employment and facilities and services. Walking and cycling routes will also assist in creating healthy lifestyles and will have health benefits. New development will have a role to play in delivering some of these proposals.
- **5.5.11** The policy therefore sets out general transport principles to be considered both in preparing the Plan and subsequently in determining planning applications. The underlying principle is ensuring that both the Plan as a whole and individual planning allocations and decisions have regard to the goal of an integrated transport system and supported by improvements to the highways and transport infrastructure. The strategic policy will be supplemented by detailed policies in the Deposit Plan.

Policy Context

LDP Objectives	1. Ensure communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly.
	3. Promote a sustainable and safe transport system that reduces reliance on the car
	4. Facilitate the provision of necessary transport, utility and social / community infrastructure
	7. Create places that are safe, accessible and encourage and support good wealth, well-being and equality
	8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors
	9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region.
	15. Minimise the causes and impacts of climate change and pollution
PPW	Para 4.4 Objectives of sustainable development
	Para 4.7 sustainable development strategy: locating new development
	Para 8.2 Promoting active travel
	Para 8.3 supporting public transport
	Para 8.4 managing traffic and parking
	Para 8.5 Planning for roads, railways, airports, ports and inland waterways
	Para 8.6 Development plans and transport
Well Being	A healthier Wales
Goals	A Wales of cohesive communities
	A more equal Wales
Key Evidence	Welsh Government Transport Plan and Strategy
	Welsh Government Transport Strategy
	North Wales Joint Local Transport Plan 2015
	Deeside Plan

	Topic Paper 16 – Transport
	Topic Paper 7 – Spatial Strategy
	FCC Active Travel
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed	Accessibility
policies	Public Transport
	Parking provision and new development
	Airport safeguarding zone
	Rail freight
	Protection of disused railway lines
	Safeguarded transport schemes (road, rail, bus, walking / cycling)
	Mostyn Docks
	Telecommunications

5.6 Policy STR6: Services, Facilities and Infrastructure

Strategic Policy STR 6

Services, Facilities and Infrastructure

An essential element in planning for sustainable places is to ensure that the physical and social infrastructure exists, or can be provided, to ensure that when and where development occurs, it can be sustainably accommodated within communities.

Delivered through a combination of recognised infrastructure providers, public organisations, and private investment, new development will contribute to the provision of a range of key infrastructure, where necessary to mitigate the impacts of new development, comprising:

- i. Affordable housing;
- ii. Open space and green infrastructure;
- iii. Education and health facilities;
- iv. Highways, walking and cycling and public transport improvements;
- v. Ecological mitigation;
- vi. Water management(supply, drainage, treatment);
- vii. Telecommunications and Broadband;
- viii. Community and town centre facilities;
- ix. Welsh Language;
- x. Public realm and public art.

Question 8

Policy STR6: Services, Facilities and Infrastructure

Policy STR6 seeks to ensure that new development is supported by necessary and adequate infrastructure whether through CIL or planning obligations. Do you have any comemtns to make on Policy STR6?

Explanation

- **5.6.1** It is important that the Preferred Strategy directs new development to locations that benefit from good access to appropriate services and facilities. This is key to the successful implementation of the Plan's ambition, strategy and policies.
- 5.6.2 PPW advises in para 12.1.1 that 'Adequate and efficient infrastructure, including services such as education and health facilities along with water supply, sewers, waste management, electricity and gas (the utilities) and telecommunications, is crucial for the economic, social and environmental sustainability of all parts of Wales'. Development proposals should enable opportunities for residents to have good access to a range of services and facilities within their local area. However, it must be recognised that there are some facilities such as certain health services, which

have to be in locations that have a wider catchment and cannot be provided locally. The physical and social infrastructure and services that are needed to make places function efficiently and sustainably must be fully understood. Consultation with other infrastructure providers will form part of the preparation of the Deposit plan which will identify those capacity issues. The provision of necessary infrastructure improvements will require the Council to work in partnership with public and private investment and strategically with the Welsh Government. Any requirements must be reasonable and developers will only need to address the needs arising from their specific development.

- **5.6.3** A key principle in planning for sustainable development is the well-being of communities. Development will only be permitted where there is adequate existing physical and social infrastructure, or where there are suitable proposals to increase provision to accommodate any additional demand deriving from proposed development and, where reasonable, to address deficiencies.
- **5.6.4** Planning Policy Wales States in paragraph 3.5.5 'Planning obligations are useful arrangements to overcome obstacles which may otherwise prevent planning permission from being granted. Contributions from developers may be used to offset negative consequences of development, to help meet local needs or to secure benefits which will make development more sustainable. It is essential that arrangements are fair to both the developer and the community, that the process is as transparent as possible and that development plans provide guidance on the types of obligations which authorities may seek from developers. When granting planning permission local planning authorities may seek to enter into a planning obligation with a developer to:
 - restrict development or use of the land;
 - require operations or activities to be carried out in, on, under or over the land;
 - require the land to be used in a specified way; or
 - to require payments to be made to the authority either in a single sum or periodically.'
- 5.6.5 The Community Infrastructure Levy (CIL) Regulations came into force on 6th April 2010 and is a system of development tax to be paid by all developers on a £ per square meter basis on developments with Gross Internal Areas of more than 100sq m. The contributions are pooled and are used for all types of infrastructure needs in the county. The local Authority will look to develop, once the LDP is finalised, a workable CIL Schedule setting out the infrastructure priorities for the county to guide how those contributions will be spent. The level of a CIL charge will depend on the viability of the development market and will vary across the County, the CIL schedule will need to take that into account.
- 5.6.6 The options for the delivery of infrastructure through Planning Obligations (Section 106 agreements) and / or Community Infrastructure Levy (CIL) and the pros and cons of each will be considered as part of this process, following LDP adoption. The Council will explore the suitability of establishing a CIL to clarify the required financial contributions from developers to help fund infrastructure provision. The mechanism for determining and prioritising infrastructure needs, whether strategic or local, will be a key part of assessing the options for CIL. Further details of the approach to CIL will accompany the Deposit Plan.

Policy Context

sure communities have access to a mix of services and facilities, as education and health, to allow community life to flourish, and the needs of particular groups such as the elderly tecting and supporting the Welsh Language aintain and enhance green infrastructure networks
2.1.10 Local Development Plans
5.4.1 to 5.4.6 Conserving and Improving Natural Heritage and the
3.6.1 to 8.6.2 Transport
0.2.14 to 9.2.19 Affordable Housing
0.3.1 Retail and Commercial Development
2.1.1. and 12.3.1 Infrastructure and Services
Ithier Wales
es of cohesive communities
e equal Wales
es of vibrant culture and thriving Welsh Language
Planning and Affordable Housing
Retail and Commercial Development
Nature Conservation and Planning
6 Sport Recreation and Open Space
8 Transport
0 Planning and Welsh Language
Paper 4 - Open Space
Paper 7 - Spatial Strategy
Paper 9 - Health, Well-being and Cohesion

	Topic Paper 11 - Retailing and Town Centres
	Topic Paper 12 – Infrastructure
	Topic Paper 16 – Transport
	Topic Paper 17 – Welsh Language
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed Policies	Water Resources
	New Community Facilities
	Retention of Local Facilities
	Sports, Recreation or Cultural Facilities and Activities
	Welsh Language and Culture

6 Supporting a Prosperous Economy

Introduction

- 6.0.1 Economic growth and resilience are key priorities for Flintshire driven by the need to shake off the effects of a global economic recession and the need to plan for recovery and an economic upturn. These effects are not limited to Flintshire and, with its neighbours both in North Wales and the North West of England, Flintshire is part of a common ambition to attract investment, create jobs, improve strategic infrastructure, and increase prosperity.
- **6.0.2** Flintshire's role in this wider ambition is significant both in terms of its strategic location as an economic hub and gateway, and in the strength of its economic base and sectoral mix, making it a significant generator of GVA locally, regionally, and nationally. Much of this ambition is based on the availability of strategic sites on Deeside and within and adjacent to the Enterprise Zone. The key point is that their potential for growth is real and immediate, and the role of the LDP will be to create the land use conditions to facilitate this.
- 6.0.3 The Joint Employment Land Review (Oct 2015) carried out with Wrexham CBC, presented sectoral growth forecasts for Flintshire to 2030, based on Cambridge Econometrics and Institute of Employment Research data. Given that the trend period that informed these forecasts coincided with the recessionary period, and that there was negative growth nationally within key sectors such as manufacturing, neither of these factors give a positive basis to look ahead and plan for economic recovery and upturn. Further work was commissioned to examine the job creation potential of Flintshire's strategic sites located at Northern Gateway on Deeside and Warren Hall, Broughton. This demonstrated a cumulative potential for the two sites to yield between 8,000 10,000 jobs over the plan period. Both sites are already commitments in that they both benefit from outline planning permissions, but it will be a central role of the LDP to ensure that these sites can be fully implemented and this will be assisted by presenting them as strategic allocations.
- 6.0.4 The ELR examined Flintshire's extensive portfolio of existing employment sites and did not conclude that there was either a need or indeed significant opportunity to consider other uses for undeveloped employment land. Where this can be done it has, but in the main it is appropriate, given Flintshire's economic context, to maintain a significant range and choice of locations for employment development.
- 6.0.5 The LDP also recognises the contribution that service sector employment makes, particularly in relation to retail and commercial jobs within Flintshire's town, district, and local centres. That said there is pressure on these traditional service centres from recession and from alternative ways of shopping, and the Plan needs to provide a sufficiently flexible but positive framework for the development of town centre uses.
- 6.0.6 Equally, sustainable tourism development is and has the potential to be a significant contributor to Flintshire's economy. Tourism development also has the potential to contribute positively to the range of social, economic, and environmental objectives of the Plan, as well as many of the Well Being Goals. There are opportunities that

can arise from the AONB and Flintshire's attractive rural landscape, its significant heritage assets, attractive villages and market towns, and a growing demand for outdoor activities and recreational development.

- 6.0.7 In this section of the Preferred Strategy this will be achieved via the following policies:
 - STR7 Economic Development, Enterprise, and Employment
 - STR8 Employment Land Provision
 - STR9 Retail Centres and Development
 - STR10 Tourism, Culture, and Leisure

6.1 Policy STR7: Economic Development, Enterprise and Employment

Strategic Policy STR 7

Economic Development, Enterprise and Employment

In order to sustain Flintshire's role as a sub-regional economic hub, the Plan will support this by:

- i. Facilitating the delivery of jobs from key strategic sites at Northern Gateway, Deeside, and Warren Hall, Broughton;
- ii. Providing a range of general employment sites to enable a range of businesses to start-up, invest, expand and grow, benefitting from Flintshire's strategic location and positive quality of life;
- iii. Emphasising Deeside and its area of influence as the economic focus for Flintshire's long term economic ambition;
- iv. Providing the opportunity to realise the creation of 8-10,000 jobs in key sectors, over the plan period;
- v. Supporting the role of Flintshire's main towns as Main Service Centres, providing a range of employment, retail, leisure development and services and facilities that are accessible to the wider communities they serve;
- vi. Supporting development related to the provision of higher/further education facilities which offer vocational skills training and direct links to key employers;
- vii. In rural areas, recognise the continued contribution agriculture makes to the rural economy, whilst also supporting wider rural enterprise, tourism and diversification;
- viii. Supporting the widespread provision of high speed broadband infrastructure across Flintshire, as well as consistent telecommunications connectivity.

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?

Explanation

- 6.1.1 The Flintshire economy is a key contributor of GVA to the Welsh Economy and the planning system needs to continue supporting economic development in the County so that it can aim to achieve prosperity at the regional and national level. Economic prosperity is fundamental to creating well-being across a range of demographic groups in Flintshire and in order for Flintshire to continue to be a prosperous County, a strong local economy is required with a sound knowledge and skills base which will provide the foundation for building success. It is therefore right to plan ahead for economic recovery and growth and build upon the County's economic strengths.
- **6.1.2** Flintshire acts as a key focal point for the wider regional economy of North Wales and the North West, providing, for example, 'high-value' manufacturing employment at Deeside Industrial Park and Airbus at Broughton. Flintshire's economy has a positive outlook relative to the backdrop of global recession with some of the key economic indicators suggesting that Flintshire's economy is currently strong and performing well: unemployment is relatively low, GDP and economic activity are relatively high. (UDP)
- **6.1.3** This positivity is also demonstrated by the designation of Enterprise Zone status for the area from Deeside Industrial Park, south eastwards to Hawarden Industrial Estate. This area has the highest concentration of manufacturing jobs in the UK and a level of innovation that requires attracts highly skilled, advance manufacturing jobs. The extension of the time period for the Enterprise Zones is further evidence of the success this has already brought in terms of economic activity and job creation and the opportunity for the LDP to assist this further. Enterprise Zone status brings with it financial incentives and scope for a simplified planning regime. In the early part of the Plan period it should provide a major stimulus of the economy of the County.
- 6.1.4 In this context the LDP strategy is about looking forward with a growth ambition that is realistic, achievable and deliverable in order to make a sustained and long term positive contribution to Flintshire's economy. In achieving this, the Northern Gateway and Warren Hall development sites are important to the economic growth ambitions of the region and have the potential to deliver up to 10,000 new jobs and up to 1,500 new homes. The Council in partnership with the owners, developers and the public sector have a shared interest in maximising the economic impact of these sites, the quality and range of jobs created and the quality and value of development secured.
- 6.1.5 The Plan needs to consolidate and build upon that economic role by providing for a level of economic growth that is aspirational but credible. This needs to be supported by an appropriate amount of housing development which is appropriate in terms of location and type in order to support economic growth whilst at the same time providing for the housing needs of the County. A strategic focus for the Plan is therefore the growth zone between Deeside, Wrexham and Chester, but this should not be at the expense of the remainder of the Plan area. The Plan also needs to ensure that the benefits of economic growth are distributed to sustainable settlements and locations throughout the County, by maintaining a wide portfolio of employment sites.

6.1.6 In economic terms, town centres are critical to the perception and image of Flintshire as well as the focus of social and economic activity and as vital providers of services and employment. The LDP will seek to ensure that Flintshire town centres are vibrant and attractive with successful businesses serving the needs of the local community. Given that much of the County is rural the Plan must ensure that the economic and housing needs of rural areas are provided for in a sustainable and innovative manner. Agriculture will inevitably remain the major user of land however the need to sustain rural communities has focused attention on ways of improving and diversifying the rural economy. In rural areas it is difficult to match demand with supply, e.g. through advance provision of business premises, as many rural businesses are embryonic in nature. Therefore a positive policy approach to rural diversification initiatives will be taken where this is sustainable and contributes to general wellbeing.

Policy Context

LDP Objectives	1. Ensure communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly
	2. Encourage the development of town and district centres as the focus of regeneration
	8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors
	9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region
	10. Redefine the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport
	13. Promote and enhance a diverse and sustainable rural economy
	14. Support the provision of sustainable tourism development
PPW	7.1.2 consideration, provision and needs of the economy
	7.3.1, 7.3.2, 7.5.1 employment sites in rural areas
	7.3.3 farm diversification
Well Being Goals	A prosperous Wales
	A resilient Wales
Key Evidence	Technical Advice Note 6, Planning for Sustainable Rural Communities (2010)
	Technical Advice Note 23, Economic Development (2014)

	Flintshire Regeneration Strategy 2009 – 2020
	Deeside Plan (2017)
	Wrexham and Flintshire Employment Land Review Study
	Flintshire Further Employment Growth Scenarios Assessment
	LDP Topic Paper No. 8 Economy and Employment
	LDP Topic Paper No. 11 Retailing and Town Centres
	LDP Topic Paper No. 14 Rural Affairs
	LDP Topic Paper No. 18 Tourism
Delivery and Monitoring of Policy	The policy will be delivered by: To be confirmed
	The following indicators will be used to monitor policy effectiveness: To be confirmed
Detailed policies	 Policies referred to in STR8: Employment Land Provision Agricultural and forestry development Rural enterprise development Small Scale Farm Diversification

6.2 Policy STR8: Employment Land Provision

Strategic Policy STR 8

Employment Land Provision

A strategic and local supply of employment land will be identified to satisfy the County's employment needs. Economic development will be guided to the most appropriate locations by providing a range and choice of sites in terms of location, quality, type and size which will comprise:

- i. Land currently committed for employment uses;
- ii. Undeveloped land and existing premises within Principle Employment Areas;
- iii. Employment land allocations including two key strategic sites of sub-regional significance referred to in Policies STR3, and STR7;
- iv. The safeguarding of existing employment sites and premises, where they play an important role in meeting future economic needs;

Land and sites outside settlement boundaries, allocated sites, Principal Employment Areas which can deliver sustainable employment development through the re-use of suitable buildings and land.

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?

Explanation

- 6.2.1 It is important that the LDP supports and underpins the local and wider regional economic ambition by promoting a strategy that promotes growth beyond Employment Land Review estimates. The LDP also has a role in supporting higher value employment sectors which can result in a higher returns for businesses, higher wages for workers, job growth in the County and increased GVA for the local economy. It is essential therefore 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.
- 6.2.2 A robust review of existing sites alongside an assessment of the amount and the type of sites likely to be required over the Plan period was undertaken in order to determine whether existing sites are still capable of meeting the needs of modern employers. A Joint Employment Land Review with Wrexham CBC was commissioned to inform the Councils respective LDPs. The review assessed the supply, need and demand for employment land and premises (Use Class B) and found that the employment land supply in Flintshire was 223.94 ha. Historically the average long

term take up levels in Flintshire have been 12 ha a year but since 2000 the average take-up rate has reduced to just over 9 ha. Over the recession, less than 1 ha a year was taken up. Using the projected growth of employment in industry sectors as the main measure of future land needs for the period up to 2030 it was indicated that there was a minimum need for 1.9 ha/year or 28.50 ha overall. This shows that there is a substantial surplus of employment land in the County and thus there is no immediate need to identify new land allocations for B1, B2 and B8 uses in addition those previously allocated in the UDP.

- 6.2.3 As TAN23 notes, employment sites should only be retained if they are viable and deliverable. However after reviewing the suitability and viability of the sites in Flintshire's land supply the Review recommended that the Council should, be looking to protect (and in some locally specific circumstances increase) their land supply rather than release land for alternative uses to cater for future demand. The LDP will therefore seek to safeguard existing sites and premises where appropriate and necessary to ensure retention of the employment land portfolio and ensure that economic growth is not constrained by a lack of land.
- 6.2.4 The concept of Development Zone designations was rolled forward from the Alyn and Deeside Local Plan into the UDP but designations were rationalised to strategic areas in terms of their economic importance. They comprised the Deeside Development Zone; Airport Development Zone and Port Development Zone. However the policy approach to Development Zones was the same as that for Principal Employment Areas, with the latter being a policy and designation introduced in the UDP. Therefore in the LDP all areas of employment development, local or strategic, will be identified under the one term of Principal Employment Area.
- 6.2.5 Where demand for employment development falls outside settlement boundaries, employment allocations, or Principal Employment Areas the LDP will take a positive approach to proposals, provided it represents sustainable development. In assessing employment proposals the LPA will apply the sequential test where preference is given to locations within settlement boundaries, then edge of settlement sites, and finally land in the open countryside. Market forces do not always conform to land use designations or boundaries and accordingly the LDP needs to have a criteria based policy which caters for this. In rural areas the Plan will recognise that economic uses can bring benefits provided that they are sustainably located and where benefits outweigh any adverse impacts of the development.
- 6.2.6 Employment development in rural areas can make rural communities more sustainable by providing jobs closer to where people live, reducing the distance people travel for their work, and stemming the loss of economically active from rural areas. The locational requirements of businesses may also be very specific but opportunities should exist through the LDP for other forms of employment and economic activity such as tourism, leisure, services and facilities, and agriculture related. It is not always possible to identify those rural areas where the need for employment diversification will arise in the future. Therefore, rather than allocating specific employment sites where demand may never materialise, the LDP will set out criteria to assess small-scale enterprises and rural employment development proposals as and when they arise. The important role the re-use and adaptation of existing rural buildings has in meeting the economic needs of rural areas will be recognised with a positive approach to the conversion of rural buildings for employment re-use.

6.2.7 The Council also recognises that to support the level of growth proposed in the LDP, access and infrastructure improvements will be necessary during the Plan period to support and facilitate economic growth, including employment and housing provision.

Policy Context

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6.3 Policy STR9: Retail Centres and Development

Strategic Policy STR 9

Retail Centres and Development

Town Centre developments will be guided by the County Retail Hierarchy and the need for a robust sequential approach. This approach will seek to maintain and enhance the vibrancy, viability and attractiveness of Clint shire's town, district, and local centres, supporting the delivery of appropriate comparison and convenience retail, office, leisure, entertainment and cultural facilities.

Town and district centres will be the preferred location for new retail, leisure, office, social and other town centre uses. Major development will need to comply with the 'town centres first' principles within PPW.

Given the changing role of town centres, both town centre and core retail boundaries will be reviewed and drawn in recognition of the need for a degree of flexibility in maintaining occupancy and footfall, and to enable a tailored approach to be taken for each centre having regard to health checks, masterplans and action plans.

Question 11

Policy STR9: Retail Centres and Development

Policy STR9 seeks to support town, district and local shopping centres as multi-functional hubs for local communities. Do you have any comments to make on Policy STR9?

Explanation

- 6.3.1 The Preferred Strategy of the LDP includes a range of social, economic and environmental objectives relating to Flintshire's communities who use town and other service centres for a variety of purposes. Planning Policy Wales (PPW) recognises that the most appropriate location for retail and complimentary uses are within town and other local service centres. In essence they may be multifunctional in respect of retail, commercial, leisure and residential uses. The UDP sought to steer new development to town centres and thereby protect and enhance the viability and vitality of such locations and the businesses within them and this approach is carried over into the LDP.
- 6.3.2 Unlike some of our neighbours Flintshire does not have one principal town centre which functions as a major shopping destination, although the retail and commercial provision at Broughton Retail Park does perform a sub-regional role. Instead there are a number of towns (Main Service Centres) within the Plan area which have relatively small and sometimes overlapping shopping catchment populations such as Buckley and Mold. All of Flintshire's town centres compete both for food and comparison goods retail with the large shopping park at Broughton and retail draw from surrounding centres at Chester, Ellesmere Port and Wrexham.

- 6.3.3 Town centres are sometimes evolving centres of economic activity and are located in the heart of the County's largest towns serving community needs in the town and the wider catchment areas. Flintshire's town centres are important centres of employment that also provide access to shopping, food and drink and health facilities. There is variety in terms of their individual history and character and differences in role and function which suggests that it may be necessary to tailor the retail strategy to recognise their different functions. That said it is accepted that the town centres can be vulnerable to out of centre/out of town retail competition as well as to modern ways of shopping via the internet.
- 6.3.4 Amongst other things PPW requires Local Planning Authorities to identify a retail hierarchy for the Plan area. Consequently the "town centres first" principle in tandem with a sequential approach to the selection of sites will be used to promote town centres as the principal locations for new retail, office, leisure and health facilities. In doing so the aim will be to create more reasons why people should visit such centres with a resultant increase in social and economic activity thereby retaining its viability. The Retail Hierarchy is set out in the table below and comprises three tiers. The upper tier comprises the traditional Town Centres where there is a recognisable town centre and a wide range of uses such as retail, leisure, office, cultural and transport facilities. The middle tier comprises District Centres where there are distinct groupings of retail and other uses but on a smaller scale and with less variety and offer. The lowest tier is that of Local Centres which range from small shopping parades in residential areas to loose clusters of retail and other uses in village centres.
- 6.3.5 In many respects the biggest retail and leisure offering within the County is that of Broughton Shopping Park. This out of town shopping park has been omitted from the retail hierarchy in previous development plans, in order to reinforce its 'out of town' location and to prevent it attracting smaller scale retail and other uses which might compete with nearby defined centres, by controlling the scale and nature of retail and other proposals which arise. Nevertheless, 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.
- 6.3.6 TAN4 Retail and Commercial Development advises in para 4.6 'Out of centre retail parks whose development has been based solely on retailing should not normally be included in the local hierarchy'. The guidance then goes on to state 'However, this should not preclude these destinations being assessed against locally-set criteria on the range and choice of services and the scale and nature of the retail floorspace, to ascertain if, through time, these centres have matured into retail and commercial centres in their own right, offering the same level of service provision and being as accessible as traditional centres'. The guidance advises that this should be done as part of the development plan rather than in relation to specific development proposals.
- 6.3.7 In the context of this guidance it is evident from the above analysis of Broughton Shopping Park that its character, role and composition has changed over time. 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. A number of town centres have seen, for instance the loss of banks as smaller branches close. In this context there could be further scope for Broughton

Shopping Park to incorporate other uses which enable it function more akin to a town centre. The Shopping Park not only serves the needs of Broughton residents but also those of surrounding settlements and communities, as well as a large workforce at Airbus and nearby employers. Furthermore, the strategic mixed use allocation at Warren Hall offers the opportunity to further raise the profile of the settlement which lies adjacent to the Enterprise Zone and within the Growth Hub identified in the Wales Spatial Plan. 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 performing more like a traditional town centre at the 'heart' of a growing and vibrant community.

- **6.3.8** Core Retail Areas (CRA) have been used in the UDP to delineate the primary shopping areas where retail development is encouraged and non- A1 development is controlled to ensure the availability of premises for retailing. In recognising the dynamic changing trends in retailing such as increases in home delivery services and internet retailing can impact upon the role of town and other centres, the CRA policy and their associated boundaries will be reviewed to assess whether it is still an effective means of ensuring that a focus of retail uses is retained in key parts of Flintshire's town centres. The LDP will also identify whether there is a need for further retail development over the Plan period and how and where this can be provided for within the service centres through allocations. To facilitate this the Council will utilise its evidence base for example, health checks, retail capacity assessments and in particular existing town centre masterplans which have already been the subject of public consultation and which make proposals for town centres.
- **6.3.9** There are also a number of district shopping centres within the County as well as smaller local centres and in some instances village shops. All of these perform an important role for top up shopping particularly for those people without access to a car. Pubs can also provide an economic and social role as a hub of community activity.
- 6.3.10 The strategic policy will need to be read alongside STR5 Transport and Accessibility and STR7 Economic Development, Enterprise and Employment. It will also need to be supported by key detailed policies in the Deposit LDP relating to a hierarchy of town and other service centres, site specific retail proposals/allocations, safeguarding retail uses in town centres perhaps through the continued use of "core retail areas" and acknowledging the role of local facilities in suburban areas and the rural settlements.

Retail Hierarchy in Flintshire		
Town Centres	District Centres	Local Centres
 Buckley Flint Holywell Mold Shotton Broughton 	Connah's QuayQueensferrySaltney	 Bagillt – High Street Broughton – Broughton Hall Road Buckley – Lane End Caergwrle – village centre Caerwys – village centre Connah's Quay – Thornfield Avenue Connah's Quay – Englefield Ave

Retail Hierarchy in Flintshire		
Town Centres	District Centres	Local Centres
		 Connah's Quay – Ffordd Llanarth Ewloe – The Highway Ewloe – Holywell Road Flint – Northop Road Garden City – Welsh Road Greenfield – Parade Hawarden – village centre Holywell - Holway Hope – village centre Mostyn – Maes Pennant Mynydd Isa – The Square Penyffordd / Penymynydd – village centre Shotton – Aston Park Road Shotton – Central Drive

Policy Context

LDP Objectives	2. Encourage the development of town and district centres as the focus of regeneration
	3. Promote a sustainable and safe transport system that reduces reliance on the car
	10. Redefine the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport
PPW	10.2.1 Strategies and support for existing centres
	10.3.1 Establish a local retail hierarchy
	10.3.3 & 10.3.5 Encourage diversity of use requiring a flexible planning approach in centres
Well Being	A prosperous Wales
Goals	A resilient Wales
Key Evidence	Technical Advice Note 4 Retailing and Town Centres (1996)
	Technical Advice Note 23 Economic Development (2014)
	Flintshire Town Centre Surveys and Health Checks (2003 and 2008)
	Flintshire Retail Capacity Assessment (2010)

	Buckley Masterplan (2011)
	Connah's Quay & Shotton Masterplan (2010)
	Deeside Plan (2017)
	Flint Strategy and Masterplan (2012)
	Holywell Town Centre Assessment (2010)
	Queensferry Streetscape Enviornmental Improvements and Design Guidelines (2010)
	Mold Sense of Place Study (2010)
	Mold Town Plan (2017)
	Mold Strategic Sites Assessment (2014)
	Annual Town Centre Benchmarking Reports (2011 – Present)
	LDP Topic Paper No 11 – Retailing and Town Centres
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed	Retail hierarchy of defined town, district and local centres
policies	Retail / Commercial allocations and designations
	New major retail development
	Small scale local retail development (within and outside settlement boundaries)
	Core retail areas
	Conversion of Upper floors
	Retention of Local Facilities
	Hot food takeaways
	Retail allocations
	Retention and provision of local facilities (single policy incorporating existing similar community facilities policy)

6.4 Policy STR10: Tourism, Culture, and Leisure

Strategic Policy STR 10

Tourism, Culture, and Leisure

The intrinsic attractiveness of Flintshire's natural and built environment makes the County an attractive destination for sustainable tourism development. Development that capitalizes on these assets and creates a year round broad appeal will be supported.

Particular emphasis will be placed on:

- i. Supporting new and extended tourism development which is appropriate to its location and enhances the existing offer within Flintshire;
- ii. Support development that promotes accessibility to Flintshire's landscape, cultural and historic assets, including the Clwydian Range AONB, coastline, rights of way, cycling and active travel networks;
- iii. Promote and enhance the maintenance and diversification of a sustainable rural economy;
- iv. Conserving and enhancing Flintshire's natural, built and cultural heritage;
- v. Enabling a range and choice of tourism accommodation to meet a variety of needs from short visit to long stay.

Question 12

Policy STR10: Tourism, Culture, and Leisure

Policy STR10 sets out a number of principles to be applied in considering different tourism, leisure and cultural development proposals. Do you have any comments to make on Policy STR10?

Explanation

6.4.1 Tourism has a key role to play in the economy of Flintshire and in particular it is important in supporting and diversifying rural communities and the rural economy. The aim of the Welsh Government is for 'tourism to grow in a sustainable way and to make an increased contribution to the economic, social and environmental well-being of Wales' (Para 11.1.2 PPW 2016). Tourism in Flintshire covers a range of attractions, such as; historic market towns like Mold and Holywell/ Greenfield Valley, coastal caravan holidays at Talacre, walking and cycling along the coastal path or more active pursuits throughout the AONB. In terms of cultural identity and cultural attractions, Flintshire has a relatively small but strong and distinctive Welsh community. This cultural identity manifests itself through the demand for Welsh language education, a wide variety of Welsh language or bilingual community groups and events throughout the year from the Cadi Ha Springtime Festival in May to the Taith y Far Llwyd in December and many more in between.

- 6.4.2 Tourism has the potential to increase economic activity, assist regeneration and conservation, and raise general health and well-being. There can also be some negative impacts of tourism, as a result of visitor pressure, in terms of traffic congestion, harm to sensitive natural environments (for example in undeveloped coastal areas and protected areas), and to local communities. Policies in the deposit LDP will aim to direct tourism development to locations to avoid such impacts or seek to control development to reduce negative impacts.
- **6.4.3** The LDP will provide the framework for the provision and protection of well-located, good quality, tourism, sport, recreation and leisure facilities and to diversify tourism in the County. The LDP will seek to ensure that proposals for new tourism related development are located in sustainable and accessible locations and that local communities are not adversely affected.
- 6.4.4 Any proposed development for tourism, sport and recreation uses located on previously used land will be encouraged where appropriate. All proposed development must be appropriate to its location and surrounding environment and not have negative landscape or environmental impact with particular regard to the Clwydian Range Area of Outstanding Natural Beauty (AONB) and European Designated Sites. Development which is likely to generate high levels of traffic and which is more akin to retail development, should be located within town centres where possible. Unlike housing or employment uses, it is more difficult to allocate land for specific tourism /leisure uses as the industry is more trend based and footloose. The plan will adopt a flexible policy based approach where the general principles in this policy are supplemented with more detailed criteria based policies in the deposit Plan.

Policy Context

LDP Objectives	13. Promote and enhance a diverse and sustainable rural economy
	14. Support the provision of sustainable tourism development
	18. Promote good design that is locally distinct, innovative and sensitive to location
PPW	Paras 5.4.1 to 5.4.6 Conserving and Improving Natural Heritage and the Coast
	Para 6.2.1 Historic Environment
	Para 7.5.1 Economic Development
	Paras 11.2.1 to 11.2.7 Tourism, Sport and Recreation
Well Being Goals	A Wales of cohesive communities
	A Wales of vibrant culture and thriving Welsh Language
Key Evidence	Flintshire Tourism Strategy

	Active Travel Survey,
	Topic Paper 1 - Biodiversity and Nature Conservation,
	Topic Paper 3 - Built and Historic Environment,
	Topic Paper 4 - Open Space,
	Topic Paper 14 - Rural Affairs,
	Topic Paper 18 - Tourism,
	TAN 5 Nature Conservation and Planning.
	TAN 6 Planning for Sustainable Rural Communities
	TAN 13 Tourism
	TAN16 Sport Recreation and Open Space
Monitoring	The following indicators will be used to monitor policy effectiveness:
Monitoring	
	tbc:
Detailed policies	Tourism attractions
	Serviced and Self- Catering Tourism Accommodation
	Caravan Tourist Accommodation/ Caravan Development in Talacre / Gronant / Gwespyr.
	Static caravan and chalet development
	Touring caravan and camping site
	Occupancy conditions
	Greenfield Valley
	Sports, recreational and cultural development
	Development and Green Infrastructure
	Welsh Language and Culture

7 Meeting Housing Needs

Introduction

- **7.0.1** This section of the Preferred Strategy focusses on meeting housing needs both as a need in itself, generated from changing population characteristics, and also from the perspective that housing is an important part of the support infrastructure necessary to achieve the Council's economic ambitions. The range of policy responses to this need will include sustainable provision for both market and affordable housing, as well as the provision of accommodation for the gypsy and traveller community.
- **7.0.2** Housing is central to people's lives. Quality, affordable housing contributes directly to community cohesion and sustainability, and to people's health and well-being. The LDP Preferred Strategy aims to strike the right balance between sustainability, community cohesion and growth, by directing the right amount and type of new housing development to the most sustainable sites and settlements. This will be balanced with the significant amount of sustainable commitments that the County already has within the land bank, which need to come forward and deliver the homes they are intended for.
- **7.0.3** The delivery of new housing is the responsibility of housing developers and it is the role of the LDP to ensure that sufficient provision of sites is made to meet a genuine demand from the industry, in the most sustainable and viable locations. This includes the need to ensure that the infrastructure is in place, or can be provided, to accommodate development and also that the impacts that development can have on communities is properly assessed and mitigated through the provision of developer obligations.
- 7.0.4 In setting out to achieve this, the LDP Strategy draws from a number of sources or key drivers which include demographic trends at work in Flintshire, an economic ambition to recover from recession and create jobs, the evidence of need for affordable housing set out in the Local Housing Market Assessment, and the Flintshire Local Housing Strategy. The latter focusses on three related themes:
 - More housing more choice increasing the supply and variety of affordable and specialist needs housing in Flintshire, including flexible ways to access these;
 - Improving homes and communities improving housing quality standards and energy efficiency of housing
 - Better services to improve people's lives assist people with specific housing needs to access quality affordable housing.
- 7.0.5 The Council commissioned a Local Housing Market Assessment jointly with its Wrexham County Borough Council neighbours in 2015. For Flintshire, this identified a need for 246 affordable units per annum (over the life of the assessment), for both social rented and intermediate affordable tenures. This evidence will inform the development of detailed policies for affordable housing in the deposit LDP, that will consider the appropriate level of affordable housing to be sought via the planning system, including viable thresholds and proportions, as well as the contribution from other sources including the Registered Social Landlords and the Council's own

initiatives, specifically the Strategy Housing And Regeneration Programme (SHARP) where the delivery of 500 new council affordable homes on surplus Council land is already underway.

7.0.6 In this section of the Preferred Strategy this will be achieved via the following policies:

- STR11 Provision of Sustainable Housing Sites
- STR12 Provision for Gypsies and Travellers

7.1 Policy STR11: Provision of Sustainable Housing Sites

Strategic Policy STR 11

Provision of Sustainable Housing Sites

As part of implementing the Sustainable Settlement Hierarchy, and to ensure that communities have access to sufficient, good quality, affordable housing to meet a range of needs and support economic growth, new housing will be directed to sustainably located, economically viable and deliverable housing sites.

The delivery of new housing on these sites will be expected to:

- i. Facilitate the provision of affordable housing relative to local needs and viability;
- ii. Making the most efficient use of land through appropriate density of development;
- iii. Provide balanced developments through a mix of housing units;
- iv. Make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units;
- v. Provide or contribute to physical, environmental and social infrastructure necessary to integrate new development into communities;
- vi. Ensure in rural areas, that genuine and proportionate needs for housing are met in a sustainable manner.

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. 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 sites.

Question 13

Policy STR11: Provision of Sustainable Housing Sites

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. Do you have any comments to make on Policy STR11?

Explanation

- 7.1.1 A home is a vital part of people's lives as it affects their health and well-being, quality of life and the opportunities open to them. The Welsh Government's approach, set out in the National Housing Strategy is to: provide more housing of the right type and offer more choice; improve homes and communities, including the energy efficiency of new and existing homes; and improve housing-related services and support, particularly for vulnerable people and people from minority groups.
- **7.1.2** A key function of the Plan is to provide an appropriate and sustainable supply of housing land. PPW and TAN1 specifically requires that the Council secures and maintains a 5 year supply of housing land. Para 9.2.3 of PPW states '*This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live*'.
- 7.1.3 As set out in STR1 the Plan seeks to meet a requirement of 6,950 dwellings by making provision for 7,645 units, through applying a 10% flexibility allowance. This requirement will be met in practice through a variety of sources of supply. This will include commitments (existing planning permissions) that are genuinely capable of being delivered, new allocations and realistic allowances for windfalls (unidentified small and large sites coming forward during the Plan period). Of the new allocations policy STR3 identifies two key strategic mixed use allocations and the remainder will be small to medium allocations which will be in the Deposit Plan. This mix of delivery, and the lack of over-reliance on strategic sites, backed up by evidence from developers relating to viability and deliverability, will enable a 5 year supply being secured and maintained. The deposit Plan will contain a housing trajectory setting out how and when housing will be delivered through the Plan period.
- 7.1.4 An indicative Housing Balance Sheet is set out below which shows how the Plan's housing requirement figure is to be met through a mix of commitments, completions to date, allowances for small sites and windfalls, strategic allocations and detailed allocations. This is indicative at present and will be refined as the Plan progresses.

Element	Amount	Notes
REQUIREMENT	7645	Housing requirement for 2015-2030 (6950 + 10% flexibility)
Less completions:	1	
2015-16	662	
2015-17	421	
Total completions	1083	Both figures include large sites and small site completions.
Revised Requirement:	6562	
Less commitments	2055	This reflects a review of sites whereby only sites with planning permission as at 01/04/17 which are considered to be realistically capable of development, are included (large sites only).
Revised Requirement:	4507	
Less Allowances:		
Small sites allowance (<10 units) 60 pa	780	Small sites allowance is calculated on the basis of the remaining 13 years of the Plan period. An allowance of 60 units per annum (as per UDP) has been included which is a conservative estimate based on an average small sites completions figure of 121 over the last 17 years (allowance is an indicative figure until results of Urban Capacity Study are known)
Windfall allowance (>10 units) 50 pa	650	Windfalls allowance (large sites) is calculated on basis of the remaining 13 years of the Plan period. An allowance of 50 units per annum (as per UDP) has been included (allowance is an indicative figure until results of Urban Capacity Study are known)
Total Allowances	1430	
Residual Requirement	3077	
LDP Strategic Allocations	1625	Includes Northern Gateway 1325 units and Warren Hall 300
New allocations Requirement	1452	
LDP Allocations		To be confirmed in Deposit Draft Plan

- **7.1.5** The policy highlights that new housing will be distributed in accordance with the settlement hierarchy (STR2) to sustainable locations and settlements having regard to accessibility, services, facilities which can support economic growth areas. The aim is to ensure that communities have access to sufficient, good quality, affordable housing to meet a range of needs by ensuring that new housing is economically viable and deliverable.
- **7.1.6** In identifying allocations in the Deposit Plan a site search sequence will be followed in line with the advice in para 9.2.8 of PPW '... starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links'. Regard also has to be had to the criteria in para 9.2.9 of PPW in terms of deciding which sites to allocate.
- 7.1.7 The delivery of affordable housing will be an integral part of the general provision of housing in the Plan. The Local Housing Market Assessment identified a need of 246 units per annum and consideration will be given in the Deposit Plan as to what affordable housing target the Plan sets, recognising that the LDP will not be the only delivery mechanism for bringing about affordable housing. The Deposit Plan will also contain detailed policies on thresholds at which development will be required to provide affordable housing and the quotas to be applied within different housing market areas, having regard to viability considerations.
- 7.1.8 As a general principle, in line with PPW, the Plan will seek to ensure that the most efficient use is made of land. The role of the Plan will be to set a housing density which is challenging but which is also sympathetic in terms of not harming the amenity standards of residents nor harming the character and appearance of the locality. More detailed advice on density will be in the Deposit Plan. Alongside achieving the highest appropriate density on a development will be securing an appropriate mix of housing on developments in terms of house types and sizes. For instance the Local Housing Market Assessment identifies a need for smaller two bedroom properties and three bedroom properties and this needs to be balanced against developer preferences for 4 bedroom dwellings. This well help work towards achieving inclusive, balanced cohesive communities.
- 7.1.9 In circumstances where a need has been established and on appropriate sites, new development will also be required to provide for more specialist needs housing. In particular to take account of the ageing population and the strong messages about the need for bungalows or other forms of housing suited to meeting the general housing needs of elderly residents or more specialist forms of accommodation such as sheltered housing. However, it would not be appropriate to for this to be required on every site and development as this will depend on the location of the site, the type of development and whether a need exists.
- 7.1.10 As set out in policy STR6 the Plan will seek to ensure that appropriate and necessary infrastructure will be secured alongside new development. Para 9.2.1 of PPW advises that in planning the provision for new housing, local planning authorities must take account of the capacity of the existing or planned infrastructure.

- 7.1.11 A significant part of the County is rural in character with a large number of small settlements. The revised settlement hierarchy seeks to take a more sensitive approach to categorising settlements based on their relative sustainability. The Plan's spatial strategy seeks to accommodate the majority of built development in the upper three tiers of the settlement hierarchy but recognises the need for smaller scale development to take place in rural settlements. The focus will still be on meeting local needs housing i.e. for specific rural enterprise based needs or for affordable housing, but additional flexibility will be built into detailed policies to allow for potential 'cross subsidy' on windfall sites by small amounts of market housing.
- 7.1.12 In addition to affordable housing being delivered through LDP mechanisms, which will be elaborated on in the Deposit Plan, the Council is also delivering affordable housing through a variety of other initiatives and projects. Principal amongst these is the Strategic Housing and Regeneration programme whereby the Council is working with a preferred development partner Wates Residential to build innovative new affordable homes. The scheme will deliver 500 new homes across the County by 2021 of which 300 will be affordable rent (owned and managed by North East Wales Homes Ltd) and 200 social rent (managed by FCC).

Policy Context

LDP Objectives	 11. Ensuring that Flintshire has the right amount, size, and type of housing to support economic development and to meet a range of housing needs 12. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure
PPW	Para 4.7 Sustainable Settlement Strategy: locating new development
PPW	
	Para 9.2 Development Plans and new housing provision
Well Being Goals	A more equal Wales
	A globally responsible Wales
Key Evidence	Local Housing Market Assessment
	New Housing Occupancy Survey
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed policies	Housing allocations
	Density and mix

New housing on unannotated land (replacement HSG3?)

Affordable housing

Rural enterprise dwellings in open countryside

Other dwellings in open countryside (replacement, conversions, infill)

House Extensions and Annexes

7.2 Policy STR12: Provision for Gypsies and Travellers

Strategic Policy STR 12

Provision for Gypsies and Travellers

The accommodation needs of Gypsies, Travellers and Travelling Showpeople will be assessed and addressed appropriately, as part of Flintshire's overall needs for housing.

Under the duty identified in the Housing Act (Wales) 2014, Flintshire has assessed the future accommodation needs which will form the basis for the provision of suitable policies in the Deposit Plan. These will include as appropriate, site specific provision of socially rented and private pitches, extension of existing private sites, provision for transit and stopping places, and a criteria based policy to judge the appropriateness of planning applications for new sites.

The Council will seek to work with neighbouring Authorities on key travelling routes, to ensure that the wider regional needs of Gypsies and Travellers are being consistently and responsibly met.

Question 14

Policy STR12: Provision for Gypsies and Travellers

Policy STR12 sets out the approach taken in providing for the needs of gypsies and travellers. Do you have any comments to make on Policy STR12?

Explanation

- 7.2.1 The accommodation of Gypsies and Travellers is often a contentious issue, not just in Wales but UK wide. Nevertheless an important role of planning is to ensure accessibility for all members of the community to key facilities such as housing, health, education and leisure. When making provision for housing the LDP will need to recognise, where they exist, the specific accommodation needs of Gypsies and Travellers. These groups follow a particular way of lifestyle often associated with travelling. A common perception is that there are insufficient sites for people who wish to pursue a nomadic lifestyle. North Wales is a popular location for "stop overs" for Gypsies and Travellers as a principal travelling route passes through all the local authority areas in North Wales.
- 7.2.2 Part 3 of the Housing (Wales) Act 2014 places a duty on all local authorities to assess the accommodation needs of gypsy families by undertaking a Gypsy and Traveller Accommodation Assessment (GTAA). In recognition of this National Planning Guidance requires LDP's to make adequate provision for the unmet accommodation needs of gypsy and traveller families. To meet this duty the Council commissioned a GTAA study and to assist in identifying the housing needs from across Flintshire.

7 Meeting Housing Needs

- 7.2.3 The GTAA data will be used to identify the number of Gypsy and Traveller households which require additional pitches, within five years and over the Development Plan period. Across Flintshire, there is one Local Authority site, six private authorised sites, one private temporary authorised site and three unauthorised sites. Two of the authorised sites are currently being redeveloped.
- 7.2.4 The GTAA identifies an unmet need over a 5 year period of -5 units and over the Plan period an unmet need of 19 pitches. Greater clarity should emerge over the exact number of pitches to be provided by the Plan in terms of progress over a number of existing sites and planning applications. The Study also identified the need for a small site for transit provision. No need for pitches for travelling showpeople was identified in the Study and any need that does arise over the Plan period can be assessed against a criteria based policy.
- 7.2.5 In relation to this evidence of need, there are a number of ways in which the Council can make provision to meet that need. This can either be achieved through extending existing sites or the LDP can allocate a new site(s). In addition the Plan can include specific policies to facilitate the provision of sites. In any event criteria based policies will be required in the LDP whether or not there is any current need identified in Flintshire, in order to meet any future or unexpected demand.
- **7.2.6** Site and service provision to Gypsies and Travellers in Flintshire is the responsibility of a number of Council directorates (education, housing and environment) together with external partners and stakeholders. The Council will work with its partners and neighbouring authorities over the Plan period to ensure appropriate accommodation for Gypsies and Travellers is provided within the County. In identifying sites for allocation, or dealing with subsequent proposals, the ability of gypsies and travellers to access service and facilities will be important in terms of ensuring cohesive communities.

Policy Context

LDP Objectives	 Ensure communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly Create places that are safe, accessible and encourage and support good health, well-being and equality Ensuring that Flintshire has the right amount, size, and type of housing to support economic development and to meet a range of housing needs Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure
PPW	9.2.21 Accommodation needs of Gypsy families

7 Meeting Housing Needs

Well Being Goals	A more equal Wales			
Key Evidence	Housing (Wales) Act 2014			
	Welsh Assembly Government Circular 30/2007 – Planning for Gypsy and Traveller Caravan Sites			
	Flintshire Gypsy and Traveller Accommodation Assessment 2016			
	LDP Topic Paper No 10 – Population, Household Growth and Housing			
Monitoring	The following indicators will be used to monitor policy effectiveness:			
Detailed policies	Allocated site(s) for Gypsy and Traveller Accommodation			
	Criteria based policy for new sites			

8 Valuing the Environment

Introduction

- 8.0.1 Flintshire has a high quality natural and built environment which is one of its primary assets, assisting in the process of protecting important biodiversity and habitats, attracting investment and promoting Flintshire's image as a tourist location and sustainable place to live and work. Clearly it also plays a key role in the health and well-being of its communities. Protecting and enhancing the material, natural and historic resources which make Flintshire special is key to the role the Local Development Plan will play, and is particularly important in the context of climate change.
- 8.0.2 The County contains significant areas of international and national statutory environmental designations, as well as many sites of local wildlife importance, which the plan will identify to ensure their protection and where possible, enhancement. In places, important towns, urban areas and employment uses sit side by side with these sensitive assets, and where development needs to happen in proximity to this context, the Plan will ensure that all reasonable steps are taken to balance the need for protection, whilst providing for sustainable economic growth and development.
- **8.0.3** The Plan must also seek to reduce the causes and adapt to the consequences of climate change and will take careful note of issues such as flood risk, the need for greater energy efficiency in development, sustainable water management, and reducing the need to travel by car in planning for the location of development safely and sustainably.
- **8.0.4** The Plan also has an important role to facilitate the provision of sustainable waste management facilities that allow the waste we generate to be managed as high up the waste hierarchy as possible.
- 8.0.5 Flintshire is also a key location for important mineral resources that are important not only in a local or regional economic sense, but nationally, as these resources can only be worked where they occur. As part of the wider regional assessment of supply, on top of reserves Flintshire currently has, a relatively modest additional provision will need to be identified in the LDP to maintain the contribution the County makes.

8.1 Policy STR13: Natural and Built Environment, Green Networks and Infrastructure

Strategic Policy STR 13

Natural and Built Environment, Green Networks and Infrastructure

Environmental networks can, and do, have a variety of roles in protecting and enhancing biodiversity, defining the landscape setting of places, defining the transition from urban to countryside, and facilitating well-being through amenity, recreation and active leisure. The key is to balance these sometimes conflicting roles, achieving a sustainable balance.

Development will identify, respect, protect, enhance and connect Flintshire's environmental assets, to create a multifunctional network of natural and historic resources.

To achieve this all development will:

- i. Protect open countryside and the undeveloped coastline
- ii. Protect the open character and appearance of green wedges
- iii. Protect and enhance the quality and diversity of Flintshire's natural, built, and historic environmental networks;
- iv. Promote opportunities to enhance biodiversity;
- v. Maintain, enhance, and contribute to green infrastructure;
- vi. Create and protect green spaces and open space / play environments that encourage and support good health, well-being, and equality;
- vii. Contribute to local distinctiveness having regard to the quality of Flintshire's landscape, biodiversity, and heritage assets including the Dee Estuary and Clwydian Range AONB;
- viii. Not adversely affect the conservation status of Flintshire's natural, built and historic environments;
- ix. Make financial contributions where appropriate, to facilitate and maintain the favourable conservation status of key environmental assets;
- x. Support measures to minimise the consequences of climate change
- xi. Protecting playing fields and open space from development: and
- xii. Ensuring adequate new open space and playing fields are provided as part of new housing development.

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?

Explanation

- 8.1.1 This policy covers a wide range of differing, but often inter-connected, elements of the natural and built environment in Flintshire. Achieving an environment that is both attractive and ensures the protection and enhancement of the historic and natural environment requires an understanding of the issues involved and needs to take a long term holistic view.
- 8.1.2 This policy recognises the intrinsic character and beauty of the countryside and coastline of Flintshire, and aims to conserve and enhance the natural environment and local landscape. It also aims to protect natural features and green spaces within urban environments. One way of doing this is to protect and enhance green infrastructure. This is a network of green spaces in both urban and rural areas, which are capable of delivering a wide range of environmental benefits. It can include parks, open spaces, playing fields, woodlands, allotments and gardens, as well as land along water courses and hedgerows. Many of the elements which make up green infrastructure also help improve the quality of life and well-being of communities and it is important that these individual elements are also protected and new facilities such as allotments and playing fields are provided.
- 8.1.3 Linked into the protection of the green infrastructure is the protection and enhancement of biodiversity, which includes wildlife and habitats. This is a core theme which supports the sustainable development principle and the protection of some species is enshrined in law. Development should be undertaken in a way that respects designated nature conservation sites and ensures the protection and enhancement of the diversity and abundance of wildlife habitats and protected species. It should also conserve and enhance natural resources such as geodiversity, and water, soil and air quality.
- 8.1.4 All of the above have a role to play in minimising the causes of climate change and to mitigate the effects of it. For example, the planting of trees in river basins can reduce run off and therefore reduce flooding further downstream.
- 8.1.5 In terms of the historic environment, the conservation of historic assets is essential, and these assets can range from historic landscapes and castles through to smaller features such as water pumps which provide a sense of history and character to places. The archaeology of the area is also important and Flintshire's long and interesting history means that there are many important archaeological sites and features which are known about, and many which have not yet been discovered. Historic assets are irreplaceable resources and their conservation provides social, cultural, economic and environmental benefits. Historic assets include listed buildings, conservation areas, historic parks, gardens and landscapes, and also many undesignated assets which provide character to the area. They are not only affected by change and neglect, but also by changes to their setting and this is an important consideration in making decisions on proposals which affect this. The historic environment can also be susceptible to the impacts of climate change and taking action to minimise the potential damaging effects of this is essential. Development which affects the historic environment should enhance and protect both historic assets and their settings. Taken together, the various elements which make up the natural and built environment can ensure that local distinctiveness, character and sense of place are retained, or created in new developments.

8.1.6 The Plan will seek to ensure that existing playing fields and open space are protected from development. Furthermore, as part of new residential development, open space and play facilities will be required to be provided of a scale and type related to the location, scale and type of development. This links in with ensuring distinctive and high quality residential environments which provide the basis for play and healthy lifestyles.

Policy Context

LDP Objectives	17. Maintain and enhance green infrastructure networks			
	18. Promote good design that is locally distinct, innovative and sensitive to location			
	19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land			
PPW	4.8 – Green Wedges			
	Chapter 5 – Conserving and Improving Natural Heritage and the Coast			
	Chapter 6 – The Historic Environment			
	11.1.3 – Sport and Recreation			
	11.1.11 & 11.2.3 Protection of Open Space			
Well Being Goals	A healthier Wales			
Godis	A Wales of vibrant culture and thriving Welsh Language			
	A globally responsible Wales			
Key Evidence	Welsh National Marine Plan: Draft Nov 2015			
Monitoring	The following indicators will be used to monitor policy effectiveness:			
	tbc			
Detailed Policies	Protection of open countryside			
	Green wedges			
	Undeveloped coast			
	Landscape and built form character			
	Green spaces			

Open / Play space / outdoor recreation – provision and protection Allotments Dee Estuary Corridor AONB Biodiversity Trees woodlands and hedgerows Listed buildings Conservation areas Buildings of local interest / traditional buildings Archaeology Registered Landscapes, Parks and Gardens of Special Historic Interest

8.2 Policy STR14: Climate Change and Environmental Protection

Strategic Policy STR 14

Climate Change and Environmental Protection

The Council will seek to mitigate the effects of climate change and ensure appropriate environmental protection in the County through:

- i. Ensuring new development is sustainably located and designed so as to reduce the need for travel by private car;
- ii. Supporting the use and development of appropriate or suitable brownfield land;
- iii. Adopting a sustainable approach to water resource management including supply, surface water run-off and waste water treatment;
- iv. Directing development away from flood risk areas, assessing the implications of development in areas at risk of flooding and ensuring that new development does not increase the risk of flooding elsewhere;
- v. Encouraging energy efficient development, environmentally acceptable renewable and zero / low carbon energy generation and combined heat and power and communal / district heating networks;
- vi. Ensuring that new development has regard to the protection of the environment in terms of air, noise and light pollution, unstable and contaminated land and former landfill sites;
- vii. Design of development to be adaptable and resilient to future effects of climate 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?

Explanation

8.2.1 One of the themes embodied in the Wellbeing of Future Generations Act is the need for 'a resilient Wales' whereby there is capacity to adapt to change such as climate change. A key principle of sustainable development, as recognised in PPW is 'tackling climate change by reducing the greenhouse gas emissions that cause climate change and ensuring that places are resilient to the consequences of climate change'. Welsh Government advises that 'climate change will have potentially profound environmental, economic and social justice implications and failure to address it will make planning for sustainability impossible'.

- 8.2.2 Climate change is being experienced in many forms. Typical 'events' include increasingly intense rainfall, more severe storms, rising sea levels and increasing average temperatures. These have a number of effects including flash flooding and storm damage, changes to landscape and wildlife habitats and the health impacts of increasing average temperatures. Parts of Flintshire are particularly vulnerable to the effects of climate change particularly along the Dee Estuary and R. Dee where there is the risk of flooding but there are also more localised risks to property and life as a result of fluvial and surface water flooding.
- 8.2.3 The planning system has a role to play in planning to minimise the underlying causes of climate change and planning for the consequences of climate changes. A key role of the LDP is to put in place 'resource efficient and climate change resilient settlement patterns that minimise land take and urban sprawl' (PPW 4.4.3). Put simply this means locating development in settlements which are accessible to a range of services and facilities whereby people can reduce private car usage and thereby reduce the harmful effects of carbon emissions. The development of brownfield land, where suitable, can also have reduce the need for greenfield sites to be developed.
- 8.2.4 As set out above a key effect of climate change is the risk of flooding and this brings with it issues relating to the likelihood of flooding as well as the intensity of flooding. The Development Advice Maps accompanying TAN15 identify the flood risk zones as set out in the TAN and this is being supplemented by a Strategic Flood Consequences Assessment. This information will have an important influence on where development allocations will be located, along with the type of development, and will also inform policies on flood risk whereby subsequent development proposals, in the form of planning applications can be assessed. The approach of the Plan will be to steer highly vulnerable development away from flood risk areas, to assess the implications of development in areas at risk of flooding and to ensure that new development does not increase the risk of flooding elsewhere. Neither of the strategic sites involve areas of C2 flood risk and whilst Northern Gateway is within a C1 flood risk area, this has been and will be mitigated through the recent flood defence strengthening and raising along the R. Dee and on-site drainage mitigation measures. A Strategic Flood Consequences Assessment will inform the identification and assessment of subsequent housing allocations.
- 8.2.5 It is also necessary for the Plan to have regard to the whole water environment as an important resource. Ensuring a reliable water supply is an important component of everyday life but needs to be balanced with effects on ground water and surface water in terms of levels and quality and any associated ecological effects. In locating and designing new development it is also necessary to ensure that the waste water network and treatment capacity is adequate to serve development and to ensure that surface water run-off from new development is adequately managed.
- 8.2.6 The principles of energy efficiency measures and renewable energy are now incorporated into Building Regulations. However, the LDP needs to ensure that new development has regard to broader principles of sustainable design in order to reduce energy usage and carbon emissions. The Plan will also encourage, where appropriate renewable energy generation technology, subject to a range of material planning considerations. An assessment of the potential for renewable energy generation, using the Welsh Government Toolkit, will inform the Deposit Plan in terms of specific

areas of search or the potential for particular types of renewable and low / zero carbon energy. Such policy approaches can also help ensure that new development is designed to be resilient to future climate change effects.

8.2.7 The County has an industrial heritage which has resulted in large areas of brownfield land and associated environmental risks such as contamination and pollution. Parts of the County also experienced coal mining and this has left a legacy of potential risks associated with unstable land. Landfill operations have taken (and continue to take) place, resulting in problems associated with leachates and gas emissions. The Plan therefore recognises the need to have regard to environmental protection and this will be set out more fully in subsequent detailed policies. These policies will also address general environmental protections associated with noise, air, water and light pollution.

Policy Context

LDP Objectives	 14. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure 5. Minimise the causes and impacts of climate change and pollution 19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land
PPW	Para 4.5 Planning for Climate Change
	Para 4.7 sustainable settlement strategy: locating new development
	Para 4.9 Preference for the re-use of land
	Para 12.3 Development plans and water
	Para 12.9 Development plans and renewable and low carbon energy
	Para 13.2 Flood risk and climate change
	Para 13.3 Development plans and flood risk
	Para 13.6 Development Plans and Contaminated land
	Para 13.8 Development Plans and Unstable land
	Para 13.11 Development Plans and improving the quality of air and water
	Para 13.14 Development Plans and noise and lighting
Well Being	A globally responsible Wales
Goals	A healthier Wales

	A resilient Wales
Key Evidence	TAN 15 Development and Flood Risk (2004)
	Development Advice maps (TAN15)
	Flintshire Local Flood Risk management Plan (2015)
	Dee Catchment Flood management Plan (2010)
	NW England and N Wales Shoreline Management Strategy
	Welsh Water Surface Water Management Strategy
	Strategic Flood Consequences Assessment (emerging)
	Topic Paper 2 - Flooding and environmental protection
	Topic Paper 15 - Energy
Monitoring	The following indicators will be used to monitor policy effectiveness:
	tbc
Detailed policies	Renewable Energy (solar, wind etc)
	Management of Water resources
	Flood risk
	Unstable and contaminated land and landfill sites
	Environmental Pollution

8.3 Policy STR15: Waste Management

Strategic Policy STR 15

Waste Management

The LDP will facilitate the sustainable management of waste by:

- i. Securing opportunities to minimise the production of waste in all development and ensuring the sustainable management of waste once it has been produced;
- ii. Supporting proposals for waste management which move the management of waste up the waste hierarchy;
- iii. Supporting proposals which reduce the impacts of existing waste management on communities and the environment;
- iv. Directing new waste management facilities towards existing and allocated industrial sites which are suitable for waste management facilities;
- v. Recognising that some types of waste facility may need to be located outside development boundaries;
- vi. Protecting strategically important sites through the use of buffer zones where necessary; and
- vii. Encouraging the co-location of heat producers and the development of heat networks through the identification of appropriate sites.

Question 17

Policy 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?

Explanation

- 8.3.1 Waste reduction is a cross cutting issue and opportunities to prevent or reduce the generation of waste should be made in all development, in line with guidance in PPW paragraph 12.6.3. Despite efforts to encourage waste reduction at the national level, there are still significant quantities of waste being produced within the County. Taking a 'circular economy' approach at the design stage would help minimise the use of resources and ensure that they can be reused in future.
- 8.3.2 Flintshire accommodates a range of waste facilities across the waste hierarchy with a number of facilities which are of strategic importance, including Parc Adfer, which will manage North Wales local authority collected residual waste. The sustainable management of waste can bring economic benefit and given Flintshire's location in the sub-region, it is well located to accommodate strategic facilities which serve a wider area. It is important, however, that provision does not compromise the amenity

enjoyed by communities through careful location and siting of new facilities or result in the overprovision of disposal and recovery capacity since this may encourage wastes being managed further down the waste hierarchy than they could be.

- 8.3.3 National policy and guidance has moved away from requiring LDPs to identify prescriptive land areas for waste management and now requires that waste management needs are considered as part of wider employment land surveys. Any specific needs of Flintshire as a Waste Collection and Disposal authority and any need arising from local authority procurement programmes should also be considered. There is no identified need for further recovery or disposal infrastructure within the County given the progress which has been made in terms of Parc Adfer which will manage residual waste from across North Wales and the AD facility developed at the Waen in Denbighshire which manages food waste arising in Flintshire, Denbighshire and Conwy. Planning permission has also been secured and is in the process of being implemented for landfill at Parry's Quarry. Therefore, no strategic allocations for waste management are identified within the LDP.
- 8.3.4 Flintshire has met its statutory recycling targets, landfill allowance scheme targets and Parc Adfer will enable targets for landfill diversion to be met when it becomes operational in 2019. The majority of wastes arising in Flintshire are now recycled or recovered in some way which is a distinct contrast to the position when the UDP was being prepared. Planning permissions have recently been granted for a number of merchant waste management facilities in Flintshire which would move the management of waste up the waste hierarchy. In 2015 Flintshire had more permitted waste facilities than any other authority in North Wales and makes a significant contribution towards the sustainable management of waste. Whilst significant progress has been made, a policy approach is being developed as part of the LDP to ensure the County can respond to changing technologies and changing demand, optimising the economic benefits that sustainable waste management can bring.

Policy Context

LDP Objectives	5. Facilitate the sustainable management of waste		
PPW	Paragraphs 12.5 & 12.6		
Well Being Goals	A globally responsible Wales		
Key Evidence	North Wales Regional Annual Monitoring Report (April 2016) Topic Paper 5: Waste		
Monitoring	The following indicators will be used to monitor policy effectiveness: tbc		
Detailed policies	Waste reduction: Part of a general development management policy. Detailed waste policy directing new waste facilities and identification of detailed criteria against which proposals would be assessed.		

8.4 Policy STR16: Strategic Planning for Minerals

Strategic Policy STR 16

Strategic Planning for Minerals

Flintshire's important mineral resources will be sustainably managed by:

- i. Protecting minerals from unnecessary sterilization by directing new development away from areas underlain by mineral of economic importance or where this is not possible through the requirement for prior extraction;
- ii. Reducing the conflict between mineral development and sensitive development through the use of buffer zones;
- iii. Contributing towards the regional supply of mineral through the allocation of 1.4 million tonnes of sand and gravel and 3.84 million tonnes of crushed rock through the extension to existing quarries, in collaboration with Wrexham County Borough Council;
- iv. Identifying those areas where mineral extraction would not be acceptable;
- v. Ensuring new mineral extraction is located so as minimise impacts on communities and the environment;
- vi. Securing appropriate restoration which can deliver specific environmental and community benefits;
- vii. Maximising the use of secondary and recycled aggregate.

Question 18

Policy 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?

Explanation

8.4.1 Flintshire is underlain by a wealth of minerals where many settlements have historically been shaped by mining. The mineral industry is still very active in the County with limestone and sand and gravel still being worked at a number of different sites. Minerals are an important resource which should be protected for future generations by locating non-mineral development away from areas which are underlain by mineral of economic importance. Given the distribution of mineral within Flintshire and the location of existing settlements it is considered inevitable that there will be some loss of mineral, however this will be minimised through careful site selection. A detailed safeguarding policy will be included to ensure that the need to protect the mineral

resource is considered prior to any non-mineral development outside allocated sites or identified development boundaries. Within development boundaries the need to undertake prior extraction to address issues of instability will also be addressed

- 8.4.2 The North Wales Regional Technical Statement identifies the level of need for mineral at the regional level and then apportions this to individual local authorities. A need for additional sand and gravel has been identified in Flintshire as well as a need for crushed rock shared between Flintshire and Wrexham. It is proposed to meet the need for crushed rock within Flintshire through the extension of an existing quarry rather than through the allocation of a new site since the tonnage required would not support the creation of a new quarry site and this has been formally agreed with Wrexham, forming part of their LDP Strategy. Detailed allocations will be identified at the Deposit stage.
- 8.4.3 The LDP will seek to minimise the impact of mineral extraction on communities and the environment by directing mineral extraction towards those locations which have the least impact and ensuring that high quality restoration is undertaken. Buffer zones will be identified around existing quarries, in line with Minerals Technical Advice Note 1: Aggregates, and proposals for new quarries / extensions to existing quarries will be required to identify a suitable buffer between mineral extraction and sensitive development. Detailed policies will set out the criteria against which proposals will be assessed.

Policy Context

LDP Objectives	 9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region 13. Promote and enhance a diverse and sustainable rural economy 19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land
PPW	Chapter 14
Well Being Goals	A globally responsible Wales
Key Evidence	BGS Mineral Resource Maps BGS Aggregate Safeguarding Maps Coal Authority Maps Topic Paper 6: Minerals
Monitoring	The following indicators will be used to monitor policy effectiveness: tbc
Detailed policies	Mineral safeguarding Buffer zones Sustainable supply of minerals Secondary and recycled aggregates

How the Strategic Policies link with LDP Objectives and the Well Being Goals – **Summary Table** Creating Sustainable Places and Communities **Relevant LDP** Well Being Goal Strategic Policy Relevant LDP Strategic Objective Objective STR1: Strategic Delivering 8, 9, 11 A prosperous Wales Approach Growth and A resilient Wales Prosperity STR2: The Location Delivering 8, 9, 11, 12, 13 A prosperous Wales Growth and of Development A resilient Wales Prosperity Delivering 8, 9, 12 A prosperous Wales STR3: Strategic Sites Growth and A resilient Wales Prosperity STR4: Principles of Safeguarding the 15, 16, 17, 18, 19 A globally responsible Sustainable Environment Wales Development and A healthier Wales Design A Wales of cohesive communities A more equal Wales 3,4 A healthier Wales STR5: Transport and Enhancing Community Life Accessibility A Wales of cohesive communities A more equal Wales STR6: Services. 1, 6, 17 A healthier Wales Enhancing Facilities and Community Life A Wales of cohesive Infrastructure Safeguarding the communities Environment A more equal Wales A Wales of vibrant culture and thriving Welsh Language

Supporting a Prosperous Economy			
Strategic Policy	Relevant LDP Strategic Objective	Relevant LDP Objective	Well Being Goal
STR7 Economic Development, Enterprise and Employment	Enhancing Community Life Delivering Growth and Prosperity	1, 2, 8, 9, 10, 13, 14	A prosperous Wales A resilient Wales
STR8:Employment Land Provision	Delivering Growth and Prosperity	8, 9	A prosperous Wales A resilient Wales
STR9: Retail Centres and Development	Enhancing Community Life Delivering Growth and Prosperity	2, 3, 10	A prosperous Wales A resilient Wales
STR10:Tourism, Culture and Leisure	Delivering Growth and Prosperity Safeguarding the Environment	13, 14, 18	A Wales of vibrant culture and thriving Welsh Language
Meeting Housing Nee	ed	L	l
STR11: Provision of Sustainable Housing Sites	Delivering Growth and Prosperity	11,12	A more equal Wales A globally responsible Wales
STR12: Provision for Gypsies and Travellers	Enhancing Community Life Delivering Growth and Prosperity	1, 7, 11, 12	A more equal Wales

Valuing the Environment			
STR13: Natural and Built Environment, Green Networks and Infrastructure	Safeguarding the Environment	17, 18, 19	A healthier Wales A Wales of vibrant culture and thriving Welsh Language A globally responsible Wales
STR14: Climate Change and Environmental Protection	Safeguarding the Environment	18, 19	A globally responsible Wales
STR15: Waste Management	Enhancing Community Life	5	A globally responsible Wales
STR16: Strategic Planning for Minerals	Enhancing Community Life Safeguarding the Environment	9, 13, 19	A globally responsible Wales

Appendix 1 Issues

1.1 Enhancing Community Life

1. Ensure communities have access to a mix of services, community and cultural facilities, to allow community life to flourish to provide for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community and particular groups such as the elderly

1.2 Issues and Considerations:

- Lack of facilities and services
- Addressing quantitative and qualitative deficiencies in open space
- Ensuring new housing development incorporates or contributes to well-designed open space which is properly managed and maintained
- Accessibility of / to facilities and services
- Financial pressure on facilities and services numbers / location / accessibility i.e. it is not realistic for all settlements to have a comprehensive range of facilities and services but recognising the availability of services and facilities in adjacent or nearby settlements
- Should facilities and services respond to development or direct where development should go?
- Provision of health centres and facilities
- Ensure that facilities exist for education either exist or can be provided
- Ensure that new development contributes where necessary to school improvements where capacity issues exist with the present level of accommodation
- Ensure that education facilities are accessible to local communities especially younger children in a safe and convenient way
- Safeguard and protect community identity
- Ensure the principles of equality are applied in preparing the Plan

2. Encourage the development of town and district centres as the focus for regeneration

1.3 Issues and Considerations:

- recognising the role of town / district / local centres in terms of provision of services and facilities and seeking to maintain or enhance through regeneration or other measures
- Seeking to address decreased vitality and viability resulting in associated problems with management and maintenance of both public realm and also built fabric with vacant units and poor maintenance.
- The means to attract new investment to traditional town centres
- 3. Promote a sustainable and safe transport system that reduces reliance on the car
- 1.4 Issues and considerations:

- need for joined up transport system involving road, rail, bus, cycling and walking and recognising the role of town centres as transport hubs
- social exclusion in rural areas
- social exclusion to certain groups of population
- access to jobs for those without private car e.g. improved accessibility to Deeside Industrial Park (DIP)
- addressing the potential for improvements to the railway system both for freight and passengers e.g. the need for new or improved rail station at DIP and the electrification of the Wrexham Bidston Railway
- public transport nodes and routes
- identifying disused trackbeds and other potential routes for recreation / commuting
- identifying capacity and congestion hotspots and scope for either new road schemes or road improvement schemes
- recognise the health benefits of promoting alternative method of transport such as walking and cycling'
- Safeguarding the continued operation of Hawarden Airport
- consider the role of Mostyn Docks and River Dee as a transport corridor
- designing and managing roads to reduce journey times, increase safety and reduce congestion
- the outcome and implications of the Welsh Government consultation on the blue (improvements to the A494(T)) and red (new route linking Dee Bridge with A55 at Northop) options for improving the A494T/A55T/A548 route corridor

4. Facilitate the provision of necessary transport, utility and social / community infrastructure

1.5 Issues and considerations:

- water treatment capacity and network
- water supply capacity
- lack of timely investment in infrastructure eg water treatment to deliver development – pressure on service providers to respond – feeding into service provider plans and providers
- need better understanding of infrastructure provision
- energy provision renewable energy generation and improving energy efficiency and conservation'
- understanding the scope for renewable energy within the County in order to inform the development of suitable policies and proposals

5. Facilitate the sustainable management of waste

1.6 Issues and considerations:

- identifying future waste management and disposal needs North Wales Residual Waste
- the need for firm allocations rather than areas of search
- contributing towards an adequate network of waste disposal and management installations
- design of housing and other development to facilitate increased recycling

- ensure risks posed by active or former landfill sites, given the landfill legacy in parts of the County, are minimised by directing sensitive development away from inappropriate sites
- reviewing existing employment sites to identify those which can accommodate waste management facilities

6. Protecting and supporting the Welsh Language

1.7 Issues and considerations:

- Identify the use of Welsh Language within the County and identify trends whereby the language is flourishing or declining
- **1.9** assess the impacts of proposed housing allocations on the Welsh Language, including Welsh Language Schools, where necessary and appropriate

1.10 7. Create places that are safe, accessible and encourage and support good health, well-being and equality

1.11 Issues and considerations:

- Placing emphasis on the creation of safe and good quality public realm as part of new development
- Ensuring new development is accessible to all users
- Ensuring that new development creates the conditions which are conducive to healthy living

1.15 Delivering Growth and Prosperity

8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors

1.16 Issues and considerations:

- Recognising the importance of the Flintshire economy to Wales and West Cheshire and Chester / Wirral
- Have regard to the Mersey Dee Alliance and Northern Powerhouse agendas in terms of implications for the economy of Flintshire
- Over-reliance on manufacturing yet Deeside Enterprise Zone (DEZ) focus on 'advance' manufacturing
- Focus on storage and distribution at Northern Gateway
- Underdeveloped / disjointed tourism industry outcomes of tourism destination management project.
- Accessibility to work opportunities
- Need to review older industrial allocations new uses?
- Ensure key existing employment sites and allocations are protected from inappropriate development

- Lack of understanding as to what the market is likely to need over Plan period in terms of location, size and type of sites
- The need to ensure an adequate and appropriately skilled and trained labour supply is maintained
- What is the Council's / Welsh Government's target in terms of job creation and how does this translate into supporting development requirements?
- Addressing the needs of and implications of special and hazardous industries and protecting community
- The need to ensure a sustainable supply of minerals over the Plan period in which the economic importance of minerals extraction is balanced against environmental effects
- 9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region

1.17 Issues and considerations:

- Need to identify and deliver the right strategic sites location, size, type to meet present / future needs (more informed view than traditional approach of over – allocation) either through allocations or a flexible but robust policy approach
- Recognising key economic drivers such as Airbus, Tata, Toyota etc
- Address the impact of Northern Gateway and DEZ and setting the scene for the remainder of the Plan period
- Recognising growth hubs and linkages with surrounding settlements to spread wealth and regeneration
- Recognise the benefits of mixed use development sites

1.18 10. Reinforce and improve Flintshire's town and district centres as vibrant destinations for shopping, leisure, culture, learning and business

1.19 Issues and considerations:

- Addressing the effects of the economic downturn and cultural changes such as on line shopping
- Will economic recovery bring back town centres to their former glory or has their 'shopping' role changed fundamentally
- Need to address the role and function of town centres is it predominantly retail or is it a mix of uses
- How to control / prevent the loss of shops in town centres review of core retail area policy and consideration of alternative policy approaches
- Importance of night time economy assisted by people living in town centres eg above shops.
- Is there a need to control specific types of development e.g. hot food takeaways as part of healthy living concerns?
- Need to re-look at retail hierarchy role and function of each town / district / local centre i.e. are specific policies needed for each town centre or one size fits all?
- Utilising the information contained within existing town centre masterplans and health checks

- Determining whether there is a need for further retail floorspace and if so, the Identification of sites for new retail development having regard to the town centres first principle
- determining whether park and ride has a role to play in facilitating and supporting healthy town centres
- the need to retain and facilitate local and rural shopping facilities
- 11. Ensuring that Flintshire has the right amount, size and type of new housing to support economic development and to meet a range of housing needs

1.20 Issues and considerations:

- Providing an amount of housing which meets local needs and a reasonable level of in-migration which supports the economic growth aspirations of the Plan
 - understanding and addressing the under- delivery of housing in the UDP
 - undertaking a robust assessment of existing housing land bank and making informed allowances for small sites and windfalls
 - The provision of housing which meets the needs of the general market as well as affordable housing and specialist housing such as elderly persons accommodation and gypsy and travellers'.
 - Set an appropriate and achievable level of affordable housing for the plan area based on local need and viability
 - ensure that a 5 year housing land supply can be sustained throughout the Plan period
 - develop a policy framework to identify what developer contributions, through CIL or otherwise, will be required towards the community and infrastructure impacts of development.

1.22 12. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure

Issues and considerations:

- Need greater emphasis on the delivery of housing viability and deliverability
- Ensuring housing allocations deliver associated infrastructure upgrades where necessary
- Ensuring housing allocations are in sustainable locations based on a sustainable settlement and locational strategy and detailed audits of settlements
- Ensure that a range of physical, environmental and social infrastructure, including for instance an adequate road network and public transport (rail and bus) is available or can be made available

- Ensuring housing allocations are in areas where there is sufficient viability to deliver affordable housing etc
- Ensure full and realistic assessment is made of the existing housing landbank before identifying new housing allocations
- Review green barriers against the criteria in PPW in order to avoid coalescence and review settlement boundaries
 - Adopting a site search sequence focussing initially on the availability and suitability of brownfield land
 - Making the most efficient use of land
 - 13. Promote and enhance a diverse and sustainable rural economy

1.27 Issues and considerations:

- Recognise the contribution of the agricultural economy and the need for diversification in the rural economy either as part of farm diversification or through development in and on the edge of settlements – site allocations or flexible policies?
- How realistic is it to achieve employment re-uses of rural buildings such as barns?
- Utilizing natural assets such as renewable energy
- Ensure that a sensitive and sustainable approach is taken to meeting housing needs in rural areas e.g. local needs and rural enterprise dwellings and investigating the delivery of affordable housing as part of mixed tenure schemes

14. Support the provision of sustainable tourism development

1.28 Issues and considerations:

- Underdeveloped / disjointed tourism industry outcomes of tourism destination management project 'in terms of a strategic framework for tourism in the County e.g. accommodation and attractions'
- Recognising changes in tourism increased short breaks and new / innovative forms of accommodation
- Recognising that tourism is increasingly all year round
- Recognise the tourism role of market towns
- Need for flexible policies to allow for changes in the tourism industry reflecting changing consumer preferences'
- Safeguarding and enhancing natural and heritage assets i.e. coast, key landscapes etc
- Recognising the importance of tourism 'events' such as Mold Food Festival
- In addition to improving existing attractions such as Greenfield Valley, the need to consider and develop new tourism destinations such as Holywell and Hawarden.

1.29 Safeguarding the Environment

15. Minimise the causes and impacts of climate change and pollution

1.30 Issues and considerations

- Recognising that parts of the County are susceptible to flooding (coastal and fluvial) e.g. along Dee Estuary but also recognizing local flooding hotspots e.g. surface water flooding
- Understanding the degree of flood risk in the County in terms of tidal, fluvial and surface water
- Recognises that extreme weather events are more likely
- Adopting a precautionary and long term approach to the location / siting / design of development and travel patterns / arrangements as part of understanding the effects of climate change and sustainable transport alternatives
- Ensuring new development has built in resilience to climate change e.g. through design measures such as SUDS
- Addressing light, noise, air and other types of pollution within the County as part of identifying development sites
- Identifying physical constraints to development in terms of contaminated and unstable land (having regards to site search sequence' in PPW and preference for brownfield land.
- Recognising the role that a sustainable pattern of development can play, for instance through promoting a modal shift from car to public transport, in tackling climate change

16. Conserve and enhance Flintshire's high quality environmental assets including biodiversity, landscape, cultural heritage and natural and built environments

1.31 Issues and considerations:

- Ensure the proper status of the Clwydian Range and Dee Valley Area Of Natural Beauty (AONB) is recognised as being of equal importance to national Parks, as there is a perception by some that it is regarded as being of lesser importance
- Presence of several European designations and other protected habitats and species throughout County and implications for spatial strategy.
- Presence of great crested newts in and around several settlements particularly Buckley
- Culturally seen by some as having closer links with NW England than the rest of Wales
- Using the knowledge and information built into the Landmap system to ensure that the characteristics and features of the landscape are recognised and are considered as part of development proposal's
- Incorporating existing landscape and biodiversity features as part of development proposals and improving the ecological value of sites
- Assessing whether the Plan should identify special or local landscape designations

- Identification of a coastal zone and the review of the existing policy approach
- Safeguarding the County's rich and varied built and historic environment including listed buildings, conservation areas, scheduled ancient monuments, archaeology sites and historic landscapes, parks and gardens whilst allowing sensitive managed change

17. Maintain and enhance green and blue infrastructure networks

1.32 Issues and considerations:

- Identifying existing networks and gaps where linkages are needed
- Recognising the Dee Estuary as a strategic linear open space opportunity and improving local accessibility to it
- Using networks as links to open countryside but also as links to facilities, services, public transport i.e. as part of everyday life
- Recognising the different roles of green (land based) and blue (water based) infrastructure networks – landscape, wildlife, movement, recreation, amenity and food production etc
- Ensuring that new development contributes where necessary to maintaining / enhancing existing networks or providing missing links
- Protecting built heritage at risk and sensitively managing change in the historic environment
- 18. Promote good design that is locally distinct, innovative and sensitive to location

1.33 Issues and considerations:

- Identifying and valuing what is the character of our settlements layout, form design, materials etc
- Ensuring that the vernacular character or local distinctiveness is incorporated into new development
- Using design principles and policies to recognise local distinctiveness yet not stifling of innovative design

19. Support the safeguarding and sustainable use of natural resources and promoting the development of brownfield land

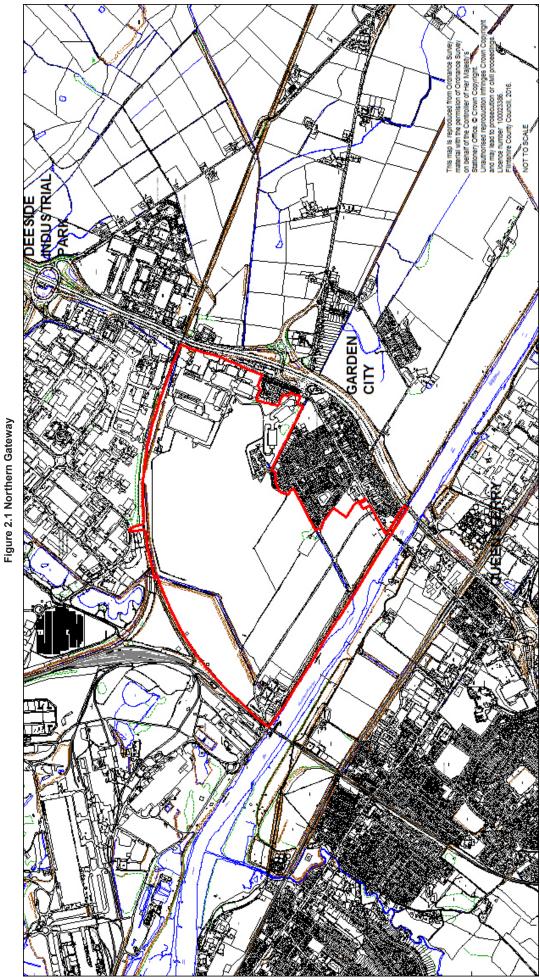
1.34 Issues and considerations:

- General support for renewable energy in terms of addressing climate change
- Identifying what scope / capacity there is for renewable energy in the County wind, solar
- Does / should the Plan set targets for renewable energy
- Safeguarding minerals of economic importance and reviewing whether the minerals safeguarding designation in UDP needs to be further refined
- Reviewing whether the UDP mineral buffer zones are still fit for purpose
- Ensuring a sustainable supply of minerals is maintained over the Plan period and assessing whether present reserves of minerals are sufficient for the Plan

period or will new sites or extensions to existing sites be required for aggregates and hard rock

- Protection of best and most versatile agricultural land
- Protecting water quality and conserving water supply

Appendix 2 Key Strategic Site Maps



STR3A Northern Gateway Mixed Use Development Site

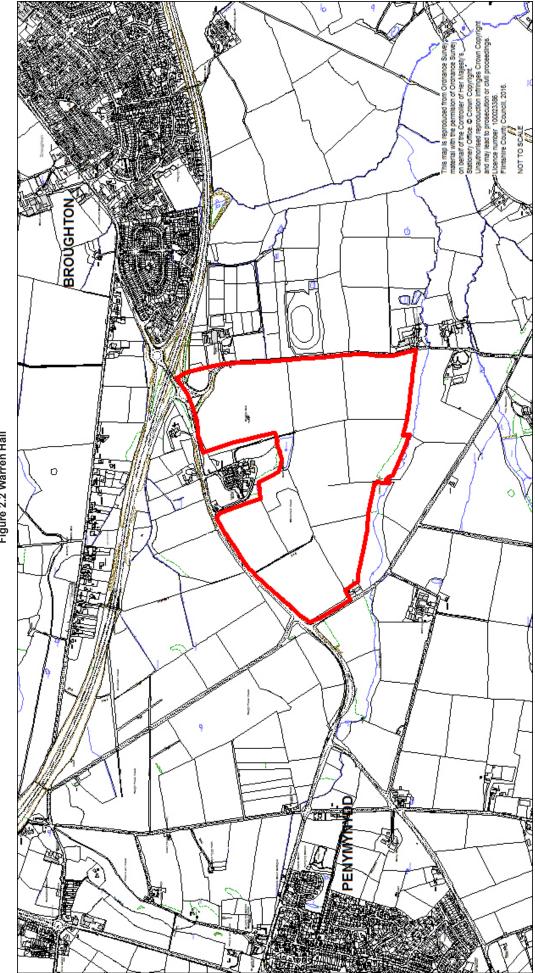


Figure 2.2 Warren Hall