Summary of Comments and Responses re Key Messages document : Q1 - Q8

APPENDIX 1

Representee	Comments	Response	Recommendation
General Comments			
National Grid	No comments to make on this document.	Noted	No change
Coal Authority	No comments to make on this document.	Noted	No change
Wrexham Bidston Rail Users Assoc	Response relates to those issues which relate in some way to the passenger train service provision on the Wrexham-Bidston line; Rail connectivity linking communities and employment locations in north east Wales and across the border into north west England is poor; forcing many to drive to work on heavily congested roads and denying work opportunities to those who cannot afford to drive or who are unable to drive to work. Young people are at a particular disadvantage if they need to drive as the cost of running a car can represent a significant element of their salary which many may not be able to afford. In an area which has 30% of the Welsh economy (without even considering the significant and growing economic activity immediately over the border, which employs many Welsh residents), the 2011 census shows rail's share for travel to work is 1% in Flintshire and 0.9% in Wrexham; both less than half of the average of 2.1% for Wales as a whole. It is the WBRUA's view that modest rail service improvements in north east Wales will further unlock the economic potential of the area The WBRUA's strategy for the Wrexham-Bidston Line is to identify, justify and promote:	Noted	No change

	• Opportunities to improve current service performance, passenger satisfaction and passenger numbers; • Opportunities for an improved service frequency and an extension to current operating hours between Wrexham and Bidston together with improved interchange with other services at both Shotton and Wrexham during the course of the new franchise; • The case for the introduction of a new station, Deeside Parkway, on the route adjacent to the Deeside Industrial Park and the A548 (see Figure 1 below). This new station would enable employees to get to the Deeside Industrial Park by train and at the same time provide easy access from the network of dual carriageways to park and ride facilities for rail services to Birkenhead, Liverpool, Wrexham and beyond; • The introduction of a through service between Wrexham and Liverpool, if and when suitable rolling stock (such as IPEMUs – Independently Powered Electrical Multiple Units; battery/electric trains which can run beyond the limits of electrification) becomes available; • A case for full electrification of the route. Deeside Parkway Station - It is the WBRUA's view that this strategy fully aligns with the vision of Flintshire's local development plan; namely to achieve a sustainable and lasting balance which provides for the economic, social and environmental needs of Flintshire.		
Northop Community Council	Members of Northop Community Council met on 11th April and resolved to respond to the consultation as follows:	It is disappointing that the Community Council did not feel that they were able to respond as they have provided	No change

	The Council does not have the technical knowledge to be unable to comment in detail on what are complex professionally drafted documents setting out options for the future direction of the Flintshire Local Development Plan. The Council does however feel strongly that if a rigorous methodology for decision making is adopted by Flintshire County Council, then that methodology and subsequent policies and development briefs must be adhered to.	detailed feedback on previous consultations. The KMd was written in an easy to understand format and has been complemented by other respondents. Although the two appendices are more detailed in setting out the settlement assessments and the drawing up of different settlement hierarchies, the paper was primarily seeking to call upon the detailed local knowledge of stakeholders, particularly community councils, in ensuring that the settlement strategy in the Plan is both soundly based and sustainable.	
Cllr Cindy Hinds	For our community to have confidence in the changes in the UDP to those being proposed in the LDP we must make sure that all the information about our community - Penyffordd, Penymynydd and Dobshill is correct. If I start with Housing as my first observation and obviously the most contentious for our community I would wish to make these objections to your proposals in the LDP. 1. We have suffered under the UDP an increase in new developments to a percentage rise approximately 35% under the guidance of 'Settlement B' category, we should have had only 8 to 15%. This increase left our villages with severe problems.	Noted At the baseline of the UDP Penyffordd / Penymynydd had 1340 dwellings. Taking completions and commitments (planning permissions) of 363 units this gave a total theoretical growth of 27% over the Plan period (this broad level of growth was sanctioned by the UDP Inspector). However, as at April 2015 (when the monitoring of growth as part of the UDP ceased) some 81 dwellings had not been competed so the actual growth over the Plan period was 21%. These 81 dwellings	No change

		are in effect contributing to growth over the LDP Plan period.	
	A) The sewerage system is too small, too antiquated and is very close to collapse. By inadequate survey and drainage works on The Groves site has now caused severe problems for existing residents and the new development itself is in a state of surface water flooding. Latest example new play area under approx 2 foot of water, photographs can be provided. On the Corwen Road, for the first time that I can remember, had surface water right across the road and the culvert is right by and was full and flowing over. The other areas being affected - the youth club and scout hut, there was sewerage and water all in front and coming out of the gate onto the main road. The Post Office and surrounding areas - water coming down Penymynydd Road and causing the whole of Chester Road by here to be just like a river. Alyn Drive and Abbots Lane. Approximately four years ago Welsh Water did some remedial works and put non return valves on a number of houses, aimed at stopping the sewerage and excess water and FCC helped out. This did alleviate the problems until this year and this, I feel new developments are adding problems.	As part of preparing the UDP all statutory consultees were involved in the process to ensure that the allocations in the Plan could be delivered in terms of infrastructure. These sites have also been through a further round of consultation as part of the consideration of planning applications on them. The events listed in the objection must also be considered in the context of unprecedented levels of concentrated rainfall where such problems have occurred throughout North Wales.	
	B) There is no doubt in my mind that the Redrow site, whilst it is off the top of Penymynydd Road the drainage runs downhill and puts extra pressure on Penymynydd Road and Chester Road.	See response above	
	Your proposals do not emphasise strongly enough that older villages need complete refurbishment and	The LDP nor the lpa has the remit to require per se the complete	

	renewal of the water and sewerage systems, in fact you have now made the situation worse by declaring your intentions to class our villages as an urban settlement. Our community finds this proposal absolutely ridiculous and just an attempt by Planners to use your concentration paragraph to give the backing to increase housing development once more. The community is surrounded by farms and fields and a by-pass which was built, if I may remind you, to alleviate the congestion through the village. The UDP housing plans, which I have referred to, have increased in the centre of the village ten fold, evidence early morning queues to get onto the by-pass and tea time, evidence the amount of traffic calming measures which had to be placed to make the village safer.	refurbishment or renewal of water and sewerage systems. Rather, the Plan can seek to establish through consultation with the relevant statutory providers, whether existing infrastructure can accommodate further development and whether any necessary improvements to the infrastructure can be made to improve capacity. The document has not declared its intentions of classifying the settlement as an urban area. Rather, the KMd has put forward a number of options for organising settlements into hierarchies. One of these possibilities is the identification of urban areas. All stakeholders are being given the opportunity to submit their views in order to assist in identifying the most appropriate approach. The issue of housing numbers is not being considered as part of this exercise. The reference to a ten – fold increase in the village is not clear as to whether this refers to the level of housing or the level of traffic. The settlement has a number of access points onto the A550 at the top, middle and bottom of the village as well as access via Chester Road onto the A5104 for residents travelling to Broughton and the A55. The impact on	

		highway capacity and the creation of a safe vehicular access and egress will be assessed as part of looking at all Candidate Sites.	
	Our school has classes 35 and over and increasing all the time when the houses are occupied. To remind you once again that we have no doctors, or health services, bus services are being reduced, some are under threat, no Sunday service and the X55 which was taken off a number of the older people in the village very angry because they cannot go to Chester. I am saying we cannot accept any more new housing developments until 2030 as we have far exceeded our original total and would be disastrous if our community is faced with the threat of more housing when our infrastructure and services are not fit for purpose.	The settlement audit shows that the settlement does in fact have a range of facilities and services. Although the medical centre no longer operates, a new medical centres is being built nearby in Hope. The reduction in bus services as a result of budget pressures is occurring throughout the County and not only in this settlement. The calculations above show that the settlement has not had the growth envisaged during the UDP as there were 81 units still to be completed at the end of the UDP Plan period. The level of growth is nowhere near 35% as being stated by the objector. It is not clear from the submission exactly what harm would be caused to the village and its residents by further development.	
	Spatial Plan - Working Together - The Welsh Assembly Government intentions were that Authorities, like Flintshire would plan well into the future on industrial development sites, business parks and now, of course, enterprise zones. To work out how best we can serve our community by increasing employment.	Noted. However, the delivery of further economic growth and employment needs to be supported by new housing.	
	Working across border and with neighbouring Councils, like Wrexham, was paramount to the Spatial Plan's	The allocations in the UDP were put forward having undertaken consultations	

	success in North East Wales. Having worked on the UDP and objected to many of their piecemeal schemes I am still bitterly disappointed that Flintshire's Education Dept has played no part in forecasting where new schools should be built, old schools should be closed (until now) and where this new influx of workers to our County will want to live and their children to be educated. The same can be said for Highways, there seems to be little or no observations about future travel and congestions problems, in fact they are all too willing to sit on their hands where large developments are planned. Social Services, again, I have not seen any sort of future planning for an ageing population and the increase of migration of older people to our County. An example can be when large scale housing developments are proposed and there is only affordable housing. Pensioners accommodation or care for the elderly are either not discussed or the last in line for any support. I know developers do not want to build bungalows but surely single storey for the elderly or ill can be part of any 106 agreement.	with a range of internal and external consultees and service providers and were also considered by an Inspector at the UDP Inquiry. The KMd clearly references the need to have regard to the implications of an ageing population, but this must be in the context of a land use plan and not the Council's remit in other service areas and responsibilities.	
	Disability - I was shocked not to find any mention of plans to deal with the increase in our County of people becoming disabled, either physically or mentally. For this category all your plans have to take heed of travel, housing, proximity to healthcare, clinics, doctors, hospitals etc. And no indication at all of directions to housing developers about making their properties, at least some part that can accept tomorrow's disabled, e.g. Do front and back of house both have to have steps, can one be a ramp, are door widths and turning circles inside houses capable to use a wheel chair, can	This issue has implications for a number of Council services including housing, education, social services as well as external health authorities. However, it is not clear from the objector what the land use planning implications are that need to be addressed by the Plan. The present Building Regs require measures to be incorporated into all new housing in terms of design adaptations and ensuring that further adaptations can be made if	

	bathrooms be easily converted to help disabled without great cost and to remind you of the cost to Flintshire if we have to make a property suitable for a disabled person. Our streets in our towns, dropped kerbs, uneven roads and paths, it is if the Disability Act had never come into law and we have at this late stage an opportunity to put into our plans suggestions and directions to help our disabled residents. FCC should always remember that we have adopted the covenant to our Armed Forces and those who come back with disabilities, mental illness or just looking for somewhere to live, which at this point, I would like to remind you of how many houses we have vacant in Flintshire.	needed to meet a particular disability need in the future. Higher standards are usually applied by housing associations and the Council's New Homes. Furthermore, some developers sign up to the Lifetime Homes initiative whereby homes are designed to be able to adapt to changing needs. Given this broad context and framework already in place it is not clear why the Plan needs to include this as an issue.	
	2. Settlement Boundaries - Our community vigorously opposes any changes to our present settlement boundary unless it can be proved that a minor alteration will be good for the residents.	Whether any changes are appropriate to settlement boundaries will be assessed having regard to the methodology set out in the Candidate Sites Assessment Methodology Background Paper. It is not clear what the objector defines as being 'good for residents'.	
	3. Minerals - Across Flintshire, including Bannel Lane, has thousands of tonnes of open cast coal. Flintshire should alter their presumption for open cast for to presumption against, unless it can be proven that coal fired energy is needed and it is in the country's interest.	Flintshire does not have a presumption in favour of open cast coal. Any minerals extraction proposals will be considered against national planning guidance and the Minerals policies in Chapter 18 of the UDP, having regard to the merits of the proposal.	
	4. Members of the Planning Committee must give proper planning objections when opposing officers recommendations. Officers must heed their own	This is not a matter for this document. However as a general principle decisions should be made in accordance with the	

	planning policies and not try to circumvent for any outside interest.	development plan (UDP) unless material planning considerations indicate otherwise.	
Cllr Rita Johnson	These are my comments regarding the LDP. As I have stated to you and Andy Roberts on many occasions, many Oakenholt residents (myself included) feel that Oakenholt which has always had its own identity is slowly becoming part of Flint and by being classed as part of Flint it is Oakenholt which will bear the brunt of any extra housing (perceived needed by God only knows) and this is totally NOT what the residents of Oakenholt want or need. The maisonettes in Flint were to be demolished and replaced by the same number of new houses but now it has reduced from 200 to only 90 so where are the extra houses being placed? Let's see.....17 given permission at Pandy Garage and just lately 23 at Coed Onn Road not the centre of Flint as stated originally.	The KMd is not specifying either the amount of growth or the location of growth at this stage. It is seeking instead to put in place some general principles and to provide a sustainable means of assessing and categorising settlements. Oakenholt is not and never has been an identified settlement in any development plan. The local planning authority is charged with a requirement to identify the level of growth that should be provided by the Plan and this is primarily comprised of household growth such as the continuing trends for smaller households. Some of the displaced occupants of the maisonettes will have found new accommodation elsewhere. The two sites mentioned have arisen as 'windfall' housing proposals and such sites formed a part of the UDP overall housing provision i.e. that windfall sites are likely to continue to come forward over the Plan period. The consequence of not allowing positively for such windfall sites is that a development plan would need to make more allocations.	No change

	I am informing you now as the local member for Oakenholt that any extra development will (is already) will be overdevelopment and not sustainable. How many times have I complained about the A548 and how it is already congested and potholed (this will be worse now The Planning Inspectorate, in it's wisdom overturned the decision made by our planning committee and gave approval for the batching plant). All of these issues are to be taken into account, not just the dictates from WAG and their manic obsessions with ticking boxes. No more houses in Oakenholt now or in the foreseeable future please!	Noted	
Broughton Unit Trust (Broughton Shopping Park)	We note that the Council is looking at a number of growth and spatial options which will inform the Local Development Plan's Preferred Strategy and, importantly, as part of this assessment, each settlement within the County's hierarchy has been examined in terms of available services and facilities alongside their size, population and character. With regard to Broughton specifically, the Settlement Audit undertaken in December 2015, together with the accompanying Services Provision Map, expressly includes all the retail/service facilities at Broughton Shopping Park as contributing towards the range of facilities available to the local population at both Broughton and Bretton. The Audit acknowledges that service provision in Broughton is excellent on account of the significant retail and commercial premises centred around the Shopping Park and at Main Road. Moreover, in terms of "sustainability", with settlements ranked between 1-10, with 1 the most and 10 the least sustainable, Broughton is ranked 2 and, as such, can	Noted. Consideration will be given to Broughton Shopping Park as part of looking at Candidate Sites and settlement boundaries.	No change

	reasonably be regarded as one of the most sustainable locations in the County. Furthermore, the importance of the Shopping Park in terms of the local economy is also appropriately highlighted, with it being referred to alongside Airbus and local industrial estates as a major source of employment. The foregoing is of particular relevance in the context of the current Unitary Development Plan (UDP) for two reasons; firstly, the three tier settlement hierarchy in the UDP is widely recognised as being anachronistic and, secondly, the settlement boundary for Broughton, as defined in the UDP, is tightly drawn around part of the settlement but excludes Broughton Shopping Park. In light of the approach adopted by the Council in undertaking the Settlement Audit for Broughton, which we endorse, there is a compelling evidence base in our judgement for amending, at the appropriate time, the settlement boundary for Broughton to include Broughton Shopping Park. Furthermore, in considering the options presented under "Settlement Categorisation", we note that both Options 3 and 4 define Broughton as including Broughton Shopping Park and Bretton. Either of these options are supported by BUT, although it is recognised that Option 4 provides a more "fine-grained" categorisation of smaller settlements.		
Mostyn Community Council	The paper raises a number of issues which it sets out in the form of options for review. It proposes a review in terms ranging from little change to the existing Plan strategy, through degrees of revision to an overall option 5 review as a full rethink on its existing strategy.	Noted	No change

	This latter option has to be taken seriously and a premise for such an in depth review has to be the reflection on the existing plan which expired 2015. There is no doubt in that regard that that previous plan has had very limited success as a mechanism for planning regulation and control. The review towards a future policy has to examine the constraints of the existing plan. These need to recognise that the now old plan had some fundamental shortcomings which have left a very difficult planning environment for the future. The council area and environment has now to come to terms with some fundamental planning difficulties. It has a roads infrastructure which has been ill conceived and unsuitable for its needs. It also has a poor and virtually non-existent spatial planning realisation. It has also to deal with very demanding government pressures to deliver affordable housing - which it has equally failed to make preparations for. It has equally failed through that poor spatial planning context, to deliver an adequate and sustainable economic capacity for its communities. Recommendations 1. The plan requires a rigorous re-examination of its highway and roads infrastructure.	It is not explained how the UDP is responsible for a roads infrastructure which has evolved over dozens of years, rather than over the UDP period. No explanation is given of the spatial planning approach that the Community Council consider is missing. The KMd is the very opportunity for the Community Council to share its views as to how the strategy for the LDP should be shaped yet the response appears to be looking backwards not forwards. 1. This will be undertaken in association with the assessment of candidate sites in terms of identifying whether the local network is adequate to accommodate further development. However, ant issues with the existing highway network, are not a matter for the LDP to address.	

	2. It needs to ensure a delivery of the housing needs for the community against a background where its management has been at the behest of developers and market driven speculation which has provided housing supply for outside overspill rather than local community needs in Flintshire.	2. It is not accepted, in the context of Mostyn, how new housing development has been at the behest of developers and in terms of it providing for the needs of outside overspill rather than local needs. In looking at the levels of housebuilding over the UDP period Mostyn experienced 0.4% actual growth (2 units) amd Rhewl Mostyn experienced 11.3% growth (17 units).	
	3. Environment pressures are although appropriately shaped by habitats directives its energy needs pressures are poorly understood. Closer attention is needed to the existing fabric of communities and the built heritage in the countryside. This especially needs more fundamental attention to spatial planning and the likely closer integration with neighbouring Authority Local-Plans, with these changes to include community local plans based on local community input having statutory material consideration weight.	3. The comments involve a considerable number of strands, but the overall point being made here is difficult to understand. On the one hand very localised and specific issues are being raised such as community fabric and built heritage in the countryside yet on the other hand spatial planning is being mentioned, which is usually a higher level of planning which applies to a larger area. It is not clear what the link is between the two. The preparation of the Plan has involved ongoing liaison with adjoining authorities.	
	4 These changes also to secure weight for more intelligent regulation of new development in the open countryside and statutory Rural Development Plans.	4. It is unclear from these comments what it is that the Community Council are concerned about in terms of new development in the countryside. Are they seeking more stringent control of rural development or a more relaxed approach?	

Holywell Town Council	The introduction to the report explains that a stakeholder panel has been established. Please can you advise how the panel was selected and do Town/Community Councils have representation?	A Key Stakeholder Forum for the LDP comprises 42 different organisations who were selected to represent a wide range of statutory organisations and interested bodies. The group includes representations from the Public Social Sector e.g. Health Trust and Police, Public Economic Bodies e.g. Welsh Government and FCC Economic Development officers, Public Environmental Organisations, e.g. Natural Resources Wales, Private Companies, e.g. Home Builders Federation, Social Voluntary Sector e.g. Flintshire Local Voluntary Council and Voluntary Environmental Organisations e.g. Campaign for the protection of Rural Wales. The aim of this group is to involve these organisations in the development of the LDP as part of the consultation process. Consultation with the Town/ Community Councils is also ongoing as Planning Strategy Manager has attended the County Forum meetings and has attended approx. 22 individual Town/ Community Council meetings over the past 2 years (including Holywell Town Council, April 2015). Planning Aid Wales also held a Planning workshop meeting in County Hall in June 2015 specifically for Town /Community Councils. Further workshops and meetings are due to be held this year specifically with	No change.

		Town/Community Councils to ensure there is an appropriate level of consultation.	
Bloor Homes	The submission by NJL begins with an overview of general principles of PPW and then addresses guidance in PPW and TAN relating to the need to maintain a 5 year housing land supply. This culminates in the following statements: As there is no demonstrable 5-year supply of housing land and no adopted development plan in place, there is significant concern raised by Bloor Homes regarding the delivery of the much needed growth within Flintshire. In light of the above extract from TAN1, Flintshire will be unable to demonstrate a 5-year housing land supply until the LDP has been adopted. The constant under-delivery during the previous Plan period has created an acute housing shortfall that needs to be addressed and this shortfall is unlikely to be made up for a considerable period of time. It is therefore essential that Flintshire progress and adopted a new LDP as soon as possible and in a way that is right for the County so that the needs can be met. There have been clear failings in previous approaches advocated by the Council which have exacerbated the issues faced and have inevitably worsened the situation faced by the Council. Bloor Homes would like to see a new LDP adopted at the earliest possible date to provide them with certainty over the future delivery of housing, employment and services the area desperately needs.	Whilst it is accepted that there is a less than a 5 year housing land supply it is not accepted that Flintshire does not have an adopted Local Plan. The UDP remains as the adopted plan until the LDP is formally adopted. It is also important to emphasise that the local plan does not 'deliver houses', that is the role of developers. The main reason for the lack of growth in housing in the County is due to the national economic decline in previous years and the present financial restrictions on mortgages. (as recognised by Redrow) It is disappointing that Bloor Homes are taking this approach when they have acted pro-actively in developing Clydesdale Road, Drury and the large site at Broughton. The need to progress the LDP is recognised. However, from this the objector returns to the assertion that there clear failings in previous approaches by the Council, without specifically stating what these failings actually are.	

	NJL also include in their submission a section promoting a candidate site in Broughton (BROU001 Land between retail park, Bretton Rd and A55).	The Candidate Site will be assessed on its merits and against the emerging Preferred Strategy as set out in the Candidate Site Assessment Methodology Background Paper.	
Bloor Homes	In terms of section 2 of the document – 'where are we now?' offers the following comments: Timescales – concerned about the delays that have already taken place getting the LDP to its current stage. Every effort should be made by the Council to ensure the LDP is adopted as soon as possible. This will provide developers with the certainty and information they require to bring forward developments that will benefit Flintshire Documentation – Concerned that a Key Stakeholder Forum took place and that NJL have not been invited or included within these discussions. Would like clarification as to why consultants have not been included in important discussions. Also has a particular interest in the reference to 'green barrier review' and 'urban capacity study' and would like to further understand the nature of the study and what opportunities there will be for comment.	Noted The Key Stakeholder Forum has been set up to include a range of statutory organisations and interested parties. The Home builders Federation is included in that group who represent the developers and consultants. The very fact that NJL are making comments proves that this consultation is reaching developers and consultants at this early stage in the LDP process.	No change
White Acre Estates	Submission made in the context of an ownership interest in a site at Rhos Road, Penyffordd, which was subject to an outline residential planning application for up to 40 residential dwellings (Ref: 053656). The application was refused in January 2016 on foul drainage grounds and is now the subject of an appeal. We consider the site to be one that will provide a	Noted. The site is now the subject of an appeal and this will determine whether the site is appropriate, viable, deliverable etc. The site will also be assessed as one of the Candidate Sites.	No change

	contribution towards the acute housing shortfall faced by the Council.		
White Acre Estates	We would note that we are concerned about the timescales associated with the adoption of the LDP which already appears to have slipped a year behind schedule. This creates uncertainty for developers and will serve to exacerbate the existing housing shortfall. With regard to the documentation section, we would request to be included in the Key Stakeholders Forum moving forward as we represent a number of landowners and developers operating within Flintshire. We would therefore welcome the opportunity to be involved in the LDP process.	It is unfortunate that there has been slippage in the LDP process so far but this is not uncommon for LDP's. In terms of the Key Stakeholder Forum, the Home Builders Federation is included in the group to represent developers/ landowners. Obviously there are many landowners and developers and not all can be invited to that group. The point of the group is to have a relatively small number of organisations which represent a wider range of opinions, to make it reasonable to act as a discussion forum and sounding board. The fact that the objector is on the mailing list and has responded that the Council is engaging with the private sector.	No change
Lavington Participation Corp. and Duncraig Investment Corp	Submission made in the context of an ownership interest in a site at at Quarry Farm, Oakenholt, part of which is the subject of a live residential planning application (Ref: 052566). In the first instance, we would stress that it is absolutely critical that Flintshire County Council (FCC) deliver their Local Development Plan within the timescales set out within their Delivery Agreement. It would appear that the Council are already over a year behind their target dates which suggests that adoption could slip into 2019/20, the implications of which could be severe. The national message advocated by Welsh Ministers is that Local Planning Authorities (LPAs) must have an up to date Development Plan against which to judge	It is unfortunate that there has been slippage in the LDP process so far, but this is not uncommon for LDP's. The Council is endeavouring to make good timely progress with the LDP and understand the issues noted by the submission.	No change

	planning applications. This is highlighted through recent amendments to Technical Advice Note 1 which now states that LPAs without an adopted Development Plan are unable to prepare a Joint Housing Land Supply Assessment and are deemed not to have a 5 year housing land supply. As a result, FCC will be unable to demonstrate a 5 year housing land supply until the LDP has been adopted, which creates uncertainty for developers. This in turn leads to less housing being delivered which serves to exacerbate the current shortfall.		
Lavington Participation Corp. and Duncraig Investment Corp	We would note again that we are concerned about the timescales associated with the adoption of the LDP which will create uncertainty for developers and serve to exacerbate the existing housing shortfall. With regard to the documentation section, we would request to be included in the Key Stakeholders Forum as we represent a number of landowners and developers operating within Flintshire. We would therefore welcome the opportunity to be involved in the LDP process.	See response to White Acres Estates, above.	No change
David Rowlinson	In addition to commenting on the KMd a series of comments and suggestions are made for specific parts of the County and these can be summarised as follows: i) Development along the northern side of Hawarden, set within the line of a new road from B5125 Glynne Way to Gladstone Way ii) Development between Higher Shotton, Queensferry and Hawarden with new distributor road and a railway station iii) Development along the southern edge of Northop Hall and a new grade separated interchange to east	Although the scope of these site specific suggestions goes beyond the subject matter of the KMd, they will be considered by Officers as part of the assessment of Candidate Sites in these areas.	No change

	of Northop Hall with link through to Connahs Quay and a link along Pinfold Lane to Alltami.		
Flint Town Council	In headline terms the Council felt that there was little to take issue with. The issue of principal concern to members was however to repeat their previous resolutions concerning development in the town. I set out their resolution of 13th July 2015 for your information and confirm that the membership is still of the view that the extant permissions need to be fully implemented before their impact can be assessed. In the meantime there should be no further development to the south and southeast of the Town. There are sufficient brownfield and windfall sites available to serve any future development needs. 1. That F.C.C. designate no further land for development to the East and South East of our town Flint. On the basis that at this moment in time approximately only 10 % of the allocated development has taken place. 2. That the Authority recognises the statement made within the traffic management analysis which high-lights the appropriate level of vehicle activity suitable for the round-about at the Croes Atti development substantial evidence why the above is a legitimate statement. 3. Furthermore if any further allocations of development in those stated areas were to be granted it would seriously under-mine the integrity of the environment.	Noted. The KMd document outlines the issues to be considered in the LDP and sets out the existing situation in terms of settlement surveys to help make decisions on a settlement categorisation. Although the scope of these site specific issues goes beyond the subject matter of the KMd, they will be considered by Officers as part of the assessment of Candidate Sites in these areas. The submission points out a number of important issues which will need to be addressed as we get closer to decisions on settlement growth and the allocation of sites.	No change

	4. That the Authority takes into account the substantial development due to take place in the centre of our town, following the demolition of the Maisonettes then the re- development of a hundred new homes on the old Walks plus the extra sheltered care and the new health suite on the site of the old Leas, all which have been given formal consent. 5. The Authority also needs to take into account the new development already taken place (Centenary Square) and the potential re-development of former Magistrates Court and Police Station as well as the potential for re-development of the Clinic site once the Health Suite is completed. 6. That there needs to be a significant period of time given to the Town to assess the impact of traffic movement as further evidence to why there should not be any further allocation of permissible development. 7. Finally without being accused of being over parochial I am of the opinion that Councillors in this Town have taken their responsibilities and requirements in planning processes diligently and now it is the time for others to accept their share of any new developments that may ultimately emerge from the process.		
Caerwys Town Council	Agrees with Q1 – Q22	Noted	No change
Halkyn Community Council	Agrees with Q1 – Q22	Noted	No change
Dr Klaus Armstrong Braun	Puts forward a number of additional strategies, objectives and policies, which can be incorporated in the relevant proposed strategies for the LDP. These relate to Dunedin (New Zealand), City of Seattle. [these amount to several dozen pages of extracts from the respective plans]	Whilst noting the objectors suggestion, these are plans and strategies which are from different countries and prepared under different planning regimes.	No change

Vision			
Q1 - Vision			
Graham Bolton Partnership	Delete “lasting” from the vision as there is no one balance to be achieved, which may well change over time.	Welsh Government explains in para 4.3.1 of PPW the principles of sustainable development which is acting in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. In this context it is appropriate for the Plan to be seeking to achieve a lasting balance.	No change
Taylor Wimpey	Yes, however we believe the vision needs to needs to incorporate the need for a strong and supportive housing market to ensure that Flintshire remains a location of choice for both residents and migrants.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The vision recognises its regional economic importance as well as its historic and cultural identity. Housing will be an important part of achieving the vision but it is not considered appropriate or necessary for reference to a ‘strong housing market’ in a vision statement, particularly as housing is addressed in the objectives which support the vision.	No change
Kerry Norcross	Agree with vision	Noted	No change
Wrexham Bidston Rail Users Assoc	The WBRUA recommends that business interests also be included. Connecting workers with their employment is a key driver for the WBRUA’s strategy. Can the wording of the Vision be amended to “.....needs of Flintshire, its residents and businesses, through realising.....”?	The WBRUA rightly identify that businesses are important to the County. The vision seeks to embrace a wide range of interests and considerations but within a statement that is focused. The downside of adding to many	No change

		considerations is that the vision becomes less focussed and increasingly wordy. Given that the vision already includes two references to the economy it is not considered necessary for the businesses to be specifically mentioned.	
Cllr Nancy Matthews	Agrees	Noted	No change
Penyffordd Community Council	Broadly agree but greater emphasis needed on retention of community identity currently being lost through overdevelopment and 'bolt on'.	The vision seeks to embrace a wide range of interests and considerations but within a statement that is focused. The downside of adding too many considerations is that the vision becomes less focussed and increasingly wordy. Given that the vision already includes references to the social and environmental needs of Flintshire's residents, it is not considered necessary for community identity to be specifically mentioned.	No change
Redrow	No - the council should be seeking to ensure that the LDP embraces the thrust of PPW, which is to be positive towards, and promote, sustainable development across Wales, to that effect, we believe that the vision should be making stronger reference towards Flintshire becoming a more attractive place to live and work through the creation of sustained economic growth and implementation of associated development.	The vision seeks to embrace a wide range of interests and considerations but within a statement that is focused. The downside of adding to many considerations is that the vision becomes less focussed and increasingly wordy. Given that the vision already includes references to a sustainable balance and to provide for the economic needs of Flintshire, it is not considered necessary for economic growth and development to be specifically mentioned. The basic thrust of PPW exists in its own right and	No change

		will be had regard to in progressing the Plan.	
Minerals Products Assoc	Yes, however, the introduction suggests the Local Development Plan (LDP) will cover the 15 year period 2015 to 2030 and when adopted this will replace the adopted Unitary Development Plan (UDP). As we are already in 2016, it would be advisable to amend the 15 year period to cover 2016 to 2031.	The choice of Plan period is so that there is no gap between Plan periods. It is not considered that there would be much to be gained from amending the Plan period by one year and could create an environment whereby the Plan period is a moveable feast.	No change
Holywell Town Council	As is recognised in many parts of this document planning has as large a role to play in developing and attracting tourism, as much as it does in manufacturing and service industry The Vision currently emphasises quite correctly Flintshire as the regional gateway for economic investment, it could be expanded to specifically recognise Flintshire as a gateway into Wales as a major tourism destination thereby bringing tourism into focus	It is not accepted that the Plan's role is to develop and attract tourism development. The LDP is a land use Plan and its role is to facilitate development either by providing for development by allocating land or by devising a suite of policies to consider tourism proposals as they arise. The role of developing a strategy for tourism and attracting investment is the role of Tourism Bodies and the Council's regeneration team. If such a strategy identifies the need for allocations or a particular policy thrust then this can be taken on board but the Plan should not be incorporating proposals where there is very little likelihood of delivery. The vision seeks to embrace a wide range of interests and considerations but within a statement that is focused. The downside of adding to many considerations is that the vision becomes less focussed and increasingly wordy.	No change

	as major employment, albeit sadly a low wage opportunity. This would also bring a more inclusive feel and approach to the LDP, specifically recognising the economic offering the parts of Flintshire that sit outside of the Deeside can provide	Given that the vision already includes references to a gateway location and an area for economic investment which could include tourism investment, it is not considered necessary for tourism destination to be specifically mentioned. The vision includes the term 'economic investment' in relation to the whole County, with no specific mention of Deeside.	
Crag Hill Estates Ltd & Praxis Holdings	We agree with the proposed LDP Vision, in particular the emphasis on Flintshire having a unique position as a regional gateway and area for economic growth. The Northern Gateway proposed development area including the Airfields together with Deeside Industrial Park is a strategic employment area which will play a key role in achievement of the Vision, assuming there is support in the provision of infrastructure and sites to attract regional, national and international investment.	Noted	No change
Bloor Homes	Whilst in the most part Bloor Homes agrees with the Vision as set out, there is concern regarding the lack of any emphasis on the delivery of housing. In order for the Council to achieve the vision it sets out for the LDP, there needs to be a significant contribution towards the number of houses that have consistently been under-delivered in recent years. Bloor Homes suggests that a greater emphasis needs to be placed on housing delivery in the Vision. Without this vital inclusion, residential developers are not given any certainty that the delivery of houses within Flintshire is a key target. Given the consistent lack of housing delivery, Bloor Homes consider it important to bring housing and its delivery to the top of the Council's agenda.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The vision recognises its regional economic importance as well as its historic and cultural identity. Housing will be an important part of achieving the vision but it is not considered appropriate or necessary for reference to a 'strong housing market' in a vision statement,	No change

		particularly as housing is addressed in the objectives which support the vision.	
Grosvenor Estate	Agree	Noted	No change
White Acre Estates	Overall, my client is in agreement with the Vision presented for the LDP; however we would suggest that housing delivery should be specifically included in the Vision Statement as this will be critical to achieving the other aims.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The vision recognises its regional economic importance as well as its historic and cultural identity. Housing will be an important part of achieving the vision but it is not considered appropriate or necessary for reference to housing delivery in a vision statement, particularly as housing is addressed in the objectives which support the vision.	No change
Lavington Participation Corp. and Duncraig Investment Corp	Overall, my clients are in agreement with the Vision presented for the LDP; however we would suggest that housing delivery should be specifically included in the Vision Statement as this will be critical to achieving the other aims.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The vision recognises its regional economic importance as well as its historic and cultural identity. Housing will be an important part of achieving the vision but it is not considered appropriate or necessary for reference to housing delivery in a vision statement, particularly as housing is addressed in the objectives which support the vision.	No change

David Rowlinson	Yes. I very much agree with these aims. I think that the aims could be modified to state how these aims require coordination and collaboration with various parties who all contribute to the identity and environment in Flintshire. The LDP is not just about releasing pockets of land for development, but about providing the infrastructure, support and opportunity for the community to flourish. It should be about strategic planning rather than reactionary provision.	It is suggested that the wording '' lasting balance'' does demonstrate that the aims will be achieved through the coordination and collaboration between various parties. The comments arising on the vision show that different interest groups wish to see markedly different amendments and additions to be made to the vision, the result of which would turn the vision from a short sharp statement to a long and rambling wish list.	No change
Flint Town Council	The Vision was accepted and endorsed and the issues identified were accepted as relevant and proper.	Noted	No change
Cllr David Williams	Broadly agree but greater emphasis needed on trying to keep of community identity that is currently being lost through overdevelopment and urbanising of rural villages through what appears to be an unofficial 'bolt on' policy. Other ways of delivering for the housing shortage should be strived for.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The vision recognises its regional economic importance as well as its historic and cultural identity. The protection of the community identity will be an important part of achieving the vision but it is not considered appropriate or necessary to reference it in a vision statement, particularly as safeguarding communities is addressed in the objectives which support the vision. It would be wholly inappropriate for the vision for the Plan to be addressing issues relating to	No change

		overdevelopment or bolt on development	
Cllrs Carol & David Ellis	Disagree – the lpa should assess each town on the amount of previous houses built in the UDP. Buckley has seen a large amount of properties built with the infrastructure sadly lacking in the town – schools, doctors, roads, thriving town centre. Properties have been built too far out of town where roadways and footways are not able to sustain the amount of traffic generated, especially in semi-urban areas.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The submission refers to site specific issues	No change
AONB Joint Committee	The overall thrust of the Vision is supported along with the specific references to 'providing for environmental needs' and 'protecting the areas strong historic and cultural identity'. It is assumed that this encompasses conservation and enhancement of the nationally recognised landscape of the AONB, but the committee would suggest that this should be made more explicit.	The protection of environmental and natural resources will be an important part of achieving the vision but it is not considered appropriate or necessary to reference this in a vision statement, particularly as safeguarding the environment is addressed in the objectives which support the vision.	No change
CPRW	No – It fails to take account of Flintshire's open countryside which forms the character of its rural landscape and a major contributory factor towards the health and well-being of people who reside and work inside the County. Within the vision, is a requirement to state, unambiguously, that such a valuable and finite resource is afforded the protection it merits for future generations in order to maintain an acceptable quality of life.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The vision recognises its regional economic importance as well as its historic and cultural identity. The protection of the open countryside will be an important part of achieving the vision but it is not considered appropriate or necessary to reference it in a vision statement, particularly as safeguarding the	No change

		environment is addressed in the objectives which support the vision.	
Dr Klaus Armstrong Braun	The Vision is very narrowly focused just on people and their needs and economic investment using the catch-all phrase, 'sustainable' which is meaningless unless clearly defined. It and the other phrase, 'lasting balance' are vague but imply use of natural resources and not a balance with Nature Biodiversity. It also misses out partnership with neighbouring counties' communities working together. The below is Ew.EU's Vision which is requested to be used: [wording not included in submission] It is requested that the above be also added: '' Natural Resource Protection and Restoration • Promote a clean, safe, healthy, liveable and ecologically sound environment for today and the future. • Pursue sustainability. • Minimize impacts on Davis' land, water, air and biological resources and seek to enhance and restore Davis' environment, through such projects as **wetlands and multi-functional drainage ponds. ''** *(City of Davis, California, General Plan -2007)*.	The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The vision recognises its regional economic importance as well as its historic and cultural identity. The protection of environmental and natural resources will be an important part of achieving the vision but it is not considered appropriate or necessary to reference to natural resource protection in a vision statement, particularly as the environment is addressed in the objectives which support the vision. The suggested wording is far too narrow and focused to represent a vision for a development plan.	No change
Huw Evans Planning	I am not convinced that this is a vision. A vision needs to set out an overarching aim and what is put forward does not make it clear as to where the LDP is taking Flintshire in the next 20 years. It tends to say the things that people can't really object to. The vision needs to provide a focus to drive the plan forward. For example "Over the next 20 years Flintshire's key settlements will be regenerated through a proactive approach positively engaging with the development and	The vision does set out an overarching aim, that is ''to achieve a sustainable and lasting balance which provides for the economic social and environmental needs of Flintshire'' the proactive element is to ensure that there is a balance in the County so that there is not under or over development but a balance of development to ensure the needs of	No change

	voluntary sectors". The one described above is rather tame and lacks ambition whereas good planning should be about encouraging and facilitating things to happen - it doesn't exactly grab you by the throat! It would be very useful if the vision could include a statement that the Plan should be a maximum of 100 pages long. That is not meant in jest as current development plans are excessive, repetitive of national policy and advice and consequently encourages regulation for regulations sake.	the County are fulfilled. Often an LDP vision can overstate what a plan can actually do, this vision is realistic and is therefore more likely to be achievable. It be inappropriate for such a statement to be included in the overriding vision for the Plan. However, as a general principle the concept of a concise Plan is attractive and will be looked at.	
Betsi Cadwaladr Health Board	We are broadly in agreement with the Vision for the LDP and recognise the importance of the issues highlighted in the draft Vision statement. However, we would have welcomed a reference to the LDP's contribution to health and well-being in general, and specifically a reference to the goals set out in the Well-being of Future Generations Act 2015. Both the Local Authority and the Health Board are amongst the statutory partners which will be required to contribute to achievement of the seven goals and it would be a good foundation to recognise this new approach to how we deliver our functions and work towards improving well-being of our population. Our response. The vision for the Plan seeks to set out an overriding purpose for the Plan. This is based around the principle of sustainable development in terms of meeting the economic, social and environmental needs of the County and its people. The health and well-being of the residents of Flintshire will be an important part of the plan but it is not considered appropriate to	Noted. However the purpose of the 'vision' is to provide a focussed and snappy vision for the Plan as a whole. In this context, making reference to legislation and numerous issues and considerations can have the effect of turning a vision into a checklist.	No change

	reference it in a vision statement, particularly as it is addressed in the objectives which support the vision.		
Cllr Dave Healey	In principle I agree with the broad vision for the proposed LDP	Noted	No change
Issues			
Flint Town Council	Members would have welcomed some explanation as to how the issues and the responses generated would be weighted when being taken into account for decision purposes but assumed that this is something for later in the process.	It is necessary for a development plan to read as a whole, as there will often be a tension between certain aspects or policies. In the same way, as recognised by the objector, there are widely differing objectives. Part of the process of preparing the development is to gauge the weight to be applied to one aspect compared to another. This is why the KMd has been put out to consultation to engage with stakeholders as to their views.	No change
Issues – Enhancing Community Life			
Q2 – 'community needs'			
The Theatres Trust	The Theatres Trust supports policies that provide a clear statement for the protection and enhancement of your existing and essential community and cultural facilities, along with encouragement to provide new and additional facilities. 'Well-being' is having a sense of satisfaction with life. Social and cultural well-being includes personal experiences and can either be active (sports) or passive (theatre), and the provision of a variety of community infrastructure and cultural facilities for these activities is vital for their contribution to resident and visitor life satisfaction and are an essential element in a sustainable society.	Noted. The inclusion of a policy seeking to protect community and cultural facilities is a matter to be considered as part of drafting policies in the deposit Plan (and reviewing existing policy CF1 in the UDP). The issues raised in the representation provide a fuller approach to defining community life and well-being. It is therefore considered that the title in para 5.2 of the KMd could be amended to read:	Amend the wording in the title within para 5.2 of the KMd

	Culture and the arts can affect social well-being in many ways including social cohesion, reducing isolation and loneliness, and supporting initiatives that develop understanding between generations. Cultural activity can contribute to skills development and lifelong learning, help to sustain vibrant communities and grow the economy. Support of culture is increasingly seen as an investment in an area's present and future. There is a growing awareness of the role that the arts and culture play in developing an educated workforce and in attracting an educated workforce to an area or town. To support the objectives, we recommend a policy along the lines of: Community and Cultural Facilities *The council will resist the loss or change of use of existing community and cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site*. The Policy should also contain criteria for encouraging the provision of new facilities. For clarity, we recommend that the accompanying text and the Glossary contains an explanation for the term 'community and cultural facilities'. We recommend this succinct all-inclusive description which would obviate the need to provide examples: *Community and cultural facilities provide for the health and wellbeing, social, educational, spiritual,*	'Ensure communities have access to a mix of services, facilities, community and cultural facilities to allow community life to flourish, to provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community, and particular groups such as the elderly'.	

	recreational, leisure and cultural needs of the community.		
Mold Town Council	There is no mention of churches/chapel and other places of worship yet most of the settlements in the appendices have them. They play a key role in community life, not just spiritual but also as a venue for activities which brings a community together.	In response to the objection by The Theatres Trust above it is proposed to amend the title in para 5.2 so that it is more descriptive and will include reference to 'spiritual'.	Amend the wording in the title within para 5.2 of the KMd
Graham Bolton Partnership	Agree with the vision and concerns – and note the comment at the end of the paragraph above that existing hierarchy, or services and facilities, should not necessarily be the determining factor in guiding the location of new development.	Noted	No change
Taylor Wimpey	We agree with the issues however we believe that facilities and services should be planned concurrently with residential development, ensuring the best possible outcome for areas that accommodate future development. It should be acknowledged that development can create and maintain sustainability of settlements and respond to the service requirements of an area and as such development should not be limited by their provision.	The objection seems to be implying that new housing development should not be limited by the provision of services in a settlement, as new development can provide such facilities and services. Whilst it is the case that new development can bring about new facilities and services this is unlikely to be provided at a scale which provides for the whole needs of a settlement or community. It is therefore important that new development is focused on those settlements which have a range of infrastructure, facilities and services in line with the advice in PPW, having regard to the principles of sustainable development.	No change
Kerry Norcorss	I agree. I think in terms of availability of services and facilities this should hold limited weight to the other factors in that some of the facilities highlighted e.g dentist, doctor, church, are (for most people) visited	Noted. The need to have regard to the housing needs of older people is recognised in para 5.12.	No change

	once every 6 months and therefore bear less relevance. Where this is not the case particularly is within the elderly community, and so I would think that it would be worth considering prioritising some of the type of property in regions with these facilities as being for the over 55's.		
Wrexham Bidston Rail Users Assoc	The provision of adequate public transport, to get people from where they are to where they need to be and at the time they need to be there, is a key issue. The WBRUA recognises that the existing provision of rail services in Flintshire is well below what should be expected. Although Flintshire has a significant population living within 5km of a railway station (the highest in North Wales) the 2011 census shows only that 1% of the population uses rail to travel to work (less than half the Welsh average of 2.1%). With its infrequent service, delays and regular cancellations, the Wrexham-Bidston line is perceived by both existing and potential users to be unreliable and underperforming its potential. The WBRUA therefore proposes that "Provision of reliable public transport services to get people from where they are to where they need to be and at the time they need to be there" be identified as an issue.	Noted. The LDP can do little by itself to address issues relating to public perception of rail service or seek to provide reliable services. The role of the Plan is to identify key public transport nodes and routes and to identify through its strategy and allocations, development that can feed into and use public transport. Whilst noting the comments about the low levels of rail use in Flintshire, the Plan cannot though force people to use them and neither can it force improvements to services. In view of this, and the fact that transport issues are addressed in other parts of the KMd, it is not considered necessary or appropriate for this additional issue to be included	No change
Cllr Nancy Matthews	Access to facilities and services - as long as there is an adequate bus service to where there are facilities and services Maintain village schools. They do more than educate the children, they provide a focal point in the community Access to local education for children under 11. Might be a good idea to talk to Ian Budd and co.. LDP cannot	Noted. Noted Noted	No change

	work in isolation neither can education. Let's have some joined up thinking		
Railfuture	Community access and health is enhanced by safe and accessible walking and cycling facilities and that should be a consideration in community enhancement.	Noted but these messages are addressed elsewhere within the KMd.	No change
Llay Hall Investments	Llay Hall agrees that document does identify the key issues facing communities and that the plan should focus on addressing those matters. New development is best provided in sustainable locations with ease of access to facilities and services. The Mold Settlement Services Audit confirms that Mold is a key town whose services and facilities also serve surrounding settlements. It contains a good mix of shops, community facilities (including two high schools, primary schools a leisure centre, library and sports clubs) and a range of employment opportunities. Further growth and development in Mold should therefore, be encouraged where they are located in close proximity to the key services and facilities. Sites which benefit from access to key services, promote sustainable transport methods and are well-related to existing settlements are key to enhancing community life in the County.	Noted	No change
Penyffordd Community Council	As last question – greater emphasis on retention of community identity.	Noted	No change
Redrow	No - one of the main issues facing social mobility across Wales at the moment is the chronic undersupply and unaffordability of the housing market. Given that this is such an important social and nationally politic issue, we would wish for the Enhancing Community Life section to include the following issue 'ensuring that the objectively assessed and identified housing need is met in full.	Noted. However there two sets of issues relating to housing and it is not necessary for points to be repeated throughout the KMd.	No change

Holywell Town Council	Under the heading ensuring new housing development incorporates or contributes to well-designed open space which is properly managed and maintained: Expand to include consideration of the characteristics of main access roads into new developments for example Brynford Road, Milwr Road, Greenfield Road, Well Street in Holywell, all of which have been compromised due to expansion of housing. While the flows of traffic may appear to work before the development it is often the new developments that act like the straw on the camel's back. Should facilities and services respond to development or direct where development should go? Specific developments or housing provision for example homeless tend to require specific services such as job centres and youth services, planning should consider encouraging the location of these services close to the communities already established and most in need of the services.	It would be inappropriate for the KMd to go into such detail. Furthermore, to do so for one area would require a similar approach for other areas. Such locational detail would detract from what the KMd is trying to identify i.e. a sound way forward for the Plan. Each development proposal (as well as the Candidate Sites) is assessed by Highways Officers. This is the very question that the KMd is posing in terms of trying to get a steer from stakeholders. The location of and catchment areas for services such as job centres and youth centres is not a responsibility of the Plan, it is the remit of the relevant service providers. The preparation of the LDP will have regard to the location and availability of services and facilities in developing the Strategy and identifying suitable allocations.	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree. The provision of facilities should respond to development on a large strategic site. Development	Noted	No change

	should not be constrained on large strategic sites because facilities are lacking. In such circumstances, a phased approach to development is necessary with agreed trigger points for the provision of facilities as development progresses.		
Bloor Homes	The sixth bullet asks whether facilities and services should respond to development or whether they direct where development should go. Bloor Homes believes that both of these statements are true and it is not possible to separate them. Developments need to have facilities in relatively close proximity to their sites to make them attractive, but developments should also look to contribute and bring forward services that meet the needs of the local community as and when they are built. It is not simply a case of trying to define how each situation should be treated, it should be dealt with on a case-by-case scenario. This question is followed up with the statement 'Ensure that facilities for education either exist or can be provided'. Bloor Homes support this statement however feel the approach to it should be different to previous methodologies. It is important that when local facilities are reviewed in relation to a development proposal to not simply focus on the closest facilities to a site. It is often the case that there are services within close proximity to a site that aren't necessarily the closest, however they have a catchment area falling close to a site that can meet the needs of a development. The current policy framework does not allow for this to be taken into consideration. There is also a lack of comment relating to a lack of housing opportunities for local residents and the	Noted Noted. However, an important part of sustainable development is to have key local services and facilities such as a school, particularly a primary school, within reasonable distance of a new development. Such a practice will encourage walking to school rather than the objectors approach which appears to advocate encouraging unsustainable journeys to schools further afield.	No change

	community. In order for communities to flourish and to meet their needs, it is important that a range of housing opportunities are provided to ensure its future growth.		
Grosvenor Estate	There should be further emphasis on the retention and enhancement of services within rural settlements	Noted. However the various bullet points in the first 3-4 sets of issues, address this issue.	No change
White Acre Estates	White Acre Estates have a number of concerns regarding the way in which the Council is looking to approach the provision of community facilities alongside the delivery of housing developments. Initially we would wish to comment on the sixth bullet point listed regarding the relationship between facilities/services and developments and the way they are brought forward. White Acre Estates do not feel it is possible to deal with facilities and services independently to development proposals. Developments need to have facilities in relatively close proximity to their sites to make them attractive, but developments should also provide a catalyst for bringing forward services that meet the needs of the local community and future residents. This must be considered on a case by case basis. With regard to education facilities, the current system only takes the nearest school into account when reviewing development impacts. In reality, there may be a number of schools within a particular catchment that should be assessed in terms of capacity. The LDP should allow a more flexible approach for dealing with education contributions which more accurately reflects reality and the school placement process.	The KMd is not setting out a 'proposed' way forward. Furthermore, it is not looking a facilities and services separately from new development – the wording of the 6th bullet point mentions new development. Rather it is posing some questions about the relationship between infrastructure and new development, with the intention of securing feedback. See comments above.	No change
Lavington Participation Corp. and Duncraig Investment Corp	While we do agree with some of the identified issues within this part of the Key Messages document, we feel that the LDP should adopt a more flexible approach to	See response above.	No change

	education contributions so that all schools within a catchment area assessed for capacity when considering the impact of residential planning applications. At present, assessments of residential development impacts are based on the closest available school to a site rather than an overall review of schools within the catchment. This should be amended to allow greater flexibility and a more accurate reflection of the realities of school placements.		
David Rowlinson	I agree, and am pleased that the LDP is considering a wide range of impacts of the development. I feel that more could be made of improving transportation links (I understand this is covered by access - but I think strategic infrastructure improvements should be listed). The LDP has an opportunity to identify improvement to existing networks in order to improve access to new development. This will also require coordination with regional transport authorities such as Network Rail, North Wales Trunk Roads Agency, Highway England etc. In additional there is no mention of provision of technology infrastructure. Even if this is only in the form of wayleaves for service corridors. These are vital in the future.	Noted.	No change
Cllr David Williams	greater emphasis on retention of community identity	Noted. The importance of local communities is recognised in the KMd.	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	The range of issues identified is quite comprehensive but does not specifically refer to the special problems facing rural areas such as the AONB, and the committee would ask that the rural dimension be fully considered as part of the plan making process.	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change

Dr Klaus Armstrong Braun	Support except where comments are added: Bullet 5. ''but recognising the availability of services and facilities in adjacent or nearby settlements '' This is supported as building facilities everywhere only denudes existing facilities resulting in many cases the facilities closing. Thus demeaning the locals the facilities. Bullet 6. Direct where development should go ADD New Bullet: Ensure and or enhance the surrounding natural environment thus providing a high quality of life.	Noted It is considered that the subject matter of the suggested wording is out of context in terms of section 5.2 and would stress that environmental issues are covered elsewhere in the Kmd.	No change
Huw Evans Planning	Much of the issues are about what good planning and design should be as a matter of course. Much of it is superfluous and merely clutters up the plan. As stated above the plan can rely on PPW and TANs rather than repeat their contents in a slightly different form. What exactly is 'community identity'? If it exists how does the plan protect or develop it?	Noted. The KMd id merely raising issues. To gauge feedback as to what stakeholders consider to be important. It is understood that policies in a LDP should not unnecessarily repeat what is stated in national guidance. This could mean different things to different people but in a planning context it is suggested it is about creating a sense of place which people are proud of and where there is a healthy sense of community spirit related to the identity of the place. The Plan needs to be prepared with close involvement of the Education Authority	No change

	Contribution to school improvements is fine but how does the plan actually ensure that education facilities are available to younger children?		
Betsi Cadwaladr Heath Board	We welcome the inclusion of health and health facilities in the list of issues and considerations. Again, it would be helpful to reference the role of communities in contributing to broader healthy lifestyles and well-being – although this is certainly picked up later in the document.	Noted.	No change
Cllr Dave Healey	In principle I agree with the identification of issues. I would lay some emphasis on the need to plan for an aging population and flag up mental health as an issue which needs to be considered.	Noted The issue of an ageing population is to be addressed by the plan and is considered in section 5.12 of the KMd in terms of elderly persons housing. Health and well-being is also an issue for the plan and is included in the objectives no 7 as set out in paragraph 6.1 of the KMd.	No change
Q3 – 'town centre regeneration'			
Mold Town Council	Suggests two additional bullet points: • Recognise the role of planning process – change of use and out of town developments. • Consolidating town centres so have viable centre with residential properties amongst/above/surrounding	The 9th bullet point in para 5.11 mentions the need to determine whether there is a need for further retail floorspace and the identification of sites for new retail development. It is suggested that after '…sites for new retail development' the remainder of the text be deleted as it is covered in the last bullet point and replaced with 'having regard to the town centre first principle'. The 4th bullet point in para 5.11 mentions the issue of the loss of shops in town centres and the need to review the existing policy approach and any	Amend the 9th bullet point in para 5.11

		alternative policy approaches. Whilst the consolidation of town centres is an option to be considered it might not be appropriate in all instances. The objectives identify the importance of looking at each centre individually through tailored policies or action plan	
Taylor Wimpey	Understands the importance of regeneration within town centres however it should be acknowledged that the Borough requires a more diverse housing market. Therefore alongside regeneration there will be the requirement for new homes outside of town centres, on greenfield sites and in close proximity to the urban area.	The points raised by the objector are adequately addressed in sections 5.12 and 5.13 which deal with housing.	No change
Kerry Norcross	Agree. High streets and town centres benefit the community and the local economy, and so I also think housing developments within walking distance of such amenities should take precedence. The reason I say within walking distance is this – We used to live in Chester, and so walked to the local shops, coffee shops, bars, cafes, chemists etc. and spent money in them on a regular basis. Now we live in Oakenholt, which is only a couple of miles away from the Flint high street, but we never use these facilities because they still require us getting in the car and the area also gets heavily congested. I think preservation of high streets is essential for the economy and for the sense of community (Mold is the perfect example) but that housing developments close to these amenities (within walking distance) are required in order to allow the high streets to really thrive.	Noted	n/a
Wrexham Bidston Rail Users Assoc	The WBRUA agrees in principle with these headings. A railway station, where one exists, can be a significant	Noted	n/a

	asset to any town, district or local centre. With a significant population living within 5km of a station, Flintshire should seek to enhance each station's accessibility as well as capitalising on its existence to support regeneration and investment.		
Cllr Nancy Matthews	Agree	Noted	No change
Railfuture	Numerous population centres in Flintshire have no railway facilities and those that do have a poor, infrequent and unreliable service. Is it any wonder that towns struggle when the only option to get to and from them is a length bus journey or problematic parking and a walk. Services to the existing stations in Flintshire (south end of the Borderlands Line plus Shotton and Flint on the North Wales Main Line) clearly underperform their potential as they are not of a sufficient frequency and reliability. Statistics show that the use of rail in Flintshire is well below what should be expected and indicates that the service fails to get people to where they want to go at the time they want to be there with an acceptable level of reliability.	Noted. But, is the objector suggesting that new railway lines be constructed to serve such communities, in an era of financial austerity, or that the Plan can directly address rail service frequency etc. Noted.	No change
Penyffordd Community Council	Also to attract small businesses to smaller communities rather than centralise – the word town shows the disregard given to this issue in respect of providing employment and business opportunities to smaller communities.	Noted. This set of issues relates specifically to town and district centres, although the first bullet point also includes reference to 'local' centres to address the role of local shopping centres.	No change
Cheshire West and Chester City	Cheshire West and Chester supports the aim of encouraging the development of town and district centres as the focus for regeneration to prevent the proliferation of out of town shopping areas.	Noted. However, given that Broughton sits at the centre of the growth hub identified in the Wales Spatial Plan and has significant employment development as well as being in close proximity to	No change

	When considering the retail hierarchy and the need for further retail floorspace, an emphasis should be placed on meeting Flintshire's own needs, the impact on neighbouring authorities and the contribution to unsustainable travel patterns, particularly in locations such as Broughton.	several large settlements, is the objector justified in portraying it as contributing to unsustainable travel patterns?	
Redrow	No - an additional issue should be raised, such as the marginal viability of new development across many of the borough's town centres and how needs for new housing, employment and retail uses can be delivered across the borough.	Noted. However, the issue of viability and deliverability of housing development is addressed elsewhere in the KMd. Given that this section of the KMd is focussing on town, district and local centres it is not clear why the objector raises the viability of housing development.	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree There should be recognition that the Airfields site at the Northern Gateway will be providing a District Centre that should play a role in the hierarchy of Centres in Flintshire. Methods to attract investment to it and viability issues will be key considerations as phased development of the Airfields progresses.	Noted. The Northern Gateway exists as a commitment i.e. a site that has planning permission. This section of the KMd does not mention existing centres by name so it would be unreasonable to mention by name a local shopping facility that hasn't even been built.	No change
Bloor Homes	It is suggested that there should be a further note added to the considerations highlighting that housing can contribute towards the vitality and viability of town centres. Housing developments will facilitate the population that will support the vitality and viability of town centres.	The general thrust of the comment is noted and supported. However, In responding to other sections of the KMd, other respondents have queried whether this is always the case as there is a perception by some that new edge of settlement residents are more likely to travel elsewhere to say a supermarket than they are to travelling in to a town centre, paying to park etc. On balance it is not considered necessary per se to include the suggested bullet point as the	No change

		role of housing in contributing to economic growth and services and facilities is recognised elsewhere in the KMd	
Grosvenor Estate	There should also be an acknowledgment of the economic role of smaller rural centres and of the economic benefits of rural businesses	Noted. The first bullet point recognises the role of 'local' centres. These can be both rural and urban and it is not considered necessary to distinguish.	No change
Lavington Participation Corp. and Duncraig Investment Corp	We agree with the issues that have been identified, but would add that housing can contribute towards the vitality and viability of town and district centre. This should be taken into consideration within the LDP when considering site allocations and the housing requirement.	See earlier response	No change
David Rowlinson	Again I feel that transport infrastructure in such town / district areas should be listed. Some of the biggest issues faced are parking, access routes, safe cycling routes and rail provision.	The KMd has grouped issues under key 'themes'. Whilst the comments of the objector are accepted, it is not necessary for them to be repeated throughout the document.	No change
Cllr David Williams	Also attract small business to smaller communities rather than centralise in allocated business development sites – the word 'town' shows the disregard given to this issue in respect of providing employment and business opportunities to smaller communities.	See response to Penyffordd CC	No change
Cllrs Carol & David Ellis	Totally agree with regenerating town centres as Buckley has been deprived of much needed funding from the Welsh Government compared to other areas such as Deeside and Wrexham.	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change

Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	Recognising the role of town and local centres is fine but is the plan and its policies capable of responding, let alone quickly enough, to the swift and continuing change in retail and commercial trends? If it is to do so then it will need to be far less restrictive and regulatory. Over the 15 year lifespan of the UDP it has been unable to respond to the severe economic downturn and any recovery is in spite of the plan as opposed to being helped by it. During this time there have been huge changes to shopping, home delivery, internet shopping and banking. Its one thing to say that regeneration is an issue but how is the plan "the means to attract new investment" etc? If the plan is to achieve this it needs to focus and put its energies on action plans, land assembly and compulsory purchase if necessary. It needs to be the vehicle for action.	Noted. The KMd recognises the need to consider the most appropriate policy approach for town centres etc having regard to the scenarios presented. However, despite calling for more flexible policies and highlighting how the UDP policies were too inflexible, no advice is given as to what alternative approaches could have / should be taken. The KMd has mentioned in section 5.11 the tailored approach for each centre.	No change
Cllr Dave Healey	In principle I would agree with the focus for regeneration. However I would lay greater emphasis on the need to recognise the value of tourism into the region and the need to plan in ways which safeguard the heritage of Flintshire which has largely unrecognised potential to encourage tourists to 'stay a while in Flintshire' and generate wealth within the County.	The KMd has mentioned in section 5.15 the issue of Sustainable Tourism.	No change
Q4 – 'transport system'			
Network Rail	5th Bullet point – Deeside Industrial Park - There are no committed proposals for a new railway station at Deeside Industrial Park (DIP) at this stage. However, the Welsh	Noted. In the interim period, until the proposals by Welsh Government are clear, it is proposed that the 5th bullet point be amended to acknowledge this	Amend 5th bullet point to read ''the need for new or improved rail station at DIP'.

	Government and regional authorities, we gather, are starting to consider a range of options for improving rail connectivity to the Deeside Industrial area which may include proposals for a new station and / or the upgrade of existing facilities at Hawarden Bridge Railway Station. Feasibility work, we understand, is being undertaken; Network Rail has not seen any documentation regarding the proposals at this time. Hawarden Bridge Rail Station – (a) Enhancements at the station - development proposals can increase footfall at railway stations placing increased pressure on the station itself and stopping services due to increased usage. Therefore, we would recommend that the council assess development proposals for their potential to impact upon Hawarden Bridge Railway Station and to ensure that developer contributions towards enhancements are included in any planning consent, and as a policy within the 'Key Messages' document. Developer contributions can be via CIL, S106 or unilateral undertakings. Enhancements at Hawarden Bridge Railway Station could include (but not limited too): · New help-points · Waiting shelters · CCTV · Customer Information Systems (CIS) · Improved access to and from the station (b) Level Crossing - Any increase in pedestrian footfall as a result of development proposals at Hawarden Bridge Railway Station could result in increased usage of the level crossing at the station. A material increase in the type and volume of user at the level crossing will in all	could be achieved through an improvement to the existing station at Hawarden Bridge. The Key Messages document is a fairly high level document which 'sets the scene' for the future direction of the Plan. In this context, the comments regarding Hawarden Bridge Station are noted but are too detailed to be referenced in the KMd.	

	likelihood increase the risk. The Office of Rail and Road (ORR) is the independent safety and economic regulator for Britain's railways. In light of the ORR's comments to reduce or eliminate the risk at level crossings, Network Rail would highlight the following to the council: · We would seek the support in principle of the LPA, Highways and Rights of Way to close Hawarden Bridge Level Crossing · Support from the LPA, Highways and Rights of Way to close Hawarden Bridge Level Crossing and not to actively oppose any closure · Any replacement crossing of the railway would be subject to a Diversity Impact Assessment (DIA) · We would seek support in principle from the LPA, Highways and Rights of Way towards the findings of the DIA · Consultation would need to also take place with the local community and businesses, local interest groups · Developer contributions towards funding any replacement crossing of the railway, either via CIL, S106 or unilateral undertaking should be included within the 'Key Messages' policy. Contributions could be pooled over several developments if necessary. As Network Rail is a public body it is unreasonable to expect us to fund railway infrastructure mitigation measures as a result of third party development.		
Wrexham Bidston Rail Users Assoc	The WBRUA fully agrees with the issues identified under this heading and can only reiterate the response made to Q2 above: The provision of adequate public transport, to get people from where they are to where they need to be and at the time they need to be there,	Noted	No change

	is a key issue. The WBRUA recognises that the existing provision of rail services in Flintshire is well below what might be expected. Although Flintshire has a significant population living within 5km of a railway station (the highest in North Wales) the 2011 census shows only 1% of the population use rail to travel to work (less than half the Welsh average of 2.1%). With its infrequent service, delays and regular cancellations, the Wrexham-Bidston line is perceived by both existing and potential users to be unreliable and underperforming its potential.		
Mold Town Council	Suggests two additional bullet points: • Recognise the role of planning process – change of use and out of town developments. • Consolidating town centres so have viable centre with residential properties amongst/above/surrounding.	These points are addressed in relation to Q3 above. In addition, the 5th bullet in para 5.11 mentions the value of having residential uses in town centres especially above shops.	No change
Graham Bolton Partnership	The comment about designing and managing to "minimise" road speeds is simply wrong; road speeds should be commensurate with safety and not an aim in itself; economic development and modern life depends upon speedy communications of all sorts, and that must include road as well as public transport networks.	Noted. In considering further the wording of this bullet point it is suggested that that the wording be amended by replacing 'minimising speed' with 'reducing journey times'	Amend the wording of the last bullet point in para 5.4
Taylor Wimpey	Agree that transport and infrastructure is often one of the biggest constraints within Boroughs and these issues need to be addressed in order to enable sustainable, economic and residential development to succeed. Such issues should not just consider sustainable transport within town centres but also within the smaller settlements.	Noted. The second bullet point recognises the issue of social exclusion in rural areas in the context of poor transport. This is likely to become even more of an issue as budget constraints result in the withdrawal of or reduction in services to rural settlements. In this broader context it is appropriate for the issues to be focused on town centres as they act as transport hubs.	No change

Alice Williams	Please consider how cycling can be encouraged through the development of schemes that will separate cyclists from cars and promote the use of bicycles as a daily means of transport, not just a weekend leisure activity. The British social attitudes survey shows that a majority of the population (around 60%) are deterred from cycling on our roads because they perceive it as too dangerous. I am a fit, healthy resident of Penymynydd and I prefer to cycle to my local towns of Buckley or Mold or Chester if possible. However to do this I have no choice but to use busy main roads where I frequently encounter dangerous driving that puts my safety at risk. Traffic is unlikely to reduce in the near future. A separate zone for cyclists such as a cycle path or dedicated pavement area would encourage more cycling, reduce traffic and associated pollution, reduce injuries and deaths and help to tackle obesity from inactivity. Linking Penyffordd and Penymynydd to Broughton shopping area or to Buckley or Mold with dedicated cycling routes makes sense because of the number of people in these villages who depend on their cars for most journeys. Using existing pavements, but filling in the "gaps" to make meaningful, continuous routes or widening narrow areas might be cheaper than building cycle paths from scratch.	Noted. The LDP can seek to promote and bring about improved cycling and walking as part of new development proposals particularly larger development, by ensuring that development is well related to town and village centres, local employment, public transport etc and also through measures such as specific cycle lanes. However, the Plan cannot in itself seek to bring about a wider network of cycle routes as this needs to be done through initiatives such as Active Travel. If though there are specific 'gaps' in existing route networks and schemes are in place to deliver these missing links then policies in the Plan may seek to safeguard land for this to be implemented.	No change
Kerry Norcross	Agree. I think the new rail station at DIP is a great idea, and also recognising town centres as transport hubs. With regard to designing and managing roads to minimise speeds, increase safety and reduce congestion, as new developments are being created the	Noted	No change

	wider transport effect should be assessed, and acted upon. An example would be Oakenholt lane, where a large scale development has taken place in Oakenholt, with the main entrance/exit located in a position where anyone trying to reach the A55 has to turn left to go through a congested Flint Town Centre, or right and up onto this lane which is narrow in parts but has a national speed limit and so providers drivers with a 'faster' way to get to the A55. This has caused a 'rat run' affect which should in future be envisaged and some speed controls such as speed bumps put into place. So looking at the possible impact on roads further than the immediate entrance and implementing controls in advance would be really valuable I would say.		
Cllr Nancy Matthews	avoid social exclusion in rural areas particularly important for access to facilities, brings us back to transport	Noted	No change
Railfuture	Laudable aim. However how are you going to achieve it without a decent urban rail network linking efficiently to Chester Wrexham and Mold? Once again we would reiterate the need for linking Mold to the rail network, linking Wrexham Bidston to the north wales coast to Chester line with suitable curves and providing services in and out of Chester and Wrexham at viable times. Also under this heading better connections between Wrexham Bidston and NW Coast line at Shotton and a more frequent service on the former. Also again a station for the industrial estate at Deeside. We would also advocate the promulgation of a fast and frequent service into Liverpool via Bidston that can be used by commuter and shoppers – electrified route	Noted. There is no strategic context in terms of transport policy or strategy for facilitating a rail link to Mold. Unless this was a scheme with a commitment in place to delivering it would be inappropriate to reference it in the LDP. As a general point there are countless settlements up and down the country which operate perfectly sustainably without a rail line being present.	No change

	directly through avoiding the lengthy delay of changing trains?		
Llay Hall Investments	Llay Hall agrees with the issues identified and would like to emphasise the importance of ensuring a sustainable and safe transport system. In particular: • New development should provide for new access and enhance existing access links with regards to walking and cycling. This is to enable access to local facilities without depending on the private car. • Recognising that the provision / enhancement of pedestrian and cycle links contributes to the sustainability of development and also improves the health and well-being of residents. • In order to reduce the reliance on the car, it is important for the Council to promote development which provides safe and convenient access to public transport, including bus stops. • Development which is located in close proximity to public transport provides alternative modes of transport to access the local areas facilities and services and also, in some cases, facilitates access to surrounding settlements. • Those factors enhance the overall sustainability of proposed development and existing settlements.	Noted	No change
Penyffordd Community Council	Yes but more focus & support for smaller communities and appreciate that there are other areas in Flintshire rather than the Deeside strip!	Noted	No change
Wirral Council	Wirral Council would support improved accessibility to Deeside Industrial Park for those without a private car, including improvements to the railway system and a new rail station on the Borderlands (Bidston-Wrexham) railway line.	Noted	No change

Cheshire West and Chester City	The promotion of a sustainable and safe transport system that reduces reliance on the car, including improvements to the railway system, new and improved road schemes that are of benefit to both authorities and the use of disused railway lines for recreational routes and the safeguarding of the operation of Hawarden airport, are also supported, and align with policies being developed in the Local Plan (Part Two).	Noted	
	However, a greater emphasis should be placed on the need to reduce carbon emissions, alongside other considerations (for example, under point 5.4). The identification of capacity and congestion hotspots should also include the consideration of cross-border travel patterns and recognise that any new road or road improvements schemes should be developed working in partnership with neighbouring authorities and key stakeholders, in particular with relation improvements to the A550 Welsh Road, which is a key strategic project for Cheshire West and Chester Council and Highways England. Cheshire West and Chester and Flintshire councils should also continue to discuss options for the Chester Western Relief Road along with options for any potential development areas bordering the City and in the Sealand area.	Noted. The issue of climate change is addressed in section 5.16. It is considered appropriate for the 4th bullet to reflect the comments of the objector by adding 'and travel patterns / arrangements' after 'development'.	Amend 4th bullet point in 5.16 as stated
	Maintaining and improving cross-border connectivity by all modes is a key strategic priority for Flintshire and Cheshire West and Chester. All connecting routes between the two authorities are susceptible to traffic impacts from significant growth in Flintshire, in particular from Broughton and Saltney and sites at RAF Sealand, which will have obvious immediate and direct impacts on our network.	Noted. However, it is equally applicable to note that the large green belt release on the south western edge of Chester may have impacts on the transport network in Flintshire.	

Minerals Products Assoc	Yes. However, the authority may wish to consider the safeguarding from inappropriate development, of existing and potential transport hubs such as rail sidings and wharves, including those with scope for the transportation of minerals.	Noted. This is far too detailed an issue to warrant mention in the KMd. Consideration can be given to this as part of the drafting of detailed policies.	No change
Holywell Town Council	A good list but could be expanded to include: A transport system that promotes ease of access to tourist sites in the County. For example, the current list refers to the need to create a rail station for job creation at Deeside; the tourism aspect could include a railway station/halt at Greenfield and Mostyn. Currently the trains stop at Flint while Holywell and Greenfield are promoted as potential tourism sites. Note here the proposal in the Town Council's Candidate Sites submission. Explicitly state the vital importance of linking transport system with all other objectives in the LDP, for example where settlements share facilities ensure transport is designed to fit with needs of population for example bus timetables that coincide with hospital outpatient clinics or patient visiting times or evening economy. Providing a stand-alone one bus a week service would tick the box for service provided but not reduce the reliance on the car.	The comments are noted but the need for a new station to serve Deeside Industrial Park is recognised as a realistic and achievable scheme. There is no similar recognition of a new railway station at Greenfield in terms of national or local transport priorities. Whilst noting the benefits that such a station would bring to Holywell and Greenfield it is not possible to include schemes in development plans where there is no certainty that they can be delivered within the Plan period. Whilst noting the sense of such an approach, the provision of bus service timetables and coordination of different services is not a matter for the LDP but the transport operators.	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree	Noted	No change

	There is a need to improve transport options for Deeside Industrial Park which will help to support employment growth in the Deeside Enterprise Zone and the Northern Gateway strategic employment site. It will help to broaden the labour market catchment and consequently attract new businesses and investment.		
Bloor Homes	The issues and considerations identifies a need for a joined up transport system but there also needs to a joined up approach to delivery. Too often it is the case that the onus is on the developer to provide the infrastructure and means for transport facilities to be provided. There needs to be a collaborative approach between developers, service providers and the Council to ensure the infrastructure is in place to meet the needs of the growing population.	Noted. However if the location, scale or nature of the development necessitates that certain transport infrastructure improvements in order to mitigate the effects of the development then it is perfectly reasonable for the developer to have a responsibility for or at least a role in delivering it.	No change
Grosvenor Estate	Agree	Noted	No change
David Rowlinson	I whole heartedly agree with these statements. The interface and collaboration with other organisations needs to be emphasised, as does the link to the other topics. Quality of transport infrastructure is what sets some parts of Flintshire out. Personally I work in an office on the far side of Warrington. If it wasn't for good transport, I would not live in Flintshire. There have been lots of improvements on the English side. However very little change on the Welsh side (drome corner aside). Access to more highly paid city jobs will improve the economy in Flintshire. This means sorting out Aston Hill. Making better use of the Deeside Bridge, and ensuring that new development improves matters, instead of strangling already busy networks. See the slides I have prepared at the end of this response.	Noted. Strategic transport issues relating to the A494 Aston Hill etc are the responsibility of Welsh Government and the outcome of the recent consultation exercise on the red and blue routes is awaited with interest.	No change

	Flintshire should work with regional transport authorities, not blame them or claim that they have no control.	Noted	
Cllr David Williams	Yes, but more focus & support for smaller communities and appreciate that there are other areas in Flintshire rather than the Deeside strip and Broughton!	Noted. It is noted that there are areas other than Deeside and Broughton. However, one of the objectives of the KMd is to highlight more strategic transport issues as they will have a bearing on the Plan strategy.	Noted
Cllrs Carol & David Ellis	Agree in general but Buckley needs to have a full assessment of roads and footpaths as what was suitable 10 years ago is not now due to the amount of housing, location of the health centre. Design is an issue, the problems were totally foreseeable to anyone with 1 grain of common sense but not implemented when required.	Noted. However, it is difficult to respond given the lack of detail in the objectors comments about exactly what these problems are and how they could been addressed.	No change
AONB Joint Committee	The committee welcomes recognition of this issue and supports the principle of active travel in and around the AONB as a means of accessing the countryside. The issue raised are agreed, and opportunities to develop and promote walking and cycling as recreational activities in addition to day to day travel should also be considered	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	All good and commendable issues to deal with but is the development plan the right vehicle and are these matters for investment by other services, organisations and operators?	Noted. It is recognised that the development plan may not be able to address all of the issues raised. The KMd is trying to secure feedback as to stakeholders views as to what is important to be taken on board in	No change

	The role of Mostyn Docks is determined by vested and often competing interests such as ferry operators and the Mersey Docks and Harbour Board. How does the plan safeguard the operation of Hawarden Airport? Design of roads and provision of cycleways is down to good design and mainstream development management for new development. How does the plan impact on improving existing infrastructure? This depends on capital investment coming from other government or external sources. Much of these issues are unaffected by the plan and their inclusion merely clutters it up	preparing the Plan. Also, in the light of budgetary pressures, it is accepted that there may be limited public investment in transport. Noted Recognition of the airport safeguarding zone will be a consideration in assessing the candidate sites. Noted. However, each development opportunity can be assessed as to whether it can assist in the missing walking and cycling routes being identified as part of the Council's Active travel work.	
Betsi Cadwaladr Health Board	We are pleased to see the references to social exclusion, and the recognition of health benefits of alternative methods of transport. This might be an opportunity to flag the need to ensure equality issues are addressed, given our shared statutory duties as public sector bodies.	Noted. It is considered more appropriate though for a new bullet point to be added to section 5.2 along the lines of 'ensure the principles of equality are applied in preparing the Plan'.	Amend section 5.2 as stated.
Cllr Dave Healey	Add encourage the development of community transport to fill the gaps left by the withdrawal of bus subsidies in order to minimise the impact on rural communities and access to services.	The LDP is a land use plan and only has control/influence over certain matters. The issue of bus subsidies and community	No change

		transport is an issue for Transport Agencies.	
Q5 – 'necessary infrastructure'			
Mold Town Council	Infrastructure needs to be in place for renewable schemes, particularly large scale. If the electricity is made how will it be transported to the user/grid?	The comments appear to be promoting the concept of large scale renewable energy schemes and ensuring that the necessary infrastructure grid is available for them to tap into. The last bullet point in para 5.5 stresses the need to understand the scope for renewable energy within the County in order to inform policies and proposals. Despite the general support for renewable energy, large renewable energy schemes can bring about a range of policy and environmental issues and challenges. It would be inappropriate for the Plan to be promote the necessary grid infrastructure to facilitate large renewable energy schemes when the scope for and appropriateness of such schemes has not been established.	No change
Taylor Wimpey	All these issues need to be responded to in a strategic manner, ensuring that capacity and infrastructure improvements are planned for to enable economic and residential growth to succeed both in the short and long term.	Noted	n/a
Kerry Norcross	Agree	Noted	n/a
Wrexham Bidston Rail Users Assoc	Although transport infrastructure is identified in the heading of this section, it is not explicitly reflected in the issues. From the railway perspective transport infrastructure relates to the adequate provision and	Section 5.4 of the KMd has not included bullet points in respect of transport as there is a sections dedicated to transport issues. In that section of the report the	Amend 5th bullet point of section 5.4 as stated

	maintenance of stations, railway track & structures, signalling and electrification to support a reliable service which meets passenger needs. Electrification of the Wrexham-Bidston line will enable a reliable through electric train service to Liverpool and could be more cost effectively realised with an electric sub-station also serving the North Wales Main Line (which will need to be electrified by 2026 if through services between North Wales and London are to operate over HS2). The WBRUA therefore suggests "Railways – infrastructure enhancement to support passenger service improvement" is added as an issue.	need for improvement to the rail system such as a new station to serve DIP has been mentioned as this has clearly been identified in response to the Northern Gateway development, declaration of Enterprise Zone etc. Apart from the issue of the electrification of the Wrexham – Bidston railway line, the Council is not aware of any rail schemes would necessitate inclusion on the Plan. It is not considered that the suggested wording is either necessary or appropriate. However, it is considered reasonable to add 'and electrification of the Wrexham – Bidston Railway' to the 5th bullet point of section 5.4	
Cllr Nancy Matthews	Crucial to work closely with Dwr Cymru on provision of water supply Sustainable urban drainage schemes in relation to new developments	Noted	No change
Railfuture	Under the heading of transport, utility and infrastructure, I would expect to see something about rail transport and possibly reconnecting of certain towns to the network such as Mold and or the use of old railway lines as cycle and walking routes such as Mold-Wrexham and Mold Denbigh. The answer cross references the previous answer.	This comment has been addressed in other responses. The issue of the re-use of former railway lines is addressed in the 7th bullet point.	No change
Penyffordd Community Council	Again, consideration needed for areas outside Deeside – (water pressure problems of Penymynydd)	Noted	No change
Minerals Products Assoc	Yes, See above regarding the safeguarding from inappropriate development, of existing and potential transport hubs such as rail sidings and wharves	Noted	No change

United Utilities	United Utilities agree with the issues and considerations stated within this section.	Noted	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree There is a need to ensure infrastructure providers do not have long lead-in times for the provision of power, water, sewerage etc as otherwise such potential delays could deter inward investment with it deciding to go elsewhere where there are fewer constraints.	Noted	No change
Bloor Homes	Bloor Homes agrees with the issues and considerations identified within the document. Provision of services to support new developments coming forward are a key problem to speed of delivery. There needs to be an early solution to a problem developed at an early stage through good planning practices. Foul drainage is an area of particular concern for developers across Flintshire. Applications are constantly being held up due to severe issues with a lack of infrastructure in place to support new developments. The underlying infrastructure needs to be in place so that new developments are able to connect to the waste water facilities without causing severe issues.	Noted	No change
Grosvenor Estate	There should also be an acknowledgment of the economic role of smaller rural centres and of the economic benefits of rural businesses	The issue of the rural ecomomy is addressed in section 5.14	No change
White Acre Estates	This question is of particular importance to White Acre Estate. The aforementioned scheme was refused in January 2016 as the Council considered that 'there is no capacity in the existing foul drainage network to accommodate flows from the development…' We therefore raise serious concern as to how the Council is going to achieve its housing requirements	Noted. However, the Council has no control over the spending budget or priorities of Welsh Water as this is a matter for each successive % year investment plan. The Council is working closely with Welsh Water as part of the assessment of Candidate Sites in order to	No change

	over the LDP period if Welsh Water do not invest appropriately in infrastructure in to accommodate additional development. Foul drainage is an area of particular concern for developers across Flintshire and applications are frequently held up while foul drainage solutions are identified for individual projects. This is ineffective, and FCC should ensure that Welsh Water budget for infrastructure improvements that will be required due to housing growth. Welsh Water will benefit financially from new housing delivery through increased revenues on new sites and this increase in revenue should be reflected in greater investment. Housing supply should not be constrained by the failure of utilities providers to invest in the network and the Council must acknowledge this issue within the emerging LDP. The utilities providers need to be included in developing a strategy for the future growth of Flintshire at the earliest stages. Once a strategy is in place that can be implemented, developers can get reassurances that they will be able to bring forward sites for development.	ensure that infrastructure does not inhibit delivery of development.	
Lavington Participation Corp. and Duncraig Investment Corp	We fundamentally oppose FCC's current stance with regard to the consideration of foul drainage infrastructure and outline planning applications, whereby the developer is expected to fund a hydraulic modelling assessment prior to determination of the planning application.	Noted. However, the Council does not have the budget to commission hydraulic assessments in connection with planning applications. If NJL are promoting planning applications on behalf of clients on the basis that they are viable and deliverable and will make an early contribution to housing land supply then they should be prepared to fund the	No change

	Moving forward, it is critical that Flintshire and Welsh Water ensure that sufficient and appropriate foul drainage infrastructure is provided in advance of developments coming forward on allocated sites. The consequences of not doing this could be severe in terms of the delays to housing delivery over the plan period.	necessary evidence to support the application. Noted	
David Rowlinson	This doesn't mention technology infrastructure which is increasingly important. The other important statement is to do with timing of infrastructure delivery. The infrastructure should come before the development, not afterwards. Contracts and planning conditions needs to be drawn up to ensure that infrastructure improvements come first, instead of being the last item to be completed to fulfil contract stipulations.	Noted. However this depends on the nature and type of infrastructure provision or enhancements. There will be some infrastructure where it will be necessary for it to be provided upfront and there will be other infrastructure such as local shop, community centres etc where it would be unreasonable to provide until a certain point in time in the phasing and completion of development.	No change
Cllr David Williams	Again, consideration needed for areas outside Deeside – (water pressure problems of Penymynydd!) ensuring infrastructure can cope before permitting developments.	Noted	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	Energy and related infrastructure developments, notably large scale wind and solar projects, can have significant landscape and other environmental impacts, and when formulating future policy and guidance due weight must be given to the need to conserve and enhance the nationally protected landscape of the AONB and its setting. The identified issues are agreed, but environmental constraints on infrastructure development should also be recognised as an issue.	Noted. However the environmental issues referred to are set out elsewhere in the KMd.	No change

CPRW	It is disappointing to note that provision of a mains gas supply is not mentioned, an issue encountered within some rural communities who do not have access to this particular utility.	The provision of a mains gas supply to those parts of the County is not a matter for the LDP but an issue for the relevant service provider. New development should only make provision for infrastructure improvements relating in scale and kind to address any impacts of the development itself, and not address existing shortcomings.	No change
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	How does the plan facilitate investment by other service providers? Renewable energy development will impact on landscape character and 'protected' areas. A rethink (and consistency) on development within green barriers is going to be necessary if the authority is really committed to renewable energy generation	The main role of the Plan in respect is when infrastructure investment is need to facilitate development or where it is necessary to safeguard lad for a known project to occur. Noted. A renewable energy assessment is proposed to be undertaken to look at the scope for and type of renewable energy over the Plan period. It is not accepted that there is an inconsistent approach to renewable energy in green barriers.	No change
Cllr Dave Healey	I agree with several priorities identified especially those associated with the outdated systems of drainage and sewage disposal which are causing problems in some parts of Flintshire.	Noted	No change
Q6 – 'management of waste'			
Mold Town Council	Use waste from existing landfills as fuel supply for waste to energy plant. Find buyers for all recycled plastics.	Whilst some of these suggestions may or may not have merit it is not necessary for the Plan to make specific provision for	No change

	Dog waste as fuel supply for anaerobic digestion once pasteurised.	them in the Plan. It is certainly not the role of the Plan to find buyers for all recycled plastics. In line with the advice in PPW the Plan will identify specific sites to facilitate waste management facilities and will formulate criteria based policies with which to consider waste management development proposals.	
Kerry Norcross	Agree	Noted	n/a
Wrexham Bidston Rail Users Assoc	The WBRUA agrees with the identification of issues under this heading and recommends that, if appropriate, Flintshire should develop the example set by some other authorities and use rail for the bulk transport of waste.	Noted. The issue of using rail for freight has been recognised in section 5.4 of the KMd. Land was safeguarded in the UDP at Shotton for a rail chord to facilitate rail freight but this has not been progressed by the relevant authorities.	No change
Penyffordd Community Council	Yes with more local 'bring sites' including collection service for bulk green waste.	Noted, However, with increasing budget pressures it is likely that recycling facilities will become even more focused on larger sites in accessible locations.	No change
Minerals Products Assoc	Yes. The final bullet point should also identify existing and former mineral sites with scope for waste management facilities. These are often associated with good transportation links.	Noted. Such sites can be considered as part of identifying areas of search or allocations for waste management facilities.	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree There may be potential for modern high technology waste management facilities on the Northern Gateway site.	Noted. This could be addressed as part of the existing planning permissions. The site is effectively a commitment and for this reason it will not feature as an allocation in the Plan and therefore not appropriate for this level of detail to be included in the Plan.	No change
Bloor Homes	Agree	Noted	No change
Grosvenor Estate	waste & landfill comments issued under separate cover	Noted	No change

David Rowlinson	Agreed. Current system of 6 different receptacles for waste needs looking at. How can the recycling facilities be changed to make recycling easier. Are there any commercial opportunities for the waste (would hope these are already being exploited).	The manner in which waste / recycled material is collected from households is not a matter for the LDP. Having said that the design of houses needs to make provision for storage of recycling bins etc.	No change
Cllr David Williams	Yes with more local 'bring sites' including collection service for bulk green waste, especially in rural & semi-rural areas.	See response to Penyffordd CC	No change
Cllrs Carol & David Ellis	It makes no difference whatsoever what I put here as Buckley is and always will be the waste disposal capital of Wales. Landfill is a problem and all the problems it brings with it as Brookhill proved what was a landfill turned into a land use – the Welsh Government initiative was to recycle more but we still see more and more applications by such companys as Brock Parrys Quarry for landfill.	Noted	No change
AONB Joint Committee	The identified issues are agreed, but environmental constraints such as the AONB should also be recognised as an issue when formulating future policy and proposals on waste development.	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	Agree	Noted	No change
Cllr Dave Healey	– Management of waste is highly contentious. It may be worth looking at Rhyl in Denbighshire to see how they achieve very high levels of recycling.	Noted	No change
Q7 – 'Welsh Language'			
Mold Town Council	Assessing the supporting infrastructure, e.g. Welsh language schools.	The second bullet point in para 5.7 identifies the need to assess the impacts	Amend the last bullet point in para 5.7

		of proposed housing allocations on the Welsh Language. However it is accepted that one of the key elements in this is the impact on Welsh Language schools. It is therefore proposed that 'including Welsh language schools' be added before 'where necessary…'.	
Taylor Wimpey	Yes. Cultural heritage is vital to the identity of a nation and we recognize the need for valuable improvement to areas where this is in decline. Well designed, sustainable and affordable residential development provides the opportunity for Welsh speaking families to stay within the area. It is often the case that young people struggling to get onto the property ladder end up moving to places which are more accessible, affordable and suited to their needs. Housing growth will therefore enable these people who may otherwise look elsewhere to remain within the Borough due to the diverse range of housing on offer.	The document identifies the need to have a better understanding of Welsh Language within the County particularly in terms of trends. Once this is on place then the potential impacts or not of new housing allocations can be assessed. It is too simplistic to argue that having a range of housing opportunities will help Welsh speaking families to stay within the area or Borough. By the same logic the provision of a range of housing opportunities could help bring people in from other parts of the County to a settlement or locality that has a high level of Welsh speaking and therefore could be harmful. The document as written is considered to properly identify the evidence base and approach needed to address this issue/.	No change
Kerry Norcross	Agree. If this is an important part of policy then it would probably involve supporting local housing developments in the more rural welsh speaking areas, especially where Welsh speaking schools are located, and with affordable housing a key part of developments.	Noted. Permitting too great a range of housing in rural settlements can bring about social change which can be detrimental to the Welsh language. It is also not clear that permitting housing development in such settlements will actually help retain local services such as	No change

		schools as a rule of thumb is that only I pupil is generated for every 4 new houses. This issue will require careful considerations and close liaison with Education colleagues as well as a Welsh Language assessment.	
Penyffordd Community Council	Yes but add improved facilitation within communities.	Noted	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree	Noted	No change
Bloor Homes	Bloor Homes agrees with the Council that the Welsh language should be supported and is pleased to see it is stated as 'where necessary and appropriate'. It is not always applicable to every site and therefore should be considered on a site-by-site basis. The Welsh language is not always an appropriate consideration to make in certain instances and is something that should be assessed on a site-by-site basis. The Council should not put developers under unnecessary burdens as it could potentially stifle the delivery of developments in key areas.	Noted.	No change
Grosvenor Estate	Agree	Noted	No change
David Rowlinson	I'm not quite sure this impacts on the LDP - but support the Welsh Language.	Noted	No change
Cllr David Williams	Yes but add improved facilitation within smaller communities.	Noted	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	Protecting the cultural distinctiveness of the AONB, including the Welsh language, is an aim of the AONB Management Plan and the committee welcomes recognition and consideration of this issue as part of the plan making process.	Noted	No change

CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	I acknowledge that the plan needs to address this issue and I fully support the safeguarding and encouragement of the Welsh culture and language but, in a county like Flintshire, is this really a development plan issue?	In certain parts of the County, where there is a strong percentage of Welsh speaking then potentially new development could be harmful. It is for this reason that the Council needs to address the Welsh language as part of the preparing the Plan and possibly undertake an Impact Assessment if potential concerns are identified.	No change
Betsi Cadwaladr Health Board	We welcome the inclusion of the need to assess impact on the Welsh Language. We would have welcomed seeing a more positive statement with regarding to promoting the Welsh language and culture, given the duties of statutory bodies under the Welsh Language Act and the Welsh language standards which are being introduced. Our response. The LDP is a Land Use Plan and as such the objectives around the Welsh Language need to be realistic and set out what can actually be achieved. Careful consideration will need to be taken in the development of areas where Welsh is widely spoken to ensure that mitigation measures can be taken to avoid a detrimental effect on the language.	Noted	No change
Cllr Dave Healey	– I agree with measures being taken to protect the native language of Wales.	Noted	No change
Q8 – 'safe, accessible places…'			
Mold Town Council	Seeks the addition of the following bullet points:		No change

	• Assess impact on financial pressures for maintenance of public realms.	The document has identified the broad aim of ensuring that there is a good quality public realm as part of new built development. The issue as to how this is done, in particular the implications of budgetary pressures will be a matter for detailed consideration in drafting policies and possibly supplementary planning guidance.	
	• Safety can be designed into new developments where cars can access/park (planning policy issue), where children can safely play.	In the context of the Highways Act the purpose of a highway is for the movement of vehicles and pedestrians. Whilst, in line with Manual for Streets, it is possible for shared areas for vehicles and pedestrians within new developments this is primarily concerned with the removal of a dedicated footway. This is quite a different concept than that advocated by the objector in designing vehicular areas where children can play. In the absence of any formal guidance that this can be safely done then it would be inappropriate to include this within the KMd.	
	• Areas for food production (good health and well-being) research available on benefits to people who can be outdoors growing their food with others in their community.	Para 5.18 addresses issues relating to green infrastructure networks. The 4th bullet point refers to 'recognising the different roles of green infrastructure networks – landscape, wildlife, movement, recreation, amenity etc'. It is	Amend the 4th bullet point in para 5.18

		proposed that 'food production' be added in this bullet point.	
Taylor Wimpey	We agree that masterplanning larger scale developments can offer greater opportunities for improving accessibility and connections within both the immediate and wider surrounding area. This in turn supports the health and wellbeing of existing and new residents.	Noted	No change
Kerry Norcross	Agree, although I do not believe that this should be at the detriment to countryside e.g. if we have to take an extra 2 acres of agricultural land to allow 2 acres of open spaces etc. then this in my mind is a step in the wrong direction. If an area has sufficient amenities such as parkland, ponds and open dog walking spaces already then adding more of these amenities would not create further benefit. So perhaps including these open outdoor provisions should be prioritised in areas where there is no access to this sort of amenity. Developments within easy access to sports centres would also be an advantage I would have thought.	Noted	No change
Wrexham Bidston Rail Users Assoc	The WBRUA agrees with these issues and sees an adequate provision of rail services as a key factor underpinning accessibility as well as supporting good health, well-being and equality by enabling mobility and reducing road traffic demand. The provision and maintenance of easy, safe access to Flintshire's railway stations has to be an underpinning consideration.	Noted	No change
Railfuture	Provision of safe cycling and walking facilities linking to public transport especially rapid transport such as rail and light rail. These would all enhance safety and health and wellbeing. At the same time adequate transport is very much and equality issue in its ability to level the	Noted. However the issues raised are addressed in other sections of the document.	No change

	playing field economically to some extent between communities		
Penyffordd Community Council	Agree	Noted	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree	Noted	No change
Bloor Homes	Bloor Homes agrees with the issues and considerations raised.	Noted	No change
Grosvenor Estate	Agree	Noted	No change
David Rowlinson	I don't see this as separate from the other topics listed. It feels like an add on to address current political trends. DDA access should be considered for any people facing development.	Noted. Creating safe, accessible and healthy places is a fundamental role of the planning system.	No change
Cllr David Williams	Yes – to consider and provide further response as appropriate.	Noted. However, the KMd is the appropriate means of commenting on this in order that the Plan can progress, rather than having to go back to address further comments at some unspecified point in the future.	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	The committee would emphasise the important role that access to the AONB and wider countryside plays in promoting good health and well-being. Recognised benefits include opportunities for physical activity through walking and cycling and the positive effect on mental well-being of experiencing beautiful places such as the Clwydian Range and Dee Valley, which are some of the ecosystem services provided by the AONB.	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support	Noted	No change

Huw Evans Planning	Good design and embracing traditional planning principles should be doing this as a matter of course. I am however concerned that planners have become regulators with the skills and experience of negotiating good design and outcomes being lost at the expense of ticking boxes.	Noted	No change
Betsi Cadwaladr Health Board	We wholeheartedly support the inclusion of the issues identified and look forward to working with FCC on further development of this area	Noted	No change
Cllr Dave Healey	I agree with emphasis being placed on the issues identified.	Noted	No change

Issues – Safeguarding the Environment			
Q16 – 'Climate change'			
Mold Town Council	Need to reinstate and enhance natural defences – habitats, water catchments and river ecosystems. Well wooded catchments in hills above settlements, wet-lands and wildflower rich grasslands to increase the water holding capacity of landscapes near towns. There is no mention of air quality.	Increased consideration is being given to such measures in response to recent flood events as opposed to traditional flood protection or engineered solutions. The lead for schemes like this needs to come from Welsh Government / Natural Resources Wales. If schemes are proposed which required land to be safeguarded for them to be implemented then the Plan could consider this. However, it is not the role or responsibility of the LDP to devise such water holding and water management schemes. The 6th bullet point in para 5.16 mentions the need to address light, noise and other types of pollution within the County in terms of identifying development sites. However, it is considered that ',air' could be added after 'noise'.	No change Amend 6th bullet point in para 5.16
Kerry Norcross	Agree	Noted	No change
Wrexham Bidston Rail Users Assoc	As stated in the WBRUA's responses to earlier questions, with a large population within 5km of a station and the current relatively low use of rail, Flintshire has the potential to see more significant use	Noted. It is accepted that this has a role to play in addressing climate change but consider that the objector's suggested wording should be broadened out in the	Add a new bullet point to section 5.16 as stated.

	of rail if rail services better served the needs of the population. The WBRUA therefore advocates that consideration also be given to including "Promoting a modal shift to rail from road to reduce the impact on the environment."	context of a sustainable pattern of development: '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'	
Strutt and Parker	We agree that there is a need to ensure that "new development has built-in resilience to climate change" but feel it prudent to highlight that new development can take place in flood risk areas where it is demonstrated that flooding will neither occur at the site nor lead to flooding elsewhere. In line with the identification of this issue, the candidate site "Land at Rhydymwyn" demonstrates that new housing which is resilient to climate change can be delivered despite being within a floodplain, due to the implementation of flood resilience measures.	PPW 13.2.1 states 'Flood risk, whether inland or from the sea, is a material consideration in land use planning. All development on land within the flood plain of a watercourse, or drained via a culvert, or on low lying land adjacent to tidal waters, is at some risk of flooding and whilst flood risk can be reduced by using mitigation measures it can never be completely eliminated'. PPW 13.3.1 states '…A sustainable approach to flooding will therefore involve the avoidance of development in flood hazard area…'. The Candidate Site in Rhydymwyn lies within a zone C2 flood risk area i.e. without significant flood defences, in the TAN15 Development Advice Map. Neither TAN15 nor PPW supports highly vulnerable uses such as residential within C2 zones.	No change
Cllr Nancy Matthews	SUDS - must be insisted upon NO SHORT CUTS Tropical type storms make this essential	Reference to SUDS is an example of how new development can be resilient to climate change. Preferably sustainable	No change

		drainage systems should be utilised to deal with surface water disposal. The variety of SUDS techniques available means that virtually any development should be able to include a sustainable drainage solution. However SUDS schemes cannot be insisted upon as in some instances it may not be viable or practical for technical reasons.	
Railfuture	Climate change consideration should direct any responsible governmental body towards investing and supporting sustainable transport over the private car. Thus reinstating former rail provision, provision of light rail and provision of cycling alternatives to the car though costly in the short run are less costly than the consequences of runaway climate change.	It is agreed that supporting sustainable transport as opposed to over reliance on the private car can make a positive impact in reducing the causes that contribute to climate change	Add " and sustainable transport alternatives" after the word SUDS in bullet point 5 of paragraph 5.16
Penyffordd Community Council	Agree	Noted	No change
Redrow	We object to the proposed implementation of a sequential test in relation to new housing development. Many of the brownfield sites within the centres of settlements across Flintshire are unviable and haven't been developed in either good, let alone poor, economic strength. We therefore urge the council to seek to deliver housing where it is needed upon a borough land supply basis that Welsh Government intends authorities to through the revisions to TAN1 land supply guidance.	The sequential test in relation to new housing is enshrined in national planning policy and is a common and logical approach taken by numerous local authorities. The objector has misinterpreted the final bullet point in paragraph 5.16 which from the outset recognises that not all brownfield sites are suitable for development as a result of constraints such as contaminated and/or unstable land.	No change
Crag Hill Estates Ltd & Praxis Holdings	We agree that if development sites have a risk of flooding than it is a constraint that could deter investment. There must be flood protection measures	TAN15: Development and Flood Risk has been adopted by the Welsh Government in recognition of the growing problem of flooding. It contains detailed advice and	No change

	for such sites plus resilience measures built into the development.	guidance when considering proposals or planning applications for new development. Allocating sites for new housing in flood risk areas is generally not compatible with TAN15. Planning applications on unallocated sites may be looked upon favourably provided that the consequences of a flooding event can be effectively managed.	
Bloor Homes	A large number of the solutions that are set out in the issues and considerations are very specific, but it should be recognised that each individual site has very different characteristics to others that can be in close proximity. We therefore suggest that the Council should adopt a flexible approach. There is no one size fits all approach that the Council should advocate. The Council should take into consideration a range of site typologies that can help deliver the aspirations of the Council. This means that there should be a consideration of all site types – both greenfield and brownfield. The Council highlights the search sequence for identifying sites that has been set out in PPW. This starts with previously developed sites, then settlement extensions followed by new sustainably located sites around settlements. This is a desirable approach however it is not always possible to meet the criteria to achieve the objectives of the Plan. The Council has to recognise that there are only a finite number of brownfield sites across Flintshire. The total area of these sites is not going to likely be able to deliver all of the growth that is needed to support both economic and population growth.	Noted It is established practice to follow a site search sequence and to identify brownfield land opportunities when it is appropriate and realistic to do so. The objector seems to have wrongly assumed that the KMd is advocating solely brownfield land allocations. The intention is to identify a range of allocation by location, type, size etc. Again, the objector seems to be assuming that the Council is intent on allocating brownfield sites only. The lessons learnt from adopting such an approach in Wrexham's first LDP are well established in this context.	No change

	Brownfield sites will need to be supplemented with sustainably located greenfield sites in order to deliver the necessary growth. The Council should take a holistic approach to site selection and identify ones that meet a broad range of criteria.	Noted.	
Grosvenor Estate	Agree	Noted	No change
Lavington Participation Corp. and Duncraig Investment Corp	Again, we would note that brownfield sites are not always more sustainable than greenfield sites in nature, and often come with development constraints that take time to resolve. An appropriate selection of greenfield sites should therefore be allocated for housing. In terms of the consideration of green energy and building specifications, it must be recognised by FCC in the LDP that different sites may present different energy solutions and hence a one size fits all approach should not be included within any policies.	Noted. It is established practice to follow a site search sequence and to identify brownfield land opportunities when it is appropriate and realistic to do so. The objector seems to have wrongly assumed that the KMd is advocating solely brownfield land allocations. The intention is to identify a range of allocation by location, type, size etc. National policy seeks to reduce energy consumption from non- renewable resources. This energy generation can be from wind, sun and biomass sources all of which represent sustainable solutions.	No change
David Rowlinson	Agreed. I would expect any new development to follow such processes as part of the planning process. Surely part of this should be understanding the capacity and resilience of critical infrastructure and managing accordingly.	Noted. Understanding Infrastructure capacity and resilience is specifically referred to in bullet points 3 and 4 of paragraph 5.5 of the Key Messages document.	No change
Cllr David Williams	Agree	Noted	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	The identified issues are agreed. Addressing all forms of pollution, including excessive noise and light, will help maintain the tranquillity of the AONB as one of its special qualities and support the AONB's Dark Skies initiative.	Noted	No change

CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	The Council needs to be more consistent in its approach to housing in flood risk areas. Whilst Northern Gateway is of major importance is it really sustainable to allow over 1000 new dwellings within the C2 flood zone? A more pragmatic approach should be taken to some developments in preference to the 'worst possible scenario' which is based on a sequence of events and rise in sea level that is unlikely to ever arise because if we ever get to that situation major new flood defence works would have been implemented. The alternative is a retreat which mean the relocation of Sealand, Saltney, Sandycroft and parts of Shotton and Connah's Quay.	Noted. The site is not C2 flood zone but C1 and the allocation was recommended for inclusion following scrutiny by the UDP Inspector and as part of the consideration of subsequent planning applications. The development proposes a comprehensive approach to flood risk management and mitigation works. PPW identifies climate change as a key consideration within the planning system. It would be wholly inappropriate to ignore the effects of climate change nor seek to tackle the causes of climate change. Taking a longer term view it is not considered feasible for flood defences to keep being built or increased to protect all existing areas.	No change
Cllr Dave Healey	I completely agree with the need to recognise the impact of climate change and the need for us to develop strategies with regard to flood prevention. I have raised particular concerns about the risks with exist with regard to Caergwrle's Packhorse Bridge	Noted	No Change
Q17 – 'environmental assets'			
Natural Resources Wales	With regards to Section 5.17 - Conserve and enhance Flintshire's high quality environmental assets including landscape, cultural heritage and natural and built	Noted. It is accepted that PPW clarifies that National Parks and AONBs are of equal importance to National Parks in terms natural and scenic beauty. Despite	Amend bullet point 1 in 5.17.

	environments we are not clear what the following statement means – 'Ensure proper status of the Clwydian Range and Dee Valley Area Of Natural Beauty (AONB) is recognized. Still not clear that it is regarded as national importance alongside National Parks'. Planning Policy Wales, paragraph 5.3.6 identifies that National Parks and AONBs are of equal status in terms of landscape and scenic beauty and that both must be afforded the highest status of protection from inappropriate development. Paragraph 5.3.6 of PPW goes on to mention that in development plan policies and development management decisions National Parks and AONBs must be treated as of equivalent status. In National Parks and AONBs, development plan policies and development management decisions should give great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of these areas.	this, there is still a perception in dealing with the public and developers that the AONB does not carry the same weight as National Parks. The KMd is justified in raising this as an issue, rather than simply relying on what is in PPW. Nevertheless the wording at present is considered to be slightly cumbersome and could be improved. It is is therefore proposed to reword as follows: 'Ensure the proper status of the Clwydian Range and Dee Valley Area Of Natural Beauty (AONB), as being of equal importance to National Parks, is recognized, as there is a perception by some that it is regarded as being of lesser importance'	
Mold Town Council	Could be criticised for suggesting closer links with NW England (Culturally) than Wales.	The bullet point is merely suggesting that 'some' people consider that Flintshire has stronger cultural links with the NW England land to Wales. This reflects its gateway location at the centre of a strong sub-regional or regional local economy.	No change
Kerry Norcross	Agree	Noted	No change
CPAT	While I welcome the intent of 5.17, I feel that the list of historic environment features should be expanded to include those within the Historic Environment Record. As you are aware the Historic Environment Record has been made statutory by the Historic Environment (Wales) Act 2016 and it is expected that guidance issued by the Welsh Government later this year will require	Noted. The Historic Environment Record (HER) is a database and archive of information about sites of archaeological interest. CPAT's website appears to contradict the function of HER. On the one hand it states it has an important role in assisting local authorities to assess	Add the words "and archaeology sites" within the text of the final bullet point in paragraph 5.17

	Local Authorities to have regard for the content of the Historic Environment Record in the execution of their duties (including planning). Therefore I feel it would be prudent to add "sites recorded in Flintshire's Historic Environment Record" to the list under the final bullet point.	archaeology implications of proposed developments. On the other it warns against using the information for development control purposes. However archaeology is part of Flintshire's cultural fabric.	
Cllr Nancy Matthews	AONBs are regarded as having national importance, which is why they all have management plans It would be a good idea to get FCC to recognise the importance of the AONB!!	Noted. The KMd is making the point that despite the guidance in PPW, there is a still a perception by some that the AONB does not carry the same weight as a national park. The wording though has been amended to make this point clearer.	Bullet point 1 in paragraph 5.17 is to be amended to offer greater clarity
Penyffordd Community Council	Yes but add, support protection of rural buildings of local historical interest. No more destruction of traditional farm buildings	The key issue and consideration is to protect all buildings of local historic interest whether in a rural or urban location and often include traditional farm buildings.	No change
Minerals Products Assoc	It is unclear why GCN appear to be being given primary status when other protected species exist. Appropriate mitigation and compensation can be delivered through the licensing process to ensure the conservation status of a protected species is maintained, in accordance with the habitats directive This should not therefore been seen as a barrier to development proposals. Reference could be made to the Woking Borough consideration of GCN.	It is not being suggested that the presence of a protected species is necessarily seen as a barrier to development proposals. Furthermore it is acknowledged that it is possible (via mitigation & compensation) to ensure a species conservation status is maintained. Bullet point 3 in Paragraph 5.17 is highlighting an evidence based issue regarding the presence of GCN in particular settlements in Flintshire. Bullet point 2 clearly acknowledges the presence of other protected species and their habitats throughout the County.	No change
Bloor Homes	A large number of the solutions that are set out in the issues and considerations are very specific, but it should	Noted	No change

	be recognised that each individual site has very different characteristics to others that can be in close proximity. We therefore suggest that the Council should adopt a flexible approach. There is no one size fits all approach that the Council should advocate. The Council should take into consideration a range of site typologies that can help deliver the aspirations of the Council. This means that there should be a consideration of all site types – both greenfield and brownfield. The Council highlights the search sequence for identifying sites that has been set out in PPW. This starts with previously developed sites, then settlement extensions followed by new sustainably located sites around settlements. This is a desirable approach however it is not always possible to meet the criteria to achieve the objectives of the Plan. The Council has to recognise that there are only a finite number of brownfield sites across Flintshire. The total area of these sites is not going to likely be able to deliver all of the growth that is needed to support both economic and population growth. Brownfield sites will need to be supplemented with sustainably located greenfield sites in order to deliver the necessary growth. The Council should take a holistic approach to site selection and identify ones that meet a broad range of criteria.	See response above See response above See response above	
Grosvenor Estate	Agree - but recognising that many of the protected landscapes or designations can only be manged as part of a sustainable and vibrant rural economy.	Noted	No change

David Rowlinson	Agree that environment should be safeguarded. Concern over rising costs of development in connection with environmental issues. Is saving Great Crested Newts more important (worthy of cash), than small schemes which improve quality of life for residents. A balance needs to be struck. Clwydian Range should be protected.	Agreement that the environment should be safeguarded is noted. The key messages document is not attempting to prioritise what is the most important issue but rather to identify all the key issues and considerations that should inform the LDP. EU Directives as backed up by PPW set the context for decision making where international protected species are involved. It is also agreed that a balance ought to be struck and the AONB requires protection.	No change
Cllr David Williams	Yes and add- Support protection of rural buildings of local historical interest. No more destruction of traditional farm buildings. Never again allow an urban style development to be built in the open countryside that replaces iconic buildings (Meadowslea development where hospital buildings were replaced with a 'Brookside development').	The key issue and consideration is to protect all buildings of local historic interest whether in a rural or urban location and often include traditional farm buildings. The design and appearance of development proposal is a detailed matter for the development management process.	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	The AONB is one of the county's major assets and the committee welcomes recognition of this as a key issue to consider in formulating the plan. National policy is clear that AONB's and National Parks are of equivalent status as Welsh protected landscapes (PPW - Edition 8, January 2016 - para 5.3.6), which is reinforced in the recently published Welsh Government Review of Designated Landscapes. The committee would emphasise the need for a specific AONB policy in the plan to add local detail to national policy in the same way that the Denbighshire LDP and emerging Wrexham LDP addresses the issue. In framing policy for the AONB	Noted. See response to Natural Resources Wales above.	See change above

	the committee would highlight the need for a consistent approach across all three local planning authorities and the need to include safeguards which protect the setting of the AONB in addition to the designated area itself. In addition, the committee would also draw attention to the landscape quality and character policies and objectives set out in the AONB Management Plan in formulating policy and would emphasise the need to positively promote opportunities to enhance the AONB as part of any new development proposal. The committee would also recommend that the policy draws attention to Supplementary Planning Guidance (SPG) for the AONB, and would urge the three local planning authorities to collaborate in the preparation of such guidance at the earliest opportunity to ensure a consistent cross boundary approach throughout the AONB. It is also suggested that the AONB Management Plan should be specifically recognised as part of the evidence base for the LDP.		
CPRW	In relation to the first bullet point attention is drawn to 'PPW ch5 para 5.3.6 which states 'National Parks and AONB's are of equal status in terms of landscape and natural beauty….'. Until any change is made to those guidelines by WG then the AONB must be recognised as of the same status as a national park.	Noted. See response to Natural Resources Wales above	See change above
Dr Klaus Armstrong Braun	Support except in opening sentence, 5.17, add Biodiversity between, ''assets ''including biodiversity'', landscape ...''	Noted. Include reference to biodiversity as an asset to be conserved and enhanced.	Add the word "biodiversity," after the word "including" in 5.17
Huw Evans Planning	Agree and support but the authority needs to get on approve the draft SPG re development and great crested newts which is of considerable benefit in terms	Noted. The Council is committed to preparing a series of up to date SPG's including SPG No 8 Nature Conservation	No change

	of protecting habitats and giving good guidance to developers. Another example of the need to get on and deliver where it is needed.	and Development. These have been out for public consultation and following a report to Cabinet will be formally adopted by the Council.	
Cllr Dave Healey	I completely agree with all aspects which have been identified. I would further add the need to encourage rural villages and communities to work together to promote their appeal to visitors in order to encourage their sustainability. It would be interesting to explore sources of funding for the development of facilities similar to Flint's Old Court House in groups of villages in rural communities.	Noted. Whilst noting the merits of the comments these go beyond the remit of the Plan which is a land use document.	No change
Q18 – 'green infrastructure'			
Mold Town Council	Agrees with the issues listed.	Noted	No change
CPAT	Yes. I am particularly glad to see mention of the historic environment under 5.18	Noted	No change
Kerry Norcross	Agree. Particularly with the networks missing links. Developments have a wider impact on road networks than just the immediate frontage and understanding where pressure points are being created is essential. I would like to see where possible the new developments helping to ease theirs and existing traffic issues in the region rather than adding to them. I will use the Oakenholt development as an example as it is one that I am more familiar with – The site register indicates that developing this region could reach roads that proceed quite easily and directly to the A55 Flint Mountain junction. However a road will likely meander through the estate which even if connected at the top and bottom will only ever prove useful to the people on that estate, and will never help the wider community (other	Noted. The first bullet point refers to 'identifying networks and gaps where linkages are needed' but this is with regard to green infrastructure rather than highways infrastructure. It is inevitable that new development will to add to traffic in a locality (unless it is replacing a previous use of a site). Consideration will be given to the creation of a safe access and egress and whether the local highway network can safely accommodate the likely nature and	No change

	residents local to that area etc) or be useful at relieving traffic through Flint to the A55. I would like to see the new larger development sites take some of the additional traffic issues on board and look for ways to help connect the residents (and other existing local residents) either through or along the perimeter of the development to exits where they are most likely to want to travel. So using the Oakenholt development example, Leadbrook Lane forms the perimeter of the candidate sites and with a couple hundred yards of connecting road (where there is currently just a farm track) to the top to Starkey lane would give a short 'as the crow flies' access to the A55 (where there are junctions in both directions), thus connecting the bottom Flint road to the A55 Flint Mountain junction by a one minute journey. I think that these are the sort of green infrastructure opportunities that exist, where there are immediate wins and these wins are not only for the new development but also for the other existing residents in the area.	volume of traffic flows arising from the site. Those Candidate Sites which seek to extend the Croes Atti development will be assessed alongside the range of candidate sites and it is not appropriate to go into detail here.	
Railfuture	We would urge maximum effort to convert the Mold Denbigh and Mold Wrexham former railway routes into cycle routes.	Noted.	No change
Penyffordd Community Council	Yes but add, recognise that there are areas in the County other than the Dee Estuary that need protection including the preservation of rural & semi-rural areas with protection of green spaces.	Noted. It is accepted that there are areas throughout the County which are of value as green spaces. The bullet point is merely recognising that the Dee Estuary is a strategic opportunity for a linear green space and that there are opportunities to improve local accessibility to it.	No change
Wirral Council	Wirral Council would welcome support for the protection of the Dee Estuary.	Noted	No change

Minerals Products Assoc	Yes. Recognise the ability of minerals developments to help deliver and enhance wildlife networks, where appropriate,	Enhancements of wildlife networks can be achieved through a variety of means and as part of new development. It would be inappropriate to mention only minerals development.	No change
Crag Hill Estates Ltd & Praxis Holdings	We agree that is necessary to provide a good quality environment to attract investment. Corporate businesses are generally interested in image and appropriate environment to attract high quality staff.	Noted	No change
Bloor Homes	Bloor Homes agrees with the issues and constraints identified.	Noted	No change
Grosvenor Estate	Agree	Noted	No change
David Rowlinson	A lot of words here, but not sure what they mean in reality. Again seems more a political topic than something which will change the LDP. The Dee Estuary is not a pleasant place. It is tidal mud. Important environmentally, and needs to be protected. But not worth investing in as a green space.	The Dee Estuary is an internationally recognised nature conservation area. In addition to this the Dee Estuary provides a linear green space with cycling and walking routes and has along it a number of settlements as well as industrial areas, and is close to a number of other settlements. The KMd is merely trying to recognise that the Dee Estuary has much greater potential as a green space in linking these communities.	No change
Cllr David Williams	Yes but add. Recognise that there are areas in the County other than the Dee Estuary that need protection including the preservation of rural & semi-rural areas with protection of green spaces. A greater study of areas outside the normal locations needs to be undertaken, my current understanding is that the potential development of Fagyl lane quarry does not appear to have had any lead from the County. There are other areas that need to be investigated.	Noted. It is accepted that there are areas throughout the County which are of value as green spaces. The bullet point is merely recognising that the Dee Estuary is a strategic opportunity for a linear green space and that there are opportunities to improve local accessibility to it.	No change

AONB Joint Committee	The AONB should be recognised as one of the key providers of 'Green Infrastructure' in the county.	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support except add in: Maintain and enhance green, ''and Blue'' infrastructure networks	Agreed.	Insert " and blue" between "green" and "infrastructure"
Huw Evans Planning	Agree	Noted	No change
Cllr Dave Healey	– I agree to all of that.	Noted	No change
Q19 – 'locally distinctive design'			
Mold Town Council	Design guides needed for new developments that reflect what the key attributes are on the built environment.	Detailed guidance on promoting good design by Welsh Government is set out in TAN12 Design. Unlike some other Counties, Flintshire has a number of towns and main villages each with their own character, design features, materials etc. It would be extremely resource intensive to produce a design guide for each of these settlements.	No change
Kerry Norcross	Agree	Noted	No change
CPAT	There might also be a consideration of the historic environment under 5.19	Noted. Para 5.19 is more focussed on new development in terms of setting out some design principles and approaches. Whilst the historic environment is a consideration as part of this it is mentioned within para 5.15. It is not considered necessary to repeat points throughout the document as it must be read as a whole.	No change
Penyffordd Community Council	Yes but add, promote innovative design and stop building carbon copy developments that have little variation or Character.	Noted. This is already reflected in the bullet points.	No change

Redrow	Additional site specific design guidance should be refrained from in areas of marginal viability for development - it is recommended that the LPA undertake both a residential, retail and employment development viability to understand whether any additional specific design guidance would impact negatively upon development coming forward.	Noted. However both PPW and TAN12 note that good design should be approached in a manner where costs are considered on the whole life of the development not just initial construction costs.	No change
Bloor Homes	Design criteria whilst important should not be too prescriptive. Each site should be able to sit within its specific surrounding and reflect the local vernacular. Any policy that is written should acknowledge that design criteria should be judged on a site-by-site basis.	Noted	No change
Grosvenor Estate	Agree	Noted	No change
David Rowlinson	Agreed. Sensible planning approach required. We don't want identical estates popping up everywhere. I would suggest that individuals housing regs should be loosened, providing neighbours are happy. Developers should put in more work to ensure their houses match the style, size and arrangement of other housing in the area.	Noted	No change
Cllr David Williams	Yes but add. Promote innovative design and stop building carbon copy developments that have little variation or character. There is a danger that current house building, due to unimaginative designs, will be stigmatised in the future in the same way as those of the sixties.	See response to Penyffordd CC above	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	This is a key issue in accommodating development in protected landscapes such as the AONB, and recognition of the issue as part of the plan making process is fully supported. The committee would again emphasise the need for a specific AONB wide SPG to	Noted	No change

	assist in achieving good design that is sensitive to location.		
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	Does Flintshire really have a vernacular or distinctive character? It is noted that there are still no Conservation Area Appraisals adopted which would provide good guidance for both planners and developers in the most sensitive architectural and historic areas. Do enough planners have the right skills and experience to effectively engage with designers and developers to achieve positive outcomes?	Noted. As a County it is accepted that there may no single vernacular design identifiable. Nevertheless, there are subtle variations between different parts of the County and particular settlements. Conservation area appraisals are extremely resource intensive and will be progressed as and when resources and time allows. Unknown. However the majority of planners will have an appreciation of the necessary skills required by virtue of their academic training be it in Town and Country Planning and/or Civic Design. These skills are ultimately best honed by gaining experience “at the coalface” through planning practise (development management) supplemented by Continuous Professional Development. In addition there are practising planners who have high level skills and particular experience in specialist areas such as conservation of the built historic environment and/or urban design. It could equally asked whether house builders and their architects have the	No change

		necessary skills and experience to design innovative development or whether a safer option of persisting with what the market is familiar with is pursued.	
Cllr Dave Healey	– Agreed	Noted	No change
Q20 – 'natural resources'			
Mold Town Council	There is no point in setting targets for renewable energy unless there is commitment and resources to meet them. Until EU sets targets and LA's are fined for not meeting them it won't happen.	The third bullet point in para 5.20 is raising as an issue what approaches could be taken in the Plan in respect of renewable energy. In PPW there is presently no targets set in respect of achieving a certain amount of energy generation from renewable energy. Rather, lpa's are encouraged to undertake an assessment of renewable energy to inform decisions about how the Plan addresses this e.g. through areas of search, allocations or criteria based policies, and this will be undertaken. Larger renewable energy schemes are now likely to fall within the definition of Developments of National Significance whereby applications will be submitted to Welsh Government and considered by PINS. Considering the implications of this new consent regime it seems unduly harsh to be promoting the idea of financial fines on lpa's.	No change
	Add Tidal Power to the list. Flintshire has 25 miles of Dee Estuary with 2nd largest tide in UK.	The Dee Estuary may have a large tidal range but it is also of European nature	No change

		conservation significance (Natura 2000 site) being a Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, largely on account of its importance for birds. It would be inappropriate for the Plan to promote the concept of a tidal barrage energy scheme in the absence of any consideration of its potential impacts or whether it could be delivered within the Plan period.	
Kerry Norcross	Agree	Noted	No change
Wrexham Bidston Rail Users Assoc	From the railway perspective, electrification (including trains equipped with regenerative braking) will enable increased use of renewable energy. Although railway electrification could potentially be identified as a specific issue in relation to this topic, the WBRUA accepts that railway electrification is more aligned with the topic covered by Q6 and by the modal shift to rail identified in the WBRUA's responses to other questions.	Noted	No change
Strutt and Parker	The promotion of brownfield land for development in order to achieve protection of agricultural land, has key viability and deliverability issues. We consider that the Authority will need to allocate greenfield land for development in order to meet their identified housing needs, as has been the case within Wrexham Council.	Noted. The objector seems to be identifying a direct link between promoting brownfield land in order to protect agricultural land. The promotion of brownfield land for development is a key planning principle in PPW and so is the protection of best and most versatile land. The lpa must assess candidate sites in the light of a variety of such planning considerations having regard to a site search sequence. The experience of Wrexham LDP1 and 2 is noted.	No change
Penyffordd Community Council	Agree	Noted	No change

Wirral Council	Wirral Council would support the prioritisation of brownfield land, subject to flooding, nature conservation and other environmental safeguards.	Noted	No change
Redrow	Redrow does not believe that the council should be promoting a brownfield first approach towards new development, whether that be residential, commercial or retail uses. There is a clear directive within national planning guidance to boost land supply, therefore, limiting the supply of land through the implementation of an arbitrary brownfield first approach would run counter to national guidance and could have the effect of stagnating development in marginal centres. Greenfield development and brownfield development should be used in tandem with one another to provide a mixture of development typologies, in the instance of housing development, both family and smaller housing can be provided if a positive approach towards greenfield development is taken, boosting the overall population that can support the local centres.	The Council is not per se prompting a brownfield approach but merely reflecting the principle in PPW which states in para 9.2.8 '*In identifying sites to be allocated for housing in development plans, local planning authorities should follow a search sequence, 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*'. The KMd is merely stating that that as part of the site search sequence it is necessary to have regard to brownfield land.	No change
Minerals Products Assoc	Yes. However, bullet point 6 needs to ensure that appropriate landbanks are maintained throughout the plan period, to ensure a steady and adequate supply can be maintained throughout and beyond the end of the plan life.	The need for a sustainable supply of minerals is also mentioned in para 5.9.	No change
United Utilities	United Utilities is pleased to see that protecting water quality and conserving water supply forms one of the considerations within paragraph 5.20 'Support the safeguarding and sustainable use of natural resources such as water and promoting the development of brownfield land'.	Noted	No change
Crag Hill Estates Ltd & Praxis Holdings	Unrealistic onerous targets for renewable energy in developments should not be set as they could deter investment.	The second and third bullet points are more focussed on renewable energy generation on a commercial scale rather	No change

	Technology is changing rapidly and targets can soon become out of date. Such policies should be advisory rather than unduly prescriptive and mandatory.	than domestic residential scale. Building Regs presently provides the framework for this. The KMd is reflecting the advice in 12.9.2 'Local planning authorities should guide appropriate renewable and low carbon energy development by undertaking an assessment of the potential of all renewable energy resources and renewable and low carbon energy opportunities within their area and include appropriate policies in development plans'.	
Bloor Homes	Throughout the consultation document there is a focus on delivering brownfield sites. It should be noted that brownfield sites are not always the most suitable. There can be issues associated with these sites that can affect viability and deliverability; issues that can affect sites coming forward and stalling.	The KMd reflects the site search sequence in PPW. The KMd does not focus on delivering brownfield sites but stresses the need to establish whether there are brownfields which are realistic to include as part of the housing land supply, on the basis that they are viable and deliverable.	No change
	Utilising a range of site typologies covering both previously developed land and greenfield land will ensure a steady stream of sites that can deliver the much needed housing and economic development for Flintshire.	Noted	No change
	It is not always necessary to safeguard agricultural land. There are often cases where there is a surplus of agricultural land, or land that is no longer of a suitable quality to support agriculture. This means an area of land becomes redundant and should be used for more appropriate purposes. Facilitating development on	Noted. It is suggested that the penultimate bullet point is amended by adding 'best and most versatile agricultural land' to emphasise that the focus is on protecting high quality agricultural land.	Amend penultimate bullet point as stated.

	these types of sites in a sustainable way will ensure the sustainable growth of Flintshire.		
Grosvenor Estate	Agree	Noted	No change
White Acre Estates	Throughout the consultation document there is a focus on delivering brownfield sites. It should be noted that brownfield sites are not always the most suitable. There can be issues associated with these sites that can affect viability and deliverability; issues that can affect sites coming forward. Utilising a range of site typologies covering both previously developed land and greenfield land will ensure a steady stream of sites that can deliver the much needed housing and economic development for Flintshire. It is not always necessary to safeguard greenfield land on the edge of settlements. There are often cases where the greenfield sites present sensible options for sustainable growth and this should be recognised.	See response to Bloor Homes above Noted The bullet points do not refer to safeguarding greenfield land, rather reference is made to safeguarding agricultural land and it is accepted above that this should be clarified as meaning 'best and most versatile' agricultural land.	See above No change See change above
David Rowlinson	Renewable energy important. Needs to tie in with regional approach. i.e. Dee Tidal Barrage would be more effective and may be more well received than wind turbines. Could the barrage then improve watersports / other activities. We don't want to see a simple / tick box policy such as all new houses to have X metre square of solar panels. Ground sourced heat pumps, for new developments would be a better requirement.	Larger renewable energy schemes are now likely to fall within the definition of Developments of National Significance whereby applications will be submitted to Welsh Government. The Dee Estuary may have a large tidal range but it is also of European nature conservation significance (Natura 2000 site) being a Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, largely on account of its importance for birds. It would be inappropriate for the Plan to promote the concept of a	No change

		tidal barrage energy scheme in the absence of any consideration of its potential impacts or whether it could be delivered within the Plan period.	
Cllr David Williams	Agree	Noted	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	The questions and issues raised in this section are all relevant and require full consideration as part of the plan making process. The need to balance the need for minerals against the strict controls over such development in the AONB or within its setting should also be recognised as an issue. In addition, the committee would draw attention to the need to weigh the potentially harmful impact of large scale energy projects on the AONB and would urge caution in setting specific county targets for renewable energy. The important role that the AONB has in providing a wide range of ecosystem goods and services should be recognised and considered as part of the plan making process.	Noted	No change
CPRW	The third bullet point should be deleted as targets will create a rod for one's back if they are unable to be met for one reason or another. Such a situation could result in hasty and inappropriate decisions being made in an attempt to meet targets. It is further advocated that a new bullet point is included with regard to residential amenity and environmental protection as follows 'addressing issues relating to nuisance, light, dust, odours and pollution'.	This has been raised as an issue for consideration in the KMd to gauge reaction. There is no requirement in PPW for the Plan to set targets. However, it is required to undertake a renewable energy assessment to inform the likely type, scale, location etc of renewable energy over the Plan period thereby allowing an informed judgement as to how the Plan can be facilitate this, either through allocations or policies.	No change

		The issue of environmental protection from different sources of pollution is addressed in bullet point 6 in para 5.16 i.e. safeguarding the environment.	
Dr Klaus Armstrong Braun	Support except add in: natural resources such as water and ''land'' ...''	Noted. Rather than add further terms to the heading for this section it would be clearer to delete 'such as water', given reference is made to water in the bullet points below.	Amend heading in para 5.20 as stated
Huw Evans Planning	Generally superfluous. Ample national planning policy and advice.	Noted	No change
Cllr Dave Healey	Agreed	Noted	No change
Plan Objectives			
Q21 - Objectives			
Kerry Norcross	Agree	Noted	No change
Wrexham Bidston Rail Users Assoc	The WBRUA believes that transport is equally important under each of the current headings: - Delivering Growth and Prosperity transport connects businesses and enables workers to reach employment; - Safeguarding the Environment where the modal shift to rail would be more sustainable and less polluting. The WBRUA therefore recommends that consideration be given to including Transport under each of the existing headings or an additional heading, Sustainable and Safe Transport, be added.	Noted. It is accepted that there are issues which could apply to many or all of the 19 objectives. The purpose of the objectives is to identify them according to key planning themes or issues. They need to be read as a whole rather than separately, By including multiple issues or terminology in every single objective would make them appear as checklists rather than strategic objectives.	No change
Dwr Cymru / Welsh Water	Welsh Water support the proposed strategic objectives of the Plan, in particular objectives 4, 12 and 19 which reference the importance of infrastructure provision and the safeguarding and sustainable use of natural resources.	Noted	No change
Railfuture	On the basis that the objectives are highly "strategic" and therefore do not go into detail their broad aims are worthwhile. However, detailed tasks and objectives	Noted	No change

	need to be identified to provide practical enhancements in terms of infrastructure and in terms of policy rather than simply holding up these laudable aims.		
Llay Hall Investments	Llay Hall generally agrees with the objectives outlined. In particular it considers that the following objectives are essential to ensure the delivery of much needed housing in the County: • "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." • "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." In order for Flintshire to achieve its vision of seeking "sustainable and lasting balance" and creating an LDP which is centred around "places and people", measures such as allocating and promoting sustainable housing sites must be implemented throughout the LDP.	Noted. However the subject matter of the bullet points is set out elsewhere in the KMd as well as in other objectives. Noted	No change
Penyffordd Community Council	Yes, but in the delivering growth section, add provide affordable provision in rural areas to provide for existing community residents who are being forced out of their communities.	The need for affordable housing is mentioned elsewhere in the KMd and is also mentioned in the 10th bullet point in the key messages in section 7. Objective 11 mentions the need to meet a range of	No change

		housing needs. Given that the objectives are meant to be short and sharp it would be inappropriate for them to list every possible issue. The KMd has to be read as a whole.	
Wirral Council	Wirral Council would particularly support objective 2 (encourage the development of town and district centres as the focus for regeneration); objective 3 (promote a sustainable and safe transport system that reduces reliance on the car); objective 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); and objective 19 (support the safeguarding and sustainable use of natural resources such as water and promoting the development of brownfield land).	Noted	No change
Bloor Homes	The objectives set out in the table provide a broad range of ideas and objectives that the Council consider will help it achieve a balanced policy position that will direct the future growth of Flintshire. Bloor Homes broadly agrees with the list of objectives set out as it is recognised that there are many challenges that need to be addressed to deliver the growth needed. There needs to be an acknowledgement that greenfield sites also make a significant contribution towards delivering growth. The Council should take into consideration all types of sites that are in sustainable locations, be it greenfield or brownfield.	Noted Noted. The 8th bullet point in section 7 mentions the fact that generally brownfield land is subject to constraints. By implication this will result in the need for green field allocations but in the interests of clarity it is proposed that the following text be added at the end of the bullet point 'and this is likely to result in the need for greenfield site allocations'.	No change Amend 8th bullet point in section 7 as stated. No Change

	Sites in close proximity to services, near to a range of transport routes and able to deliver development in the short term should be given priority. They will be able to support the longer term strategic sites to ensure a constant supply of housing and employment sites are brought forward.	Noted. However it is interesting to note apparent support for strategic sites when in other submissions NJL are criticising the Council's apparent focus on strategic sites in terms of concerns about deliverability. This reinforces the Council's earlier points that a range of sites are needed in terms of type, size, location etc.	
Cllrs Carol & David Ellis	Agree with the majority of the objectives in principle. As what has happened with the UDP there has been no joined up thinking and developers have been allowed to basically build wherever they want, which has been detrimental to the needs of the town.	Noted It is not accepted that developers have been allowed to build wherever they want in Buckley. The UDP Inspector agreed that the town of Buckley was a sustainable location to accommodate further development, in line with the principles embodied in PPW. A number of allocations were agreed by the Inspector and it is notable that three of these (Well Street, Whitleys Depot and Mount Pool have not been developed). The Plan seeks to make up the housing requirement with a mix of commitments (existing planning permissions), allocations and allowances for small sites and larger windfall sites to continue coming forward over the Plan period. The actual level of growth over the Plan period as measured at 01/04/15 in Buckley was 17.4% which was well within the 10-20% indicative growth band for a category A settlement and well below the	No change

	A full impact assessment needs to be carried out in Buckley as any other large sites that are developed could destroy the identity of the town forever. As previously stated the roads that were built many years ago to feed in and around what was a small town are still the same roads that supply a town three times the size, which are causing chaos. Out of town development needs to have a full impact assessment and needs to have benefit for the community in general.	level of growth approved by the Inspector. It is accepted that a number of windfall sites have come forward and each has been assessed as to its acceptability. Whilst it is accepted that all new development will have some impacts and need to be carefully assessed, it is not clear how such new development will destroy the identity of the town forever	
Enhancing Community Life			
Mold Town Council	No. 6 should also include protecting the Welsh Culture.	Noted. Add 'and culture' at the end of objective 6.	Amend objective 8 as stated.
Delivering Growth and Prosperity			
Taylor Wimpey	We support the idea that housing development is required to meet housing needs and support economic development and should be supported by the necessary infrastructure. A strong housebuilding industry can primarily bolster jobs and growth whilst a high-quality housing stock will attract further investment to the area.	Noted Noted. It should be stressed that whilst new housing can support economic growth and can by itself contribution to economic growth during the construction phase, housing by itself is not an economic activity.	No change

	Development will increase funds through mechanisms such as Council Tax payments which will improve local services and infrastructure.	Noted. However, if housing is located in the wrong places or at an inappropriate scale it can also create infrastructure and service problems that cannot be tackled through normal council tax funding.	
CPAT	The scope of point 16 above should be widened to include the historic environment - perhaps in place of the phrase 'built environment'.	Noted. Add after 'natural' the word ',historic'.	Amend objective 16 as stated.
Redrow	objective 13 'promote and enhance a diverse and sustainable economy' should be more amended to the following: 'Ensuring that Flintshire has the right amount, size and type of new housing to support planned strong economic growth and to meet its fully objectively assessed housing need'.	Objectives relating to housing are set out in nos. 11 and 12. It is not understood why a perfectly valid objective relating to the rural economy should be replaced with one relating to housing.	No change
Redrow	An additional objective should be added to the delivery growth and prosperity section: 'In order to fully meet housing needs, review the settlement boundaries and green barrier boundaries in all settlements to ensure that there is sufficient land made available for development to fully meet housing needs that deliver strong economic growth'.	Section 6 of the Plan seeks to identify some key objectives which reflect some of the issues identified in the previous section. The objectives are meant to be short and snappy and not meant to read as quasi policies. The Plan needs to be read as a whole in terms of vision, issues, objectives and then policies and proposals.	No change
Crag Hill Estates Ltd & Praxis Holdings	Yes we agree, particularly with objective 9 relating to Flintshire strategic economic sites being an economic driver of the sub-region and objective 12 ensuring housing development is focused in viable and deliverable locations with the necessary infrastructure.	Noted	No change
Cllr David Williams	Yes, but in the delivering growth section, add provide affordable provision in rural areas to provide for	Section 6 of the Plan seeks to identify some key objectives which reflect some of the issues identified in the previous	No change

	existing community residents who are being forced out of their communities.	section. The objectives are meant to be short and snappy and not meant to read as quasi policies. The Plan needs to be read as a whole in terms of vision, issues, objectives and then policies and proposals.	
Dr Klaus Armstrong Braun	Support with proviso of comments made above	Noted	No change
Safeguarding the Environment			
Minerals Products Assoc	Yes. However, point 19 should be amended to read Support the safeguarding and sustainable use and supply of natural resources such as minerals and water and promoting the development of brownfield land	In the light of a suggested amendment to the issues section relating to natural resources, it is proposed that a matching change is proposed to the wording of the objective by deleting 'such as water' in order to simplify its reading. The need to have regard to minerals issues is mentioned elsewhere in the KMd.	Amend objective 19 as stated.
United Utilities	United Utilities is pleased to see the inclusion of Point 19 under Section 6. The Objectives for the Plan, which supports the safeguarding and sustainable use of natural resources such as water and promoting the development of brownfield land.	Noted	No change
Whitley Group	Yes – with particular regard to ensuring 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.	Noted	No change
Grosvenor Estate	Agree - but recognising that many of the protected landscapes or designations can only be managed as part of a sustainable and vibrant rural economy.	Noted. This is far too detailed an issue to be included within general Plan objectives.	No change
David Rowlinson	All the objectives are great. But they don't really mean much at this point in the plan. The important thing for	Noted. However, the Plan needs to be prepared at a time when public money	No change

	the council will be to understand the inter-relations and to get the correct balance when the costs of meeting different objectives are understood. Flintshire is in need of long term investment, delivering a strategic plan. This should be across departments and work with other government and non-government organisations to ensure that want is delivered on the ground improves quality of life, encourages investment and is seen as good value for money. The public couldn't care less which pot the money came from or whether it meets one department's annual objectives. It is about working out what the public really needs and delivering it at the appropriate time.	and investment is scarce and likely to remain so in the foreseeable future. One of the objectives of the KMd is to try and give the public (and others) the opportunity to set out their thoughts as to how the County should change, or to simply identify issues that need to be addressed. Unfortunately it is difficult to secure such feedback as the public generally only seeks to get involved when there are site specific proposals to object to. Trying to get people to understand and agree to a strategy which could ultimately result in development in their area is inherently difficult.	
AONB Joint Committee	The Plan Objectives are agreed, notably Objective16 which confirms the need to conserve and enhance Flintshire's high quality environmental assets, including its landscape. This should be made more explicit by amending the objective along the lines of "…high quality environmental assets including the AONB and other landscapes, cultural heritage and natural and built environments."	Noted. It is proposed to amend the wording of Objective 16 as suggested.	Amend objective 16 as stated.
CPRW	Supports objectives on the whole but with objective 16 delete its first word 'conserve' and replace with the word 'protect'. The word 'protect' is to shield something from harm whereas conserve is to retain something of worth without necessarily providing protection.	Noted. It is considered appropriate to amend the wording objective 16 as suggested.	Amend objective as suggested
Huw Evans Planning	What is there to object to? Key question is will the policies and proposals in the plan match up to them and deliver?	Noted	No change

Cllr Dave Healey	– Agreed	Noted	No change
Moving Forward			
Q22 – key Messages			
Mold Town Council	Housing Growth figures need more clarity from Welsh Government. Encouraging employment opportunities in areas outside Deeside – not just related to retail.	Welsh Government, through a Ministerial letter from Carl Sargeant on 10th April 2014 clarified that the 2011 based projections are based on a period of low economic activity and are therefore likely to underestimate the level of future household growth. The projections are therefore a starting point and must be considered alongside a range of other considerations and evidence. The Wales Spatial Plan identifies a growth area involving a broad triangle joining Wrexham, Chester and Deeside and this will include many settlements in Flintshire. The need for development in such settlements is recognised.	No change
Graham Bolton Partnership	Undelivered housing provision from the UDP needs to be accommodated in the plan – the need for new housing didn't go away because people could not obtain housing finance to build or buy during the economic downturn/crisis; yes, development should be concentrated on sustainable locations but also those which can be made sustainable.	The housing need in the UDP was assessed at the base date of the UDP in completely different circumstances than exist now. Owing primarily to the financial crises and economic downturn that housing need was not manifested in supply ie completions as buyers were unable to obtain finance to purchase and similarly developers could not obtain finance to develop. The whole housing market slowed significantly to the point that the previously identified housing need could not realistically materialise.	No change

		The LDP offers the opportunity to assess the housing need for the LDP in the light of circumstances that exist now. To combine the two housing needs in the manner suggested is wholly inappropriate as it is not comparing like with like.	
Taylor Wimpey	We agree that the housing need identified within the 2011 Government projections needs to be increased given the circumstances under which they were produced. We support the idea that the historic under-delivery of housing should be factored into future housing need in order to make up the current deficit. Although Flintshire, Wrexham and Chester are identified as self-contained housing markets, Flintshire should fully promote its proximity to both areas, in particular Chester in order to attract investment of people living or working in these areas and vice versa. We fully support the need to review open countryside and green barriers throughout the Borough.	Noted. The Ministerial letter from Carl Sargeant explains that lpa's need to have regard to other evidence and considerations. The KMd is not promoting the idea of adding the UDP under delivery onto the LDP requirement but is raising it as an issue. The KMd recognises the sub regional location of the County and the interactions between Flintshire and Chester. However, the key message in the document is that Flintshire should be providing primarily for its own housing needs and not meeting the needs of Chester as advocated by developers in consultations on the earlier Topic Papers. Noted.	No change
Kerry Norcross	Agree with most. I feel that the open countryside policies, green barriers and settlement boundaries from the UDP have been effective at keeping areas identifiable, attractive to new and existing residents, and ensuring community feel amongst most	Noted. However, it is inevitable that to some extent settlement boundaries and possibly green barriers will have to be amended in order to meet the Plans housing requirement figure.	No change

	settlements. Therefore I think where possible this approach should remain. I appreciate the inspectors realistic view of the need for urban areas to merge and agree with the areas suggested (Deeside East, Deeside West, Buckley etc.) as being both appropriate in terms of geography but also in terms of being similar in nature and atmosphere. If the urban areas approach is to be adopted I think it would be important that the candidates sites selected work towards a more unified connection of similar areas, rather than development in opposite directions, so as to ensure they become defined as areas in their own right, whilst also protecting the countryside. I also agree that there is some need for development in rural communities to help retain service provision. I would suggest those settlements with good access to the likes of the A55 will have the ability to be most desirable for small scale growth.	The comments of the UDP Inspector was that there are areas of the County that are already merged and form larger urban areas. In the light of this and the Inspectors concerns about the spatial distribution of development between different categories of settlements, the Inspector was of the opinion that it was necessary to undertake a fundamental of areas of open countryside and of green barrier.	
Wrexham Bidston Rail Users Assoc	Based on the evidence identified in the WBRUA's responses to earlier questions, the WBRUA believe that Improvements to rail transport which benefit both the population and business interests is a key message which needs to be added to those already identified.	In the absence of any strategic context or commitment by the relevant bodies for the type of strategic rail investment advocated it would be unwise to flag these up as key messages, when there is little certainty that they could be delivered in the Plan period. The Wales National Transport Plan has set the strategic direction for transport projects over the next few years.	No change
CPAT	There appears to be no mention of the LDP's need to at least be aware of environmental issues (whether natural or historic) that may effect or enhance development.	The key messages are intended to be those issues or considerations that will drive the future direction and shape of the Plan and environmental issues are mentioned in the 8th and 9th bullet point.	No change

		Whilst protection of the historic environment is important (as reflected in it being addressed elsewhere in the KMd) it is not considered to be a key 'strategic' issue.	
Llay Hall Investments	Llay Hall agrees that the document identifies the Key Messages that need to be addressed in the emerging plan. In particular, that: • 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 above issues emphasise the much needed requirement for new housing and employment development in Flintshire to meet wider sub-regional objectives as well as the growth aspirations of the county. The key towns, including Mold, are the most sustainable location to accommodate a significant amount of that new development given the range of services and facilities that they contain and consistent with the objectives of sustainable development.	Noted	No change

	In light of this, the Council should adopt an approach which considers redefining settlement boundaries and / or Green Barriers to allow for the sustainable extension of existing settlements to accommodate the much needed housing in the County.		
Penyfordd Community Council	Yes, but concerns over last bullet point. A further point should be the protection of rural & semi-rural communities to safeguard community spirit.	The comments of the UDP Inspector are in the public realm and provide an important context for the preparation of the LDP. Whether or not people agree with the Inspectors comments it is necessary to air them and to address them. The need to have regard to community well being and identity is addressed elsewhere in the KMd. The key messages are intended to be those issues or considerations that will drive the future direction and shape of the Plan and it is not considered that community identity is a 'strategic' issue in this sense.	No change
Wirral Council	Wirral Council agrees with the summary of key messages set out on page 21 of the consultation document.	Noted	No change
Cheshire West and Chester City	Chester is identified as part of a self-contained local housing market area, separate from north-east Flintshire, although it is recognised that there movements between the two authorities. This was confirmed in the Local Plan (Part One), which sets out the levels and location of new development that is required to meet in Cheshire West and Chester's objectively assessed need. The Council supports Flintshire's plan to provide the right amount of housing development to meet its own	Noted. This will be addressed as part of the consideration of growth options.	No change

	local needs, providing this does not lead to unsustainable travel/ commuting patterns. However, if the higher growth scenarios were considered achievable and translated into a higher housing requirement for Flintshire, then this has clear strategic implications for neighbouring authorities.		
Redrow	Disagree with the 5th bullet point. The DCLG threshold for identifying an area as being its own HMA is for over 80% of all commuting from homes to work taking place within the defined area, therefore, when establishing that Cheshire West was its own housing market area there was some degree of overlap between adjoining and neighbouring authorities. When the council undertakes its housing market assessment, Redrow would welcome an analysis of home to work journeys to establish the role of where people are coming from, into the area, in order to obtain work. Allocating more land for housing within those locations as a result of people's movements would not only provide a material benefit of reducing commuting patterns and distances across the existing road network, but would also result in the support of the existing facilities based around the main employment hubs in the borough. We therefore object to the assumption that just because Cheshire West has been designated as its own HMA, that Flintshire's housing needs must be assessed in complete isolation of the relationship between the two areas.	The Inspector considered, as part of approving Part 1 of the CWAC Local Plan, that the County was capable of meeting its own housing needs. CWAC have since confirmed that they will be meeting their own housing needs, partly through a strategic green belt review on the south western edge of the city. Put simply, if CWAC are providing for their own needs, Wrexham are providing for their own needs why would it be reasonable or indeed necessary for Flintshire to provide for its own needs and the part needs of adjoining authorities. Furthermore, given that CWAC is releasing green belt land on the south western edge of the city, why would it be necessary to have large provision for growth in the far north eastern part of Flintshire adjoining the CWAC border? Flintshire should concentrate on providing for its own needs based on the sustainability of its settlements, but having regard to the broad direction set in the Wales Spatial Plan of the strategic growth triangle.	No change
Minerals Products Assoc	Yes, However, it needs to be recognised that the underestimate of housing identified in the above	Noted.	No change

	paragraphs should not be used as the marker upon which landbanks for minerals are based. Increased demands for housing must run in parallel with the likely increase in demand for the supply of raw materials. This must be reflected in appropriate strategic documentation, including the LAAs and minerals policies within the Local Development Plan.		
Crag Hill Estates Ltd & Praxis Holdings	Yes we agree that attractive locations are necessary to secure inward investment. There must be a good labour supply to support this and so housing supply must logically follow to support economic growth. New housing sites should be viable and deliverable to contribute towards housing land supply.	Noted	No change
Whitley Group	Yes - this is with particular regard to the requirement for a fundamental review of open countryside and green barriers in certain parts of the County. Settlements such as Buckley are capable of accommodating future growth with elements of green barrier release. It is submitted that limited green barrier release can occur without detrimental impact on the environment in certain areas. Buckley is identified as a sustainable location in that it is a Category A settlement in the adopted Flintshire UDP. The settlement has been the subject of growth over the course of the past 10 years, however the availability of brownfield land within the settlement boundary is limited. However certain smaller settlements can still be sustainable locations for growth.	Noted. A review of settlement boundaries and green barriers and the assessment of candidate sites will enable the identification of allocations in line with the emerging Preferred Strategy.	No change
Emery Planning	Finally, we make comment upon the key emerging messages as set out in 7.2 of the Key Messages document. Bullet point 4 states that a key message for	See earlier comments.	No change

	consideration is “Whether and the extent to which the under-delivered housing over the UDP Plan period should feed into the new housing requirement figure”. It is imperative that the housing shortfall is met in full as part of the emerging LDP, and the Key Messages document must reflect the Council’s commitment to addressing the shortfall as a matter of priority. The arbitrary discounting of past shortfall would not reflect an accurate picture of the housing need in the borough, and the Council would subsequently run the risk of developing a plan that was unsound. It is important to recognise that unmet housing need does not cease to exist just because a new plan is produced. The new plan should positively seek to address that unmet need.		
Bloor Homes	The consultation document provides a synopsis of the key messages that the Council feels should be reviewed moving forward through to drafting a new Plan. Bloor Homes have some concerns regarding some of the bullet points listed in the section. The concerns raised are as follows: • 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 Council needs to recognise that the under-delivery of housing witnessed in previous years through the UDP needs to be made up through the new Plan. There is already a significant shortfall and the Plan needs to rectify this. • Whether and the extent to which the under-delivered housing over the UDP Plan period should feed into the new housing requirement figure. The under-delivery of housing during the UDP Plan period is an essential consideration when planning for	See earlier comments. As above As above	No change

	future growth across Flintshire. The shortfall needs to be addressed and must feed into the new housing requirement.		
	• The Wales Spatial Plan identifies a key triangle of growth comprising the Wrexham, Deeside and Chester area. It is important that the Council recognises not only the three settlements that form the growth triangle. There needs to be consideration given to those settlements that fall within the triangle that can support the sustainable growth of the economy and population. Allowing a number of settlements to accommodate the levels of growth needed will ensure a more sustainable approach is achieved.	There are a number of settlements within the broad growth triangle identified in the Wales Spatial Plan.	
	• 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. As the Council has identified, the brownfield sites are located in areas that have significant constraints. There is potential therefore that these will get stalled as the issues could hinder progress. The Council should take into consideration greenfield sites that are sustainably located and not subject to similar constraints in order to deliver housing needs in the short term.	Noted	
	• 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. Delivering greater levels of housing will ensure that the needs of all members of the community are being addressed and alleviated. Greater levels of housing will	Noted	

	encourage a younger workforce into Flintshire. Ensuring the younger population is accounted for in future delivery is critical for long term sustainability. • 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. Bloor Homes feels a review of settlement boundaries is something that needs to happen with the upmost importance in order to attempt to undo the failings of the UDP. The Council needs to ensure there is flexibility within the policies to facilitate the needs of sites and their specific needs. Policies should not be too prescriptive and onerous to the developers as they will be further failings akin to those of the UDP. The planning process should be a collaborative approach to ensuring development is brought forward to meet the needs of the County.	Whilst noting and agreeing with the general sentiments of the comments made, the need to yet again put this against the alleged 'failings' of the UDP is unhelpful. This is even more the case when compared to the stance taken by Redrow, a developer, who, like Bloor Homes have acted proactively in delivering sites, yet recognise that it was the economic downturn, not any fault of the UDP or the Council, which resulted in housing not being delivered.	
Grosvenor Estate	Agree	Noted	No change
White Acre Estates	White Acre Estates have some concerns regarding some of the bullet points listed in the section. The concerns raised are as follows: • 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 Council needs to recognise that the under-delivery of housing witnessed in previous years through the UDP needs to be made up through the new Plan. There is	See comments above	No change

	already a significant shortfall and the Plan needs to rectify this. Housing growth helps underpin job growth and economic development as well as vice versa. • Whether and the extent to which the under-delivered housing over the UDP Plan period should feed into the new housing requirement figure. The under-delivery of housing during the UDP Plan period is an essential consideration when planning for future growth across Flintshire. The shortfall needs to be addressed early in the plan period and must feed into the new housing requirement. • The Wales Spatial Plan identifies a key triangle of growth comprising the Wrexham, Deeside and Chester area. It is important that the Council recognises not only the three settlements that form the growth triangle. There needs to be consideration given to those settlements that fall within the triangle that can support the sustainable growth of the economy and population. Allowing a number of settlements to accommodate the levels of growth needed will ensure a more sustainable approach is achieved. • 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. As the Council has identified, the brownfield sites are located in areas that have significant constraints. There is potential therefore that these will be stalled as the issues hinder progress. The Council should take into consideration greenfield sites that are sustainably located and not subject to		

	similar constraints in order to deliver housing needs in the short term. • 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. Delivering greater levels of housing will ensure that the needs of all members of the community are being addressed and alleviated. Greater levels of housing will encourage a younger workforce into Flintshire. Ensuring the younger population is accounted for in future delivery is critical for long term sustainability. • 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. White Acre Estates feels a review of settlement boundaries is something that needs to happen with the upmost importance in order to attempt to undo the failings of the UDP. The Council needs to ensure there is flexibility within the policies to facilitate the needs of sites and their specific needs. Policies should not be too prescriptive and onerous that they hinder site viability. The planning process should be a collaborative approach to ensuring development is brought forward to meet the needs of the County.		

David Rowlinson	Generally agree. Previous answers all relevant. This form is really drawn out! Development in rural areas (but with associated infrastructure development) is essential. Otherwise we are just tweaking the edges and providing a bit more housing, not improving the county.	Noted	No change
Cllr David Williams	Yes, but concerns over last bullet point. A further point should be the protection of rural & semi-rural communities to safeguard community spirit.	See response to Penyffordd CC above	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	Specific recognition of the AONB in the summary and the need to consider environmental constraints is welcomed. However, the committee would suggest that the AONB should not only be described as a constraint but also as an asset. The need for some development in rural communities to help sustain local services is also supported, but reference should be also be made to local needs and affordability in respect of housing development.	Noted. However, the reference to the AONB in this bullet point is in terms of preventing large scale development in and around the AONB. In this context it is a landscape 'constraint'. The variety of references to the AONB in the KMd plus the additional references proposed in this report, is considered to represent the AONB as an asset as well.	No change
CPRW	All summarised key messages are accepted except for the bullet point relating to comments made by the UDP Inspector. It is advocated that a precautionary approach is made with regard to development in the open countryside and reducing green barriers. The open countryside is a finite resource and subject to ever increasing pressures from development despite being a major contributor towards the health and well being of people. It is also an essential resource with regard to food security and supporting tourism.	In accommodating new development in the LDP Plan period it will be necessary to identify greenfield allocations. The UDP Inspector provides a suggested approach based on her assessment of the spatial strategy in the UDP.	No change
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	If the County wants to be a major force and economic driver for the wider region then has to accept a higher	Noted. One of the key themes in the KMd is to seek to align the level of housing	No change

	level of housing growth to achieve sustainable patterns of transport movements and service provision. It can't have one without the other.	development alongside economic growth.	
Cllr Dave Healey	Whilst I agree with many of the points made I believe some are problematical. In particular comments which have been attributed to the UDP Inspector have the potential to bring in changes which are potentially damaging to rural communities. If we are to preserve key aspects of our heritage and our rural communities we need to be cautious in identifying new 'urban' areas for development.	Noted. However, the context for this section of the document i.e. the Inspector's comments, is not to identify 'new' urban areas. Rather, it is to do with recognising that there are areas of the County where settlements adjoin each other, share facilities and services and therefore operate on the ground as 'urban' areas, rather than as separate settlements. This point is picked up and developed as part of the alternative methods of categorising settlements in Appendix 2 of the KMd.	No change

Summary of Comments and Responses re Key Messages document: Q23 on **APPENDIX 4**

Settlement Categorisation			
Q23 – Settlement Assessment and Audit Reports (Appendix 1)			
Cllr Hilary McGuill	Notes that New Brighton no longer has either a pub or shop so the information is not therefore accurate.	It is accepted that the Rose and Crown pub has closed but the survey is picking up on the fact there is a bar at the hotel opposite which is to all intents and purposes a pub, on a larger scale. It is also accepted that New Brighton does not have a shop within the village but there is a shop at the petrol filling station some 430m walk from the traffic lights.	No change
Cllr Hilary McGuill	New Brighton was also missed off completely in the table of settlement bandings on page 35.	Members had an advance copy of the consultation document and this omission was rectified in the version which went out for consultation. For completeness, New Brighton is in the 7th settlement banding.	No change
Mold Town Council	There is no mention of places of worship in settlements, yet churches are often the most significant architecture in a village and the focal point for community activities.	In appendix 1 of the KMd figure 3 provides a summary table of the key facilities and services in all of the settlements which were assessed. In the individual settlement audit documents, places of worship are recorded. The key issue is whether it is considered that a place of worship is an essential component of a sustainable settlement in terms of meeting residents everyday needs. Whilst it is important for many people it is not considered by the	No change

		Study to be essential in the same was as a shop or school is.	
Graham Bolton Partnership	Initially, may we draw your attention to the Penyffordd audit, as there appear to be a number of existing facilities which have been omitted: • A garage and MOT centre on the corner of Chester and Hawarden Roads – noted on the plan but not listed • A café (Jemoleys) on Chester Road opposite Penymynydd Road • A dog grooming service on Hawarden Road north of the junction with Chester Road • A veterinary surgery on Hawarden Road/ Young Hill close to the junction with Chester Road • A hairdresser's on Young Hill opposite Corwen Road • A children's nursery at the southern end of the settlement close to the junction of Wrexham Road and the by-pass, and another children's nursery close to the junction of Mold Road and the by-pass at the north end of the settlement. The inclusion of the above facilities and services with those identified in the audit does not change the status of Penyffordd as an "urban area" but it does re-inforce the fact that there is a considerable	Noted In the 'petrol filling station' section add after 'no' the text 'but Village Motors MOT and service centre' In the 'café/hot-food takeaway' section add 'and Jemoleys café and ceramics studio on Chester Road' In 'other shops' section add 'Fuzzy Mutts dog grooming, Hawarden Road'. In 'other shops' section add 'Daleside Veterinary surgery opening June 2016 on Hawarden Road'. In 'other shops' section add 'Carolann Hairdressers, Vounog Hill'. In 'Pre-School / Nursery' section add 'Hope Green Day Nursery, Wrexham Road and Stepping Stones Day Nursery, Penymynydd Road' Noted [further commentary on the issue of Penyffordd / Penymynydd being defined as an urban area is provided later]	Make stated amendments to Penyffordd / Penymynydd Settlement Audit.

	number of services and facilities located here which the new residential development will help support and potentially also encourage further shops and facilities to locate in the locality. Because of timing the assessment of number of dwellings and the population of Penyffordd are not directly comparable – unless there has been a significant and unexpected reduction in household size, the recent developments will have led to a notable increase in the population of the settlement. Incidentally, we note that residential sales' details on Rightmove suggest that the broadband speeds for the settlement are good. Also, the plan indicates a medical facility, though the surgery has closed, but does not indicate the pharmacy. The above is by way of background but does support the assessment of a sustainable urban settlement. The presence of nursery facilities is, in our view, a particularly useful indicator of a settlement's health and vitality and, while Penyffordd does not provide much in the way of direct employment opportunities, it supports an active, working population and is a settlement which has reasonable access to work opportunities – in brief, a "popular choice" for young families.	Broadband speed data has been obtained from published sources using average speeds rather than residential sales details or the maximum figures published by Internet Service providers. Clearly speeds will change over time as super-fast broadband is rolled out. The plan does show the position of the pharmacy.	
Leeswood Community Council	Draws attention to page 39 of the Key Messages document which reports the results of the settlement surveys. For some reason Leeswood is listed as having no Doctor's Surgery, Pharmacy or Post Office. The Flintshire County Council representative who attended a meeting of the Community Council before Christmas was advised	Add 'Lesswood Surgery, King Street' in doctors section. Add 'Pharmacy in Leeswood Surgery, King Street' in Pharmacy section The settlement audit identifies a post office within the shop on Queen Street.	Make stated amendments to Leeswood Settlement Audit.

	that we have all three. Could you please see that these corrections are made as soon as possible?		
Kerry Norcross	Please can you look into why Oakenholt does not appear to be classed as either a defined or undefined settlement, yet smaller or more undefined settlements have been included?	Historically Oakenholt was based around Oakenholt Mill and comprised a small number of workers terraced dwellings on Old Paper Mill Lane and Leadbrook Drive. Oakenholt has never been identified as a settlement in any previous local plans or in the UDP. It clearly does not have a focus of development, the size nor the facilities and services to be defined as a settlement in planning terms.	No change
Wrexham Bidston Rail Users Assoc	The WBRUA recommends that the settlement survey identify the location of and distance to the nearest railway station. In passing, the WBRUA notes that, although there is a more sizeable population within a 5km radius of Shotton Station than there is of Flint, more trains on the North Wales Main Line stop at Flint than at Shotton. If some of these trains were switched to Shotton they would be accessible to many more people, including those from stations on the Wrexham-Bidston line who are effectively unable to change onto the North Wales Main Line because trying to connect between the two routes invariably involves a prolonged wait. With the current timetable the actual time spent on trains whilst travelling from Chester to Hawarden is only 14 minutes but during most of the day the journey will take 1 hour and 5 minutes and involve a 51 minute wait between trains at Shotton!	Noted. Where there is a nearby railway station then this should have been mentioned in the settlement audits. This will also be a consideration when assessing candidate sites. However, the detailed comments on connectivity of timetables between the two rail lines is not within the remit of the LDP.	No change
CPAT	While welcoming the general thrust of the Settlement Audit Reports, I am slightly surprised to see the rather random nature of references made	Noted. The settlement audits have been completed by different officers and some will have picked up on historical factors in	No change

	to the historic environment. All settlements are by definition historic, although their history may have had a greater or lesser effect on their development and may be more or less important to their present state. However some reports seem to be full to overflowing with unnecessary, and in part rather anecdotal, historic detail while in others (in fact in the majority) it is entirely absent. While I accept that historic detail is not the most important aspect of these reports the imbalance is almost comical.	terms of the origins of a settlement and how it has developed or changed. The objective of the settlement audits is to identify the level of services and facilities and to get a feeling for the role and character of each settlement. It is not considered that the absence or presence of historical references will have a key bearing on this.	
Cllr Nancy Matthews	better definition of settlement Should Deeside conurbation be designated as one settlement?	The purpose of the settlement audits and settlement categorisation is to ensure a more evidence based approach to looking at settlements in terms of their sustainability. One of the key lessons is that there are relationships and linkages between both rural and urban settlements in terms of shared services. In particular, in the Deeside area it is evident that facilities and services do not necessarily reflect individual settlements as they were defined by settlement boundaries in the UDP. Certain key services and facilities are found in one settlement but not the adjoining settlement and they are shared. Also, as settlements have expanded it is difficult to identify where one settlement begins and the next ends. In this sense such areas operate as a larger 'urban area'. The KMd is putting forward two settlement categorisation options that the Deeside area could be defined as two urban areas rather than a number of separate	No change

		settlements, (each with different policy controls as expressed in HSG3 in the UDP).	
Caerwys Town Council	Identified a number of issues with the Caerwys settlement audit: In 'formal outdoor sports facility' queries what '1.2' is? In 'formal outdoor play facility / area' section queries what '0.57' is? Also the bowling green should be added. The entry under 'civic offices / facility' relating to the Town Hall should be moved to the 'Community centre / hall' category. The entry under 'doctors surgery' should be deleted. The two chapels in 'places of worship' section should be deleted as they are now houses. In 'other shops' delete 'Vets, North st' and move 'Vets North Street from 'Other shops' to 'other comments' section. In 'café / take away' section delete 'Caerwys stores' entry Delete reference to ATM at Singing Kettle in the 'cashpoint' section as it is outside of the settlement	The area of these sports facilities / areas has been included. It would be better for the provision of open space to be addressed more fully elsewhere and the numbers should be deleted It is accepted it would be more appropriate for the Town Hall to be moved to the 'Community Centre / Hall' category. Accepted that the reference in the Doctors Surgery section should be deleted. The two chapel references should be deleted The reference to 'vets' should be moved to the 'other comments' sections Delete reference to 'Caerwys stores' in café section Although it is outside of the settlement it is still considered useful to record that a short distance away from the settlement there is a cash machine.	Amend Caerwys settlement audit as indicated.

	In ‘petrol filling station’ i) delete reference to Singing Kettle as it is outside of the settlement, ii) move Merlin Motors to ‘other comments’ section as it is not a pfs and iii) North Street Garage as closed years ago.	Although the petrol filling station is outside of the settlement it is still considered useful to record that a short distance away from the settlement there is a petrol filling station. Although Merlin Motors does not sell petrol it is still appropriate for a garage to be included in this section. The North Street garage should be deleted.	
	In ‘convenience shop’ section delete reference to ‘Caerwys Stores, South Street’ as now moved	Delete reference to Caewys Stores, South Street	
	In ‘bus services’ section the bus routes will be revised in 2017	The impact of any changes to bus services can be reviewed at the appropriate time.	
	In broadband section – there are now speeds of 76MBPS near exchange and 38MBPS elsewhere	The figures used in the audits was provided by OFCOM through their website and relates to 2013 (the latest available at the time of the survey). The data represents annual median average speeds not the maximum or minimum speeds promoted by Internet Service Providers. It is therefore not considered appropriate to amend the audits until new data is available.	
	In ‘other comments’ section delete reference to Trout Farm.	Delete reference to trout farm which has closed	
	In ‘Previous surveys of Service Provision’ in the 2010 line amend ‘health / Medical Facility’ from 1 to 0 and ‘community centre…’ from 1 to 2.	This section of the audit compares the present results with previous survey results. It would not be appropriate to amend this as it is merely reflecting what was previously recorded.	

	In 'access to main highway network' add reference to B5122	It would be useful to add reference to the B5122	
Caerwys Town Council	Identified a number of issues with the Afonwen settlement audit: In 'Bus' section i) there is no bus stop sign at Pwll Gwyn and ii) the bus routes will be revised in 2017 In 'employment' section amend to 'Yes – Caerwys Saw Mills and Sand Quarry, Maesmynan' In broadband section amend from '3.1-7.5' to '2.1 to 5.5' MBPS In Other comments section i) make reference to vehicle repairs at Gallaghers and ii) delete reference to Pwll Gwyn being a hotel as it is now a business. In 'access to main highway network' add reference to B5122.	Delete reference to bus stop at Pwll Gwyn. The impact of any changes to bus services can be reviewed at the appropriate time. Include reference in employment section to 'Caerwys Saw Mills and Sand Qaurry, Maesmynan'. The figures used in the audits was provided by OFCOM through their website and relates to 2013 (the latest available at the time of the survey). The data represents annual median average speeds not the maximum or minimum speeds promoted by Internet Service Providers. It is therefore not considered appropriate to amend the audits until new data is available. Add reference to vehicle repairs at Gallaghers. Move Pwll Gwyn into the employment section as it is now a business It would be useful to add reference to the B5122	Amend Afonwen settlement audit as stated
Halkyn Community Council	The settlement audits for the various areas within the community have changed slightly since the last submission	Minor updating alongside the consultation with Members and Town and Community Councils took place.	No change

Penyffordd Community Council	Settlement work seems to have been quite thorough but the fact that studies on Open Space, Recreation amenities and service infrastructure is a failing of the studies where important and relevant information has not been collated.	Information relating to open space is collated in the form of a separate Open Space Survey which is being updated.	No change
Cheshire West and Chester City	In considering development options and settlement boundaries in Flintshire, it will be important for Flintshire County Council to consider the impact on those areas bordering Chester. It is considered that it will be important to maintain Green Barrier land and areas designated as Green Belt, to prevent the coalescence of Chester and settlements in Flintshire.	Noted. The KMd recognises the need to review green barriers, which will be done in line with guidance in PPW, and this will have regard to the relationships with the green belt and settlements in CWAC.	No change
Redrow	In part, yes. We would, however, welcome the council to use a different growth target than that set out in the UDP. Rather than seeking percentage increases, we feel that it would be simpler and easier for all in the community if the housing growth for each settlement was expressed as a number of homes over the plan period.	The KMd focuses on the need to identify a robust and sustainable settlement strategy in line with PPW. Although a commentary to some extent has been provided on the growth rates used in HSG3 in the UDP, the exact manner in which growth in settlements is to be controlled is a matter for consideration in a subsequent consultation. It is not accepted though that every settlement should experience planned growth in the manner proposed by the objector as there may be physical or environmental constraints in and around some settlements which prevent this.	No change
Whitley Group	It is appropriate to further categorize settlements based on a more detailed hierarchy, than is currently provided in the UDP.	Noted	No change
Bloor Homes	Bloor Homes are pleased to see that Broughton is identified as a settlement that has provided a positive response to the survey questions asked.	Noted	No change

	Figure 3 of Appendix 1 shows that Broughton has all but three of the key services identified within the survey. These are a secondary school, a dentist and a bank/building society. These services can be found in nearby settlements that are in close proximity to the town. It needs to be highlighted that there is space for sustainable growth within the Broughton and the services identified will ensure there is sufficient capacity for growth. Unfortunately, there appears to be too much simplicity in relation to the way in which settlements are assessed as there are other factors that can influence the appropriateness of a settlement accommodating growth. Whilst the surveys are used to provide a snapshot at a particular point in time, it leaves opportunity for key pieces of information to be missed.	Noted. The role of various settlements in meeting future growth will be looked at in developing growth and spatial options Noted. However the submission does not identify what these key pieces of information are. The settlement audits are not intended to pick up every source of information but to provide a consistent method of comparing the sustainability of settlements based on key considerations. Information from the candidate site consultations will be relevant as will other sources of evidence.	
Grosvenor Estate	Survey work and settlements audits should look at how smaller settlements often share their key facilities with nearby villages or higher-order centres. These villages as often linked with good public transport and that should be acknowledged within the Settlement Audit Reports.	Noted. The settlement categorisation work has recognised the links between settlements, whether they be urban or rural.	No change
David Rowlinson	Seems reasonable. You need to start somewhere.	Noted	No change
Cllr David Williams	Settlement work seems to have been quite thorough but the fact that studies on Open Space, Recreation amenities and service infrastructure is a failing of the studies where important and relevant information has not been collated.	Information relating to open space is collated in the form of a separate Open Space Survey which is being updated.	No change

AONB Joint Committee	The committee agrees that the approach to settlement classification in the adopted UDP is in need of review, but would emphasise the need to allow for some development in the villages in and around the AONB to meet local needs, provide affordable housing and sustain local facilities and services. Such development should be sensitively located and designed and involve infill/windfall sites within the settlement or form a logical extension or 'rounding off' of the settlement. In this context, it is noted that it is not proposed to draw a development boundary to contain those settlements in the 'Undefined Village' category, which includes Afonwen, Cadole and Llanasa. The committee is concerned that such an approach could promote the inappropriate spread of development outside these villages to the detriment of the AONB and wider countryside. In addition, this also raises the issue of consistency with the approach of neighbouring authorities where settlements such as Cadole straddle administrative boundaries.	Noted. The need to allow for an appropriate level of housing in villages is recognised and this will be addressed further in deciding upon the preferred settlement categorisation and in developing spatial options. Further consideration will need to be given as to whether it is appropriate for the lowest tier of settlements to have a settlement boundary or not.	No change
CPRW	Concern is raised with regard to the use of some individual settlement audits to assess the sustainability of a community with regard to future development. Receipt of information as to the accuracy of details provided in audits has been brought to light that would question the validity of use when such intelligence requires to be accurate and up to date. Account should be taken of future loss of services and facilities that could occur in communities during the lifetime of the plan due to future financial cut backs. What might be deemed a	The settlement audits focus on settlements rather than communities. If CPRW have information on accuracy of audits then this should have been provided in their submission rather than being used to question the validity of the process and results. The settlement audits are a record of services and facilities as they exist now. Whilst it is likely that there will for instance be reductions in public transport due to	No change

	sustainable community at the present time may not be in the future.	budget pressures, it is difficult to predict this until such changes are known.	
Dr Klaus Armstrong Braun	Support	Noted	No change
Huw Evans Planning	I would question the usefulness of settlement categorisation, Does it really matter? Their function depends on the willingness and ability of private sector in them, either through new development or improvements to existing. People will gravitate towards them because of what they have to offer and the role that they have due to the existence of those services and facilities. The settlements are what they are and function in terms of what they can offer the catchment population.	PPW requires that a sustainable settlement strategy is identified. Given concerns about the variation between the size, character and role of settlements in the three tiers of the approach in the UDP it was considered necessary and important to look at other options for categorising settlements. In order to do this it was considered important to have an up to date measure of the sustainability of each settlement.	No change
Betsi Cadwaladr Health Board	Settlement categorization We have no objection to the approaches set out in the Appendices supporting this section. We look forward to being able to work closely with FCC as these approaches are developed, with the recognition of the potential impact on health services and infrastructure in areas of more significant development. We also would wish to work collaboratively to maximize opportunities for joint working and asset sharing where these arise. The Health Board can play a significant part in the development of place based plans for Flintshire and looks forward to continued discussion and development of solutions that are beneficial to our communities. The Area Team in the east of the Health Board, which covers Flintshire, is keen to develop positive relationships to enable this joint working to succeed.	Noted	No change

Cllr Dave Healey	– Comments on settlement survey work in appendix 1 and the Settlement Audit Reports: The accuracy of the evidence base is of crucial importance in defining the relative benchmark for service provision. Housing development needs to be supported by the Basic Facility Benchmark as defined in Explanatory Box 2 viz:- "The Basic Facility Benchmark – A sustainable settlement is considered to be a large identifiable grouping of dwellings which is sufficiently well serviced to ensure that its residents' basic daily needs can be met within the locality. These could include a local convenience shop, a primary school, a social meeting place, an outdoor play/recreation facility and a frequent local transportation service (bus/rail) which affords opportunity to access a fuller and wider selection of services, facilities and employment opportunities in/or adjoining nearby higher order settlement." However, there are the issues which need to be considered in connection with this approach:	The issues which are raised are all relevant issues which will be considered as part of the LDP process and Welsh Water, the Education Authority and Health Board Trust are all involved in the LDP process. It is important to note that the Plan is to cover the 15 year period from 2015 to 2030 so this plan is for development over the whole of that period. It is incumbent on the other Authorities such as Welsh Water to take into account the likely growth of the county in their planning and have a full understanding of the likely needs of the county in the future.	No change
	a) The level of provision can change drastically during a period of extreme austerity when local authorities, like Flintshire, are forced to close schools, reduce bus services, close recycling centres and take numerous other steps which change the level of provision and access to services in an area.	Noted. It is accepted that the level of services and facilities may change over time.	
	b) The mere existence of a service or facility does not mean that it is available for new service users and cannot, therefore, act as	The purpose of the settlement audits is to ensure an accurate record of the existence of facilities and services. Consultation and	

	a reliable guide for the potential for development. Schools may be full and in need of new buildings. It may be difficult to get medical or dental appointments. c) The services and facilities included omit any reference to drains and sewers that may be inadequate to support further development in an area. This need was recognised in response to Q5 above but there is no recognition for the need to consider it in the approach adopted. These factors mean that proposals for development have to take account of the reality which exists at the time and not information from a dated and incomplete survey. Table 2 on page 35 of Appendix 1 places the villages of Hope, Caergwrle, Abermorddu and Cefn y Bedd together in the second grouping of the Bandings for Settlement. This positioning is based on the Settlement of Services Survey showing Key Services, as set out in Figure 3 on page 39 of Appendix 1. However the reality is that there are severe limits on the number of places available in local primary schools and in the secondary school. Ysgol Estyn and Abermorddu Primary Schools have full classes in some years and there is an element of distress,	engagement with service providers, particularly through the process of candidate site assessments will begin to address the existing capacity and potential for capacity improvements It would be difficult to address the capacity of foul and surface water networks, with any accuracy in the settlement audits. This is more accurately done as part of considering candidate sites. The settlement audits will be reviewed periodically to ensure that they are as up to date as possible. However, when a development proposal in the form of a planning application is submitted it will need to be assessed in the light of present and current information. As part of establishing where growth will be distribution across the County and the identification of allocations, it will be necessary to establish the potential to increase the capacity of certain infrastructure, in the light od ever changing parameters, such as the identified closure of Llanfynydd School.	

	within the local community, because some pupils have not been accepted for places in schools which already have siblings. Although a commitment has been made that all pupils displaced by the proposed closure of Ysgol Llanfynydd can be accommodated within Ysgol Parc y Llan at Treuddyn, parents of Ysgol Llanfynydd children are still making enquiries at the schools in Hope and Abermorddu and adding to the pressure on this community. Castell Alun High School has an admission number of 1240 but actually has a current school population of 1365 students. Appeals are made for entry into the school each year. The school has a number of outdated mobile classrooms and is in desperate need of new building development to accommodate the current school population. The current level of S106 / CIL payments is insufficient to support a new building programme and the local authority has yet to give a clear commitment that it will support the school in a bid for 21st Century funding. These factors suggest that although schools physically exist in the relevant villages, they do not have the current capacity to support further development within the locality.		
	It has been extremely difficult for patients to get appointments at Hope Medical Centre and this is a major concern within the locality. A new medical centre is due to be opened and it remains to be seen whether or not it will be able to cope with the level of demand on services any better than before. This would have to be kept under review and considered in the event of any proposals for	Noted. It would be surprising if a major new investment in a medical centre at Hope was unable to cope with needs arising from the local community.	

	housing development. Existence of a facility itself does not mean that it can cope with an increase in demand. Similarly, there is no guarantee that the dental surgery would cope with an increase in numbers of patients. There is currently a pharmacy in Caergwrle although it is seeking relocation in Hope. It is eager to expand its range of services but there is no guarantee that it will be able to do so. Although there is currently an HSBC branch in Caergwrle it is not opening new accounts. A public house in Hope has recently re-opened after a period of closure. These factors suggest that the high street 'offer' in these villages is precarious and subject to change.	Noted. HSBC operates as a service branch rather than a full branch and so does not offer a full range of services. Even though one pub may have recently closed there are a range of pubs throughout the various settlements which make up HCAC. Looking at the range of facilities and services throughout HCAC it is extremely well served for its size, and also benefits from excellent accessibility to Wrexham and Mold.	
	The Settlement Services Survey of Key Services takes no account of the condition of drains and sewers within the locality and whether they can actually support any further housing development. There are several parts of Caergwrle village which are subject to surface water flooding during periods of heavy rain, which appears to be a more regular occurrence with climate change. This is particularly noticeable along Mold Road, in Sarn Lane and in sections of High Street. Water simply does not go down the grids and one has to assume that the drains are inadequate and unable to cope. There are also issues with sewage disposal. Several complaints have been made about what is known locally as the 'Caergwrle Stink'. This is an obnoxious stench that can sometimes been experienced around the junction of Derby Road	Issues relating to drainage and surface water flooding are more appropriately addressed as part of assessing candidate sites. Existing problems in infrastructure are not a matter for the LDP to address as these are the responsibility of service providers.	

	and Sarn Lane and in Bryn Yorkin Lane. The conclusion is that the sewage system is antiquated and not fit for purpose. Local residents have complained about this and arrangements are being made by Welsh Water to ensure that an adequate supply of chemicals are used, at the pumping station, to disguise the smell. A cast iron sewer pipe is embedded in the Packhorse Bridge. This is precariously situated as the Bridge has been subject to damage from flooding and, if the pipe is fractured, sewage would pour into the River Alyn. These issues suggest that the locality does not have adequate drains and sewage systems to support further development. Therefore, although Figure 2 on page 35 places Hope, Caergwrle, Abermorddu and Cefn y Bedd in the second grouping, this does not mean that these villages have adequate 'basic facility' provision that would support further development.	Whilst it is accepted that detailed assessments of certain aspects of infrastructure, services and facilities are necessary, and recognising that the situation may change over time, HCAC is considered to represent a sustainable settlement and this was also recognised in the UDP.	
Q24 – Settlement Categorisation Study (Appendix 2)			
Kerry Norcross	No, other than is Oakenholt in this as an individual settlement, and if not should it be?	Oakenholt, as explained above is not considered to represent a defined settlement.	No change
Strutt and Parker	We support Options 2, 3 and 4 in that the greatest levels of development should be focused towards main service centres due their sustainability. We agree with the recognition that relationships and linkages exist between individual settlements,	Noted. The identification of urban areas is one of a number of alternative approaches to the	No change No change

	meaning that "urban areas" should be defined to comprise a number of settlements where growth should be focused. This is a direct reflection of the UDP Inspector's comments that "the approach defining settlement boundaries based on individual assessments rather than identifying urban areas is backwards looking". As an example, we support Option 3 in its linking of Mold with Sychdyn as this recognises that a higher level of growth can be supported adjacent to the village given its inherent connection to Mold, which is less than two miles away. It is also important to highlight the importance that smaller settlements such as Rhydymwyn (defined village in Options 2 and 4) receive appropriate levels of development. Whilst the scale of growth would need to be carefully managed, it is important that such villages are still able to grow to ensure that their individual housing needs are met and secure their future sustainability (for example, to maintain the viability of the local garage).	UDP. For instance option 2a has regard to the relationships between settlements but in a 5 tier settlement hierarchy. The recognition of relationships between settlements does not mean that the only option is the creation of 'urban areas'. Option 3 introduces the concept of urban areas and this is transferred into the hybrid option 4. However, the consideration of this representation has highlighted an inconsistency in the definition of 'urban area' between option 3 and 4. In Option 4 Mold is stated to be an urban area in its own right and both Sychdyn and New Brighton are defined as 'sustainable villages'. In line with this approach Mold should have included in option 3 as an urban area on its own and Sychdyn / New Brighton have therefore been erroneously included alongside Mold in Option 3. Notwithstanding the proximity to and linkages with Mold, Sychdyn only appears in the 5th banding of settlements in figure 2 of Appendix 1, having regard to its level of facilities. It is essentially a modest sized rural village with a reasonable level of services and facilities. However, it is clearly quite different from Mold in terms of size, character, form and role and it would be inappropriate to see its role enhanced by including it as part of the urban area of	Amend option 3 to ensure the classification of Sychdyn and New Brighton is as it is shown in option 4 (i.e. not part of the urban areas).

		Mold. Rather, its evidenced place in the settlement hierarchy is as a sustainable village.	
Nancy Matthews	Agrees with option 4	Noted	No change
Llay Hall Investments	Llay Hall agrees that development should be directed to those settlements which best perform the functions of: – Being well connected to transport infrastructure including sustainable travel options – Providing a range of retail and community services – Containing a range of employment opportunities – Being well serviced by existing infrastructure, and – Offering opportunities for co-location of housing and employment As recognised in the study, it is the larger settlements such as Mold which are more likely to perform the functions outlined above. The Council should seriously consider proposals for development, in particular housing, in these locations which provide sustainable development and address the key issues identified, such as the demand for new housing in the County. Whilst development should also be located in other sustainable locations, the logical starting point for growth is in the main urban settlements in Flintshire including, in particular, Mold.	Noted	No change
Redrow	We believe that a potential option 1b should be incorporated into the methodology - the same approach as option 1, but to amend the hierarchy dependent upon the potential sustainability i.e. if new development can enhance the sustainability of an area and enhance its ability to support further new development.	The settlement categorisation options are based on the sustainability of settlements as they are now. In developing spatial options it will be necessary to identify which areas of the County and which settlements can sustainably accommodate new development. Redrow appear to be	No change

		reverse engineering this by suggesting from the outset that there are particular settlements which could be enhanced through new development. Until the assessment of candidate sites has been completed it is not possible at this stage to predict with complete confidence which settlements / sites can sustainably accommodate new development. In line with PPW the Council is seeking to identify a sustainable settlement categorisation which can be used to inform the drawing up of growth and spatial options. From this a Preferred Strategy can be identified against which candidate sites can be assessed. By contrast the approach by Redrow appears to have at its core the belief that development per se will enhance the sustainability of settlements when clearly this is not always the case.	
Whitley Group	Option 2 is the best approach in categorizing settlements because it is primarily based on their sustainability.	Noted	No change
Bloor Homes	Bloor Homes are pleased to see that a review of settlement characterisations has taken place. As previously mentioned, there have been significant failings in the methodology used in the UDP for assessing the appropriateness of various sites. A review of the methodology of assessing sites will ensure the new Plan will meet the needs of the County as it grows and develops. Retaining the same methodology used for the UDP will simply cause the same problems experienced previously	The support for the review of settlement categorisation is welcomed but it is not clear how Bloor Homes go straight from this to claiming that there were significant failings in the methodology used in the UDP for assessing the appropriateness of various sites. Allocations in the UDP were made on the basis of good research followed by scrutiny at public inquiry and were deemed suitable by the Inspector. The fact that some landowners /	No change

	to happen again. The Council cannot afford to allow a failure in delivering its targets.	developers have chosen to sit on sites and the crippling effect of the economic downturn is something that is outside the control of the Council. This is recognised by Redrow yet not by Bloor Homes / NJL.	
Grosvenor Estate	Supportive overall of SCS in Appendix 2 but there should be increased focus on assessing availability of public transport within the smaller settlements and an acknowledgment of the fact that many villages act as a "cluster" with shared facilities such as primary schools and health facilities.	The availability of public transport in rural areas is picked up in settlement audits. Regard to the relationships between settlements and the idea of clusters is picked up in the later settlement categorisation options. However, it must be recognised that in rural areas over the Plan period public transport is likely to worsen in the light of financial pressures. Even when shared facilities exist in rural areas such as school and health, it is still likely that the accessibility to them will be car based and this questions the sustainability of some rural settlements to accommodate growth.	No change
David Rowlinson	I think this is a real waste of time. I know that the council would like to use all these classifications to prioritise different work, and allocate housing etc. But it would be better just to get on with delivering some work. The council should be in touch with leaders in the communities and have a feel for what is "right" for that area. Yes some people will end up being upset, but that is life. Major government projects tend to have their go/no go based on the feel of the MPs is charge. Cost Benefit Ratios are great, but we are not talking rocket science. The council would be better spending their time and money ensuring that the development delivers improvements. That way people will have	PPW requires the identification of a sustainable settlement strategy and this is what the KMd is seeking to establish. The idea that this is not worthwhile 'work' is rather ill-informed and insulting as it will form the basic framework for the Plans strategy, policies and proposals. The Council is preparing the plan in close consultation with Members, Town and Community Councils and a range of stakeholders and the public. The objective of the settlement audits and categorisation options is to 'get a feel' for the settlements and to use this in identifying locations and	No change

	to put up with a little disruption, but end up with a better place to live.	sites for development, which as the objector identifies, can bring about improvements. The Council facilitates not delivers development.	
Cllr David Williams	Reserve the right to add a response!	The opportunity to comment on this is as part of this document, not at some unspecified time in the future.	No change
Dr Klaus Armstrong Braun	Supports option 4	Noted	No change
Huw Evans Planning	Not convinced that settlement categorisation achieves a great deal	PPW requires the identification of a sustainable settlement strategy and this is what the KMd is seeking to establish. The idea that this will not achieve a great deal is rather disappointing given that it will form the basic framework for the Plans strategy, policies and proposals.	No change
Cllr Dave Healey	I have read and understood the arguments associated with Appendix 2 but have no comments as such.	Noted	No change
Q25 – UDP Settlement Hierarchy (Option 1)			
Cllr Hilary McGuill	Considers that category C (0-10%) should apply to the settlement of Argoed which encompasses Mynydd Isa, New Brighton, Bryn y Baal and Llong.	The objective of this consultation is not to consider growth levels or % rates at this stage. Stakeholders are being presented with a number of different approaches as to how settlements can be organised in the LDP into a settlement hierarchy. To inform this, an analysis has been given of the pros and cons of the UDP approach (three tiers) and a number of different options are given, with pros and cons identified for each. To comment, at this stage, that settlements in the Argoed ward should be	No change

		a category C and have 0-10% growth doesn't help in trying to decide how settlements should be organised into a settlement hierarchy. Once this basic settlement structure is in place it will then be possible to start looking at how growth is distributed throughout the County and between different settlements. It must also be stressed that Argoed is not a settlement in planning terms or in terms of preparing the LDP. Argoed is a ward in which there are a number of settlements and this consultation is focusing on settlements. As recorded in the UDP Bryn y Baal is not a separate settlement but is part of Mynydd Isa and Llong is not a defined settlement at all being simply a loose cluster of dwellings. In line with national planning guidance we need to approach the LDP by identifying how sustainable each settlement is and trying to organise settlements into a settlement hierarchy based on the settlements sustainability.	
Taylor Wimpey	Generally yes, however marketability should be considered when identifying potential development areas. Ensuring adequate delivery of high-quality housing should be the key driver for the allocation of residential sites. Larger settlements will generally support additional development more easily and we would support larger-scale allocations/Green Barrier release within these areas.	Marketability is an important consideration whereby testing spatial options and possible allocations in terms of viability and deliverability can be undertaken. However, marketability is not the overriding consideration as there will still be a need for new housing in poorer housing market areas. Marketability is not considered to be a key factor in measuring the sustainability	No change

	Equally however, we believe it is important to identify larger scale and strategic release within the more sustainable, smaller urban settlements as new development is key to their continued investment. We believe the identification of 5 settlement categories would provide more clarification on which urban settlements are most sustainable.	of settlements to inform the settlement hierarchy. Noted	
Kerry Norcross	I agree a settlement hierarchy is important. If grouping the settlements into urban areas rather than the previous settlements it is important to consider that there is a hierarchy even within this group, and those with a town centre will require larger growth to deliver the support that the high street amenities need to both survive and thrive.	Noted. However, the idea of splitting the urban areas in option 3 and 4, into two tiers of urban areas would in effect be little different to option 2 or 2a which has a 5 tier approach. The whole idea of an urban areas approach is to try and simplify the present UDP approach whereby there are settlements adjoining each other which share services and facilities yet are classified differently in the UDP via policy HSG3 with different levels of growth applying to them. This UDP approach, with the amendments to HSG3 by the Inspector to make the settlement strategy more sustainable, has tended to result in a planning by numbers approach rather than one based on taking a more holistic view of the physical make up of parts of the County.	No change
Cllr Nancy Matthews	Does not agree with this (UDP) option	Noted	No change
Llay Hall Investments	As discussed above, Llay Hall agree with the conclusions outlined in the Settlement Categorisation Study in which a revised approach to the UDP Settlement Hierarchy is required to	Noted	No change

	successfully guide growth of the right type and in the right location. That said, Llay Hall consider that the UDP Settlement Hierarchy correctly identifies Mold to be within Category A. As identified in Figure 3 (Presenting the Key Settlement Survey Service Data) in Appendix 1, Mold is one of four out of the seven settlements in Category A which have access to all key services, including Primary Schools, Secondary Schools, Doctors, Supermarket and Post Office. This emphasises the sustainability of Mold and reaffirms the categorisation of Mold as one of the main settlements to accommodate growth in the County. Therefore, growth in this area should be promoted where it achieves the principles of sustainable development.		
Penyffordd Community Council	Not in its current form – option 2 or 2A seems to have refined the system to take account of the change of circumstances.	Noted	No change
Redrow	No. New development has taken place in all settlements at different levels when compared to the proposed UDP rates of growth - some have received more than their envisaged share and many have received well below what was envisaged. The Council must therefore look at how the settlements are now and compare with how they were when the UDP was being prepared and make adjustments to the hierarchy accordingly.	From the outset of the UDP it was made clear that growth bands were indicative. Although the revisions to HSG3 led to the growth bands becoming a ceiling in category C settlement and a threshold in category B settlements, the Inspector accepted that not every settlement should grow at the upper end of the growth band and that due to environmental or physical constraints some settlement will hardly grow at all. Where settlements have received more growth than that specified in the growth rates, this was due to the existence of allocations and was accepted by the Inspector in supporting such a level	No change

		of growth. The purpose of the settlement audits is to look at settlements now and to use this to devise a soundly based settlement hierarchy.	
Whitley Group	The principle of the UDP approach to identifying a settlement hierarchy is still fit for purpose. However this should be split into further hierarchy categories, as identified in Option 2. This will then make it possible to clearly identify which settlements are most appropriate to accommodate future development. This is in terms of facilities and services, character, size, role, function and sustainability.	Noted.	No change
Bloor Homes	No, the UDP approach needs to be changed to meet the changing needs of Flintshire and address the failings of the approach set out in the UDP.	The KMd accepts that the UDP approach to settlement categorisations has its limitations. But is Bloor Homes / NJL really suggesting that the UDP Inspector would have recommended the Plan for adoption if it had such 'failings'.	
Grosvenor Estate	The UDP approach to identifying settlement hierarchy is no longer fit for purpose as there appears to be a significant disparity between settlements in terms of the delivery of the indicative housing growth bands. The growth led strategy is supported but the relevance of setting growth bands should be re-appraised.	Noted. The disparity between settlements in each of the three UDP categories is a fundamental reason for looking at other approaches. The appropriateness of setting growth bands will be looked at further in devising spatial options.	No change
David Rowlinson	See above. Fit for purpose is a contractual term best avoided.	Noted	No change
Cllr David Williams	Not in its current form – option 2 or 2A seems to have refined the system to take account of the change of circumstances.	Noted	No change
Caerwys Town Council	Yes if the data as submitted is utilised correctly.	Noted	No change

Halkyn Community Council	Yes if the data as submitted is utilised correctly.	Noted	No change
Cllrs Carol & David Ellis	No – As explained previously each town should be fully assessed as in Buckleys case, poor planning has led to poor performance.	As part of the settlement audits each settlement has been looked at afresh and as part of the Candidate Site assessments each site will be assessed against a range of considerations and have regard to the views of a variety of internal and external consultees. The town of Buckley grew during the 18th and 19th centuries and in this context it is difficult to understand how poor planning has led to poor performance. Much of the pattern of development and infrastructure is a given and it is necessary to have regard to this in preparing a development plan.	No change
CPRW	It is acknowledge that this approach will not be adopted to identify a settlement hierarchy.	Noted.	No change
Huw Evans Planning	No. It presents a fixed scenario and policy basis for decision making in an environment which can change significantly through the lifetime of the plan. This makes it difficult for the planning system to respond and adapt to changes in the social, economic and retail trends.	Noted. The Plan has to have a framework comprising strategy, policy and proposals which provide a sound basis for facilitating growth and assessing development proposals.	No change
Cllr Dave Healey	I accept that the traditional UDP Settlement hierarchy needs refinement but also believe that there needs to be a significant element of continuity in order to protect the heritage of Flintshire which, given support, has the potential to attract considerable numbers of tourists and generate wealth for the region. It is vitally important to our economy that such people are not put off by the development of urban sprawls and that a sensitive approach is adopted to	Noted	No change

	development which avoids radical departures from the past which undermine our heritage. Tourism can serve as an additional source of employment within the region and prevent over-reliance on key sources of employment. The current crisis in the steel industry points to the need for a range of strategies which broaden the range of employment opportunities.		
Q26 – Alternative Hierarchy Approaches			
Dwr Cymru / Welsh Water	Welsh Water has no real preference regarding the various settlement categorisation options being considered as part of the Flintshire Key Messages consultation. As a provider of water and sewerage infrastructure in most of the County we are primarily governed by the Water Industry Act 1991 (as amended) and we aim to ensure that sufficient infrastructure exists for domestic development, and seek to address deficiencies through capital investment in our 5 year Asset Management Plans (AMP). We are currently delivering the AMP6 programme which covers investment for the period 2015-2020, this will be followed by AMP7 for the investment period 2020-25, and AMP8 for 2025-2030. The Flintshire LDP has a timeframe that runs until 2030, therefore any investment required at our WwTWs to accommodate growth can be considered for inclusion in future AMPs. Not every settlement in the County is served by its own Wastewater Treatment Works (WwTW), the catchment areas of some WwTWs cover numerous settlements.	Noted	No change

	Welsh Water has to put forward a business plan for investment for each AMP cycle, and as part of this work we require some certainty in terms of future growth areas. An adopted Local Development Plan with identified growth allocations helps strengthen the case Welsh Water can put forward in relation to projects requiring AMP funding as our industry regulator, Ofwat, do not usually provide investment for infrastructure to serve unconfirmed growth.		
Llay Hall Investments	Llay Hall Investments agree that the current settlement strategy set out in the adopted UDP is rather crude and simplistic, failing to provide an appropriate framework for directing future development and growth. While Llay Hall have no particularly strong preference for any of the options set out in the Settlement Categorisation Report, it agrees that a more sophisticated approach is required to classifying settlements having regard to the range of facilities they contain, their role/function and ability to accommodate to new development and growth. Notwithstanding the above, Llay Hall notes that each option clearly recognises Mold is within the upper tier as one of the largest and most sustainable settlements in Flintshire. The town is able to accommodate a significant amount of growth based upon the range of services that it offers and its opportunity to meet sustainable development objectives as set out in National Policy. This should include review of the settlement boundary and Green Barriers designations which should not be a constraint on delivering an	Noted	No change

	appropriate quantum of development in the right locations. I trust that you will take account of these comments as the new plan emerges. We would be pleased to discuss further with you and please do not hesitate to contact me if you have any queries.		
Redrow	See response to Q23 and Q25	Noted	No change
Grosvenor Estate	We agree that an approach which has broader categories than the current UDP Hierarchy could be supported. However, this approach must make it clear that the smaller settlements are sustainable locations for some new development otherwise those settlements will stagnate and lose further services such a local schools; small convenience stores; post offices etc.	Whilst the general comments are noted, it is not accepted per se that all smaller settlements are sustainable locations for some new development. The settlement audits and settlement categorisation options are trying to identify which rural settlements are sustainable to accommodate some growth. It is also not accepted that the location of development in such smaller rural villages will automatically prevent the loss of local services and facilities. It is highly unlikely that a small development in a rural settlement would generate sufficient trade to support a local shop as people will still tend to spend the majority of their convenience expenditure in supermarkets.	No change
David Rowlinson	Whichever approach, get the council closer to the communities and more likely to get on with appropriate development. I don't mind if Hawarden is classed as a small settlement or a town, providing that the development which goes on is suitable and makes it a better place.	The manner in which for instance Hawarden is classified does matter as this will provide a broad guide to the level of development that might be expected to be accommodated (subject of course to other constraints).	No change
Flint Town Council	The Town Council welcomed the designation as a category A settlement in each of the options put forward and to that extent could not identify any material difference in the approach to them in the	Noted	No change

	options put forward. There was however much to recommend a new approach to the issue as set out in option 3 and the hybrid thereof.		
Cllr David Williams	Option 2 or 2A are the preferred option where it is clear which locations can support certain development. Growth projections need to be identified. Strongly object to Options 3 & 4 as identity of existing established communities could be lost.	Noted The KMd is clear that the formulation of growth options is the next stage in the Plans preparation. It is not clear how the identity of existing established communities will be lost by a planning tool seeking to establish 'urban areas' in the Plan. Even with the Deeside examples the individual settlements which make it up will still be listed. Those individual settlements will still exist as places in their own right and community identity will be unchanged. The urban areas approach is merely seeking to address some of the limitations of the UDP approach whereby within geographical areas of the County where settlements adjoin each other there were different categories of settlements with different policies and growth levels applying to them. This results in a planning by numbers approach and has little regard to the reality on the ground whereby these settlements in effect operate as an urban areas and share facilities and services.	No change No change No change

	There would appear to be a move under this option to put Pen-y-ffordd into the same growth category as Deeside which I strongly object to.	Having regard to the above, the concept of 'urban areas' is soundly based. Penyffordd / Penymynydd is a difficult settlement to categorise as it clearly a relatively large settlement and is in a sustainable and accessible location and has a range of facilities and services. However, it is accepted that it is not directly comparable to the Deeside areas or the main towns in the Urban Areas option. Also it is not directly comparable with Hope / Caergwrle as it does not have the same level of facilities and services. In looking at the basic bandings of settlements in figure 2 in appendix 1 of the KMd it is evident that Penyffordd / penymynydd appears in the 4th settlement banding in Figure 2 in appendix 1, based on its level of services and facilities. It therefore falls some way below most of the other settlements which have been included within the urban areas option. On further reflection it is considered that Penyffordd / Penymynydd would be more appropriately removed from the urban areas listings.	Delete Penyffordd / Penymyndd from the urban areas options.
Caerwys Town Council	Supports option 1.	Noted	No change
Halkyn Community Council	Supports option 1.	Noted	No change
Option 1a – UDP Approach with Minor Change			
Option 2 – Refined UDP Approach			

Taylor Wimpey	We believe option 2 should be considered. As 10 settlement groups have been identified within figure 2, we believe these should be condensed into 5 categories in order to provide more direction in terms of where growth should be located, particularly in identifying which rural settlements are most sustainable. We broadly agree with the settlement categorisation identified here.	Noted. However, the creation of option is informed by an assessment of settlement characteristics and sustainability and is not just simply a mathematical process of reducing 10 categories into 5.	No change
Bagillt Community Council	Considered the various options listed for Bagillt for the future and favoured it being continued to be treated as a sustainable village and did not want to be grouped together with Holywell and other neighbouring settlements.	Noted	No change
Penyffordd Community Council	Supports this option or option 2a	Noted	No change
Option 2a – Refined UDP Approach including Settlement Relationships			
Penyffordd Community Council	Supports this option or option 2.	Noted	No change
Option 3 – A fresh Approach – Urban Areas			
Nigel Edwards	I would like to formally lodge an objection to the proposal to classify Pen-y-ffordd as urban. The increase in development that this would likely bring would, given that Pen-y-ffordd is not a town, result in lots more travelling and the village becoming more and more of a sprawling commuter settlement.	See response to Cllr David Williams above	as above

Mary Edwards	I would like to register my objection to the proposal to classify the village as 'urban'. I do not feel that Pen y ffordd can cope with the additional buildings and extra traffic. It is a semi-rural village, not an urban area. The importance of open, green spaces is crucial for healthy living and cannot be over emphasised.	See response to Cllr David Williams above	As above
Cropper	I have read the plan and it is well written and very comprehensive. I live in Penymynydd and don't think that Penyffordd and Penymynydd should be classed as urban as you cannot really compare it with Mold for instance; so with consideration for all the other settlements in Flintshire I think option 2a of table 3 would be the best option. I hope this feedback is helpful.	See response to Cllr David Williams above	As above
Cllr Nancy Matthews	Reclassify urban settlements. Re- draw boundaries so total area acts as one	Noted	No change
GF Clark	After inspecting this document I find the number of proposed building sites alarming. The percentage increase in the number of houses has already exceeded the government guide lines.	The Candidate Sites are those that have been suggested by landowners and developers and merely publishing them in the Register does not infer that they will be included in the Plan. There are no government guidelines which imposes % limits on the growth of settlements. The level of growth in Penyffordd / Penymynydd over the UDP Plan period was not as high as envisaged as at the end of the Plan period there were still 80 units to be completed at the Wood Lane Farm site. See response to Cllr David Williams above	No change As above

	I presume the proposal to change the classification of our village from rural to urban would assist developers in the building of yet more houses. There are problems already: 1 The sewers and drains are unable to cope. I understand sewage from the White Lion Site is contained in a tank by day and pumped to Hope during the night because the diameter of the existing pipe is inadequate. If this is true, the system cannot sustain more pressure. 2 The traffic attempting to join the main roads in the mornings leads to lengthy queues and risky pull outs. The traffic at both schools causes major difficulties as parents drop off their children on the way to work. 3 We have one small supermarket, probably soon to become the Post Office as well, with a tiny car park. This is a nightmare for people living by the Spar, with cars parked across their drives and on the pavements. It is not easy to drive past, either. With more houses these problems will increase. There are other considerations as well: 4 There are no doctors' surgeries in the village. This means yet more traffic. Those, who must use public transport, will need to be able to walk a considerable distance to catch a bus. 5 There is a developing shortage of school places. Some local children have been refused places in Hope Secondary School and are having to travel further afield. 6 There are no significant numbers of new employment prospects in the local area so there will more and longer car journeys. This cannot be environmentally sound.		

Bloor Homes	A review of the approaches proposed has concluded in a preference for Option 3 as set out in Appendix 2 of the consultation document.	Noted	No change
	Allowing a greater amount of differentiation compared to the very limiting approach as set out in the UDP will enable settlements to be better aligned with how they sit within Flintshire. This helps generate a clear picture of how the settlements can further contribute towards the growth of the area and how the sustainability of settlements can be better assessed on an individual basis.	Noted	
	A 'fresh' approach to understanding settlements will enable the Council to move away from the previous system that has clearly had failings in delivering growth and development.	It is yet again disappointing to see Bloor Homes / NJL slavishly associating lack of housing delivery with the 'failings' of the settlement classification in the UDP. Bloor Homes has successfully developed the Clydesdale Road, Drury site and is developing the Broughton site. If other landowners and developers had taken a similarly pro-active approach to implementing their allocations and permissions then the delivery of houses in the UDP period would have been greater.	
	Whilst this option is still in a development phase and will need refining Bloor Homes want to add the following suggestions. • The Council needs to fully understand the relationships between settlements and how they interact with one another.	The whole ethos on which the urban areas approach is based is the recognition of the relationships and linkages between settlements and sharing of services and facilities.	

	• Recognise that settlements do not work in isolation. • Where settlements are being 'partnered up' there is clear picture as to what settlement boundaries will look like utilising this different approach. • The Council needs to understand that certain services have a catchment area and when bringing developments forward, it is not just a case of identifying the nearest services to a site as previously used. Even though there needs to be additional work put into developing this scenario, Bloor Homes consider it the best way forward. Taking a more holistic approach to understanding an area will mean it can better respond to the challenges faced over the Plan period.		
White Acre Estates	A review of the approaches proposed has concluded a preference for Option 3 as set out in Appendix 2 of the consultation document. Allowing a greater amount of differentiation compared to the very limiting approach as set out in the UDP will enable settlements to be better aligned with how they sit within Flintshire. This helps generate a clear picture of how the settlements can further contribute towards the growth of the area and how the sustainability of settlements can be better assessed on an individual basis. A 'fresh' approach to understanding settlements will enable the Council to move away from the previous system that has clearly had failings in delivering growth and development. Whilst this	Noted Noted See previous response to Bloor Homes	No change

	option is still in a development phase and will need refining White Acre Estates want to add the following suggestions. • The Council needs to fully understand the relationships between settlements and how they interact with one another. • Recognise that settlements do not work in isolation. • Where settlements are being 'partnered up' there is clear picture as to what settlement boundaries will look like utilising this different approach. • The Council needs to understand that certain services have a catchment area and when bringing developments forward, it is not just a case of identifying the nearest services to a site.		
Lavington Participation Corp. and Duncraig Investment Corp	It is clear that a reconsideration of settlements and their hierarchy is needed for the LDP, primarily because the under delivery of housing that has been experienced during the UDP period. Having assessed the approach for categorising sites, we consider Option 3 to be the most appropriate. This provides a good starting point for the consideration of settlements, although more work will need to be undertaken to understand the way in which the various areas function in isolation and also relate to one another.	See previous response to Bloor Homes	No change
Huw Evans Planning	Option 3. The others have either failed to respond to change brought about by external factors or are too prescriptive.	Noted. It is not clear though from the submission how the UDP settlement hierarchy failed to respond to change. Nevertheless, it is accepted that the growth bands as applied through HSG3 became a planning by numbers approach	No change

		and proved difficult to monitor and implement consistently.	
Option 4 combining Urban Areas (Option 3) with the lower settlement categories in Option 2			
Graham Bolton Partnership	In answer to Q24-27, we consider that the UDP approach to the assessment and categorisation of settlements is no longer appropriate. You have identified in the Key Messages document the reasoning for considering potential alternative approaches and we agree that with the evolved local plan approach and with the benefit of experience, a new way of identifying and categorising settlements should be adopted. It should, however, first be stated that there is a need for such identification and categorisation if there is to be orderly planning of future development and infrastructure to guide both public and private sector investment decisions; clearly, establishing a proper understanding of the existing settlement pattern and attributes, strengths and weaknesses of those settlements and their sustainability is a vital part of developing a plan strategy to provide a spatial focus for the policies of the plan which allows for orderly planning and the focusing of development and investment.	Noted	No change
	We consider that Option 4 is the best approach. There appears to be an error in the body of the Key Messages document as it refers at 8.4 to Option 4 being “A hybrid approach combining the ‘urban areas’ defined in Option 2 with the lower three	Noted. In para 8.4 of the main document option 4 should have referred to the urban areas as option ‘3’ and the lower three bands from option ‘2a’	Amend as identified

	bands from Option 2" – we think that the reference to Option 2 is not correct and it should refer to Option 3, which is confirmed in paragraph 4.7 of Appendix 2. A robust identification of settlements and their categorisation clearly needs to concentrate on urban areas, where most facilities are and will thus likely to be the most sustainable locations but also recognise the particular character of the settlement pattern and the relationship between rural settlements and urban areas/towns. Option 4 appears to us to be the best building block for this task. However, in developing strategy and policies for future development, the hierarchy of settlements should not necessarily be the determining factor as it may well be that some settlements will benefit from what some might consider to be disproportionate development so as to provide the population base to justify and support additional or new facilities and services.	Noted	
Kerry Norcross	I believe Option 4 is the most thought out and in-line approach for what has been set out as the objectives of this LDP. However I would be interested to understand the proposed growth levels. For example will Urban Areas be allocated a growth percentage and what will it be, as these areas are now a mixture of the old Category A and Category B (and in some are just an amalgamation of Cat B such as Deeside East, and Hope)? If there is to be an upper and lower limit there should be some guidance as to where the upper and lower should be swayed towards when	The KMd is concerned with putting in pace a soundly based and evidence settlement strategy or hierarchy, as encouraged in PPW. This will then inform drawing up a number of options as to how the Plans housing requirement figure could be distributed across the County. As part of looking at these spatial options it will be necessary to consider how the amount of growth in each tier in the settlement hierarchy can be controlled and measured. The use of growth rates is clearly one method as it was used in the UDP but is	No change

	considering candidate sites. I would think perhaps basing the higher end on areas with town centres (such as Mold) to support the objectives of making town centres more economically sustainable, vibrant and more highly utilised and enjoyed, and the lower end to those where the benefit may be much less felt (such as Penyffordd and Penymynydd). I would say that if Option 4 approach is to be taken, the sites being selected should be to bring these specific communities closer, so that they form a recognisable region on the plan, which in turn will help future UDP's/LDP's by having a good solid recognisable region.	not now used in any other LDP in Wales. Rather, the focus is on broadly distributing growth based on the sustainability of the different tiers in the settlement hierarchy. This will be looked at further in future consultations.	
Emery Planning	We agree with the Council's assertion in Appendix 2 that the arbitrary growth bands imposed on settlements in the UDP was far too simplistic. In many places it contributed towards suppressing the delivery of housing, which in turn has led to the current situation of an inadequate housing land supply. Appendix 2 presents 6 possible scenarios for defining settlement hierarchy within Flintshire. We support Option 4, which is a hybrid of the Urban Areas as defined in Option 3 with the 3 Lower Settlement Categories in Option 2a. We consider this to be the most intuitive approach out of all options proposed. It takes into consideration the relationships between key urban centres and their associated and dependent settlements; and acknowledges that smaller villages can be highly sustainable locations for housing development on this basis. This shift away from arbitrary designations in the UDP is	Noted. The objector has provided no evidence as to how the UDP settlement hierarchy suppressed housing delivery. If this was so, the UDP Inspector would not have recommended its adoption. The Plan made sufficient provision through commitments, allocations and allowances for small sites and windfalls. It is the economic downturn that impacted on housing delivery not the settlement classification (a point recognised by Redrow).	No change

	welcomed, and will enable the Council to approve proposals based on individual merit. The inclusion of the three lower settlement categories from Option 2a as part of this option also provides the fullest picture of the settlement hierarchy in Flintshire. It accurately reflects that there are a number of sustainable villages capable of delivering housing that are not necessarily within the larger defined urban areas. Finally, we re-emphasise that the Council should prioritise a review of settlement boundaries. This is imperative in order to provide additional flexibility which does not currently exist.	A review of settlement boundaries is inextricably linked to the preparation of the LDP and the results of any such review will be included in the deposit draft plan and not in advance of it.	
David Rowlinson	Whichever approach get the council closer to the communities and more likely to get on with appropriate development. I don't mind if Hawarden is classed as a small settlement or a town, providing that the development which goes on is suitable and makes it a better place.	See earlier response	No change
Cllr Dave Healey	The failings of the UDP have been made apparent and Option 1 is not a viable option given these failings. Option 1a has similar limitations although, for reasons given above, it should not be assumed that rural villages of Ewloe, Hawarden, Hope and Mancot have significant potential for housing development. Consideration must be given to the issues raised above.	Noted However it is not accepted that the UDP failed. The Plan made sufficient provision through commitments, allocations and allowances for small sites and windfalls. It is the economic downturn that impacted on housing delivery not the settlement classification. What the KMd is focussing on is that the three tier approach of settlement categories in the UDP has limitations in terms of accurately reflecting the sustainability of settlements. There is far too much inconsistency and glaring variations in the types of settlements particularly within category B and C.	No change

	Option 2 is rather ambitious in including Hope, Caergwrle, Abermorddu and Cafn y Bedd as a single 'Local Service Centre'. For reasons given above it would be wrong to assume that the level of service provision can support further housing development viz: • Insufficient school places • Uncertainties about the availability of medical services • Precarious high street 'offer' • Inadequacy of systems of drainage and sewage disposal In addition it is very important to preserve the character of these villages as potential attractions to tourists. Both Hope and Caergwrle have signs which welcome visitors to them as 'Historic Villages'. Even so Option 2 does have several positives and is a more logical approach to settlement categorisation than that of the UDP. The further refinement offered by Option 2a would overcome some of the above difficulties if Hope, Caergwrle, Abermorddu and Cefn y Bedd were categorised as **Sustainable Villages**, rather than **Local Service Centres.** Given all the factors mentioned above it is presumptuous to assume that they have the necessary infrastructure to support further development. Options 3 and 4 are completely unacceptable as they represent a philistine break with the past which does not recognise the value of villages as	The settlements bandings shows that relative to the settlements in Flintshire as a whole, HCAC falls within the 2nd banding with the effect that it is a sustainable settlement. Whilst accepting that the situation may change over time and that there is more detailed assessment to be undertaken with regard to some services and facilities, broadly speaking HCAC is a sustainable settlement. The need to preserve the character of villages is recognised and will be a consideration in assessing the candidate sites. Noted It is considered that HCAC sits far higher in the hierarchy than a sustainable village does. The purpose of this work is to formulate a soundly based approach to categorising settlements. Whether a settlement is ultimately able to accommodste new development will be assessed through the consideration of candidate sites. Options 3 and 4 represent a new planning tool whereby 'urban areas' are identified as a new category of settlement and	

	communities with a heritage. There is no way, for all the reasons mentioned above, it would be acceptable for the villagers of Hope, Abermorddu, Caergwrle and Cefn y Bedd to be classified as 'urban'.	ultimately on the proposals map through the drawing of a settlement boundary. The identity and value of settlements will still exist. In the case of HCAC it is already a number of settlements which are linked and represented by a single settlement boundary in the UDP. It is therefore an existing example of the 'urban areas' approach being advocated in the KMd i.e. that in parts of the County settlements adjoin each other, share facilities and in effect operate as an urban area. Based on the results of the settlement audit work, the broad accessibility of the settlement at the confluence of roads between Wrexham and Mold and Wrexham and Deeside, it is a sustainable settlement. The ultimate level of development it can accommodate will be considered at a later time in terms of assessing candidate sites against a range of criteria,	
Q27 – Suggested Other Settlement Hierarchy Approaches			
Kerry Norcross	I think that option 4 is fairly robust, and the only other suggestion I would have is that 'Urban Areas' are split into 2 categories (or just prioritised in such a way) so that those with town centres are given precedence for the largest amount of development to support and re-energise the town centres, which appears to be a clear and achievable goal of this LDP: Urban Areas Cat 1	Noted. However, if the urban areas are split into two tiers then it would in effect be the same as one of the 5 tier settlement hierarchies.	No change

	Buckley (inc Alltami, Drury and Burntwood, Mynydd Isa) Deeside West (inc Aston, Shotton, Connah's Quay, Garden City, Queensferry) Flint Holywell (inc Bagillt, Carmel and Greenfield) Mold Urban Areas Cat 2 Deeside East (inc Ewloe, Hawarden, Mancot, Pentre, Sandycroft) Hope (Caergwrle, Abermorddu, Cefn y Bedd) Penyffordd and Penymynydd Saltney (inc Saltney Ferry)		
Penyffordd Community Council	With regard to appendix 2 with options 3 & 4 where Flintshire County Council want to categorise Penyffordd/Penymynydd as a community that is comparable to Deeside, Mold and Buckley for growth. The Council would like to express it is felt unacceptable and would wish to remain a sustainable village and not be turned into a town.	See response to Cllr David Williams above	
Redrow	See response to Q24	Noted	No change
Bloor Homes	Bloor Homes, as stated in response to question 26, that a new methodology to understanding settlements and how they work together will be the best way forward in developing the Plan. The additional work required to improve Option 3 will develop a sound method of assessment and therefore there is no need for more sustainable options to be discussed.	The support for option 3 is noted but that particular option is limited as it results in all settlements outside the urban areas in the same tier. This option 4 is a hybrid of the urban areas and the lower three tiers from option 2a. It therefore has the urban areas at the top of the hierarchy and three bandings for all the other smaller settlements. This is considered to represent a more comprehensive approach that option 3 offers.	
Grosvenor Estate	We believe that consideration should be given to the availability of public transport within the	See earlier response to this point	No change

	settlements ad many of the smaller settlements rely on larger settlements nearby for school provision, medical facilities and larger commercial facilities such as supermarkets. The lack of provision of these facilities in the smaller settlements does not make those settlements unsustainable provided they are accessible by public transport.		
David Rowlinson	See answers above. Efficient methods are better. I don't want a "system" to be accountable, I would like passionate people at the council who believe that what they are developing is right for the area.	The Plan is being prepared in line with the advice in PPW. Passion and belief is to be commended but unless it is backed up with evidence it will be difficult to convince an Inspector at examination that the Plan is sound.	No change
Cllr David Williams	Sustainability seems to be the priority. An improved emphasis on the preservation of existing Community functionality needs to be taken account of as currently this is an important area that is being overlooked.	Noted	No change
Huw Evans Planning	A more relaxed and responsive way would be to make sensible decisions based on sustainability principles and deliverability. More mixed use and exciting development would bring vitality to settlements.	The whole ethos behind the settlement audits and categorisation options is to measure sustainability of settlements and to provide the framework for a sustainable spatial strategy. The value of mixed use developments is accepted. It is not clear what the objector means by 'exciting' development.	No change
Cllr Dave Healey	A refined version of Option 2a which recognises the distinct villages of Hope, Abermorddu, Caergwrle and Cefn y Bedd as **Sustainable Villages** rather than one **Local Service Centre** would be the preferred option.	Noted. However, HCAC is considered, based on the evidence available, to sit higher in the settlement hierarchy than sustainable villages. A simple perusal of the settlements in the 'sustainable villages' section of oprttion 2a demonstrates that HCAC is a different character and role and	No change

		has a far greater level of facilities and services.	

Issues – Delivering Growth and Prosperity			
Q9 – 'economic growth and diversification'			
Mold Town Council	Include rural agricultural economy in the list. Ensure community identities retained – no coalescence, protected from inappropriate development on green land.	Para 5.20 (resources) recognises in the 7th bullet point the need to protect agricultural land and para 5.14 (rural economy) recognises the need for diverse and sustainable rural economy. Nevertheless it is considered that the 1st bullet point in para 5.14 could be amended to read 'recognise the contribution of the agricultural economy and the' before 'need for diversification…'	Amend the 1st bullet point in para 5.14.
Taylor Wimpey	Yes, however there needs to be an understanding that some of these issues can best be resolved through increase provision of housing in order to facilitate economic growth.	The 4th bullet point recognises that a sensitive and sustainable approach is needed to meet housing needs in rural areas specifically in terms of local needs and rural enterprise dwellings. The other bullet points raise a series of questions as to how best rural economic development and diversification can be achieved eg through planned allocations or a flexible policy approach. The comments seem to suggest that such rural economy issues can be resolved through increased provision of housing. In reality, unless that housing is in locations with good range of facilities,	No change

		services and accessibility and brings about local needs / affordable housing it will either i) result in unsustainable car based development patterns or ii) provide housing for commuters that is out of reach of local people. The objector has put forward no evidence to show how increasing rural housing supply actually facilitates rural economic development.	
Kerry Norcross	Agree, especially with the need to review older industrial allocations for new uses wherever possible. Reusing these areas will be much less detrimental to the countryside than allocating new spaces for industry/offices on previously undeveloped land. And it ensures that these areas do not become undesirable areas of 'unwanted industry graveyards'.	Noted. However, many of these older industrial areas are located along the Dee Estuary where there are issues relating to flood risk, contamination and ecological importance of the Dee Estuary. This makes them generally unsuited to new uses especially housing.	No change
Wrexham Bidston Rail Users Assoc	The WBRUA is of the view that good transport connections are a key factor which underpins growth. The WBRUA has already identified a number of relevant issues in its response to earlier questions. The overarching need is to link workers more effectively with their employment and to provide suitable public transport for those who are unable or do not wish to drive to work. The more frequent service on the Wrexham-Bidston Line together with a new station serving the Deeside Industrial Park, Deeside Parkway, proposed by the WBRUA (see Figure 1 above), would increase the catchment for employers at Deeside and enable those who are unable to drive to seek employment there. The WBRUA therefore advocates that the following issue be added "An enhanced service on the Borderlands Line together with a new station,	Noted. The subject matter of the proposed additional criteria is already addressed in section 5.4 and it is not necessary for it to be repeated here.	No change

	Deeside Parkway, to improve access to employment at the Deeside Industrial Park."		
Cllr Nancy Matthews	This is an important area where planning takes the economic health of the County very seriously rather than just thinking about the impact of an industrial building on its immediate vicinity.	Noted	No change
Railfuture	I would add in this section the need for rail links to Chester (curve link from Wrexham Bidston line onto Chester Holyhead line and circular commuter service around the whole route encompassing Flintshire / Chester and Wrexham and a branch to Mold. Also a Deeside industrial estate to have a suitable station. Cycling opportunities for commuting along the disused railway routes between Wrexham and Mold and Mold and Denbigh. This answer references previous answers where the points are covered such as Q3 and 4.	A rail link at Shotton to facilitate rail freight was safeguarded in the UDP. However, this scheme has not progressed and is not identified in either the WG national Transport or the Joint Local Transport Plan for Flintshire. Similarly there is no strategic context to consider a branch railway line to Mold. The need for a new station to serve DIP is mentioned in the document. The Council is presently looking at walking and cycling routes as part of its Active Travel work.	No change
Penyffordd Community Council	Provision of business & employment opportunities in rural & semi-rural areas.	Noted. This is addressed in para 5.14 of the KMd.	No change
Cheshire West and Chester City	Point 5.9 should therefore refer the need for appropriate transport infrastructure investment to enable improved road and rail connectivity and accessibility. Similarly, strategic transport infrastructure should be added to the issues listed under point 5.5 and a reference to electrification could usefully be added to bullet 5 under point 5.4, while bullet 2 (under point 5.8) could be qualified to include a reference to access by sustainable means.	Para 5.4 of the KMd deals with transport infrastructure. In this context it is suggested that: • The fifth bullet point be amended to include reference to the electrification of the railway system • A new bullet be added: The outcome and implications of the WG consultation on the blue and red options for the improving the A494T/A548 route corridor	Amend as indicated

	While Flintshire's contribution to the sub-regional economy, as reflected in the designation of the Enterprise Zone is accepted, Chester's position as the primary economic driver and sub-regional centre for the West Cheshire and north-east Wales sub-region should be recognised.	The first bullet point clearly puts the Flintshire economy in the context of adjoining areas but could be further clarified by adding '& Chester' after 'West Cheshire'.	
Redrow	An additional issue should be included within this section - to ensure that for any planned economic growth, the associate housing infrastructure is planned for in order to retain as many new workers brought into the area, assisting in the wider objectives of the plan such as stimulating urban regeneration and promoting more sustainable home to work travel patterns.	The role of housing in supporting economic growth and development is clearly identified in para 5.12 and need not be repeated. The sequence of the objectives as written is also relevant to identify the supporting role for housing. The concern comes when the desire for housing development does not match the pace of economic development as this is outside of the Council's control.	No change
Minerals Products Assoc	Yes. Include an additional bullet point ensuring the safeguarding of mineral resources and associated infrastructure.	The last bullet point in para 5.9 is considered to adequately address minerals.	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree The Northern Gateway proposed development area including the Airfields together with Deeside Industrial Park is a strategic employment area which is a key asset for the regional economy, assuming there is support in the provision of infrastructure and sites to attract regional, national and international investment. There should be a focus on storage and distribution uses at the Northern Gateway site.	Noted Noted. This is a significant commitment supported by the Council. Significant infrastructure is being provided at public expense. Such sites primed in this way should have significant strategic and competitive advantage and as such need to start to deliver beneficial economic and housing development. Noted	No change

	There should be a review of older industrial allocations to see if they are more appropriate for other uses, with employment directed to new allocations on strategic employment areas such as the Northern Gateway. The provision of an adequate and appropriately skilled and trained labour supply will help to broaden the labour market and consequently attract new businesses and investment.	Noted Noted	
Bloor Homes	Bloor Homes does not agree with the issues and considerations that have been identified. It is considered too simplistic to focus solely on the delivery of opportunities to develop the economic growth that is wanted within Flintshire. The Council needs to adopt a joined up approach as housing delivery is an essential part of delivering economic benefits to the area. Increasing levels of housing delivery will not only allow for more people to live in the area which will boost the economy, but will also provide jobs during the construction phase of a project. NLP Planning produced a research paper in May 2015 titled 'The Economic Footprint of House Building in Wales' which shows clearly how increasing growth in housing numbers can have a direct impact on the growth of the local economy. The Council must recognise the important role house builders have in the economic growth of the area.	Noted The role of housing in supporting economic growth and development is clearly identified in para 5.12 and need not be repeated. This is also recognised in the third bullet point in the key messages in para 7.2. That said, the over simplified approach taken here assumes that developers are able or willing to deliver housing to support the economy and there is a concern that this will not happen with some. Noted. Clearly new housing development has an economic impact during the construction phases and is important in supporting economic growth and development generally and as part of creating sustainable development. However, it is questioned whether	No change

		housing itself is in itself an economic activity in the same way that other wealth generating businesses are.	
Grosvenor Estate	Agree - but need some further emphasis on rural economy	The rural economy is addressed in para 5.14.	No change
Lavington Participation Corp. and Duncraig Investment Corp	It should be noted here that a sufficient level of housing provision in appropriate locations is critical to facilitating economic growth. It is too simplistic for the Council to focus on employment provision in isolation and we advocate that a joined up approach is necessary. Moreover, we consider that the economic aspirations of Flintshire should be taken into account when determining the objectively assessed housing need and housing requirement. Where economic growth is anticipated this must be reflected in an uplift to the housing requirement.	The role of housing in supporting economic growth and development is clearly identified in para 5.12 and need not be repeated. This is also recognised in the third bullet point in the key messages in para 7.2.	No change
David Rowlinson	I certainly agree that it is important that the council understands these factors, as these are essential for the local economy. Infrastructure development is vital to tempt new commercial development. I have a limited understanding of what the council can do to influence some of these decisions. Diversified economy is essential. It would be very useful if we could attract some UK client organisations to Flintshire business parks. This would lead to the supporting organisations following suit. Ewloe business park is a good example. Would it have been more developed and attracted more investment if more offices and less homes had been built?	Noted	No change
Cllr David Williams	Provision of business & employment opportunities in rural & semi-rural areas.	The rural economy is addressed in para 5.14.	No change

Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	Recognition of the need to balance the supply of minerals with environmental impacts is supported as a particular issue affecting the AONB and its setting.	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support but add: Ascertain what other vocational work people want to carry out or niche skills etc such as Caring, carpentry, smithy, Stone walling, electricians, plumbers, or niche skills and flexibility.	This is not a matter for the LDP.	No change
Huw Evans Planning	The problem for the plan is that it will not know what the market is likely to need over the plan period. It clearly has a key role to play but it cannot control job creation or job loss. The plan needs to be much more flexible and responsive rather than prescriptive. Whilst there needs to be a review of the older industrial and employment areas and possible new uses identified it must be recognised that there is a need for the small and less prestigious areas and units. Very often it is in these smaller and cheaper units that local enterprises are born and flourish. There will always be a need for the 'dirtier' business unit.	Noted. The Plan needs to assume that the economy will continue to pick up (as it is doing) and make suitable provision for continued economic upturn and improved viability / deliverability. It is difficult to Plan in advance for such small businesses. They often start small and gradually expand. Allocating sites for smaller businesses is not always successful. Instead it may be better to have flexible policies which allow such businesses to start and grow organically. This dilemma is recognised in para 5.14.	No change
Betsi Cadwaladr University Health Board	Qs 9 – 20 Delivering Growth and Prosperity and Safeguarding the Environment We are broadly in agreement and welcome the commitments shown in these areas. Again, a reference to the Well-being of Future Generations goals would have been helpful. The goals encompass a slightly	Noted. The Council will need to have regard to the Well Being of Future Generations Act but it is not considered that it is necessary to mention this specifically within the Key Messages document as this could lead to pressure to list countless other legislative requirements.	No change

	broader approach to these aspects. We also would welcome the inclusion of partners in Public Health Wales in ongoing discussions		
Cllr David Healey	Q9 – With regard to this heading I would like to place special emphasis on the need for FCC to recognise the potential of tourism, especially that associated with the heritage of the area and to seek to develop a coordinated Flintshire Heritage Strategy with relevant partners including the newly established North East Wales Heritage Forum. Recognising, celebrating and protecting our heritage should be of greater priority in County planning considerations.	It is an important role of the LDP to safeguard the historic/ heritage assets of the county in terms of the built, natural and cultural environment. The plan process seeks to engage with all interested parties and the newly formed group can be added to the LDP mailing list to include them in future consultations. The 5th bullet point in section 5.15 recognises the need to safeguard and enhance natural assets and it is considered that reference to 'heritage' assets could also be made	Amend 5th bullet in 5.15 as stated
Q10 – economic sub region driver			
Mold Town Council	Yes	Noted	No change
Taylor Wimpey	We agree and believe that an adequate supply of good quality market homes can help support these businesses.	Noted	No change
Kerry Norcross	Agree. I think that this is something that Flintshire Council and its peers are particularly successful at. So for example the more recent developments at Hawarden Industrial Park. I also think there is value to the flexible but robust policy approach as needs could vary greatly and over-allocation would potentially encourage development for developments sake without the level of growth to support it, and with the risk of creating future 'industrial graveyards'.	Noted. Development plans have generally tended to over-allocate employment land so that there is a range of sites in terms of location, size and type, so that there is flexibility. Although the Plan is looking at the appropriateness of a more focused approach, there is little evidence that over-allocation will result in sites being developed for the sake of it.	No change
Wrexham Bidston Rail Users Assoc	The WBRUA agrees with these issues with employment centres being accessible by frequent and reliable rail	Noted	No change

	services wherever possible to enable workers to reach employment. Insofar as the Wrexham-Bidston line is concerned the WBRUA recommends an enhanced service with a new station, Deeside Parkway, to serve the Deeside Industrial Park (see Figure 1 above). This will improve access to the businesses at the Deeside Industrial Park and assist in reducing road congestion by promoting a modal shift to rail.		
Strutt and Parker	To secure Flintshire as an economic driver for the sub-region, the need to deliver the right strategic sites is important. As part of recognising growth, hubs and linkages, candidate site "Land at North West of Buckley Mountain" should be supported for additional employment use, forming an extension to Catherall's Industrial Estate as part of a mixed use site (including new housing provision). The site has the potential to offer a sustainable hub of development and a logical extension to the existing settlement of Buckley Mountain, due to the proximity of the existing industrial site. A mixed use employment and housing site would deliver a wholly sustainable form of development by enabling residents to live and work within the same site, also reflecting the existing form of development within the area. The parcel of land has been sub-divided into smaller sites (see attached plans). Further site development specifics will be provided at a later stage.	Noted. The merits of the Candidate Site will be assessed against the Candidate Site Assessment Methodology Background Paper and against the emerging Preferred Strategy.	No change
Cllr Nancy Matthews	Agree but need to look at spreading development along the A55 corridor.	Noted. The primary role of the A55 is as a strategic transport corridor. It is not considered that locating economic development at each junction along the A55 would represent sustainable	No change

	Also looking at small units (double garage size) for emerging businesses.	development and would certainly have an impact on open countryside. It is difficult to Plan in advance for such small businesses. They are often start small and gradually expand. Allocating sites for smaller businesses is not always successful, particularly when there has been an economic downturn and developers are unwilling to develop speculative business units. Instead it may be better to have flexible policies which allow such businesses to start and grow organically. This dilemma is recognised in para 5.14.	
Railfuture	The wider implication of this question suggests better regional links and that can only be achieved by better connectivity to NW England and London. Electrification of the NW Coast line and linkage to HS2 and HS3 and Manchester and Liverpool airports is essential. Also as previously stated better links to Chester via a curve to the North Wales coast line and better links to Liverpool via Wrexham Bidston by making the line better served with faster more frequent trains and a contiguous link through to Liverpool city centre.	In response to another submission, reference to electrification has been accepted. There is no strategic context for the provision of a rail curve between the Wrexham- Chester line and the North Wales Coast line.	No change
Penyffordd Community Council	Provision of business & employment opportunities in rural & semi-rural areas.	The rural economy is addressed in para 5.14.	No change
Redrow	An additional issue should be included within this section - to ensure that for any planned economic growth, the associated housing infrastructure is planned for in order to retain as many new workers brought into the area, assisting in the wider objectives of the plan such as stimulating urban regeneration and	Noted. The 5th bullet point in section 5.13 recognises the importance of ensuring housing allocations are well related to economic growth areas. This recognises the opportunities for closer links between home and work and creating a more	No change

	promoting more sustainable home to work travel patterns.	sustainable travel pattern. However, this is not considered to warrant a specific bullet point.	
Minerals Products Assoc	Yes. However, bullet point 2 could include important mineral resources, which are essential to the local, regional and national economy.	It is not considered that the minerals industry employs anywhere near the same numbers as the key business mentioned. The bullet point seeks to emphasise the role of key high profile employers and it is not considered necessary to mention minerals here, as to do so would result in pressure to add sorts of other economic activities.	No change
Crag Hill Estates Ltd & Praxis Holdings	Agree On the assumption the necessary infrastructure is provided at the Northern Gateway strategic site, market demand is likely to be strong for such readily available sites, rather than older industrial sites which have many constraints and are expensive to develop. The role of the Northern Gateway within the DEZ should be kept under review to ensure it is responsive to future economic conditions and property market demand.	Noted Noted but questions why the provision of the necessary infrastructure at Northern Gateway is queried. This is a significant commitment supported by the Council. Significant infrastructure is being provided at public expense. Such sites primed in this way should have significant strategic and competitive advantage and as such need to start to deliver beneficial economic and housing development. Noted	No change

Bloor Homes	The Council needs to recognise the benefits of mixed use schemes in bringing forward various Plan aspirations within a single location. Mixed use developments play a significant role in delivering housing numbers and non-residential floorspace in sustainable locations.	Noted. It is suggested that a further bullet point is added: 'recognise the benefits of mixed use development sites'.	Amend as stated.
Grosvenor Estate	Agree	Noted	No change
David Rowlinson	Agreed. Education establishments need to be accessible to all. New sixth form centre in Connah's Quay seems to go against this. It is good to bring more children together as this will attract better talent of teacher. However the transport situation through Connahs Quay, Shotton, Queensferry is still terrible. The council need to consider how to train a modern workforce and retain them in the area.	Noted In an urban area such as this there should also be scope for walking to the new school. Although not directly within the remit of the Plan, this is recognised in the KMd	No change
Cllr David Williams	Provision of business & employment opportunities in rural & semi-rural areas.	The rural economy is addressed in para 5.14.	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
CPRW	In the main support the identification of issues raised, but suggest that mention is made of a sequential search of all previously developed land with regard to site selection (PPW)	The site search sequence and brownfield land is mentioned in para 5.16 and again in para 5.20.	No change
Dr Klaus Armstrong Braun	Generally support, but concern at hubs impact on small settlements and environment.	The 4th bullet point in para 5.10 identifies the role of hubs as offering the opportunity for wealth and regeneration to spread to surrounding settlements. This is picked up explicitly in the Wales Spatial Plan and is in line with the principles of sustainable development. It	No change

		is unclear why the submission considers this to be harmful to small settlements.	
Huw Evans Planning	Flintshire is in an enviable geographical position with good communication links to the North West and motorway infrastructure. It makes sense to capitalise on this and, along with Wrexham, continue to be the powerhouse of North Wales and neighbouring areas. This a major hub for the wider region. However the fragility of placing too much reliance on major multinationals has been brought sharply into focus with the global problems facing the steel industry and Tata. Hasnt the impact of Northern Gateway already been addressed through the consideration and assessment of the planning application?	Noted The focus is on ensuring a balanced economy which is more resilient. Yes but the impact of the DEZ has yet to be fully manifested and it will be interesting to see what momentum this brings with it for the remainder of the Plan period.	No change
Cllr David Healey	Again I would add emphasis on recognising the value of tourism as an additional focus for regeneration and wealth creation in Flintshire.	The importance of Sustainable Tourism is an issue which the plan will address and it is considered to be adequately referenced in section 5.15 of the KMd.	No Change
Q11 – 'town and district centre'			
The Theatres Trust	In line with our comments to question 2, the support and provision of cultural facilities in town centres can act as a drawcard, support the night time economy, and have flow on economic benefits for other town centre businesses. Support for the cultural led rejuvenation of former, but vacant cultural and community buildings, can also act as a catalyst for wider regeneration with in town centres.	Noted. The importance of cultural facilities in town centres is considered to be adequately referenced in this section of the KMd.	No change

	We therefore support town centre policies that promote cultural provision and opportunities.		
Mold Town Council	Agrees with issues listed	Noted	No change
Kerry Norcross	Agree. Broughton Park's recent changes are a shining example of the right mix of retail, food and leisure. Mold High Street is also an excellent example of a high street working well, and to be proud of.	Noted	No change
Wrexham Bidston Rail Users Assoc	The WBRUA agrees with these issues. An enhanced, reliable service on the Wrexham-Bidston line would enable people to access shopping, leisure, culture, learning and business destinations without the need to drive.	Noted	No change
Cllr Nancy Matthews	Control of out of town retail developments. Attention to high streets attracts tourists	Noted	No change
Railfuture	Cycling facilities are an integral part of this. Also I would argue more off street parking and pedestrian walkways with off high street delivery facilities for business premises to avoid congestion.	Noted, whilst this can be addressed as part of the consideration of new development in town and district centres, it can do little with existing development and arrangements. The scope for increased cycling is recognised in the KMd.	No change
Penyffordd Community Council	Provision of business & employment opportunities in rural & semi-rural areas.	The rural economy is addressed in para 5.14.	No change
Redrow	No - an additional issue should be raised, such as the marginal viability of new development across many of the borough's town centres and how needs for new housing, employment and retail uses can be delivered across the borough.	This section of the KMd is addressing town and district 'centres' i.e. the core areas which have a variety of uses including retail, leisure, commerce, transport, leisure etc. Whilst housing is an important part of such centres, it is unlikely that such locations will be able to accommodate major new development. It is therefore unclear what the objector's reference to viability is to do with in this	No change

		context. The general point about the viability and deliverability of housing is addressed in para 5.13.	
Crag Hill Estates Ltd & Praxis Holdings	Agree Specific policies may be needed for different centres in particular for the proposed District Centre at the Airfields.	Noted Noted. However, it will be some time before a district centre exists at The Airfields.	No change
Bloor Homes	Bloor Homes agrees with the issues and considerations raised.	Noted	No change
Grosvenor Estate	Agree - essential to retain and enhance rural business and shopping facilities	Noted	No change
David Rowlinson	Generally agree. My feeling is that town centre shopping will never recover. Too easy to go online, or go to a regional centre (Chester / Liverpool) for serious shopping. Therefore the council needs to consider how to achieve change of use. French have typically achieved this - cafes / local shopping provision in pedestrianised town centres, shopping centre on the outskirts. However is this driven by longer lunch hours that allow people to travel into town (and park easily). Or it the UK life too busy. Instead of "protecting" town centres, the council should be facilitating their change to serve the new needs of the community.	The KMd poses these questions about the future role and make-up of town and district centres. Despite the growing use of internet shopping there is clearly still a role for town and district centres, perhaps more specialist shopping along with an enhanced leisure role. The need to review the present 'core retail area' policies is also mentioned.	No change
Cllr David Williams	Provision of business & employment opportunities in rural & semi-rural areas.	The rural economy is addressed in para 5.14.	No change
Cllrs Carol & David Ellis	Agree with some but specific policies are needed for the likes of Buckley and vast investment from the Welsh Government. The park and ride will not work due to town location. Removal of parking fees to assist business by FCC is essential.	The KMd clearly recognises the need to look at the role and function of each town and district centre and whether there should be a standard policy approach or tailored policy approach. The role of health checks and masterplans is also recognised.	No change

CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Support but add: Seek to have a diverse shopping experience with many small specialist shops	Noted, but this is one of many possible ways in which town and district centres can evolve and diversify.	No change
Huw Evans Planning	The major problem is that in the past the UDP has been unable to respond to the swift and significant changes in the economy and particularly the retail trading patterns. A new plan must not be prescriptive and requires a significant degree of flexibility and respond positively to new and mixed uses in the town centres. Having a masterplan is all well and good but what action is the council taking to make them happen? What engagement and partnership is happening with the private sector and is the council willing to utilise its compulsory purchase powers to assemble land and bring sites forward? Unless its prepared to do so then, as seen by the last 15 years, nothing much is going to change. Is a hierarchy necessary? Will it hinder new/mixed uses? The plan is not going to be able to prevent the changes that are happening and will happen in the future, so it should embrace the opportunity for change. P & R does not reduce car useage it reduces congestion in certain areas. Flintshire's town centres dont have the attraction and level of draw which justifies P & R	Noted. The need to re-appraise previous approaches to planning town and district centres is clearly set out in the KMd. This will pick up on the work being carried out by Economic Development / Regeneration colleagues whereby tailored approaches to each centres are being progressed. PPW advises that 'Development plans should establish the existing hierarchy of centres, identify those which fulfil specialist functions and be clear about their future roles'.	No change
Cllr Dave Healey	I agree with the issues mentioned. I might add the need to strive to keep Banks in local areas where possible but I know the decisions with regard to these are beyond our control.	Noted.	No change
Q12 – 'housing needs'			

Mold Town Council	Yes	Noted	No change
Taylor Wimpey	We fully support the need to provide housing to meet local needs, increasing populations and economic growth aspirations and the recognition that there has been a high under-delivery of housing in past years. To facilitate delivery of housing, we support the allocation of a generous housing land supply along with necessary safeguards for future allocations. Safeguarding development sites allows a developer to adequately plan the development from an early stage. Once safeguarded, a developer can ensure consistency of delivery, diverting greater resource towards community engagement and resource planning than would otherwise be committed for shorter-term allocations. We fully appreciate that developer contributions are a vital aspect of development planning, and these should be determined through the viability of individual sites.	Noted. It is interesting that the objector fails to recognise the role of house builders in the under delivery of housing in past years. The objector is unclear in identifying a distinction between safeguarded allocations as opposed to shorter term allocations. It is unclear what a "generous" supply of housing land means as this exists in Flintshire as undelivered permissions, and also the Council is required to make provision for housing based on an appropriate assessment of need. Any developer contributions as part of housing allocations will need to be based on robust research related to viability.	No change
Kerry Norcross	Agree. It is interesting that the full allocation of UDP has not been utilised. I think that these should certainly be reconsidered to be included as part of this next wave as they were identified as the best sites for development previously, and in most cases that sentiment remains. The economy will have drastically affected the amount of building in the last few years, and as the demand slowly increases this land appears to be slowly being developed. I would also think that perhaps too much growth was anticipated in the previous UDP and this should be considered when estimating housing numbers going forward, especially as research shows a recession has historically occurred every 10 – 20 years	Noted	No change

	in recent decades and so inevitably is likely to feature at some point during this next LDP. In terms of selecting houses that meets the needs of the general public as well as more specialist housing like over 55's, general housing is suitable to every area I would imagine, whereas specialist housing is not. I believe that looking at the types of facilities available is an important driver for specialist housing and areas with easy access to a doctor, dentist and church would be key indicators for over 55's housing in the local vicinity. With regard to gypsy sites, my experience is that gypsies tend to choose their own sites, and so if allocation is being made it should be near to or abutting existing sites or where they already frequently visit in order to ensure it is fully utilised. In terms of affordable housing, I think that the most successful instances are where they are integrated as part of a housing mix, for example Northop Redrow development. This is what I think should be the aim for most developments, so that sites have a mix rather than a 'rich estate' and 'poor estate' contrast.		
Wrexham Bidston Rail Users Assoc	The WBRUA believes that good access to transport infrastructure should be a prerequisite for new housing developments and Flintshire should seek to capitalise, so far as is possible, on its rail network to get people from such new developments to where they may want to go. The WBRUA therefore recommends the inclusion of the following; "Where possible, new housing should have easy access to adequate rail transport in order to enable people to travel to work and access shopping, leisure, culture, learning and business destinations without the need to drive."	Noted. Section 5.12 is concerned with the overall 'need' for housing. Section 5.13 is concerned more with the location and delivery of that housing. Nevertheless it is considered reasonable to include reference to public transport in the 4th bullet point of para 5.13. Include in 5.13 brief mention of rail / buses	Amend 4th bullet point of para 5.13 as stated

	To underpin the above, reduce car usage and increase the viability of any enhanced rail service, the WBRUA suggests that Flintshire should promote, as far as possible, new housing development in the vicinity of its railway stations rather than at more remote sites and specify, as a condition of planning, 'on foot' access to the station from the new development.		
Cllr Nancy Matthews	Very careful consideration of the question of affordable housing. Should be market controlled, not socially engineered by a local authority ie if smaller houses are built then the prices are smaller. Developers cannot be forced to sell properties at a considerable discount Shared ownership should be pursued and will help people on to the ladder affordable housing is better classed as starter homes We are currently restricting the growth of rural communities with our attitude to affordable housing Companies such as Aldi are continually seeking to alter their planning conditions by offering cash instead of affordable houses. Developers cannot afford to build and not make some profit We need to be planning for the real world..... Where builders have to make enough money to pay wages	Noted. It is clear that the private sector has a role to play in delivering affordable housing as part of larger development. However, other affordable / social housing is largely delivered by housing associations and similar bodies as well as the Council's New Homes initiative. The Council is not seeking to socially engineer such housing provision but merely to ensure that, when new affordable housing is provided it meets a specific identified local need. It is an oversimplification to state that small houses will mean small prices as this will depend on the attractiveness of the settlement and also the strength of the local housing market. Experience has shown that there are parts of the County where even with a 30% discount, houses are not genuinely affordable to local people, due to the prevailing house prices. The whole premise behind affordable housing is that it is needs driven and not left to the market to decide to provide. Speculative developers often choose to ignore the need to	No change

		provide evidence of need, particularly in rural areas. The Council is not expecting developers to not make a profit, but is seeking to ensure that new houses are affordable to local people in housing need.	
Railfuture	No housing development should take place without adequate off street parking, cycling facilities and if economically possible adequate public transport preferably rail and light rail.	This is an oversimplification of where housing development can be located, and the form in which it can be delivered. For instance, why should it be necessary for a small development of apartments in a town centre have to provide off street parking when there is public car parking and public transport available?	No change
Llay Hall Investments	Identifying additional sites to accommodate new housing in Flintshire is critical to meet both the short and longer-term development needs and economic growth aspirations of the council. In the short term this is particularly important given the Council is unable to demonstrate a five year housing land supply (5YHLS) and due to the historic under-delivery of housing development against the target set out in the Unitary Development Plan (UDP). As the Council acknowledged in the joint Housing Land Availability Study 2014, the increase in housing land supply must come through the local development plan (LDP). Through the call for candidate sites consultation, the Council must consider sites which are sustainable, viable, deliverable and that could come forward in the short term to address both the under delivery of housing and contribute to the 5YHLS.	Noted, however there must be a clearer commitment and evidence of a willingness to deliver sites by developers, avoiding land banking of sites waiting for better or optimum market conditions to return.	No change

	Identifying a range of sites in sustainable locations with good access to services and facilities should be a primary focus for the emerging plan.		
Penyffordd Community Council	Improved provision of affordable housing in rural areas rather than concentration in the traditional areas of the County. Conversely, provision of higher priced market housing in the traditional lower priced areas.	Noted. Most affordable housing tends to be located in larger settlements because it is in these large settlement that the bulk of housing development takes place, and as part of larger housing schemes, affordable housing is required. These are also generally the most sustainable locations for housing. The provision of affordable housing in rural areas is also important but this needs to be done in a manner which reflects the scale and type of need in rural areas and reflect the sustainability of those settlements. It would be inappropriate to seek to reverse established practices and trends which are based on sound sustainability principles. The focus should be on achieving a mix of housing types and sizes on new sites so that it attracts a variety of buyers and also has a varied and interesting layout and design.	No change
Wirral Council	Although Flintshire and Wrexham are considered to form a self-contained local housing market area, Wirral Council would welcome further clarification on any migration and workforce assumptions and the assessment of any likely impacts on neighbouring areas.	Noted. The focus of the Plan is on seeking to provide for its own housing needs and in this context it is unclear what impact this would have on neighbouring areas, presumably the Wirral.	No change
Redrow	While it is welcome that the issue of housing provision within the LDP is recognised as one of its key messages and issues, it is felt that more could be done within this	Noted. It is considered that the title of para 5.12 and the first bullet point recognises the role of housing.	No change

	section to ensure that core principles of the PPW are taken on board - namely, taking a positive and proactive stance towards economic and housing growth. Therefore, it is disappointing to see that the identified issues appear to dwell on previous failures of the UDP, which were largely down to unforeseen macroeconomic factors, rather than anything to do with the work of the Council through the UDP. It would be welcomed by Redrow if the council were to amend the first issue to reflect the the government's intention around new housing provision, namely, to 'Providing an amount of housing which meets the full and objectively assessed local needs and a reciprocal level of in-migration which supports the economic growth aspirations of the Plan'. Furthermore, many of the allocated sites that haven't been developed during the plan period have been owned the council or WG, so it would be welcomed if one of the issues in this section recognised this problem and sought to bring all publicly owned and allocated land in the LDP/UDP to the market within the first 5 years of the plan.	The reference to the UDP is made in the context of continuing criticism of the UDP, largely led by NJL on behalf of other developers, in terms of its alleged failings in not delivering housing. It is refreshing to hear that Redrow consider this to be down to the macroeconomic factors, rather than the UDP. It is also refreshing to note that Redrow has acted pro-actively by developing a number of sites in the County at a difficult time, particularly The Heathlands in Buckley. If other developers and landowners had acted similarly then the housing delivery in the UDP period would have been greater, bearing in mind that the plan can only make adequate provision for housing (which it did) but it is the interaction of landowners, developers and the market that determines delivery. The housing allocations in the UDP were allocated in good faith and scrutinised by the Inspector on the basis that they were available for development. The KMd clearly references the need for sites in the LDP to be scrutinised in terms of viability and deliverability.	

Minerals Products Assoc	Yes. However, it is important to recognise the need for raw materials to deliver the projected housing and infrastructure requirements.	Noted. This is mentioned elsewhere in the KMd	No change
Crag Hill Estates Ltd & Praxis Holdings	We strongly agree that the Plan must set an appropriate and achievable level of affordable housing for the Plan Area based on local need and viability. There is no point in unduly constraining a marginal site. The focus should be on housing sites that are attractive to the market, with those being released where there is only limited demand.	Noted. However, is the objector saying that development (and appropriate affordable housing) should not be provided in lower housing market areas, because viability is poorer. The price of land being sold needs to also reflect such considerations. It is recognised that there is a need for allocations that are attractive to the market but this is not the only consideration.	No change
Whitley Group	Yes – it is crucial to ensure that Flintshire has the right amount, size and type of housing to support economic development and sustain a five year housing land supply throughout the Plan period.	Noted	No change
Emery Planning	We support the broad vision of ensuring that an adequate amount of housing is secured for the borough. We also support the acknowledgement and commitment to addressing the under delivery of housing throughout the UDP period. We also welcome the approach toward providing housing which meets the needs of the general market, as it is clearly evidenced that a housing shortage can only be addressed by providing housing in areas that are attractive to both developers and buyers. We also welcome the Council's commitment to ensuring that a five year housing land supply is sustained throughout the plan period. However, we consider that the Council should go further on this. Paragraph 9.2.3 of Planning Policy Wales (adopted January 2016) states that:	The issue of viability and deliverability (which will include an assessment of constraints etc) is clearly referenced in para 5.13. These considerations will also form part of the assessment of Candidate Sites. It is not clear how the objector has come to the conclusion that the Council placed an overreliance on brown field land when there does not appear to be any empirical evidence to support this.	No change

	"Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. 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. There must be sufficient sites suitable for the full range of housing types." We consider that the sentence relating to any potential site being "free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development" should be added to the key issues and considerations for Question 12. A consistent application of this test would prevent the inclusion in the housing supply of unviable land that is unlikely to come forward, thus presenting a more accurate snapshot of the amount of housing land available in the borough. Lack of economic viability has been a problem for the authority in the past, in particular in relation to an over-reliance on highly constrained previously developed land, and has been a major contributing factor towards the authority not having a sufficient housing land supply. We consider that the sentence stating that the Council will "Set an appropriate and achievable level of affordable housing for the plan area based on local need and viability" should be revised. The overall quantum of affordable housing to be planned for should accurately reflect in full the evidenced need in		

	the borough. This may justify an increase in the overall requirement.		
Bloor Homes	Viability is a key consideration to make when assessing the policy framework on which decisions are made. Policies should not be too onerous that they stall developments coming forward. The market dynamics of having more housing which makes the affordability of housing improve should be recognised. A limited supply of houses will only serve to increase prices through a lack of availability for purchasers. A greater level of provision will also ensure that there is a broader mix of housing types for residents to choose from, therefore allowing them to either upscale or downsize. This will in turn facilitate the needs of other residents. The Council must ensure that there is enough housing being brought forward and planned for, not only to make up for the shortfall that has been experienced over the previous plan period. It will also help to accelerate the rate of growth that will assist in achieving the objectives of the plan.	Noted Noted The Plan is charged with the duty of objectively assessing the housing need for the Plan period. The housing need for the UDP was assessed at a previous point in time and in different circumstances and that need clearly has not translated into completions largely because of the economic downturn. It would be wholly inappropriate to seek to add the UDP 'under-delivery' onto the LDP housing requirement as this would be not be comparing 'like with like'. The objector is wrong in stating that greater provision will lead to greater delivery as the evidence and the experience of the UDP does not bear this out as whilst the plan made suitable provision to meet the housing requirement, the houses were	No change

	A variety of site types and sizes should be used to enable the Council to achieve the objectives of the Plan. This is discussed further in answer to question 13.	not delivered by developers. The objector is referred to the comments of Redrow on this matter which are instructive and refreshing from the perspective of a developer taking a half full rather than half empty stance in all that is being commented. Noted	
Grosvenor Estate	Agree - essential to retain and enhance rural business and shopping facilities	Noted	No change
Lavington Participation Corp. and Duncraig Investment Corp	This section of the report addresses affordability, but fails to mention that providing a significant quantity of housing in the right locations can improve affordability for residents. This must be acknowledged when preparing the LDP. FCC must ensure that there is enough housing being brought forward and planned for, not only to make up for the shortfall that has been experienced over the previous plan period, but also to accelerate growth moving forward. There must be a variety of housing sites taken forward as allocations within the LDP to meet the need, including some greenfield sites which can come forward in the short term.	Noted, however surely it is the provision of a quantity of housing **at the right price** to match the local market that is the important factor in delivering housing sustainably? Noted re providing for a range of sites. The Plan is charged with the duty of objectively assessing the housing need for the Plan period. The housing need for the UDP was assessed at a previous point in time and in different circumstances and that need clearly has not translated into completions largely because of the economic downturn. It would be wholly inappropriate to seek to add the UDP 'under-delivery' onto the LDP housing	No change

		requirement as this would be not be comparing 'like with like'.	
David Rowlinson	Agreed. Site should not be made available until previous sites developed. Housing should match the style / price of the local community. The council needs to ensure (through whatever means) that infrastructure is provided prior to the housing development, and that the new housing enhances communities rather than increasing traffic / pollution / other negative effects. No issue with communities growing, but settlement boundaries need to be protected to stop villages joining together and losing their identity.	Noted. However, the focus of the KMd in this respect is that the existing housing commitments are robustly assessed to ensure that they are likely to genuinely add to housing land supply and are likely to be developed. It would be unreasonable to hold off any new sites from being developed until the UDP sites are developed. Whilst recognising the need to prevent coalescence, it is not clear how settlement boundaries per se can be protected in their entirety.	No change
Cllr David Williams	Improved provision of affordable housing in rural areas rather than concentration in the traditional areas of the County. Conversely, provision of higher priced market housing in the traditional lower priced areas to balance social mixes.	See response to earlier point	No change
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB	The identified issues are noted. The committee would emphasise the importance of meeting needs for affordable rural housing for local people who would be otherwise priced out of the housing market in the AONB by those from outside who wish to live in such a beautiful area.	Noted	No change
CPRW	The issues raised appear to present a reasonable assessment	Noted	No change
Dr Klaus Armstrong Braun	Partially support but add:	Whilst these forms of development may be appropriate on some sites they man not on other sites. It would be better for	No change

	Type of accommodation, I.e. Rent, and Apartments/mews/courtyards, which are more efficient and sustainable use of housing land.	schemes to be designed based on the specifics of each site or locality rather than seeking to impose certain forms of development	
Huw Evans Planning	The UDP has failed rural housing. Exception policies dont work and the same principles should be applied as in urban areas where new market housing provides the cross subsidy for local needs/affordable housing. Previous plans have failed to address the housing and care requirements of an ageing population. Developments which provide the transition from independent living to care in later life should be encouraged.	Noted. The UDP policies in respect of rural housing reflect those in PPW. The scope for mixed market / affordable housing in rural areas will be addressed as part of the Plans progression. Nevertheless it is considered worthwhile adding at the end of the 4th bullet point in para 5.14 'and investigating options relating to the delivery of affordable rural housing as part of mixed tenure schemes'.	Amend para 5.14 4th bullet point as stated.
Cllr Dave Healey	In principle I agree with the broad aims, whilst safeguarding the heritage of Flintshire	Noted	No change
Q13 – 'location of housing'			
Mold Town Council	Ensure use of brown land areas before identifying new housing allocations. This is contradicted elsewhere when it says that UDP housing areas will not necessarily be carried forward into LDP.	The principle of adopting a site search sequence, focusing on the availability of previously used land, is embodied in PPW but could usefully be added by including a new bullet point 'adopting a site search sequence focussing initially on the availability and suitability of brownfield land'. The 3rd bullet point in para 5.12 identifies the need to undertake a robust assessment of the existing housing land bank and making informed allowances for small sites and windfalls. This will involve	Add a new bullet point to para 5.13. Amend the wording of the 7th bullet point in para 5.13

		reviewing UDP allocations to see if they are appropriate to be carried over into the LDP as well as those sites which have planning permission to see what amount of 'commitments' can be included in the Plan. The 7th bullet in para 5.13 is reflecting this by reinforcing the need to make full use of the existing housing landbank before identifying new housing allocations. However, it is considered that the opening wording of the bullet point could be improved by saying 'Ensure full and realistic assessment is made…'.	
	Small settlements need housing growth, agricultural/young farmers who want to live and work in the rural locations, these keep villages alive, i.e. schools etc.	The third bullet point in para 5.13 explains the need to ensure housing allocations are in sustainable locations based on a sustainable settlement and locational strategy and detailed audits of settlements. Whilst accepting that there is a need for some housing development in rural settlements to meet local housing nee, there is little evidence of a direct link between providing new housing and retaining local services and facilities. For instance at a rate of 1 school place per 4 dwellings it would take a significant level of new housing development to generate sufficient pupil numbers to retain a school but such a level of development might not be able to be sustained by other services and facilities in a settlement. This is why the Key Messages	

		document is focussing on the sustainability of settlements through the settlement audit process.	
Graham Bolton Partnership	as noted above, there may well be locations which need greater amounts of new development to enable the provision of essential and other services and facilities and achieve the vision at 5.2	Noted. But this is assuming that development can deliver the provision of essential and other services and facilities when several developers are highlighting the inability of new development to deliver infrastructure improvements due to concerns about viability.	No change
Taylor Wimpey	We fully support the need for a greater emphasis on the allocation and delivery of housing. There needs to be a recognition that some allocated sites may not be delivered as intended whilst emerging/new housing allocations may be more committed. We fully support the need for a review of Green Barriers and settlement boundaries to enable both short and longer-term housing delivery.	This is recognised in the KMd by identifying the need for a robust review of UDP allocations and permissions. Noted. It is unclear what the objector is referring to in terms of short and longer term housing delivery. Is the objector suggesting housing delivery beyond the Plan period i.e. land banking which is not supported, or to short term and longer term sites within the Plan period. The Plan will need to allocate a range of housing allocations in terms of size, location etc to ensure that sites can be delivered throughout the Plan period rather than in the latter years only.	No change
Kerry Norcross	Agree in general. I would say that although housing allocations should be well related to economic growth areas, I feel that this covers most of the North East of Flintshire, and that Flintshire's economic growth areas are easily accessible to a fairly good percentage of	Noted. The UDP Inspector identified the need for green barriers (and for that matter open countryside) to be reviewed as part of the LDP. PPW also requires that existing green barriers are reviewed. It is	No change

	Flintshire, and so perhaps weighting based on this is fairly equally spread across most North Eastern settlements. I feel that the green barriers (which look like they make up only around 2% of Flintshire) should really be preserved, especially where there are other suitable options for development available. If the county was short of suitable candidate sites then this would need to be considered and inevitably sacrificed but my feeling is that it should not be forfeited in other lesser circumstances. I think that the green barriers that were commissioned in the previous UDP have been effective at maintaining community's identities, and preventing undesirable creepage of settlement boundaries from having a detrimental effect. I believe that where possible, settlements should be (as far as is reasonably practicable) developed away from the green barrier. This would encourage the new boundaries (and potentially subsequent future UDP's/LDP's) in a direction away from the green barrier and towards the areas identified as being suitable to be considered as urban groupings: Broughton (inc Broughton Retail Park and Bretton) Buckley (inc Alltami, Drury and Burntwood, Mynydd Isa) Deeside West (inc Aston, Shotton, Connah's Quay, Garden City, Queensferry) Deeside East (inc Ewloe, Hawarden, Mancot, Pentre, Sandycroft) Flint Holywell (inc Bagillt, Carmel and Greenfield) Hope (Caergwrle, Abermorddu, Cefn y Bedd) Mold Penyffordd and Penymynydd	accepted that as part of looking for potential development allocations then sites outside green barriers would be sequentially preferable to those within. The amount of the County covered by green barriers is far greater than identified by the objector with the figure being approximately 12%.	

	Saltney (inc Saltney Ferry)		
Wrexham Bidston Rail Users Assoc	This topic overlaps with the preceding topic. The response given by the WBRUA to Q12 is also relevant to Q13. Easy access to adequate rail transport is a key sustainability issue.	Noted	See change reference in previous section
Strutt and Parker	We agree that there needs to be a greater emphasis on the delivery of housing and ensuring schemes are viable and deliverable. For this to be achieved, reviews of the Green Barrier and settlement boundaries are required. The majority of Green Barrier land is located near to sustainable urban areas and is typically undeveloped agricultural land. Accordingly the strategic release of Green Barrier land would ensure that the Local Authority achieves its local housing targets by enabling development to take place at sustainable locations where viability is clear and development is unlikely to be complicated by contamination and remediation which is often the case for brownfield regeneration. The identified candidate site known as "Land at Sychdyn" would make a logical residential extension to the settlement considering the site's location, directly adjacent to existing properties within Sychdyn. Although the site is within the Green Barrier, development would not result in the coalescence of settlements and would be spatially enclosed by the dense belt of woodland, minimising the impact and preventing any further development. Residential development at the site would promote sustainable living, as residents would be able to walk to a range of local services, amenities and major employers within the area. Development at the site would help deliver the housing needs of Sychdyn and Mold at a site that is sustainable	Green barriers will be reviewed to determine whether land within them is still considered to meet the purposes of a green barrier as set out in PPW. Regard will also be had to meeting the identified need for housing in the form of allocations but in terms of a site search sequence in line with PPW whereby brownfield land is considered first. In terms of that site search sequence regard would also be had to looking at and discounting options outside a green barrier before looking to develop green barriers. A further consideration is that land surrounding some settlements comprises best and most versatile agricultural land which is protected as a general principle in PPW. Site specific considerations in the form of Candidate Sites are not the focus of this consultation document. Candidate Sites will be assessed having regard to the technical assessment methodology and to consideration against the Preferred Strategy for the Plan.	No change

	and strategically located adjacent to an existing settlement.		
Llay Hall Investments	Llay Hall agrees with the issues identified and would like to emphasise the requirement for the review of green barriers and settlement boundaries in order to enable sustainable development. The current settlement boundaries, in particular the 'Green Barrier' around Mold, represent a constraint to sustainable growth of the town. In order to ensure that new housing development is located in the most sustainable locations settlement boundaries should be reviewed to enable the logical and sustainable extensions of the town. Furthermore, in order for new housing development to be sustainable, they must be located in close proximity to a range of services and facilities including schools, doctors, supermarkets, public transport and an adequate road network. In order to address the shortfall of housing delivery from the UDP, the Council should be mindful to promote and approve housing development which is proposed in sustainable locations and are viable and deliverable in the short-term.	Noted.	No change
Penyffordd Community Council	Greater protection of green barriers & brownfield sites and more emphasis on bullet point 7. Possible creation of new town? Revive potential for housing on the land at Gateway to Wales!	Given the widespread concern being expressed about the poor delivery of housing in Flintshire, a new town, due to the time necessary to get it up and running, is unlikely to result in an early contribution to housing land supply. The feasibility and need for a new settlement will be investigated further as part of growth options.	No change

Redrow	We welcome the recognition of the above issues. However, we would like to see a further issue identified in that, the role in which new housing development can play in the support of existing shops and facilities within local centres, ensuring the vitality, viability and vibrancy, hence fulfilling the wider ambitions of the emerging LDP.	Noted. However, views are being expressed by other objectors that new housing development on the edges of settlements does not support local facilities such as shops as they are more likely to travel further afield to a nearby supermarket.	No change
Minerals Products Assoc	Yes. However, it is imperative that proposed housing sites do not sterilise mineral resources either directly or in terms of proximity.	As part of preparing the Plan, minerals safeguarding areas will be reviewed as well as buffer zones around minerals sites.	No change
Crag Hill Estates Ltd & Praxis Holdings	We agree that viability and deliverability of housing is a key consideration. It is necessary to ensure that housing allocations are in areas where there is sufficient viability to deliver affordable housing. If existing housing allocations and landbanks are not delivering the expected supply of housing due to lack of market demand, then new sites where there is evidence of market demand should be released instead.	See response to earlier comment Existing allocations and commitment will be the subject of a robust review to ensure that are realistic to be carried over into the LDP as part of the housing supply for the Plan period.	No change
Whitley Group	Yes – this is with particular regard to ensuring housing allocations are in sustainable locations, and the need for greater emphasis on the delivery of housing in relation viability and deliverability. It is recognized that many potential housing sites are not deliverable. It is of great importance to consider the need to review green barriers and settlement boundaries. This is in recognizing that historic boundary lines will no longer apply in some cases and the pattern of settlements is ever changing. Indeed the planning inspector recognises that defining settlement boundaries based on individual settlements	Noted Noted	No change

	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. It is submitted that the Council could struggle to meet housing land supply without an element of green barrier review / release. Any green barrier review should be informed by the suitability of brownfield / previously development sites for development. In addition it will more than likely be difficult to meet housing land supply within existing settlement boundaries. The Council recognises that whilst the County has extensive areas of brownfield land, 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. Therefore the suitability and deliverability of many Brownfield sites for alternative development is questioned. Often these Brownfield sites are not located in the most sustainable of locations. Consequently, this further requires certain areas covered by green barrier to be considered for release.	Noted Noted Noted. Brownfield sites will be assessed as to their suitability, rather than making a general assumption that all brownfield sites are unsuitable.	
Emery Planning	We welcome the Council's broad approach to place greater emphasis on the delivery of housing, particularly in terms of viability and deliverability. We also welcome the broad approach of providing housing in sustainable locations. However, there are elements of the 'issues and considerations' that we object to: We do not think it is necessary to state that future housing allocations are well located to economic	Noted The Wales Spatial Plan identifies the importance of the Wrexham, Deeside and	No change

	growth areas. This could potentially be restrictive, and could discount sustainable sites that are "free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development" from being allocated. Allocations should be assessed on the basis of their overall sustainability.	Cheshire growth triangle. In terms of sustainability it is appropriate to look at identifying sites in this broad growth area, having regard to the settlement categorisation option which is selected. It is accepted though that there is a need for allocations in appropriate settlements elsewhere in the County.	
	We also object to the sentence which states that the Council will "Ensure full use is made of the existing housing landbank before identifying new housing allocations". The Council currently has a housing land supply of 3.7 years. The Council should therefore invite a rolling submission of potential housing allocations in order to address this shortfall.	The objector fails to understand the quantum of commitments that exist which contradicts the position shown by the TAN1 calculation. It is this actual land bank that must be critically assessed as part of the LDP rather than conveniently set it aside as inferred by the objector. Existing allocations and commitment will be the subject of a robust review to ensure that are realistic to be carried over into the LDP as part of the housing supply for the Plan period. It goes without saying that the Plan will have to have new allocations alongside existing commitments.	
	Finally, we would suggest that the sentence stating that the Council will "Consider the need to review green barriers and settlement boundaries" should be revised to state that the Council categorically will review green barriers and settlement boundaries. The UDP Inspector in his covering letter to the Inspector's report, stated in 2009 that:	Noted. It is proposed that this bullet point is amended by deleting 'Consider the need to'	Amend the last bullet point in para 5.13 as stated.

	"The Council has undertaken a review of both the green barrier and settlement boundaries. Whilst I have accepted the generality of the reasoning put forward, I do nevertheless have some concerns, for instance the majority of development will not take place in the category A settlements. I consider the time is rapidly approaching when the matter of detailed boundaries and the strategic function of the countryside in some localities needs to be looked at critically and in depth. Until that can take place as part of the LDP process I have recommended the spatial distribution of growth, as guided by the settlement strategy, should become even more focused on the towns and larger villages with growth/new development in the smaller least accessible villages and areas of open countryside severely restricted". There has been a need to review restrictive policy designations in the borough since 2009. The preparation of a new LDP provides the perfect opportunity to review settlement boundaries and green barrier policy in line with the Inspector's comments, as part of a wider drive to address the severe shortage of housing land. Where appropriate, the deletion of restrictive planning policy would result in the coming forward of sites that are "free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development" in line with the clear aspirations of national planning policy. We would also suggest that the Council needs to review detailed boundaries around settlements, many of which are drawn very tightly leaving no flexibility.		
Bloor homes	Viability and deliverability are essential considerations that need to be made to ensure that developments can	Noted	No change

	come forward in the right locations and at the right time without stalling.		
	Bloor Homes has concerns about an apparent focus on strategic sites to deliver the aspirations and objectives that will be set out in any plan. Whilst strategic sites have their benefits in bringing forward significant levels of development, it is a highly risky strategy to focus Plan aspirations on sites that come with significant risk due to their size and nature.	The Plan will need to make a provision for a variety of size and type of sites and this will include strategic sites. It is not accepted that the KMd unduly focuses on strategic sites. The Council is also confused as to the stance adopted by Bloor Homes as notwithstanding its objection here to strategic sites, earlier Bloor made comments promoting mixed use development which logically and invariably is provided on larger strategic sites to make the mix of uses viable and deliverable.	
	The Council should take into consideration a broad mix of site typologies in order to be able to deliver housing targets in the short term. A history of under-delivery means the Council is behind where it should be in terms of housing delivery.	Noted. See earlier comments about under-delivery.	
	The Council should take a range of site sizes, based on both greenfield and brownfield typologies. Smaller sites will enable the Council to quickly deliver housing numbers to meet is aspirations for economic growth.	Noted	
	The Council should implement policies that ensure appropriate and sustainable windfall sites can also be brought forward effectively.	Noted	

	Bloor Homes considers there is a need for settlement boundaries to be readdressed. It is clear that the previous strategy adopted in the UDP has not worked particularly well as there has been consistent under-delivery of new homes. Redefining settlement boundaries and identifying sites that can sustainably grow settlements should be a matter for serious consideration by the Council. New, better suited sites can therefore be identified to help deliver the objectives of the Plan.	Noted. See earlier comments re under-delivery	
	The services available within various towns will have changed since the last review and so there will be some that have become more sustainable than others. As a result, settlements that may have been considered unable to support any further growth will be in a position to accommodate it and help Flintshire to grow.	Noted.	
	Bloor Homes have concerns regarding the Council's 'housing land bank' that is referred to in the consultation document. These sites are likely to have been allocated in the UDP, if not even earlier, and are still yet to come forward with either a proposal or to deliver a consented scheme. There clearly must be reasons that these sites have failed to deliver the type and quantum of development they were allocated for and some such sites should be reconsidered in light of this.	Existing allocations and commitments will be the subject of a robust review to ensure that are realistic to be carried over into the LDP as part of the housing supply for the Plan period. The sites have not been developed because landowners have not released them and house builders have not built them.	
	Reallocation of these failed sites will only go further to exacerbate the delivery issues faced by the Council and prevent more sustainable development sites from being	By announcing its intention to review existing commitments it is obvious the Council will not seek to carry over sites	

	brought forward in the short term. Given the lack of delivery over the previous Plan period, the Council should take serious consideration of its housing allocations. In order to regain control of the lack of delivery, the Council should take a flexible approach to assessing sites. Sustainably located housing allocations alongside windfall sites can play an important role in delivering housing in the short term.	where there is little evidence of them coming forward. NJL fail to explain how the Council can control delivery of housing other than having a sound LDP, policies and proposals. It is ultimately landowners and developers who control delivery. The Council cannot force a developer to build.	
Grosvenor Estate	Housing allocations must take account of overall delivery target and not be constrained by a perception that there is a deliverable "housing landbank"	Noted. The housing requirement figure will based on an assessment of housing need. The KMd is making the point that in meeting that housing requirement it is necessary to review the existing landbank to ensure that those sites included in the housing balance sheet are realistic and likely to come forward.	No change
White Acre Estates	Viability and deliverability are essential to ensuring that developments can come forward in the right locations and at the right time without stalling. White Acre Estates has concerns about an apparent focus on strategic sites to deliver the aspirations and objectives that will be set out in any plan. Whilst strategic sites have their benefits in bringing forward significant levels of development, they are likely to take a long time to deliver. The Council should allocate a range of both greenfield and brownfield sites of varying sizes. Policies should also be included in the LDP that ensure appropriate and sustainable windfall sites can also be brought forward effectively.	Noted The Plan will need to make a provision for a variety of size and type of sites and this will include strategic sites. It is not accepted that the KMd unduly focuses on strategic sites. Noted	No change

	White Acre Estates considers there is a need for settlement boundaries to be readdressed. It is clear that the previous strategy adopted in the UDP has not worked particularly well as there has been a consistent under-delivery of new homes. Redefining settlement boundaries and identifying sites that can sustainably grow settlements should be a matter for serious consideration by the Council. New, better suited sites can therefore be identified to help deliver the objectives of the Plan. The services available within various towns will have changed since the last review and so there will be some that have become more sustainable than others. As a result, settlements that may have been considered unable to support any further growth could now be in a position to accommodate development and help Flintshire to grow sustainably. White Acre Estates have concerns regarding the Council's 'housing land bank' that is referred to in the consultation document. These sites are likely to have been allocated in the UDP, if not even earlier, and are still yet to come forward with either a proposal or to deliver a consented scheme. Reallocation of such sites may further exacerbate the delivery issues faced by the Council and prevent more sustainable development sites from being brought forward in the short term. In order to regain control of the lack of delivery, the Council should take a flexible approach to assessing sites. Sustainably located housing allocations alongside windfall sites can play an important role in delivering housing in the short term.	Noted. See earlier comments about under-delivery. By announcing its intention to review existing commitments it is obvious the Council will not seek to carry over sites where there is little evidence of them coming forward.	

Lavington Participation Corp. and Duncraig Investment Corp	As set out above, it is important that the LDP allocates both brownfield and greenfield sites in sustainable locations which can deliver housing. We have a fundamental concerns regarding FCC's approach to the 'housing landbank' and its consideration in the LDP. Some allocated sites which were not delivered over the UDP period should not be carried forward as allocations without a thorough assessment of site viability and deliverability. Strategic allocations must also be balanced with smaller sites which can be delivered quickly and without technical constraints.	Noted By announcing its intention to review existing commitments it is obvious the Council will not seek to carry over sites where there is little evidence of them coming forward. Noted	No change
David Rowlinson	Agree as per points above. I would change the emphasis. There is always infrastructure which can be improved as part of delivering housing, it is always necessary, otherwise we are not improving. Too many recent developments have just involved building some new houses and a previously undeveloped field, and then adding a small park. Not good enough. Needs to be strategic improvements. See the slides for an example for Hawarden and Northop Hall. I understand that funding such improvements should be challenging. But the benefits should result in greater houseprices, so more profit for developers. Sorting out Shotton / Queensferry / Connah's Quay is a priority. This is a great example of how settlements have merged, the infrastructure issues have not been addressed, and as a result traffic has built up, house prices have fallen, and the local economy suffers.	Whilst the benefits of a more strategic approach is appreciated, the Objector mentions that funding would be challenging. This reflects the concerns of other submissions from house builders that focusing on strategic sites can affect delivery of housing.	No change
Cllr David Williams	Greater protection of green barriers & brownfield sites and more emphasis on bullet point 7. Possible creation of new town? Use of derelict land in urban areas.	Given the widespread concern being expressed about the poor delivery of housing in Flintshire, a new town, due to the time necessary to get it up and	No change

		running, is unlikely to result in an early contribution to housing land supply. The option of a new settlement will be investigated further as part of growth options.	
Cllrs Carol & David Ellis	Full assessment of any impact that additional housing would have on Buckley as there are 13 candidate sites for Buckley Mountain alone which is totally unsuitable because as a town we are overdeveloped as it is, and we are the biggest town in Flintshire with limited infrastructure.	Merely because there are 13 sites in one ward of Buckley does not mean that they will be needed or included in the Plan. It is necessary to look at a settlement as a whole rather than on a ward basis.	No change
AONB Joint Committee	In the absence of a spatial strategy or detailed land allocations at this stage it is difficult to assess the likely impact on the AONB or its setting. However, the committee would emphasise the need to balance development needs with protection, conservation and enhancement of the AONB, but accepts that some growth in the key villages in and around the AONB may be necessary to meet genuine local need and to help sustain these settlements which provide essential services for local residents and visitors to the AONB.	Noted	No change
CPRW	It is advocated that reference is made in respect of previously developed land and use of agricultural land as set out in PPW	See response to Mold Town Council	see above
Dr Klaus Armstrong Braun	Support except Review of Green Barriers- it allows excuse for more development, in-efficient use of land and impact on the natural environment and biodiversity which is disastrously declining.	Noted. However there is unlikely to be sufficient brownfield land or other land within settlement boundaries to provide for the development needs of the County. It may also be necessary to utilise land within green barriers but this will be in the context of a review of green barriers.	No change
Huw Evans Planning	Are not these issues a 'given' for basic good planning?	Noted	No change

Cllr Dave Healey	I agree completely that there must be adequate infrastructure to support housing development and that development should not take place where that infrastructure is lacking.	Noted	No change
Q14 – 'rural economy'			
Mold Town Council	This section is underdeveloped.	Noted. The UDP contains a suite of criteria based policies relating to rural diversification development and this is likely to be carried over into the LDP. However, the Plan can only create the framework for the rural economy to grow and diversify, it cannot actually bring it about, as this depends on the ideas, actions and investment of others.	Amend the 1st bullet point in para 5.14 (as above)
	Importance of food production to local economy, including employment and sustainability.	In response to the objector's points to Q9, amendments have been proposed to the 1st bullet point in para 5.14.	
	Tourism potential/enhance market town offers	Issues relating to tourism are set out in para 5.15. However, it is considered appropriate to add a new bullet point 'recognise the tourism role of market towns'.	Add a new bullet point in para 5.15
	Well-being/health agenda/education (children).	In the context of promoting and enhancing a diverse and sustainable rural economy it is not clear what change is being sought by the objector in terms of well-being/health/education (children)	No change
Kerry Norcross	Agree. Developments should be sensitive to the look and feel of the site and should not represent gross overdevelopment.	Noted	No change

Strutt and Parker	Achieving employment reuse of rural buildings, such as barns, is often unrealistic due to challenges including proximity to strategic road networks, conflicts with nearby farmhouses and the degree of changes to the built fabric which are often required for commercial re-use. As such, the re-use of rural building as residential dwellings should be supported to ensure the buildings long term protection and assist the Authority in meeting their housing needs.	Whilst noting the general points of the objector about the difficulties in bringing about the conversion of rural buildings for employment, it is not accepted that commercial re-uses involve less physical changes to a rural building than a residential use would. The residential conversion of rural buildings is likely only to make a negligible contribution to overall housing land supply yet could have a detrimental impact on the character of rural areas. Clear guidance is provided by WG on this issue in PPW which the Plan needs to have regard to.	No change
	We agree that a sensitive and sustainable approach needs to be adopted to meeting housing needs in rural areas. However this should not prevent rural communities from expanding and a degree of development needs to take place to enable rural areas to meet their housing needs and remain sustainable. Land at Rhydymwyn is a viable site for housing development in terms of sustainability as the site is located directly adjacent to an existing settlement and is within walking distance to the village's amenities.	Noted. The focus should be on those rural settlements which have a level of services and facilities which enables them to sustainably accommodate new development. Although commenting on a Candidate Site is not within the remit of the KMd the sustainability of a settlement is a consideration. Rhydymwyn does not have a school or shop, and whilst it has a pub and local employment opportunities, it only features in the 8th banding of settlement in Appendix 1 of the KMd. This would question whether Rhydymwyn is a sustainable location to accommodate significant growth as is being advocated by the objector.	

Cllr Nancy Matthews	This is a bit woolly. It sounds good but where's its backbone? Must link rural businesses with some housing not like the March planning meeting where we turned down a dwelling linked to a rural business!!	The KMd is raising questions as to how best to provide for the economic needs of rural areas. PPW and TAN6 allows for new houses as part of rural enterprises where there is a proven functional need for a new dwelling on site.	No change
Railfuture	All comments relating to rail and public transport and cycling apply in this section also as being beneficial to helping to level the economic playing field in rural areas as well as the safety, health and environmental benefits	Noted. It is not necessary to repeat points in each section of the KMd.	No change
Penyffordd Community Council	Provide business & employment opportunities on appropriate sites in rural & semi-rural locations. (Pen-y-ffordd station)	The KMd is raising questions as to how best to provide for the economic needs of rural areas. The candidate site submission referred to will be assessed on its individual merits.	No change
Minerals Products Assoc	Yes. However, it is imperative that proposed development sites do not sterilise mineral resources either directly or in terms of proximity.	Noted.	No change
Bloor Homes	Bloor Homes consider a need for a flexible approach to be taken when assessing policies for the rural areas of Flintshire. It is understood that rural areas are sensitive to change and development, but it must also be recognised that there is a population located in these areas that have needs for growth. Facilitating development in all areas will allow the population within Flintshire to grow sustainably.	Noted however PPW provides more definitive guidance on rural development that the loose and open ended approach advocated here.	No change
Grosvenor Estate	Agree - but housing in rural areas should not be restricted to local needs and rural enterprise dwellings	The focus on affordable housing in rural areas is recognition of the fact that in many rural areas house prices are so high that they effectively preclude large sectors of the local population from getting onto the local property ladder. In response to another submission it is	See earlier change.

		proposed to look at options for delivering mixed market / affordable schemes in rural areas as part of an overall Rural Development Strategy.	
David Rowlinson	Farm buildings are typically dangerous for re-use as not always built or maintained to required standards. Flintshire's natural assets are well loved by residents. Most don't see these as being commercial property (farms). Development needs to be carefully managed, but this shouldn't mean rural areas are developed less than urban areas. This just increases the infrastructure spend required to maintain quality of life (London being the most extreme example - although London does regularly invest significant amounts in large and small infrastructure projects to support the massive urban population).	National and local policies require farm buildings to be structurally sound before being re-used.	No change
Cllr David Williams	Provide business & employment opportunities on appropriate sites in rural & semi-rural locations. (Pen-y-ffordd station, Dobshill former depot)	The KMd is raising questions as to how best to provide for the economic needs of rural areas. The candidate site submission referred to will be assessed on its individual merits.	No change
Cllrs Carol & David Ellis	Disagree with certain bullet points regarding flexible policies as it is my belief if large developments are allowed to be built in out of town locations it never benefits the town and town centre as residents will possibly never use the facilities and shops to assist in regenerating the town.	This section of the KMd is concerned with the rural economy and raises questions as to how rural growth and diversification can be best achieved. This could be through making allocations or having a flexible policy framework. It is not concerned with large housing developments in out of town locations as these should be directed to the larger Service Centres.	No change
AONB Joint Committee	The need to secure a diverse and sustainable rural economy is supported, but the committee would	Noted	No change

	highlight the need to accommodate this within environmental limits. Appropriate farm diversification projects of a nature and scale which are sensitive to their setting and will not have a harmful impact on the AONB are supported (e.g. re-use of redundant traditional farm buildings). The committee notes that protecting the best and most versatile agricultural land has not been highlighted as an issue.		
CPRW	It is advocated that reference is made to the protection of agricultural land as set out in PPW. In addition, to make reference to the potential impact upon the landscape of renewable energy projects along with their associated infrastructure	The KMd refers to the need to protect agricultural land in para 5.20. In terms of renewable energy the need to protect the natural environment of the County is picked up in other bullet points.	No change
Dr Klaus Armstrong Braun	Support but ensure that the businesses are Rural in character fit for rural skills. NOT JUST translocation of main urban industries or businesses.	Noted	No change
Huw Evans Planning	Development happens where the opportunity arises. There needs to be a shift in thinking as to what is important to local rural economies and far more flexibility. Strict control has killed off opportunities creating villages and rural areas that are exclusive, retirement or commuter settlements to the detriment of the social and economic fabric. Employment use in converted barns is seldom financially viable in areas such as Flintshire where there so much employment land and units available. On the other hand market housing with local needs housing has a significant economic and social benefit.	Noted. This is why the KMd identifies whether the provision of a framework of flexible policies is better than specific allocation to facilitate rural entrepreneurship. PPW sets the policy context for the conversion of rural buildings.	No change
Cllr Dave Healey	– I agree with the need for rural diversity and would once again flag up tourism as an area for development	Noted	No change
Q15 – 'sustainable tourism development'			

Mold Town Council	Feeds into quality of infrastructure in towns and facilities – public realm, toilets, attractions.	Para 5.19 promotes good design and para 5.8 promotes the creation of safe and good quality public realm as part of new development. The retention, maintenance etc of existing public realm, toilets, attractions is not directly a matter for the Plan, rather it is a matter for other Council services, other public bodies or private operators.	No change
	Hotels and B&B's	The first bullet point in para 5.15 mentions the need for a strategic framework for tourism in terms of attractions and accommodation. In the absence of a clear strategy for tourism or the3 existence of specific tourism proposals which would require safeguarding in the Plan, then the Plan can best assist by having in place a framework of policies with which to assess tourism development proposals as they arise.	No change
	Theatre Clwyd major attraction (no mention in tourism).	Theatre Clwyd exists and is a major tourism and cultural attraction but it is not clear what the planning issue is here. The KMd is seeking to raise issues that need to be assessed either in the Strategy for the Plan, its policies or proposals and in this regard it is not clear what role the Plan has in respect of the theatre.	No change
Kerry Norcross	Agree! Tourism is an unsung hero in the North Wales economy. However I feel that tourist areas are not	Noted. The tourism industry is difficult to positively plan for in terms of making	No change

	something that can be decided as such and so developing new tourism destinations such as Holywell and Hawarden might be difficult and might be areas that no matter what, will never become tourist destinations, despite best intentions and efforts.	allocations as it is subject to changes in the economy, societal changes etc. For this reason, development plans tend to have a policy framework which allows for tourism proposals to be considered on their merits as they arise.	
Wrexham Bidston Rail Users Assoc	Rail travel is accepted as sustainable and the WBRUA believes that railways passing through Flintshire, including the Wrexham-Bidston line, are valuable assets which can enable tourists to reach specific locations of interest (such as Hawarden) or to support rambling or cycling. The WBRUA therefore recommends the inclusion of "Recognising the sustainable benefit of rail travel for tourists visiting specific rail-connected locations or for those pursuing rambling and cycling activities."	Noted. Whilst noting the role that rail travel can have in terms of promoting and facilitating tourism, it is not clear what the role is of a land use plan in bringing this about. This is more within the remit of those in the tourism industry and those responsible for public transport to bring about in a co-ordinated manner.	No change
Cllr Nancy Mathews	what quality of tourist accommodation?	The Plan needs to put in place a suite of policies with which to assess tourism proposals. Although the provision of quality development is welcomed, the principal planning consideration of the term 'quality' is in terms of siting, design, form, materials etc rather than whether the tourism accommodation itself is quality or not. There is for instance a clear role for 'budget' accommodation such as budget hotels but this does not mean that they are less 'acceptable' in planning terms..	No change
Railfuture	Again an integral part of tourism is sustainable transport, trains, buses, cycle and walking provision.	Noted, it is not necessary for points to be repeated throughout the document.	No change
Penyffordd Community Council	Broadly support but add, support/direct rural initiatives for tourism – Assist creation of locations to South of	Noted. The role of the Plan is make positive provision for development when	No change

	County, ideal basis for Chester & North West attractions and North Wales (Llangollen, Moel Famau, Hope mountain, Fagl lane quarry initiative etc) Ref success of holiday cottage on edge of Penymynydd woods in Dobshill – more similar initiatives need supporting!	those development needs /projects are known. It is notoriously difficult to make positive site specific provision for tourism development as tourism is by its very nature 'footloose' and dependent upon changes in society and trends. In the absence of this, the Plan can seek to have a suite of policies with which to assess proposals. The Plan is a land use document not a promotional document.	
Bloor Homes	Tourism is one of the major sectors within Wales for employment and economic development. The issue that Flintshire has is that it is in a highly competitive location within North Wales. Lots of places are vying for the opportunities that arise and the economic benefits that come with it. This will help support the economy in the area, however it must be done in a sustainable way to ensure it is consistent growth that will compete with surrounding areas.	Noted	No change
Grosvenor Estate	Agree	Noted	No change
David Rowlinson	I wasn't aware that Tourism is big part of Flintshire's economy. Making places nice to visit is a good aim. I think this is more to do with improving environments, better transport links, and pedestrianisation / alternative routes to make people wish to visit such places. I would see main impact on Tourism is when A494 / A55 gets clogged with holiday traffic. Flintshire could use this to lobby for cash from adjacent councils who received more benefit from improvements.	Noted	No change
Cllr David Williams	Broadly support but add. Support/direct rural initiatives for tourism – Assist creation of locations to South of County, ideal basis for Chester & North West attractions and North Wales	See response to Penyffordd CC	No change

	(Llangollen, Moel Famau, Hope mountain, Fagl lane quarry initiative etc) Ref success of holiday cottage on edge of Penymynydd woods in Dobshill – more similar initiatives need supporting!		
Cllrs Carol & David Ellis	Agree	Noted	No change
AONB Joint Committee	Recognising that 'key landscapes' such as the AONB are an asset and significant part of the tourism offer which requires 'safeguarding and enhancing' is fully supported. The importance of the AONB in this regard should be specifically highlighted. The AONB has been awarded the European Charter for Sustainable Tourism in Protected Areas and has a Sustainable Tourism Strategy and Action Plan which should be considered as part of the plan making process.	Noted	No change
CPRW	It is advocated in the 3rd bullet point from the bottom that the words 'key landscapes' be amended to 'valued landscapes' to ensure that it is more compliant with the types of landscape indicated in Article 2 of the European Landscape Convention which UK is a signatory	Noted. In terms of tourism it is respectfully suggested that it is the key landscapes of the AONB, Halkyn Mountain and Country Parks etc which act as tourist attractions. By contrast the term 'valued' landscapes could apply to any landscape. A resident may value the field to the rear of their house but that field is not a tourist attraction.	No change
Dr Klaus Armstrong Braun	Support except Bullet 5:Safeguarding and enhancing natural assets i.e. coast, key landscapes etc Add: Not cause loss or harm to the natural Environment or Important biodiversity habitat such as wetlands , woods , ancient meadows, etc. to facilitate tourism development	The need to protect the environment is sufficiently recognised throughout the document.	No change
Huw Evans Planning	Agree but there needs to be more positive engagement with tourist/leisure operators making the most of opportunities where they arise.	Noted. This is the role of Economic Development arm of the Council. The objector appears to recognise the need	No change

		to address tourism proposals as they arise (given that it is difficult to properly plan ahead for them). The Plan is a land use document not a promotional document.	
Cllr Dave Healey	I agree with the inclusion of Tourism in the Improvement Plan and lay particular emphasis on the historical / heritage aspects which are an undeveloped attraction. I would add Caergwrle to the list of villages which should be included. This part of North East Wales is set to see a tourism renaissance with the Park in the Past Project in Hope, the Wales Link Path going through Caergwrle (via the Packhorse Bridge) and an HLF-funded Caergwrle Sense of Place Project.	Noted. However, in order to keep the KMd as brief as possible the examples given are just that, examples as a full list of tourism sites or projects within the county would be rather long.	No change