Flintshire Local Development Plan

Candidate Site Assessment Methodology Background Paper

Summary of Representations and Responses

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

		This includes the use of brownfield land inside and on the edge of existing settlements as a starting point. It is accepted that not all brownfield land is necessarily suitable for development and allocations in the plan are likely to utilise greenfield sites.	
	Site specific mitigation should be taken into account as regards intrusion into the open countryside, ribbon development, fragmented or sporadic patterns of development.	Noted. It is a central tenet of Planning Policy Wales that development in the open countryside should be strictly controlled and in particular the avoidance of sporadic and the creating or extending of ribbon development which can result in unsustainable development patterns. Not all impacts on open countryside can be addressed through mitigation e.g. landscaping.	No change.
	There should not be a blanket exclusion of playing fields, playgrounds and other amenity land, as opportunities may exist to replace facilities elsewhere.	Noted. The criterion is not implying a blanket exclusion of such areas. By their nature playing fields, playgrounds and amenity areas are generally open in character and there is no necessity for them to be included in the settlement boundary. The Council will have regard to the function these facilities offer to the community and the opportunity/need to provide replacement facilities.	No change.
	In terms of para 3.15 sites over 0.3ha located on the edge of settlements should be given priority for residential allocations and considered as part of a settlement boundary review to form part of the second stage of the assessment.	Noted. Allocating sites on the edge of existing settlements as a matter of principle sits comfortably with the search sequence approach advocated in Planning Policy Wales (PPW). Paragraph 3.9 of the assessment methodology indicates that only sites which are 0.3ha or greater and capable of accommodating 10 dwellings will be considered for their suitability as a housing allocation. This reflects the site size threshold applied in the adopted UDP and the Joint Housing Land availability studies.	No change.
	Sites should not be assessed on their number of constraints, but rather on the type of constraints and likelihood of any constraints being overcome. Remove paragraph 3.17 from the assessment.	Part accepted. It is acknowledged in paragraph 3.17 that the type and level of constraint will vary on a site by site basis. Clearly the assessment process must have regard to such constraints some of which it may	Amend para 3.17 by adding after ‘spatial strategy’ the words ‘the decision as to which sites will be taken forward will

		be possible to overcome and others which may be insurmountable. It is not considered appropriate to remove the paragraph in its entirety but to amend it to address this point.	depend on the nature of constraints in terms of whether they can be overcome or are insurmountable'.
	Deliverable greenfield sites should be allocated for housing delivery within the first five years of the plan period, particularly in light of the fact that Flintshire have a significant shortfall in housing land supply. This should be considered within the site assessment.	Noted. Delivering the Plan's preferred strategy in its totality as well as for housing is a critical function of the LDP. The Call for Candidate Sites Submission Form includes a section regarding infrastructure, Utilities and deliverability of the Candidate Site submitted. Furthermore the assessment methodology reflects Welsh Assembly Government guidance that the identification of sites "should be founded on a robust and credible assessment of the suitability and availability of land for particular uses or a mix of uses and the probability that it will be developed". When read in conjunction with the Topic Papers it is clear that the Plan will need to allocate a range of housing sites in terms of location, size and type to ensure that a 5 year housing land supply can be secured throughout the Plan period. An important factor will be to have sites that can come forward quickly following adoption.	No change.
	The plan strategy should be taken into account within the second stage of site assessment and not as a separate third stage.	Noted. The assessment document refers to four logical stages in the methodology and whilst stage 1 seeks to filter the small sites from the large sites (each one of which will be assessed) the methodology is in itself an iterative process as opposed to separate stages. It is entirely appropriate to carry out detailed assessments of the Candidate Sites in order for them then to be assessed for compliance with the Plan's preferred strategy. The objective of stage 2 is to undertake a 'technical' assessment of Candidate Sites to determine which are technically suitable to be taken forward for consideration against the emerging Plan Strategy. It would be inappropriate and inefficient for sites which are technically unacceptable to be assessed against the emerging Plan strategy.	No change.

	Sites should not be protected from development unless there are exceptional circumstances to warrant this and it can be demonstrated that a particular set of criteria have been met. A set of stringent criteria should be identified within the document against which to assess sites.	Noted . Where Candidate Sites have been put forward for protection, section 3 of the submission form should be completed with the reasoning as to why the land merits protection. In addition Paragraph 3.28 of the assessment methodology clearly states that land should only be protected from development where it is necessary and appropriate to do so based upon sound planning principles and not merely to prevent development from taking place. The representation has not provided a set of stringent criteria and as a consequence it is difficult to comment further.	No change.
Strutt & Parker (for Rhual Estates)	Sites adjoining Denbigh Road, Gwernaffield Road and Ivy Crescent were put forward as Candidate Sites. Having reviewed the proposed draft methodology and assessment process the sites score highly when considered against the methodology.	Noted. The purpose of the consultation exercise was to invite comments and thoughts upon the proposed assessment methodology and criteria. It was not an opportunity for those who have submitted Candidate Sites to self-assess their sites against the draft methodology. This will be undertaken by the plan making authority.	No change.
Strutt & Parker (for Mrs S Strong & Mrs J jones	Sites adjacent to Hendy Road, Mold were put forward as Candidate Sites. Having reviewed the proposed draft methodology and assessment process the sites score highly when considered against the methodology.	Noted. The purpose of the consultation exercise was to invite comments and thoughts upon the proposed assessment methodology and criteria. It was not an opportunity for those who have submitted Candidate Sites to self-assess their sites against the draft methodology. This will be undertaken by the plan making authority.	No change.
Strutt & Parker (for Mr & Mrs Davies – Cooke)	Sites adjoining Rhydymwyn, Buckley Mountain and Sychdyn were put forward as Candidate Sites. Having reviewed the proposed draft methodology and assessment process the sites score highly when considered against the methodology.	Noted. The purpose of the consultation exercise was to invite comments and thoughts upon the proposed assessment methodology and criteria. It was not an opportunity for those who have submitted Candidate Sites to self-assess their sites against the draft methodology. This will be undertaken by the plan making authority.	No change.

J10 Planning	Support the approach contained in stage 2 – Detailed appraisal. Suitability for allocation ought to also consider site availability and general deliverability. Specific observations on the Candidate Site Officer Assessment Form (Appendix C):-	Noted. Availability and deliverability are key components of the assessment process and appraisal (para 3.25 and 3.26).	No change.
	Q3 – **whether the site would result in the loss of agricultural land :** there ought to be some further indication here as to the quality grading of the land and its scale.	Partly accepted. Reference is made in the assessment criteria of Appendix C to the grades of agricultural land. However there is a drafting error in reference to grade 3 land which should read grade 3a. It is also considered that the wording of Q3 could include reference to 'best and most versatile' agricultural land. The scale of any agricultural land which is considered to be the best and most versatile land is likely to be self-evident from the area of the Candidate Site submitted.	Amend the assessment criteria in question 3 of Appendix C to refer to "grade 3a and above". Amend the wording of Q3 by adding 'best and most versatile' before 'agricultural land'.
	Q6 to Q8 – distances to facilities : we would suggest that to aid comparative analysis the "actual" distances are included	Noted. In the accessibility section of the Candidate Site Submission Form there are 3 questions relating to distances from public transport stops, shops and open spaces which requests details of the actual distances from the Candidate Site. This will allow for a comparative analysis to be made against the distances referred to in the assessment methodology.	No change.
	Q9 – whether the site would result in the loss of publicly accessible open space : again there ought to be some discriminating between level of use and its functional quality.	Agreed. Publically accessible open spaces offer a range of valuable roles to the community including playing fields, visual breaks in a developed area and or areas of nature conservation value. As part of the evidence gathering for the LDP the Council has carried out an open space survey and a play spaces survey which will enable a useful assessment of the use and function of such a space.	No change.
	Q21 – whether site might be prone to floodrisk : this is rather too simplistic and perhaps what it should be adding is if the site is at risk then are there any likely mitigation solutions that could overcome/address such	Agreed. Tan15: Development and Flood Risk (2004) has been adopted by the Welsh Assembly Government in recognition of the increasing frequency of flooding. The Environmental section of the	Add after Q21 an additional question 'If the site is within or adjacent to an area at risk of flooding, is the risk of flooding

	concerns or it is a clear cut “no” there are not.	submission form asks if the site is in a flood risk area and if so what the category of flood risk is as defined in TAN15. When appraising sites the Council will use the most up to date TAN15 Development Advice Maps (March 2013) and consultation with Natural Resources Wales to assess whether or not the development proposed is both suitable and justified in the flood risk zone having regards to the potential for appropriate alleviation or mitigation measures which could overcome the risk. However, it is recognised that the present wording of Q21 only records whether a site is within or adjacent to an area at risk of flooding and not an assessment of whether this is sufficient to prevent development occurring. It is therefore considered appropriate for an additional question to be added.	acceptable, having regard to vulnerability of the development proposed. • Yes • Yes with mitigation measures • No’
	Q23 – whether site would have a detrimental impact upon the character of the settlement: this is very subjective and anyone seeking to oppose development would, by default, argue that it would but to attempt to consider such an impact without the benefit of any detailed plans is implausible at this stage.	Not accepted. The character of a settlement is made up from different components such as the settlement form e.g. linear or nucleated and its cultural, architectural or historic functions as well as the character of the landscape in which it sits. A very large residential development would for example have a an effect on the character of a small rural settlement in Flintshire. Similarly a modest development (e.g. 9 or under dwellings) may also adversely effect a settlement if it relates poorly to the existing settlement form or if it constitutes skyline development. It is considered possible to make a professional judgement as to whether a site makes a logical and natural extension to a settlement even in the absence of detailed plans. If a Candidate Site fails as a result of having a detrimental impact on the character of the settlement and the reasons given are considered to be subjective than an opportunity will be available to test any perceived subjectivity at the LDP Examination.	No change.
	Infrastructure capacity, in terms of physical or social infrastructure (e.g. education, primary healthcare, highways, drainage, etc), has not been adequately	Not accepted. No reasons are given as to why the	No change.

	addressed. Recommend that it is to enhance the soundness of the emerging plan.	question of infrastructure is considered not to have been adequately addressed. Both the Call for Candidate Sites Guidance Note and the proposed assessment methodology have sections and questions that relate to the presence of existing infrastructure such as access to the highway network and the presence of water supply, sewage treatment electricity and gas.	
Dwr Cymru/Welsh Water	Support the proposed assessment of candidate sites against the identified criteria in order to filter out some sites prior to consultation with DCWW. A more meaningful response regarding impacts on DCWW assets can be given once the strategic growth and spatial distribution is known.	Support for the methodology assessment criteria is noted.	No change.
Lex Northwest Ltd (on behalf of Mr J. Handley)	**Stage 1 – Initial Filtering of Sites and Settlement Boundary Review** The assessment process should consider if a site is a logical and natural extension to an existing settlement. In doing so the assessment would be able to discount sites that will result in unsustainable housing developments in isolated locations at an early stage. It is not clear whether the Settlement Boundary Review applies to all sites or “small sites adjacent or in close proximity to existing UDP settlement boundaries”. If the latter, concerned that unsustainable patterns of development would result.	Accepted. The assessment process has regards (see appendix B of the methodology) to the guidance criteria for allocating housing sites as advocated by Planning Policy Wales. Furthermore explicit reference is made at paragraph 3.14 that the inclusion of a site should represent a natural and logical extension to a settlement. For clarification the Call for Candidate Sites was an opportunity for landowners and developers to submit sites anywhere within Flintshire. Therefore every small site (i.e those capable of accommodating 9 or less dwellings) will be assessed. That said the Council does not intend to plan for unsustainable development patterns. To do so would run contrary to established planning policy i.e in respect of the search sequence approach which requires sites within then adjacent to existing settlement boundaries to be considered first.	No change. No change.

	Recommend that only sites with the capacity for more than 10 dwellings that are within or immediately adjacent to an existing settlement should be carried forward as Candidate Sites.	Accepted. Paragraph 3.9 of the assessment methodology indicates that only sites which are 0.3ha or greater and capable of accommodating 10 dwellings will be considered for their suitability as a housing allocation. This reflects the site size threshold applied in the adopted UDP and the Joint Housing Land availability studies.	No change.
	Stage 2 Detailed Appraisal – Planning Assessment		
	The proposed methodology includes environmental planning considerations. Paragraph 3.16 refers to "safeguarded agricultural land", although there is no definition for such land. The proposed checklist refers to the Agricultural Land Classifications. It would seem appropriate to be consistent.	Noted. Safeguarded agricultural land in this context is in respect of the best and most versatile agricultural land which is defined in PPW as Grades 1, 2 or 3a which is referenced in Question 3 of the Officer assessment form. However there is a drafting error in reference to grade 3 land which should read grade 3a.	Amend the wording in Q3 as per the response to J10 Planning above.
	Revise paragraph 3.16 to clarify that only the loss of agricultural land that is Grade 1 or Grade 2 (Agricultural Land Classification) will be taken into account in the assessment of sites. Include additional criterion:- 3b – Would more than 2Ha of Grade 1 or 2 ALC be lost? Yes/No	Part accepted. It is considered appropriate to use consistent terminology to clarify what is meant by safeguarded agricultural land. Amend paragraph 3.16 accordingly. It is not accepted that there is a need to add new criteria 3b as the grade of land is referred to in the assessment criteria.	Amend the wording in paragraph 3.16 by deleting "safeguarded" and replace with "best and most versatile" agricultural land.
	The amount of agricultural land and its relationship with the remainder of the holding will also be a consideration. as the loss of a small parcel of land or land that is physically separated would not have as significant an impact as the loss of a parcel of land that forms part of a larger farm. Include additional criterion:- 3c – Is the agricultural land physically separated from a wider/larger holding? Yes / No	Not accepted. The amount of agricultural land that could be potentially and irreversibly lost will be self-evident from the area of the Candidate Site submitted. However in terms of the relationship of that land with the farm and farm holding, the Council would consult with the Welsh Government Agricultural Unit to assess a range of factors in determining whether the loss is acceptable or not. It is not considered the representors wording is appropriate.	No change
	No reference is made to the loss of existing trees. Trees often make a significant contribution towards the	Noted. It is considered reasonable to include an additional question relating to the potential loss of	Add an additional question 'Is there a loss of or threat to

	character of an area as well as being a natural habitat. Suggest additional criterion:- 13d – Would development of the candidate site result in the loss or potentially impact any trees? Loss of Trees / Potential Impact / No loss or impact	trees / hedgerows.	mature trees or hedgerows within or adjacent to the site? • No • within • adjoining'
	Stage 2 Detailed Appraisal - Infrastructure		
	This section implies an assessment of capacity will take place at this stage albeit the detailed assessment checklist does not reflect this. Officers may not have all technical information required to make this assessment. Technical studies are expensive and if required at an early stage, when the development risks remain high, sites being promoted by local land owners and not developers/strategic land companies can be at a significant disadvantage.	Noted. The section is simply commenting that new development may impact upon existing infrastructure. Indeed it is very likely that Officers will not have the technical information and hence the need to engage with those service providers who will have access to such information.	No change.
	Proximity to existing connections is an appropriate strategic consideration, but more detailed assessments should be a matter for the Preferred Local Plan Strategy.	Noted. The proximity to existing services is picked up by Q10 of the assessment form. The methodology is an iterative process as opposed to separate stages. It is entirely appropriate to carry out sufficiently detailed assessments of the Candidate Sites in order for them then to be assessed as being technically acceptable and to then go on and be assessed for compliance with the Plan's preferred strategy. It is accepted that when sites are being considered against the Plan Strategy as potential allocations then further more detailed infrastructure information may be required.	No change.
	Paragraphs 3.19 and 3.20 should be changed to reflect that at this stage proximity to infrastructure is the consideration (and not capacity) as it is likely to make the site more deliverable from both a physical and	Not accepted. The section is simply commenting that new development may impact upon existing infrastructure and that it is necessary to undertake an initial assessment of infrastructure capacity to inform which sites go forward to be assessed against the	Include a new question Q10b 'Is there a possible infrastructure capacity issue that could act as a constraint to

	viability perspective.	emerging Plan Strategy. The proximity to existing services is picked up by Q10 of the assessment form and it is considered that an additional question should be added to the assessment form after Q10 to identify whether there is any possible infrastructure capacity issue identified as being a constraint to development.	development? • Yes • No • Possibly addressed through investigation / mitigation
	This section should focus on whether there are any known significant infrastructure constraints for example the presence of a gas or water main through the site. Include additional criterion:- 10a – Are there any high pressure gas or water pipelines running through the site that are a constraint to development? Yes / No	Accepted. It would be appropriate to cover this issue by including an additional criterion as recommended in the representation, but to widen it out to 'other' infrastructure as well.	Include additional criterion:- 10c – Are there any high pressure gas or water pipelines running through the site that are a constraint to development? Yes / No
	Stage 2 Detailed Appraisal - Accessibility		
	Pedestrian and cyclist access to services is important. The focus of the methodology is on the distance of the candidate sites from these facilities. Amend paragraph 3.23 to ensure the distances measured are along adoptable highways and areas outside of the preferred maximums will not be taken forward as candidate sites as some candidate sites are extremely large and distances within the site could differ enormously.	Not accepted. The distances referred to are taken from the "Guidelines for Providing Journeys on foot" produced by the Institute of Highways and Transportation. These guidelines are a widely accepted and commonly used set of standards for assessing acceptable walking distances to facilities. It is acknowledged that it will not always be possible to achieve the desirable distances in all instances perhaps due to site constraints or other practicalities. Sites should not automatically be discounted on the basis that they are outside the preferred maximum distances as it may be possible to provide a new bus stop or other facilities on a large site.	No change.
	Amend criteria 6, 7 and 8 to read: 6 - Is the site located within 400m or 800m **walk along an adopted footpath** of an access point to regular (at least 5 services between 7am- 7pm Monday-Saturday) public transport, e.g. a bus stop or train station?	6, 7 and 8a - It is not clear whether the representor is referring to an 'adopted footway' or a public footpath' A site could be linked to local services and facilities by a variety of existing linkages and potential could exist for new linkages to be provided, particularly as part of	

	7 - Is the **whole** site located within 400m or 800m **walk along an adopted footpath** of a shop or selection of shops selling daily living essentials? 8a - Is the **whole** site located within 1000m or 2000m **walk along an adopted footpath** of a school and other community facilities including recreation open space?	larger development sites.	
	8b – How many facilities? <1 or 1-2 or >3	Not accepted. The commentary section alongside question 8 of the assessment form will allow for the number and type of facilities to be recorded. In addition as part of gathering the evidence base for the plan officers have recently carried out settlement surveys to ascertain the levels of service and facilities in the settlements.	No change.
	Stage 2 Detailed Appraisal – Economic Viability		
	Officers will be making judgements on the issue of economic viability. It is more appropriate that if there are concerns about the viability, due to for example known physical constraints or fragmented ownerships, the assessment should not discount the site but identify if additional information such as a development appraisal (to be provided by the Candidate Site proposer) will be required.	Accepted. Paragraphs 3.25 and 3.26 give an indication of the types of considerations that are likely to affect economic viability such as inappropriate adjoining uses or land contamination issues. As part of preparing the Plan, evidence gathering and in particular assessing Candidate Sites the Council will request additional information such as a development appraisal where it is considered necessary and appropriate to do so.	Add a sentence to paragraph 3.26 stating that where there are concerns about the potential economic viability of a site, the assessment will identify whether a development appraisal (to be provided by the Candidate Site proposer) will be required.
	The detailed criteria do not deal with the matter of viability or deliverability effectively. New criteria should be added:- 25 – Is the site in single ownership? Yes / No 26 – Is the Council aware of any imminent development proposal being brought forward by the proposer? Yes / No	Partly accepted. The Candidate Site Submission form contains a series of questions relating to site ownership and deliverability issues such as are there “any abnormal costs that would affect the deliverability or viability of the site “ together with when is it intended to bring the site forward for development. Nevertheless, it is considered that a simplified question could be added to the assessment form regarding viability and deliverability’.	Add another question to the assessment form ‘Is there any evidence to question the viability or deliverability of the site? • No • Yes • Possibly’.

	No reference is made to the need to take into account former uses of the site as a potential development constraint and would recommend specific criteria be added to ensure deliverability of any affected candidate sites are properly assessed. Add new criteria to 24. 24b Has the candidate site been a former quarry where land stability issues could impact development? Yes / No / Unknown 24c Has the candidate site been used / or does it lie adjacent to a former landfill site? Yes / No / Unknown	Not accepted. In the Candidate Site Submission Form Under the headings “Land Use /Planning History” and “Environmental” there are specific questions relating to previous uses of the site and whether or not the site is previously developed land. The issue of brownfield land is also picked up in question 2 of the Officer assessment form in the methodology. Partly accepted. In the environmental section of the Candidate Site Submission Form there is a specific question asking whether or not there is any history of subsidence on the site or in the locality. It is therefore reasonable to include a question regarding land stability after Q24 which deals with contaminated land. Accepted. It is considered that this an appropriate additional criterion given that it has not been referred to in either the Candidate Site Submission or Officer assessment forms.	No change. Add a new question after Q24 ‘Is the land likely to be adversely affected by land stability issues? • No • Yes • Yes but capable of being addressed through mitigation Add new question after Q24 Has the candidate site been used / or does it lie adjacent to or in close proximity to a former landfill site? Yes / No / Unknown
Emery Planning	The Settlement Boundary review criteria appear acceptable. It is not necessary to draw the settlement boundaries excessively tightly around settlements. Currently many boundaries are drawn very tightly, often excluding residential gardens, which is unduly inflexible. Small housing schemes within and on the edge of villages are capable of contributing to meeting housing needs, especially specific local needs.	Support for the settlement boundary review criteria is noted. Settlement boundaries are a widely used planning tool, which in planning terms define the extent of the urban areas. It is not accepted that current boundaries are drawn too tightly or are unduly inflexible. Settlement boundaries and the provision for growth were considered by the UDP Inspector and in the main were supported save for one or two revisions suggested by the Inspector. It is acknowledged that	No change.

		small residential schemes can make a contribution to meeting housing needs including specific local needs.	
	The planning assessment should take account of not just existing policies, but also should be influenced by (and inform) future policies. A significant extension to the village of Northop is put forward and the potential benefits of the proposal need to be weighed against non-compliance with existing policies. which may result in a different strategic approach being pursued for the distribution of development.	The assessment of candidate sites will be primarily undertaken having regards to the criteria and stages contained in the methodology paper. In addition to their individual planning merits regard will also be had to the most up to date local and national planning policy. In addition to the detailed planning assessment, Candidate Sites will be assessed having regards to the Plan's preferred strategy once this is finalised.	No change.
	Regard should be had to the potential for parts of a site to come forward. If a large site is considered unsuitable due to its scale or a particular issue with part of the site, then consideration should be given as to whether a smaller part of the site would be suitable.	Accepted. This is recognised at paragraph 3.17 of the planning assessment which states that many sites are likely to have some level of constraint which may reduce the developable area of a candidate site.	No change.
Wirral Council Regeneration and Planning Service	Paragraph 3.3 identifies that any site which is likely to have a significant effect on a SAC/SPA/Ramsar site must be subject to an appropriate assessment under the Habitats Regulations. A reference to supporting habitat should also be included.	Accepted. Reference to the supporting habitat of these internationally important designations is a relevant addition to the paragraph.	Amend paragraph 3. by including the words "and their supporting habitat" after the words "Ramsar Site".
Cassidy & Ashton Group Ltd	Previously developed land outside (and in particular immediately adjacent to) the settlement boundary should be considered suitable for redevelopment and is best placed to accommodate housing growth. Such an approach can be applied across Category A, B and C settlements.	Accepted. PPW's search sequence advocates this very approach to housing development. Beginning with previously developed land within and then on the edge of settlements. In theory an approach could be applied across the UDP settlement hierarchy however as part of the preparation of the LDP a re-assessment of the settlement hierarchy is being undertaken.	No change.
	Greater emphasis within the methodology should be placed on previously developed brownfield land and the suitability of such land to accommodate housing growth.	Not accepted. The assessment criteria and methodology has regard to the issue of the preference for using brownfield land. Where possible, appropriate	No change.

		brownfield land may be allocated bearing in mind that not all previously developed land is automatically acceptable for new housing development. Furthermore, consideration also needs to be given to the viability and deliverability of brownfield land.	
	The 'Candidate Site Officer Assessment Form' (Appendix C) should be modified in the following way: Q.6 – In respect of rural areas a distance greater than 400m / 800m should be considered appropriate within more rural Category C settlements. Q.7 – In respect of rural areas a distance greater than 400m / 800m should be considered appropriate within more rural Category C settlements.	Not accepted. The distances referred to are taken from the "Guidelines for Providing Journeys on foot" produced by the Institute of Highways and Transportation. These guidelines are a widely accepted and commonly used set of standards for assessing acceptable walking distances to facilities. No reasons or explanations are put forward as to why the distances should be greater. In any event distances to shops, bus stops and schools in Flintshire's rural Category C settlements are very likely to be within those referred to in questions 6 and 7 of Appendix C.	No change.
Cassidy & Ashton Group Ltd (on behalf of Liberty Properties)	The methodology for the assessment of sites put forward as potential Green Barrier should be clearly defined. Areas put forward as potential Green Barriers should be assessed against a range of criteria, guided by Planning Policy Wales, paragraphs 4.8.11 – 4.8.1.3	Accepted. The most recent review of green barriers was undertaken when producing the UDP. As part of preparing the LDP and in particular identifying a preferred spatial strategy, the Council will conduct a further review of existing green barriers in line with up to date advice contained in PPW, whilst having regards to the views of the UDP Inspector. Any proposed green barrier Candidate Sites will also be assessed having regards to the criteria set out in paragraphs 4.8.11 – 4.8.13.	No change.
	The 'Candidate Site Officer Assessment Form' (Appendix C) should be modified in the following way: Q.6 – In respect of rural areas a distance greater than 400m / 800m should be considered appropriate within more rural Category C settlements and sites to the edge of larger settlements within the A and B Categories.	Not accepted. The distances referred to are taken from the "Guidelines for Providing Journeys on foot" produced by the Institute of Highways and Transportation. These guidelines are a widely	No change.

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

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

	Q.7 – In respect of rural areas a distance greater than 400m / 800m should be considered within more rural Category C settlements.	accepted and commonly used set of standards for assessing acceptable walking distances to facilities. No reasons or explanations are put forward as to why the distances should be greater. In any event distances to shops, bus stops and schools in Flintshire's rural Category C settlements are very likely to be within those referred to in questions 6 and 7 of Appendix C.	
NJL Consulting (on behalf of Grag Hill Estates)	RAF Sealand South Camp", Welsh Road, Deeside, received outline planning permission on 7th January 2013 for the *'redevelopment of a strategic brownfield site for an employment led mixed use development with new accesses and associated infrastructure including flood defences and landscaping.'* Planning conditions are in the process of being discharged and the strategic development management and delivery of the project is being undertaken by Praxis Real Estate Management Limited (PREM) in collaboration with Welsh Government. A reasonable approach is being taken to site assessment. However, clarification is sought over the position of my client's site which does not appear on the candidate sites register. Paragraph 2.3 of the Draft Methodology and Assessment Process document states that *'land currently allocated in the adopted UDP will not automatically be taken forward into the LDP.'* This principle is endorsed, as some UDP allocations which have not been brought forward through the planning process within the timeframe of the UDP may well be unsuitable for development. Such sites may have constraints that cannot be overcome or be unviable. It would be illogical and to the detriment of the Local Development Plan overall to reallocate such sites.	Noted. Given that the Northern Gateway has the benefit of two outline planning consents plus progress is being made in discharging conditions, combined with the on-going investment in infrastructure to support and deliver development, there is clear evidence that the site is progressing. It is therefore not necessary for the site to be assessed alongside sites which have no planning history or developer interest.	No change.

	It is clear that some UDP allocations are suitable for development. The fact that the RAF Sealand site has not yet been developed is a result of infrastructure complexities which have taken time to resolve, and is by no means demonstrative of the fact that the site cannot or will not be developed. The Council are aware that the site is being progressed and the development will be implemented as soon as possible. RAF Sealand allocation is the largest strategic release in the county and is located within an Enterprise Zone. Due to the scale of the development, implementation is likely to take place over a 5- 10 year delivery period, during which time future planning applications will be submitted which will be judged against policies contained within the Local Development Plan. In this respect, it is critical that the site's allocation is carried forward to ensure that delivery of the scheme is not delayed. Coupled with this is the fact that there may be a requirement to respond to changing markets and/or the adjacent Deeside Industrial Park which may result in additional planning applications. In light of the above, we would request that the RAF Sealand South Camp is allocated within the Local Development Plan to allow for future flexibility.		