Flintshire Deposit Local Development Plan 2015 - 2030

Appendix 1 to report to Cabinet/Full Council

Summary of Representations and Responses

CYNGOR Sir y Fflint Flintshire COUNTY COUNCIL

Foreword

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
32	Foreword	Object	We have just had in Mancot a consultation regarding parking and congestion problem around the school in Mancot, Sandycroft CP school. Traffic problems in the two main axes going in and out of Mancot, a problem that we also have for Hawarden CP school. Knowing the recurrent traffic and parking issue, we are now faced (with this new project) with an additional 300 houses being potentially built and adding to this major problems. Nothing to date has formally been decided regarding this traffic and parking problem. So to add another 300 new houses, 1200 people (parents and children), would increase Mancot's population by 30% . In addition to this, one can estimate an additional 600 cars crossing Mancot and Hawarden every day. This project appears disproportionate in that: • Schools are not sized for new future students • The road cannot absorb such a flow of vehicles • In case of heavy rain the problem of flooding would be even worst • Security problems will arise with an increasing flow of vehicles • There is also the problem of health: not enough doctors, dental service in the area…… Also being sat on an old mining area with lots of galleries; the vibrations created by the works are very likely to create unwanted ground movements. It would have been more judicious implement a new modern school grouping both, Sandycroft and Hawarden, on this new site, to and on the current school	Remove Mancot / Hawarden development	Not accepted. A Transport Study has been undertaken in respect of the Ash Lane allocation and Highways Development Management Officers consider that the highway network can accommodate the development. The Council is looking at options to address congestion in the vicinity of the school and Cross Tree Lane. It must be noted that the site is within walking distance of two schools and not all children will be driven to school. The housing trajectory in the Housing Land Supply Background paper identifies this site as not delivering completions until 2023/24 and provides time for both the congestion issues and the school capacity issues to be addressed. The development of the site will be required to incorporate a sustainable urban drainage scheme which will ensure that surface water run off is no greater than the present greenfield run off rates. There is no reason why the site should add to flooding elsewhere as these are existing problems which will not be made worse by the development. No objection has been made to the Plan by Betsi Cadwaladr Health Board in terms of impact on health facilities. The Health Board is presently looking in more detail at how health facilities can absorb the Plans housing allocations but it must be stressed that not all occupants of these development s will be 'new' to the County as previous surveys show that approximately 60% of occupants move from within the County. Given the timing of expected completions on the site, this provides time for the health Board to

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			ground to build new housing. Something that would potentially have made more sense.		put in place appropriate measures. No objection has been made by the Coal Authority to this site. There are known mining shafts on part of the site and these can be taken account of in terms of the layout and design of the development.
124	Foreword	Object	Generally this has got to be one of the most awkward, hardest to digest documents I've clapped my eyes on! Trust me I've read a few. Considering it's taken 4 years to compile it's a shame that your average person in the street is going to give up after the first few paragraphs? I can appreciate you have to cover a lot of ground and make it comprehensive, but from what I've struggled through and that is a fair bit of it so far I can't help feeling it's the councils aim to hide behind smoke and mirrors?		Not accepted. The Plan has to be prepared in the context of national legislation and guidance and has to be informed by an evidence base comprising of background papers and other technical documents. The written statement has been written with the aim of being understandable and not too technical or jargonistic but its content must reflect the fact that it is a land use plan. The Plan has been accompanied by a glossary of terms, an easy read summary leaflet, permanent exhibitions and manned drop in sessions where Officers were on hand to help talk interested persons through the Plan, its policies and proposals and how to comment. The Objective Keystone consultation portal used by the Council is a market leading specialist consultation software package. It is used by private sector businesses and a significant number of local planning authorities. There was no requirement that representations had to be made using the consultation portal as there were clearly other methods of making representations i.e. standard representation forms, email or letter. All Local Development Plan documents were available in main libraries, connects Offices and in the County Council Offices in Mold and Ewloe. The documents were also available to view along with guidance in the ten drop in sessions that

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					took place during the consultation around the county. Guides on how to comment and register were available online and also in drop in sessions. Additionally, the phone lines were manned between the hours of 9am-5pm weekdays to provide assistance. The Local Development Plan has to be written in a particular style to meet the guidance set out in the LDP regulations manual.
225	Foreword	Object	A notable difficulty has been applied to the LDP consultation procedure which adds a needless complexity to objection to the LDP or specific details. This implies that the council is disingenuous regarding commentary or genuine feedback on the LDP. There must be clarity for all members of the public to be able to air views, support or objection to planning policies without a level of difficulty and confusion demonstrated in this document.		Not accepted. The Plan has to be prepared in the context of national legislation and guidance and has to be informed by an evidence base comprising of background papers and other technical documents. The written statement has been written with the aim of being understandable and not too technical or jargonistic but its content must reflect the fact that it is a land use plan. The Plan has been accompanied by a glossary of terms, an easy read summary leaflet, permanent exhibitions and manned drop in sessions where Officers were on hand to help talk interested persons through the Plan, its policies and proposals and how to comment. The Objective Keystone consultation portal used by the Council is a market leading specialist consultation software package. It is used by private sector businesses and a significant number of local planning authorities. There was no requirement that representations had to be made using the consultation portal as there were clearly other methods of making representations i.e. standard representation forms, email or letter. All Local Development Plan documents were available in main libraries, connects Offices and in the

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224	Foreword	Object	There is a distinct lack of clarity with regard to commentary and support or objection to the plan for users not experienced with planning applications, LDP documentation or IT literacy. This appears to be a deliberate obstruction by FCC to receive the appropriate objections to what is a fundamentally flawed LDP. There has to be clarity and ease of use considerations with regards to impacted residents of areas in Flintshire which are affected by the plans.		Not accepted. The Plan has to be prepared in the context of national legislation and guidance and has to be informed by an evidence base comprising of background papers and other technical documents. The written statement has been written with the aim of being understandable and not too technical or jargonistic but its content must reflect the fact that it is a land use plan. The Plan has been accompanied by a glossary of terms, an easy read summary leaflet, permanent exhibitions and manned drop in sessions where Officers were on hand to help talk interested persons through the Plan, its policies and proposals and how to comment. The Objective Keystone consultation portal used by the Council is a market leading specialist consultation software package. It is used by private sector businesses and a significant number of local planning authorities. There was no requirement that representations had to be made using the consultation portal as there were clearly other methods of making representations i.e. standard representation forms, email or letter. All Local Development Plan documents were available in main libraries, connects Offices and in the

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357	Foreword	Object	The Northern Gateway. Can I ask you to give serious consideration to the following Independently prepared, Peer Reviewed Scientific Paper submitted by Climate Central. Climate Central is a non profit making group of leading Climatologists. https://choices.climatecentral.org/12/53.2516/-3. 1364?compare=temperatures&carbon-end-yr=2100& scenario-a=warming-4&scenario-b=warming-2 Please also note that The Welsh Government website is currently predicting a summer temperature increase of 3.4 Deg by 2050 and a further temperature increase by 4.8 Deg by 2080. I have raised this matter with a number of	Remove Northern Gateway Site	Not accepted. The site was allocated in the adopted UDP and has had the benefit of outline planning permissions on the two halves of the site. Welsh Government has funding flood defence works involving the strengthening of flood defence embankments along the R. Dee and the creation of development platforms. More recently, reserved matters consents have been granted for housing and construction has commenced. At the January Planning Committee a resolution to grant planning permission for a large warehouse and distribution centre was approved. The Northern Gateway development makes a significant contribution not just to the growth ambitions of Flintshire but also of the wider sub-region. Its importance is reflected by the investment in infrastructure by the Welsh Government. The flood prevention measures embodied with the site have been developed in full agreement with NRW. Given this broader context and the recent progress on the site it is clearly not feasible to delete the site from the Plan.

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			RICS Members who have indicated that RICS are currently extremely concerned about future proposed development likely to be affected by the now predicted future Climate Change Putting these 3 factors together The Northern Gateway is very clearly an "Unsustainable Proposal" The creation of further Flood Defences for the benefit of this particular development will simply exacerbate the current fragile condition of existing housing Stock along the Dee Estuary. Climate Change is a Global issue that cannot be answered by such a Parochial answer as Flood Defences. Such Flood Defences will not solve this issue but merely move the problem to another adjoining location. If you were to present a Class of Primary School children with a 3 D model of Flintshire and pose the Question.. "Where should we NOT be building Houses to avoid potential flooding?" I suspect they would 100 % point to The Northern Gateway proposal.		

Introduction

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346	Introduction	Object	LDP Plan Period It is noted that the LDP period is proposed to cover a 15-year period between 2015 and 2030. Based on the Council's latest LDP Delivery Agreement (Third Revised, published in May 2019), the LDP is not expected to be adopted until at least July 2021. This would be six years after the commencement of the LDP period. Our Client objects to this approach; the Council has had no adopted and approved development and spatial strategy in place since the end of the Unitary Development Plan (UDP) period in 2015 to deliver new homes and jobs in the County. There has in effect been a policy vacuum. It is our Client's position that the LDP period should instead run from 2019 to 2034 (i.e. from the date of publication of the Deposit Plan), with any shortfall in housing delivery during the period 2000-2019 met during the subsequent period 2019-2034. In the event that the adoption of the LDP slips further owing to any concerns over the proposed development and spatial strategy (and which trigger the requirement for further work/updated evidence by the Council), then the LDP period should be adjusted further to reflect this.	It is our Client's position that the LDP period should instead run from 2019 to 2034 (i.e. from the date of publication of the Deposit Plan), with any shortfall in housing delivery during the period 2000-2019 met during the subsequent period 2019-2034.	Not accepted. Welsh Government does not prescribe a particular Plan period for a LDP. Typically the Plan period is for 15 years as this is a balance between looking far enough into the future for it to have a strategic context but so far ahead as to bring greater uncertainty in terms of forecasts, projections, changes in circumstances and guidance etc. It is also quite normal for a Plan to be adopted well into its Plan period. However, if the LDP is adopted at the end of 2021 it would still have 9 years remaining which is a significant improvement on the UDP. It is also normal practice for a Plan period to follow on directly from the previous Plan period. To amend the Plan period now to a 15 year period from 2019 to 2034 would have profound implications for the timetable for adopting the Plan as it would require a fundamental reconsideration of housing and employment growth and possibly require the identification of additional development sites. Such an approach does not represent sound or sensible planning. The Plan will need to be reviewed every 4 years. The 'policy vacuum' which is of concern to the objector would be extended even further by the objectors suggested approach.

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1120	Introduction	Object	I am commenting on a draft document which is subject to change. Comments need to be made on the final document and not the draft document.		Not accepted. The process of producing an LDP involves various stages of public participation as set out within the community involvement scheme within the Delivery Agreement. Consulting on the Deposit version of the plan is a statutory process, the Local Authority must present their final version of the plan for comments before it is submitted for formal examination by a planning inspector. During the examination the inspector may make changes to the deposit plan which the Local Authority must adopt. Once the plan has been formally adopted by Flintshire Council this will be the final version of the plan and no further changes can be made. It would not be possible to make comments on the plan once it has been adopted as no further changes would be allowed. The Deposit version of the LDP is therefore the final version of the plan, ready for the Deposit consultation stage which is the final point at which comments can be made ahead of the examination process.
1168	Introduction	Object	LDP Vision and Objectives On review of the Vision, it is considered that it is lacking in detail. For example, there is no reference or commitment to the LDP delivering, in the very least, the minimum housing and employment needs of the County, nor is there any detail on where these needs will be met (for example, directing new development towards sustainable locations). It is considered that the Vision should be expanded to include a commitment to achieve the needs of the County in sustainable towns and settlements over the LDP period and with it meet the need of current	It is considered that the Vision should be expanded to include a commitment to achieve the needs of the County in sustainable towns and settlements over the LDP period and with it meet the need of current generations, whilst safeguarding the needs of future generations.	Not accepted. Welsh Government advises in para 5.11 of Development Plans Manual 3 that each LDP must contain a vision and specifically advises a vision should 'be a concise, focused and positive statement'. It is considered that the Plan's vision accords with the guidance in Development Plans Manual 3. The Plan's vision is for the whole County and clearly addressed the need for sustainable development and meeting the needs of its residents in terms of the environment, economy and social considerations. However, it is not considered necessary for the vision to go into detail about housing provision as that is achieved in the Plans strategic policies. It is the relationship between the Vision, translated through the objectives, to

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			generations, whilst safeguarding the needs of future generations.		the plan policies which set out how much, how and where growth will happen that is key to reading the plan as a whole.
1169	Introduction	Object	Turning to the LDP objectives, our Client is generally supportive of all 19. However, and linked to the comments above (comments on the vision), it is considered that Objective 11 should be amended to read as follows: “Ensuring that Flintshire has the right amount, size and type of new housing to support economic development and to meet the minimum housing needs of the County in full, including both market and affordable housing’ Our Client supports the delivery of high-quality housing though good design. This includes the provision of green infrastructure as part of development proposals, alongside sustainable drainage systems. Our Client supports the Council’s ambition to deliver growth and prosperity which enhances community life, balanced against the need to protect the natural and historic environment where possible.	it is considered that Objective 11 should be amended to read as follows: “Ensuring that Flintshire has the right amount, size and type of new housing to support economic development and to meet the minimum housing needs of the County in full, including both market and affordable housing’	Not accepted. The wording of Objective 11 already references the need to ‘meet a range of housing needs’ and this will clearly include affordable housing. It is not considered necessary for the wording on the objective to be amended as required by the objector.
540	Introduction	Support	I refer to your letter dated 19 September 2019 regarding the above consultation. The Health and Safety Executive has no comments to make.		Accepted. Comments noted.

How to View and Comment on the Deposit Local Development Plan

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267	How to View and Comment on the Deposit Local Development Plan	Support	I agree that this above site in Greenfield should not be built upon for the following reasons: *Greenfield does not have the amenities to accommodate an increased population. Greenfield School is almost full. There is no dentist or doctors surgery and few shops. *The drains and sewers struggle to cope at present. *Access to the site is steep and increased traffic would exacerbate the situation making accidents more likely and raise pollution levels. *Greenfield is an area of great natural beauty which is home to protected species including owls, bats, badgers buzzards and kites as well as small mammals, insects, amphibians and the greenery which supports them.We need to protect the "green" in Greenfield!		Noted. The Deposit Plan has not allocated land at Tan y Felin, Greenfield for housing development nor included it in the settlement boundary. The representors comments in opposing development of the land are noted
318	How to View and Comment on the Deposit Local Development Plan	Object	I wish to object to this development for the following reason: UPD in 2015 specified 15 potential sites which have not been taken up. Instead the LPD has concentrated on green belt land in 1site only which would result in approximately a 25 % increase in the population of Mancot Village & effectively combining Mancot with Hawarden. The resulting population explosion with create	Remove Site at Ash Lane	Not accepted. The Council has assessed some 700 candidate sites and nearly 100 alternative sites. In Mancot 6 candidate sites were assessed and in Hawarden 11 sites were assessed. Each was assessed against an assessment methodology which ensures all sites are assessed consistently. The Council has reviewed housing allocations in the UDP that have not come forward to determine whether they are suitable and appropriate to be

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			havoc within this area which is already drastically short on GP facilities, there being only 1 surgery in Hawarden. My own surgery is in Shotton has been trying to get a replacement GP since March so I cannot see how new doctors will suddenly be found for new patients. There is a similar shortage at all levels for places in local schools where families are already unable to attend a school nearest to their home. There is no longer a public transport service in this area so traffic along Ash Lane will be considerably increased On school days the junction at Ash Lane & Cross Tree Lane is already horrendous & this will be really dangerous with increased traffic.endangering children crossing the road to get to school. The only leisure facility in Mancot is the library which is run on a voluntary basis, For these reasons I believe the proposal is inappropriate & not justifiable		allocated again in the LDP in terms of being viable and deliverable. The candidate sites submitted around Hawarden and Mancot are all within the green barrier in the adopted UDP. The candidate site assessment has been accompanied by a green barrier which has reviewed each existing green barrier. The UDP Inspector considered that the sites allocation for housing would not undermine the function of the green barrier and although the site now allocated is slightly bigger than that considered by the UDP Inspector, the Council considers that this does not harm the broader function and purpose of the green barrier. The provision of health care facilities is a matter for Betsi Cadwaladr University health Board who have not objected to the Plan or this site. The site is forecast not to deliver completed houses until 2023/24 and will be developed over several years. The impact of development will not be felt in 'one hit' and allows sufficient time for BCUHB to address capacity issues. The Council is working with BCUHB to establish how it will provide capacity to accommodate the growth levels in the Plan. In a similar vein there is no objection to the Plan or allocation by the Local Education Authority. Again, the Council is working with the LEA to establish how capacity can be provided to accommodate the Plans growth levels. The Council's website indicates that service 11 still runs along Gladstone Way on a route from

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					Rhyl to Chester every 30 mins Mon – Sat. The site sits between the two settlements of Hawarden and Mancot and is close to other settlements such as Broughton and Ewloe and the Deeside area. It is a sustainable location for growth as recognised in the Wales Spatial Plan and the draft National development Framework. A transport assessment has been undertaken for the site has established that the road network can accommodate the allocated site. The development will have two vehicular access points onto Gladstone Way and Ash Lane which will help traffic to dissipate, rather than all being directed along Ash Lane. The Council is looking at measures to alleciate traffic congestion at Cross tree Lane in the vicinity of the school and there is time for measures to be devised and put in place before development takes place. The site abuts the library, community hall and play area/ recreation ground and bowling green and will ensure be required to provide play space within the development.
1125	How to View and Comment on the Deposit Local Development Plan	Object	Test of Soundness. The Plan is not sound and Probably fails all 4 tests. This qualifying information is impenetrable and appears designed to mislead and obfuscate an already complex subject. According to national guidelines it is necessary for Authorities to present documents		Not accepted. The section of the Introductory Chapter of the written statement 'How to View and Comment on the Plan' was intentionally placed at the beginning of the Chapter so as to be the first part of the document to be read. The text has been written in a simple and understandable manner to identify clearly how people can view and ultimately comment on the

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			that can be used and understood by residents and council tax payers, businesses and those with an interest in the environment of environs. The so called Deposit LDP is not transparent it is opaque and it appears deliberately so. Removing an area of green barrier designated on the past for good reason by drawing a line around two properties appears very suspicious and illogical. I have not attached anything personally but I refer you to every submitted document deposited in the public consultation period between 30.9 - 11.11.2019.Residents have supplied me with copies.		Plan. The Deposit Plan was supported by an easy read summary leaflet, a representation form and two guides relating to registering with the Consultation Portal and commenting through the Portal. The Plan has to be prepared within the legislative framework set out in the LDP Regulations Wales….. and guidance in WG Development Plans Manual. The examination of the LDP by the Planning Inspectorate is concerned with establishing whether or not the Plan is sound or whether it can be made sound through amendments. The Inspectorate will therefore apply the Tests of Soundness to the Plan and determine whether or not each test is satisfied by the Plan. In this context the para 3.2 of the Introductory Chapter sets out what the Tests of Soundness are. The Deposit Plan was not designed or written with the objective of causing confusion or seeking to prevent comment. However, it is necessary for the Plan to be supported by an evidence base which will include background papers and other supporting technical evidence. In this context it is also relevant and important that objections to the Plan that reference concerns about its soundness are also supported by evidence of this is. The preparation of the Plan involved a review of existing green barriers and also other green barriers put forward as part of candidate sites. The review concluded that the green barrier

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					between Ewloe, Northop Hall, Connah's Quay and Shotton / Aston should be retained but that the release of part of the green barrier on the edge of Ewloe Green, to facilitate a housing allocation, did not undermine the objectives of this particular green barrier. The Green Barrier Review has been clearly presented and explained in a background paper which was available alongside the Deposit Plan during the consultation. Given that the Plan has been prepared and consulted upon in line with National planning guidance and regulations and with the statement of community involvement in the Delivery Agreement, it is not considered that the Plan fails the 'Preparation Requirements' test of soundness. The objector has provided no justification as to why the Plan fails to satisfy the other test of soundness.
1127	How to View and Comment on the Deposit Local Development Plan	Object	Objects to HN1(7) Holywell Road/ Green Lane Ewloe housing allocation. 1. Notices: a fair and transparent process of notices seeks to ensure the inclusion of all parties that would be impacted by any development that would directly affect them. The restricted methods of Notices adopted by the planning department of FCC failed to ensure they communicated fairly and equally to all affected persons, putting a proportion of the public/residents at a	Objects to HN1(7) Remove Holywell Road/ Green Lane Ewloe housing allocation	Not accepted. The categorisation of Ewloe as a Tier 2 settlement is based on the settlement audits which informed the Plans settlement hierarchy as consulted upon in the Key Messages document and confirmed in the Strategic Options consultation document. Ewloe has a good range of facilities and services as well as employment and has good road and bus communications and is close to Hawarden Railway Station. An Inspector in a recent appeal decision stated 'The site is located adjacent to a sustainable settlement which has a range of

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			disadvantage and who would not have been aware of any proposed development were it not for the support of other residents. 2. Transparency. The Employment Land Reviews 2015 have a set scoring /weighting dataset, why has this not been done for housing. 3. The accessibility of the online portal and the structure of the paper Representation Form is overly difficult and deemed obstructive in that they are over complex and repeated reference to ''professional'' terminology deters residents form submitting their opinions. 4. It is unacceptable to expect, in a 6 week period, for residents to undertake and pay for the level of work and appraisals that are stated as ''essential'' and for which the LA has had years to prepare. Suggested alternative sites , derelict sites on land next to Wingfields outdoor shop Sealand Road, Land adjacent Chester road and B5129 Sandycroft and the former DARA site at Sealand.		services and facilities and is accessible by transport modes other than the private car'. The detailed responses later in the Council's response will set out the level of services and facilities, the public transport, the proximity to other settlements and employment areas and the opportunities for Active Travel being pursued by the Council's Transport Strategy Team. The allocated site is therefore considered to comply with para 3.38 of PPW10 in terms of minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport. In the 15 year UDP period Ewloe saw an actual growth of 16.1% (completions of 367 units) which was just above the indicative growth band of 8-15% for a category B settlement in the UDP. In the first 3 years of the LDP period Ewloe has seen a further 65 completions, largely as a result of the speculative permission Anwyl secured at Greenhill Avenue. At the Plans base date for the Housing Balance Sheet of April 2018 there were commitments for a further 40 units giving a growth rate of 4%. Taking into account the units form the allocated site the growth for Ewloe over the Plan period would be 15.2% which is broadly in line with the previous growth bad in the UDP. The Inspector in that appeal decision concluded that the proposal would '…not result in Ewloe having an unacceptable housing growth rate'. The rate of growth in Ewloe is not considered to be excessive and higher rates of growth have been

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					experienced in other settlements. The Council is now preparing a Plan for a new Plan period and Ewloe remains as a Tier 2 settlement which is capable of sustainably accommodating further growth. On the one hand objectors claim a lack of services and facilities and on the other hand claim that Ewloe is overloaded with commercial buildings. It is these commercial and employment buildings, largely centred on St Davids Park, which adds to the role and character of the settlement and adds to its sustainability credentials. The objection does not explain how the scale of building will negatively impact on the settlement as a whole. Objections appear to regard Ewloe Green as a separate settlement whereas it forms part of a larger settlement of Ewloe. In this context the site is not considered to be out of scale or harmful. Ewloe has seen previous housing developments and each has provided the requisite affordable housing. The Viability Study which informs policy HN3 identifies that this allocation should be able to provide 40% affordable housing. Comparing the size of this housing allocation with other housing allocations in other settlements only looks at part of the overall provision. The allocation in Ewloe may be larger than the Denbigh Rd site in Mold but it is the only site in Ewloe whereas in Mold there are two allocations and other committed sites. It is

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					necessary to look at Ewloe as a whole settlement and not just the Ewloe Green part. The presence of sand and gravel and other minerals on candidate sites has been assessed by the Council's Minerals and Waste team and there is no requirement for 'prior extraction' of any reserves. It is unclear whether objectors are suggesting that the site be held back for future minerals extraction as this would surely have detrimental impact on residents and the environment. The IIA recognises that measures can be put in place to secure additional educational capacity. This was also commented on in the Wrexham LDP Inspector's Interim Findings letter where she stated 'The final reason for reducing the housing requirement was that the level of growth identified was considered to place too much strain on infrastructure such as highways, education, schools, council services and health providers. Again, we are not convinced that this is relevant to the assessment of need. Moreover, it is always a requirement for developers to make provision, through planning obligations, for infrastructure to be provided where existing capacity would not meet the additional demands and needs of new development. This would be commensurate with the scale of development'. The Wrexham Inspector also commented 'We heard during the sessions of the shortcomings in the County Borough in the provision of health

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					facilities. The local health Board, which does not object to the LDP, states in its consultation responses that it is not the provision of buildings for additional services which is the issue but the availability of the required workforce. We have little evidence, therefore, that the availability of health services is a compelling reason to prevent or limit residential development'. It must be stressed that the Ewloe site will not deliver completed houses until 2023-24 with 28 completions forecast in the first year and 45 per year thereafter. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is no formal objection from either statutory body to the Plan nor allocation. The UDP Inspector clearly considered Ewloe to be a sustainable location in recommending housing allocations within Ewloe. A subsequent appeal Inspector also considered that Ewloe was a sustainable settlement. The Settlement Audit which informed the earlier stages in the Plans preparation sets out the range of facilities and services within the settlement, and this was widely consulted upon as part of the Plans earlier engagement phases. The sustainability of the settlement is not just as reflected in the settlement itself but also in the proximity of other nearby settlements such as Buckley, Drury, Northop Hall, Connah's Quay, Hawarden and

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					the Deeside settlements as well as Deeside Industrial Park. The B5125 Mold Road is the route of two key bus services. Service 5 runs between Mold and Ellesmere Port and provides an hourly service calling in at Deeside Industrial Park. Service X4 runs between Chester and Mold and provides a link through Hawarden and runs every 30 mins. The site is also just over 2km to Hawarden Railway Station. Ewloe Green has a convenience store and a number of take aways, a social club and there are further facilities and services in Ewloe. There are also a series of Active Travel schemes as shown on the Flintshire Active Travel Integrated Route Map (Central). A key strategic route is the F6 'Connecting Settlements' route from Mold through Buckley to Ewloe. This links with other localised routes which includes: • EW2-16(1) – a route from Mare Hay Lane along the road to the rear of the Social Club and on to the roundabout. • EW2-16(2) – Route from Mare Hay Lane including the provision of a new footbridge with ramps, over A494(T). • EW2-16(3) – route from footbridge through Lakeside Business Park. • HA2-15(1) – two way cycle track along The

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					Highway between roundabout and Hawarden High School. • SH2-12(1, 2, 4, 5) - shared use cycle and pedestrian lane along the 494(T) Aston Rd from the Ewloe roundabout to Shotton / Queensferry. It is evident that Ewloe, both as a settlement in its own right and in conjunction with nearby settlements and employment areas is a sustainable location to accommodate further growth, and that travel is not wholly car dependent. Policy STR2 criteria a. states that Tier 2 Local Service Centres 'will be the locations for more modest levels of new housing development'. The amount of housing development in settlements is not just made up of new allocations but also completions during the early years of the Plan and existing commitments (as well as possible windfalls). It is not appropriate to interpret the policy as indicating a more modest site size. Ewloe Green is predominantly made up of post war modern estate type development and is not considered on the whole to have a particular character that is different to Ewloe. The two have been considered as one settlement for successive development plans for 25 years. The site size is determined by the fact that the two candidate sites work hand in hand in bringing about a logical urban extension. The site does not have constraints that would prevent its development and the site promoters consider that the site is viable and deliverable in accordance with the Councils trajectory in the

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					Housing Land Supply Background Paper. This site is not the only new housing allocation in the Plan. Each site, whether new or previously considered, needs to be assessed on its individual merits. Brownfield / Alternative Sites The Plan preparation has involved the assessment of several hundred sites, the vast majority of which are greenfield. The County has large areas of brownfield or previously developed land particularly along the Dee Estuary. However, these are former mining and heavy industrial areas and often areas where landfill has taken place. These areas are affected by flood risk, contamination and their proximity to the Dee Estuary, which is of international nature conservation importance. These areas are not suitable to accommodate residential development which is a 'highly vulnerable' land use in terms of flood risk. It is accepted that there are potentially smaller parcels of unused and derelict land and buildings in towns but these can be difficult to allocate in terms of predicting their availability, viability and deliverability. This is why the Plan makes a conservative allowance for small and large site windfalls as part meeting of the Plans overall housing requirement, thereby recognising that such sites can make a modest contribution to overall supply. A Plan which places too much reliance on such unidentified windfalls is likely to be found unsound.

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					Each candidate site (and alternative site) has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously consulted upon. The assessment is detailed involving in excess of 30 assessment criteria which would have been too detailed to publish as part of the Deposit consultation documents. Instead the Council published a summary assessment of each candidate site in the form of a Background Paper and this took the form of a conclusion on each site. This provided a clear explanation as to why each site was considered appropriate or otherwise to be allocated. There are obviously some constraints to a site being allocated that are not capable of being resolved and this might include flood risk or an ecological designation. However, in the main, many constraints are capable or being either avoided or mitigated. Planning is therefore not black and white and is not always a scientific or numeric exercise. Rather, it is a matter of planning balance in weighing up the evidence before making a decision. Merely totting up scores and allocating the highest scoring is too regimented and simplistic and fails to take account of other considerations or the application of planning judgement. It is acknowledged that para 5.3.4.11 of the Development Plan Manual (2) stresses the need to use a clear assessment methodology in order to rank sites, which can then inform plan allocations needed to deliver the strategy and

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					signpost potential reserve sites which may be required later. However, this version of the DPM has now been superseded by Edition 3 (March 2020) and there is no requirement for sites to be scored or ranked for the obvious reasons given above, that it is not a mathematical exercise. It is documented in the Integrated Impact Assessment that both the allocations and a number of reasonable alternative sites were appraised. Clearly, the reasonable alternative sites are not considered to perform as strongly as the allocated sites. In assessing candidate sites (and alternative sites) the Council has undertaken a consistent and detailed assessment of sites against an agreed methodology. Sites have been assessed against a wide range of criteria, designations and constraints of which green barriers is one. Alongside the assessment of sites is a review of green barriers. In the case of the Ewloe allocation the site is considered a sustainable location and a site which does not harm the overriding purpose of this particular green barrier given the remaining extent of the green barrier. The Plans settlement hierarchy and spatial strategy is based on a comprehensive suite of settlement audits which established the sustainability of each settlement in terms of location, size, character, role and level of services and facilities. The most sustainable settlements are generally located in the eastern part of the County close to major sources of employment. The lack of new allocations in the

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					western part of the County should not be interpreted as there being no growth. There will be existing commitments (planning permissions) and also completions secured in the early years of the Plan period. For instance there are two large site commitments in Holywell, one of which is under construction and a large site commitment at Caerwys which is also under construction. A Council site being promoted by Wates as part of the SHARP scheme also has planning permission at Gronant, along with a further site at Pen-y-ffordd. It is a normal occurrence of the housing market for properties to be for sale or to be empty. This is known as 'churn' and an allowance is made for this as part of preparing forecasts of population and household growth. When projected household growth is converted to dwellings an assumption is added about vacant properties and second homes in the stock of 3.1%. The 'Population and Housing Projections Technical Paper' in Nov 2017 which accompanied the Preferred Strategy explains that Welsh Government recommends a notional average allowance of about 4% with a range between 1.5% and 8% depending on local evidence. Each of the 'alternative' sites put forward are commented on in turn: The Northern Gateway site is a key strategic mixed use allocation in the Plan. It forms a key part of the regional growth initiatives and is consistent with the draft NDF which identifies

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					Deeside as a growth area. The site has two outline planning permissions and both parts of the site have a reserved matters approval for housing - Countryside Homes have commenced construction on the first phase of housing on the northern part (300 homes), and Keepmoat have now secured approval for the first phase of housing on the southern part of the site (120 homes). A reserved matters approval exists for a large B8 warehouse and distribution centre. The ethos behind the site is that it is a mixed use development with employment, housing and community facilities and it would be inappropriate to simply re-assign the employment areas to housing. The Gateway to Wales Hotel site recently suffered a fire and is reported in March 2020 to have been bought by a Manchester based developer with consideration being given to a range of uses being considered https://www.dailypost.co.uk/news/north-wales-news/gateway-wales-hotel-site-bought-17875172. The site though is relatively small and is not comparable to the allocated site. Neverthless, the Plans allowance for small and large site windfalls allows for sites such as this to come forward over the Plan period. The former Bengal Dynasty restaurant in Shotton is a small site which is not comparable to the allocated site. The site is capable of coming forward as a windfall over the Plan period. The Halfway House pub on Church Street in

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					Connah's Quay is presently closed. The future intentions of the landowner are not known but it is relatively small and is not comparable to the allocated site. The site is capable of coming forward as a windfall over the Plan period. During the latter part of 2019 land at Hope Hill Farm, Hope was for sale. However, the land is in open countryside and is greenfield land not brownfield and relates poorly to the form and pattern of built development in Hope. The site is not appropriate or suitable to be allocated in the Plan The former Morrisons site Wepre Drive has potential to deliver a retail or commercial development / use and it is inappropriate to be considered for residential development. Preparations are being made for the demolition of the later phases (rear) of County Hall. Development is complicated by the need to retain the theatre, law courts and Llwynegrin Hall and the need to ensure some office space is retained for FCC. The site is also challenging in terms of mature trees, a listed building, green space, protected species and topography. In this context there was considered to be insufficient certainty regrading deliverability for it to be allocated. However, the site has the potential to deliver housing in the form of a large windfall site which the plan's housing balance sheet makes allowances for. The allotments on Upper Aston Hall are not owned by the Council. The allotments were

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					opened by Hawarden Community Council on 08/06/13 and are fully let to local residents through an Allotment Holders Association. The site is not available nor suitable for housing development as it is a valued local community facility. Green Barrier The site was designated as part of green barrier (GEN4-12) in the UDP which covers land between Connah's Quay, Northop Hall, Ewloe and Shotton. The Council is required during the preparation of each development plan to review existing green barriers as confirmed in para 3.64 of PPW10 'Green wedges are local designations which essentially have the same purpose as Green Belts.... Green wedges should be proposed and be subject to review as part of the LDP process'. The Council has explained its approach to the review of the green barrier in Background Paper No.1. The overriding objective or function of this green barrier is to prevent the coalescence of the 4 settlements. Given the large extent of this green barrier, the modest drawing back of the green barrier to accommodate the two candidate sites which make up the allocation are not considered to represent a risk to the coalescence of Ewloe with Northop Hall or Connah's Quay. This is because the wooded valley comprising New Inn Brook forms a robust physical feature which prevents the expansion of Ewloe in a north westwards direction. The

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					wildlife site at New Inn Brook (a continuation of the Wepre SSSI, SAC/SPA) would also require a buffer between it and development and this further protects against development. Although the green barrier is reduced by the housing allocation it does not undermine its effectiveness in seeking to prevent the coalescence of settlements. The physical arrangement of the site and green barrier does not result in development being any closer to Buckley. The town of Buckley lies to the south west of Ewloe. Green barriers (or green wedges as defined in PPW10) are not designated based on the quality of the landscape. The suitability and sensitivity of the landscape in terms of accommodating the proposed development is a separate consideration. Planning applications must be determined in accordance with the prevailing development plan in force. The planning application (050275) for a dwelling was refused 07/02/13 against the policies in the adopted UDP at that time on the basis that as the site was in open countryside and a green barrier and that there was no special justification for a new dwelling then the application was contrary to policy. The Council is now preparing a new development plan for a new time period, to meet a new housing need and this has involved a review of candidate sites, settlement boundaries and green barriers.

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					Site Assessment The site was assessed against the Preferred Strategy and was classed as an amber site 'The site complies with the Council's Preferred Strategy, however there are site constraints that would need to be overcome to allow the site to be developed' with a further explanatory note 'This includes sites where there are known constraints which would need to be overcome such as highways improvements, flood risk or ecological constraint. This would also include policy constraints such as existing green barrier. It would also include sites where there might be a potential viability or deliverability concern particularly when a site has not come forward'. The fact that a site was classified as amber at Preferred Strategy stage did not mean that it was unsuitable to be considered for inclusion in the Deposit Plan provided that constraints can be overcome. Each of the objectors concerns about constraints will be addressed in turn: • Green barrier – this is addressed above • Agricultural land – it is accepted that the site will result in the loss of grade 3a agricultural land. The Council's approach to minimising the loss of BMV agricultural land is set out in Background Paper 9. Welsh Government has supported in principle the approach taken and has not objected to this housing allocation • Road improvements – there has been long standing concern about the junction between the B5125 Holywell Rd and the B5127 Old Mold

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					Rd at the former Boars Head Inn. This was particularly the case when planning applications on the site of the Boards Head were under consideration. The developer of the allocation will implement road improvements by improving the capacity of the junction to enable it to function more efficiently both for new and existing traffic. The provision of a vehicular access to the smaller part of the site off Green Lane will bring about the improvement of the junction of Green lane with the B5127 Mold Rd. • School capacity – This is considered later in the Council's response under 'Infrastructure'. • Sewer – Welsh Water identified earlier in the Plan preparation process that there is a sewer crossing the site. The detailed layout and design of the site will need to take into account the route of the pipe and ensure an easement for future maintenance is provided. • Ecological surveys – An ecological survey of the site has been unilaterally undertaken and submitted by the site promoters and assessed by the Council's Ecologist. Given that the site is improved agricultural grassland it is not of high ecological value with the exception of trees and hedgerows which can be retained in the main as part of a detailed layout for the site. The development would need to provide an Ecological Impact Assessment with appropriate avoidance and mitigation measures. The proximity of the SAC means indirect impacts would also have to be considered and this could be achieved by either using the public right of

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					way network to direct recreational pressure away from the SAC and wildlife site, or through commuted sums towards management works within the SAC and wildlife site. NRW have been consulted and have not objected to the allocation. • Landmap – The NRW Landmap system identifies the following evaluation scores geological landscape (moderate), Landscape habitat (high), visual and sensory (moderate), historic landscape (high) and cultural landscape (high). A Landscape and Visual Impact Appraisal has been unilaterally undertaken and submitted by the site promoter for the site. In terms of the wider landscape character this concludes that the proposal would result in a Slight-Moderate Adverse effect to the positive characteristics of the site and wider landscape. However, it adds that the proposed development would establish over time as an extension of the Ewloe settlement and result in a residual effect of Slight – Moderate Neutral by year 15. The Study recommends a number of mitigation measures including retaining, enhancing the hedgerow boundary that surrounds the site along with design measures such as scale, massing, materials and building type that reflect local vernacular, retain the public footpath for permeability alongside structure planting through open spaces and streetscapes which would help soften the built form. • Character of settlement – The site is well framed by Green Lane and existing

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					development to the south, by existing residential estate type development to the east and by Holywell Rd to the north. The western boundary is defined by mature hedgerows. The site is therefore considered to represent a logical extension to the settlement. Given that the bulk of development in this part of Ewloe is post war estate type development it is unclear why further residential estate type development would be out of character with the settlement, given that this is already the prevailing character of the settlement. • Mining – the site sits within an area where mining has previously taken place. However, there is no objection from British Coal in terms of the presence of any technical constraints to development. A detailed Geo-Environmental study has been unilaterally undertaken and submitted by the site promoter and this has not identified any issues. • Landfill – there is no landfill within the site boundary. A former landfill exists on land adjacent to Ewloe Green Primary School but this is now developed for housing and any legacy from landfill would have been dealt with through mitigation measures. • Sand and gravel reserves – this is commented on elsewhere in the Council's response • Tenant farmer– this is commented on elsewhere in the Council's response Amenity

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					Construction nuisance - It is inevitable that a new housing site will bring some disruption as a result of construction, wherever it is located. This is not a compelling reason to remove the allocated site from the Plan. A planning permission can include conditions relating to hours of work and construction arrangements. Most developers will also work to a Construction Management Plan. Ultimately nuisance from a development site will be a matter for Public Protection and Planning Enforcement to address, if any occur. Overlooking / privacy / light – The Council already has an adopted Supplementary Planning Guidance Note relating to Space Around Dwellings which seeks to ensure that the residents of new houses and residents of existing houses enjoy satisfactory living conditions in terms of privacy and light. This is a matter for the detailed layout and design of the site to address at the planning application stage and does not affect the principle of development. Air pollution – The Council, through its Public Protection service, is responsible for monitoring air quality and the levels of pollution across the County. This is done through a network of monitoring stations throughout the County. All North Wales authorities contribute to an Annual Air Quality Progress Report in fulfilment of Part IV of the Environment Act 1995. The Reports for 2018 and 2019 show that within Flintshire and indeed across North Wales, there are no Air

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					Quality Management Areas (AQMA) and in consequence has not published an Action Plan. In Ewloe there are monitoring stations at St Davids Close, Ewloe (monitoring station 2), Aston Hill Roadside (3/15), Hawarden High School (ms4), Ewloe Green Primary School (ms46), Aston Hill Roadside (ms3,15), South Bank, Aston Park Rd, Queensferry (ms5,9,10), 4 Belvedere Close, Queensferry (ms16). The conclusion of this evidence is that are no air pollution issues within the County or locally. In addition to this, Welsh Government installed their own continuous monitoring station at South Bank in Aston prior to the consultation for the red/blue route and the Aston Hill improvement scheme prior to that. At no time has the Governments action level of 40 µg/m3 NO2 been exceeded in any year so the Council have not had to make this stretch of road or any other area in Flintshire an Air Quality Management Area. Nevertheless, Welsh Government have introduced formalised speed restrictions along the A494(T) in order to generally reduce air pollution, whereby speed limits have been reduced to 50mph from the DIP junction to beyond Ewloe. It is the case though that speed limits for much of the route (River Crossing to Ewloe) have been 50mph for several years anyway. Welsh Government published the report 'Tackling roadside nitrogen dioxide concentrations in Wales - Welsh Government supplemental plan to the UK plan for tackling

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					roadside nitrogen dioxide concentrations 2017 – Interim Data on NO2 Concentrations for the Motorway and Trunk Road' in September 2019. The report highlights that since 2017 air pollution has reduced at roadside locations and will continue to reduce. A further consideration is that in the longer term, the implementation of the Red Route will have the effect of reducing traffic levels on the A494(T) and will be likely to lead to further reductions in pollution. Continued reductions in petrol / diesel emissions through tighter controls, combined with increasing levels of electric vehicles will also have the likely effect of reducing pollution further. This clearly points to a context of reducing levels of pollution in the area / County over time. The Council's Pollution Control Officer considers it is unlikely that the allocation alone would contribute enough additional pollution to push the levels currently being measured above the government action level of 40 µg/m3. However, the developer will be required to investigate and provide thorough Noise and Air Quality assessments to support any application in order to protect amenity and consider air quality in line with WG legislation and Future Generations Act. Light pollution – The detailed layout and design of the scheme will need to address the issue of light pollution as required by policy EN18 of the LDP. This must be viewed in the context of existing light pollution from existing development

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					and street lighting. PROW – The detailed layout of the site will need to ensure that the public footpath through the site remains as an attractive route, without the need for a diversion. This can be achieved by incorporating the public footpath as part of green infrastructure, so that it retains an open, non-urbanised feel. It is usual for improvements to a public right of way to be secured such as improved surfacing to improve usability. During construction works it may be necessary to temporarily close a public footpath in view of health and safety considerations. However, in this case there is a public footpath to the west of the site which runs from Green Lane to Holywell Road (Newbridge Farm) and links in with public footpaths into Wepre Park. There is a further public footpath on the far side of New Inn Brook which again links Green lane with Holywell Road. There is clearly a network of alternative footpaths. Apart from the construction phase, which is commented on above, it is unclear how or why a residential development would result in noise pollution to existing residents of a neighbouring residential development. Traffic A Transport Assessment has been unilaterally prepared and submitted by the site promoters, and assessed by the Council's Highway Development Control team. This confirms that the road network has the capacity to

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					accommodate the development. It is acknowledged the road network around Ewloe is busy at the rush hour peaks but this does not mean that additional development cannot be accommodated. The development will provide for the improvement to two junctions to i) facilitate the delivery of the site but also to II) facilitate a significant junction improvement at the junction adjacent to the former Boars Head Inn in order to improve capacity. This is a known long standing problem and in the present financial climate, the junction improvements would be unlikely to be delivered in the absence of developer funding. It is unclear from the objection which country roads have experienced such an alleged increase in traffic. It is accepted that parking problems have occurred on residential roads. However, this is an existing problem and it is unclear how additional housing development which will have its own parking provision, will make this worse. The site is proposed to have two points of access, one onto Holywell Rd and one onto Green Lane. The provision of a through road between the two access points would result in residential estate roads becoming a rat run. Instead the proposed development will deliver an improved junction between Green Lane and Mold Rd and significant improvements to the junction of Mold Rd and Holywell Road including right turn lanes to add additional capacity at the junction. A Transport Assessment has been unilaterally provided by the site promoter which

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					establishes that the road network can satisfactorily accommodate the development. The site is within easy walking distance of Ewloe Green School and its development need not ad to existing problems. The improvement to the junction of Green Lane and Mold Rd may also help improve traffic movements in the area around the school. As referenced above, work is progressing in the Ewloe area in terms of Active Travel which will improve links to Hawarden High School. The Infrastructure Plan lists road schemes that are already identified by Welsh Government or by the County Council, where it is necessary to safeguard the route in the LDP. Examples include the red route identified by Welsh Government and a number of other schemes identified in the Local Transport Plan by the Council. The Ewloe housing allocation is only a proposal at the moment as is the two sets of road improvements proposed (and referenced in policy HN1). Therefore the two proposed junction improvements are referenced in Appendix 2 of the Infrastructure Plan as part of the highways section for this site. The proposed improvements to the Holywell Rd and Mold Rd junction will be carried out by the developer within FCC Highways land i.e. the adopted highway. The proposed improvements to the Green Lane and Mold Rd junction will be carried out by the developer using adopted highway land and also land to the west of Green Lane which is within the control of the one of the

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					site landowners. However, neither the Council nor the developer has any control over land at Weighbridge Rd in terms of major road improvements. Neverthless, the Council's Active Travel Integrated Network Map shows a proposed Active Travel along Weighbridge Rd. Infrastructure The level of recent development in Ewloe is commented on above. No objection to the Plan or allocation has been made by the Local Education Authority. The commentary of the Wrexham LDP Inspector referenced in detail above, establishes that it is normal practice for new development to address capacity issues through developer contributions. The development will not deliver completed houses until 2023-24 and will take several years for the development to be completed. The impact on infrastructure will therefore be gradual and will not be in 'one hit'. This gives the Local Education Authority time to address how the growth in the Plan can be accommodated in terms of school capacity. The Planning Service continues to work with the LEA to secure appropriate mitigation for the delivery of planned LDP sites. No objection to the Plan or allocation has been made by Betsi Cadwaladr University Health Board. Flintshire has a number of relatively new Primary Health Care Centres and the issue is one of lack of sufficient staff including GPs,

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					rather than a lack of facilities as also commented on by the Wrexham LDP Inspector above. As stated in the preceding paragraph in relation to education capacity, there is ample time for the Health Board to plan for how it intends to meet the health care needs of the Plan's growth levels. The Council continues to work with the Health Board in securing the appropriate provision of infrastructure such as health for the delivery of LDP sites. The presence of services and facilities in Ewloe Green and Ewloe is commented on above, with the conclusion that there is a good range of facilities and services in the settlement which are within walking distance of the site. The issue of education capacity is identified and responded to above. The IIA reflects that measures exist to address school capacity. The issue of the public footpath is commented on in detail above. The medical centre in Hawarden village centre is 2.7km from Ewloe, medical centres in Buckley are 2.8km from the site and medical facilities in Queensferry and Shotton are within 4km of the site. The IIA is therefore correct that there are doctors within 1-4km of the site. The history of St David's Park is not a matter for this LDP. The Council has engaged with and consulted internally throughout the Plans preparation.

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					Indeed the Plan has safeguarded two sites for cemetery extensions at Treuddyn and Greenfield. No such need for sites has been identified elsewhere in the County by the appropriate area of the Council. The site adjoins an existing play area at the junction of Greenville Avenue and Circular Drive. The development will also provide on-site play space and open space as well as a Multi Use Games Area (MUGA). In addition the existing public footpath will be sympathetically integrated into a green infrastructure network for the site, so that it remains an attractive walking route. Environment Natural The site is not green space. It is presently agricultural land and with the exception of the public right of way has no right of access to the public and is otherwise private land. The public footpath will be retained as part of the detailed layout of the development and is commented on in more detail earlier in the Council's response. Trees and hedgerows, with the exception of hedgerows to secure vehicular access, will be retained as both landscape and ecological features. This is a matter for the detailed design and layout of the development. There is no objection to the allocation from NRW. An ecological survey of the site has been

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					unilaterally undertaken and submitted by the site promoter which has been evaluated by the Council's Ecologist. Whilst the site is close to the SAC and Wildlife Site there is no objection to the principle of development subject to avoidance and mitigation measures. These could involve using the public right of way network to avoid cumulative impacts of recreational pressure on ecological habitats or it can be achieved through commuted sums to contribute towards off site ecological management works. This is commented on under 'Site Assessment' above. The implications of the 1986 Agricultural Tenancy Act is a matter between the tenant farmer and landowner. The Council has no financial interest in or involvement in such arrangements and it will be for parties involved to resolve. The issue of the use of agricultural land is commented on earlier in the Council's response under 'Site Assessment'. The site is not adjacent to the New Inn Brook wildlife site as there is buffer of land between the two. The ecological issues have been commented on above and do not frustrate development or reduce the number of units. The site may be open countryside at present but it is 'improved' grassland where the previous and present agricultural practices have sought to maximize its agricultural productivity. With the exception of trees and hedgerows such land typically has low ecological value.

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					It is accepted that any development will have some impact on landscape through the loss of open countryside. However, the site has an irregular boundary as it follows hedgerows. The undulating nature of the site plus the provision of landscaping and green infrastructure can help to soften the appearance of the development. A Landscape and Visual Impact Assessment has been unilaterally prepared and submitted by the site promoter and sets out the assessment of the site and the proposed mitigation measures. This is commented on in more detail earlier in the Councils response. Environment – Historic / Heritage The Council's historic environment mapping records show only one asset in the vicinity which was an archaeological find of a 'finger ring' to the rear of Newbridge Farm. The policy already specifies the retention of hedgerows and trees. Flood Risk / Water Infrastructure The site may have small areas which are wet (as indicated on the NRW flood risk maps) this does not equate to the site being a natural wetland. The NRW Advice Map shows that the site is not within a zone C1 or C2 flood risk but that there are pockets of surface water flood risk. NRW have not objected to the allocation. National Legislation requires the use of Sustainable Urban Drainage Schemes to ensure that surface water run-off from the development

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					is no greater than the run-off from a greenfield site. The soil structures within the site will be taken into account in the design of a drainage scheme. The findings of the Geo Environmental Report unilaterally prepared and submitted by the site promoter will inform whether and how a SuDS scheme can be satisfactorily designed for the development given existing ground conditions and topography. The intention of SuDS is to sustainably drain the surface water run-off from a development to no more that the equivalent greenfield run off rate. In this context it is not considered that the perceived risk of flooding to adjoining properties can be increased, and an effective SuDs scheme has the potential to provide significant betterment to any present situation. Any surface water problems outside Ewloe Social Club are an existing issue and not related to the proposed development of the allocated site. The detailed design work associated with the improved Green Lane, B5127 junction will address surface water run-off. As explained earlier in the Council's response the allocated site is not within either a C1 or C2 flood risk zone. A detailed Geo Environmental Study has been unilaterally undertaken and provided for the site and this has shown that there are no water

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					abstraction licences relating to the site. In addition, no objection has been made to the site by either Welsh Water or NRW. Any easements or legal rights relating to the site are a civil matter between the site owners and third parties and ultimately the developer. No objection has been made by Natural Resources Wales in respect of the relationship of the site with Wepre Park SSSI/SAC. Welsh Water have made representations on the plan as set out below and confirm that a water supply can be provided to the site and that improvements to the Queensferry WWTW will be required. Energy The IIA recognises that both the construction phase of development and the operational phases of development will involve energy usage. However, that energy usage would happen whichever site was allocated in the Plan. Dwellings on the site will be constructed in accordance with the current Building Regulations in terms of energy efficiency. Policy EN12 will also require that new development maximises the potential for renewable or low carbon energy technology. Welsh Language The issue of education capacity is addressed above. The teaching of Welsh is a compulsory

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					part of the curriculum for Welsh schools and pupils. Tests of Soundness The Councils Delivery Agreement sets out how it intended to engage with and consult consultees, stakeholders and the public. The Council has exceeded statutory requirements. The Plans preparation has involved a number of documents being made available and distinct consultation exercise: • Key Stakeholder Forums • Delivery Agreement consultation • Call for Candidate Sites • Candidate Site Assessment Methodology • Publication of Candidate Site Register • Key Messages Document • Strategic Options • Preferred Strategy and Invitation for Alternative Sites • Publication of Alternative Sites Register • Deposit Plan The key stages have been publicized by public notices, direct mailings to consultees, direct

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					mailings to those on mailing list, availability of documents on web and advance notification to Council Members and Members of Town and Community Councils with an expectation that they would assist in publicizing the Plan locally. The Deposit stage involved site notices for housing allocations and strategic sites. The Council's PR Officers have also used social media to publicise the Plan. The Council has taken all reasonable steps to publicise the various stages of the Plan where the public and stakeholders needed to be involved and there is no requirement in the regulations to consult on Candidate Sites. The Council nevertheless made the register of candidate sites publicly available as soon as it was compiled, complied with changes to Welsh Government regulations to indicate at the Preferred Strategy Stage how the Council felt candidate sites complied with the Preferred Strategy or not, and then published a summary of the assessment and planning view of all candidate sites at the deposit stage. The Council has used an industry leading specialist consultation portal which is used by a large and growing number of planning authorities in Wales and England. It is disappointing that objectors claim they found it difficult to use but the Council made it clear that the portal was not the only means of making representations as they could also be made via letter, representation form and e-mail. The Council produced two 'step by step' guides to i) register on the portal and ii) how to comment on the portal, and these were available both on the

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					website and in hard copy. The Plan was also made available to physically view at a number of consultation venues. The Deposit Plan was accompanied by an easy to understand leaflet explaining the Plan and the consultation. The Plan has to meet certain legislative requirements and Welsh Government guidance and it is inevitable that the Plan has to be accompanied by a range of supporting documents and that certain terminology is used and is therefore by definition a complicated document. Objectors did not have to read the whole plan or all supporting documents to understand the allocation of the land at Ewloe. These matters are addressed in the relevant sections above. In terms of i) The Health Board do not object to this site or the plan as a whole, or on the basis of their inability to meet the demand from the growth that the Plan will facilitate over its plan period. They do not object at all. Provided that the requisite improvements in infrastructure capacity is provided then it is unclear why 300 dwellings will prevent a cohesive community from being enabled. Whilst the process of constructing a housing development will inevitably bring with it some disruption to existing residents, this would be the case whatever site was allocated in the Plan and is capable of being managed effectively via appropriate planning conditions. It is not a reason to question the soundness of the Plan. The site adjoins an existing post war residential

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					development which is of an estate type character, and which incorporates green space and a play area. In broad terms this is no different to what is being proposed on the allocated site, a housing development which incorporates a green infrastructure network, play area and MUGA. In no way, shape or form can Ewloe Green be described as a 'hamlet' as it has estate type development, commercial development, and an urban context in terms of the road network, proximity to the A494(T) and being part of the wider settlement of Ewloe. The site is not considered to be inappropriate in terms of its context and the Plan is not considered to be unsound in the terms set out. The site promoter has invested a considerable amount of time and resources into unilaterally undertaking a comprehensive set of background studies to inform the deliverability of the site which is a key part of demonstrating its soundness. The Council is also aware that initial discussions have also taken place between the site promoter and a number of house builders with a view to identifying a preferred development partner. The identification of a developer by the time of Examination will also assist in demonstrating delivery and therefore soundness. The Plan has been prepared in the light of government guidance and is not considered to be out of accord with PPW10. The issue of the scale of the allocation relative to the settlements categorisation as a Tier 2 Local Service Centre is commented upon earlier in the Council's

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					response. The allocation is considered to be in accord with the Plans spatial strategy. The Plan was made publicly available several months prior to the commencement of the consultation exercise, at the time that is was reported for approval to Cabinet and Council in July 2019. Considerable publicity was given to the consultation in good time before the start of the 6 week period involving direct mailings to people on the mailing list, press notice, articles on the Council website and social media posts. Advance briefings were also given to all elected members as well as to Town and Community Councils. The Council is also aware that public meetings were arranged by the community prior to the start of the six week formal deposit consultation and the drop in session provided in the community was the most well attended of all the sessions provided. It is not clear therefore why or how local people were not aware of the proposal, the consultation, and judging by the high level of response, the various means of making comments on the plan The consultation involved permanent exhibitions, a full range of documents at Ewloe and County Hall and key documents at libraries and Connects Centres. The full range of documents were available on the Council's website through the consultation portal. The consultation exercise was in conformity with, and indeed, in excess of with Welsh Government requirements and was also in line with the Council's Statement of Community

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					Involvement as set out in the Delivery Agreement. Welsh Government require that a development plan is supported by a range of background documents which forms the evidence base for the Plan. The range of documents accompanying the Plan is in accordance with these requirements. They were clearly listed within the Public Notice. Several of these documents are technical in nature but are written with introductions or executive summaries which seek to explain their context and purpose. The Plan is by definition a complicated document, but residents did not need to read the whole plan or all supporting documents, to understand the allocation of this land the Plan, or to make their views known. It is unclear how the consultation process is weighted in favour of this proposal as the Council is merely following prescribed Welsh Government procedures. Supporting representations The support for the allocation is noted and the submitted studies will be useful at Examination in support of the deliverability of the allocation.

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					The support for the allocation is noted. However, the Local Housing Market Assessment (and subsequent Update) clearly reference the need for smaller units of accommodation and that new developments should not comprise solely of 4/5 bedroom units. Policy HN2 seeks to ensure a mix of housing units by size and type to ensure that cohesive communities can be created. The LHMA has identified a need for affordable housing across the County and the Viability Study has assessed the ability of sites within different housing market sub-areas to deliver affordable housing whilst still remaining viable and deliverable. Ewloe sits within a strong housing market sub area where the Viability has demonstrated that 40% affordable is reasonable.
1184	How to View and Comment on the Deposit Local Development Plan	Object	Test 1: Does the Plan fit? For the reasons set out in this full Representation, our Client is concerned that the Deposit Plan evidence base is lacking in detail in terms of whether it is planning to address any housing shortfall from the UDP period, whilst continuing to place reliance on some previous UDP housing allocations which have historically failed to come forward and deliver as expected. Test 2: Is the Plan appropriate? Ø The housing requirement should take account of the identified affordability needs across the County as set out in the	Allocate more land for housing development.	Not accepted. The objectors proposed allocation on eastern edge of Penyffordd will be dealt with separately. In terms of the comments on the Tests of Soundness, each will be addressed in turn: Test 1 – The Plan is not seeking to specifically address any shortfall from the UDP housing requirement figure that was not built out. The UDP housing need was calculated at a different point in time, using different projections and forecasts and did not materialize due mainly to the financial crisis whereby households could not obtain mortgages and housebuilders could not obtain finance to build. The LDP has calculated a new housing requirement figure

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			LHMA Ø Any historic housing delivery shortfall from the UDP period should be planned for and met during the LDP period;Ø Whilst the Council is continuing to rely on windfall sites moving forward, it should be noted that historic windfall trends have taken account of the fact that a large number of speculative housing applications have been granted planning permission in the absence of a five-year housing land supply. The LDP Vision is lacking in detail, with no commitment to meeting the full minimum housing and employment needs of the County during the LDP period. Test 3: Will the Plan deliver? Ø The proposed housing allocations contain two sites which were previous allocations in the UDP, and which have failed to come forward. Ø The role of the Tier 3: Sustainable Villages in the settlement hierarchy is being overlookedØ The spatial strategy needs to be reviewed Ø The Council's housing requirement is not proposing to meet all of the identified affordable need set out within the LHMA Ø The Council's affordable housing policy is based on a historic Sub-Area approach		based on up to date projections and a range of other factors. It is not appropriate to merely add on what was not previously delivered as the need for the Plan period has been re-stated. Allocations in the UDP have been re-assessed as part of the candidate site assessment as presented in Background Paper 1. Two housing allocations in policy HN1 have been carried over from the UDP. The Well Street, Buckley site has been sold by Welsh Government to a housing association who are looking to submit a planning application. The Highmere Drive, Connah's Quay site has attracted the interest of a national housebuilder who is also looking to progress a planning application. In this context it is appropriate to include sites that were previously considered to be 'sound' allocations by the UDP Inspector and which are no being brought forward. Test 2 – The Plans allowances for small site and large site windfalls are based on long term trends and do not include the recent 'windfalls' arising from speculative sites. Strictly speaking such sites should not be regarded as 'windfalls' as these are sites which are generally policy compliant. If the speculative sites had been included in the allowances it would have been higher and this is not something the Council have sought to do as it would not be reflective of 'normal' circumstances. There is no requirement that a Plan's vision has to be detailed. The vision needs to be read alongside the objectives and key messages. Test 3 – The two carried over housing

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					allocations from the UDP are commented on in Test 1 above. The Plan is not overlooking the role of Tier 3 sustainable settlements as 'new allocations' must be looked at alongside other elements of housing land supply such as completions and commitments. The spatial strategy for the Plan is considered to be soundly based on sustainability considerations. The approach is based on a joint Local Housing Market Assessment with WCBC which has since been updated and it is not considered to be a 'historic' approach as sub market areas did not feature in the adopted UDP.

How Have We Arrived at the Deposit Plan?

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
728	How Have We Arrived at the Deposit Plan?	Object	Objects to the LDP Plan Period .It is noted that the LDP period is proposed to cover 15 years between 2015 and 2030. Based on the Council's latest LDP Delivery Agreement (Third Revised, published in May 2019), the LDP is not expected to be adopted until at least July 2021. This would be six years after the commencement of the LDP period. Our Client objects to this approach; the Council has had no adopted and approved development and spatial strategy in place since the end of the Unitary Development Plan (UDP) period in 2015 to deliver new homes and jobs in the County. There has in effect been a policy vacuum. It is our Client's position that the LDP period should instead run from 2019 to 2034 (i.e. from the date of publication of the Deposit Plan), with any shortfall in housing delivery during the period 2000-2019 met during the subsequent period 2019-2034. 2.2. In the event that the adoption of the LDP slips further owing to any concerns over the proposed development and spatial strategy (and which trigger the requirement for further work/updated evidence by the Council), then the LDP period should be adjusted further to reflect this.		Not accepted. Welsh Government does not prescribe a particular Plan period for a LDP. Typically the Plan period is for 15 years as this is a balance between looking far enough into the future for it to have a strategic context but so far ahead as to bring greater uncertainty in terms of forecasts, projections, changes in circumstances and guidance etc. It is also quite normal for a Plan to be adopted well into its Plan period. However, if the LDP is adopted at the end of 2021 it would still have 9 years remaining which is a significant improvement on the UDP. It is also normal practice for a Plan period to follow on directly from the previous Plan period. To amend the Plan period now to a 15 year period from 2019 to 2034 would have profound implications for the timetable for adopting the Plan as it would require a fundamental reconsideration of housing and employment growth and possibly require the identification of additional development sites. Such an approach does not represent sound or sensible planning. The Plan will need to be reviewed every 4 years. The 'policy vacuum' which is of concern to the objector would be extended even further by the objectors suggested approach.
1129	How Have We	Object	Road/Highways Infrastructure		Not accepted. Background Paper 3 Infrastructure Plan – Para 2.45 of the

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	Arrived at the Deposit Plan?		LDP03 Infrastructure Plan Appendix 2 Table – reference is made to the requirement of a Transport Assessment as improvements are required to the Junction of Holywell Road and Mold Road to increase capacity. Para 2.54 identifies "Highways improvements in Flintshire". This junction is not mentioned which leads me to believe no improvements are intended or if they are, why are they not available for viewing? The whole infrastructure including design in this area is dangerously lacking and woefully inadequate and will not support more vehicles. A segment of the A494 including a section which runs directly through the communities of Ewloe and Ewloe Green has had a 50mph limit implemented in recognition of traffic pollution yet you seek to increase the number of vehicles who will connect to/travel through this same area, this is at odds with a LDP which should support and serve its residents. BP8 - Disagree that the irregular shape boundary does not justify significant encroachment/extension into open countryside and loss of green barrier. BP8 – Disagree that the existence of New Inn Brook is no less of a firm and defensible barrier as is the existence of the Wrexham-Bidston railway line which is not deemed a firm and defensible barrier		Infrastructure Plan is concerned with the Joint Local Transport Plan for Flintshire / North Wales and list some of the projects and priorities within Flintshire which form part of that Plan. The proposed junction improvements to deliver the Ewloe housing allocation are not listed in the LTP and therefore it would be inappropriate to list highway improvements relating to allocations which are not yet in an adopted LDP, let alone appropriate to include in the LTP. The site schedule for the Ewloe housing allocation, later in the report, is clear in identifying two junction improvements to facilitate the site. A Transport Study has been undertaken which shows that the local highway network can accommodate the development, subject these junction improvements which provide betterment to the existing position in the community. Background Paper 8 Candidate / Alternative Sites – A landscape assessment has been undertaken for the site which demonstrates that impacts on the landscape can be reduced through mitigation and design measures. The irregular shaped boundary of the site and existing hedgerows forms part this assessment. The wooded valley associated with New Inn Brook does provide a firm and defensible physical feature which will prevent development from leapfrogging it onto the other side of the brook. In conjunction with the need to retain a buffer to the New Inn Brook, which is a designated wildlife site, the valley does provide a firm and defensible boundary to further encroachment of Ewloe towards Northop hall. The release of the housing allocation site from

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			despite it being fixed and substantial infrastructure (see BP1 page 17). I therefore do not agree that the removal of this parcel of land will not harm the integrity of the wider Green Barrier.		the green barrier does not result in coalescence between Ewloe and Northop Hall and therefore does not undermine this objective of the green barrier designation.
1128	How Have We Arrived at the Deposit Plan?	Object	IIA objectives Topics. Ref 2 Education – score should be major adverse as Ewloe Green school is full and is providing detailed reasons why additional pupils cannot be accommodated to parents trying to secure places for children. Ref 3 Health - A Rerouted a PRoW, no new health facilities, residents of existing dwellings having their physical and mental health affected by noise disruption/disturbance by a construction site. Ref 4 Affordable housing projection is 40%. Ref 5 Access the proposed development does not improve access to cultural and recreational facilities. Ref 6 the mitigation offered does not correlate with the set criteria under the subsection and there is insufficient capacity to meet education and health needs. Ref 10 Biodiversity Loss of green barrier and wildlife, it will reduce opportunities for people to access wildlife and green spaces.	Remove site at Ewloe Green	Not accepted. IIA ref 2 Education – The planning system contains provisions to address capacity issues at schools through developer contributions, as referenced in policy STR6 of the Deposit Plan and as set out in an existing adopted Supplementary Planning Guidance Note 23 'Education Contributions'. The IIA records both this and the Hawarden housing allocations as having both positive and negative effects. The Local Education Authority have been involved in the preparation of the Plan from an early stage and were made aware of the draft potential allocations well ahead of the publication of the Deposit Plan. The housing trajectory in Background Paper 4 Housing Land Supply and Delivery identifies that completions on the Ewloe site would not be achieved until April 2024. This timescale given the Local Education Authority ample opportunity to address education provision in the area. In this context the scoring in the IIA is considered reasonable. IIA ref 3 Health – The public right of way which runs through the site links in with a wider network of rights of way, providing residents with recreational opportunities to access open countryside. The attractiveness to residents of using the right of way through the site is a detailed design matter to be considered as part

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			Ref 11 Landscape and townscape, the development is on higher land than existing dwellings, Development which over shadows and dominates existing landscape will not be sensitive , the size of the development is disproportionate to the existing Ewloe Green community. It challenges Ref6 that any sense of community will be lost as Ewloe Green is consumed. Ref 13 Water Resources, The site includes natural wetlands for wildlife and boreholes which supply spring water to residents of Holywell Road and Stanford Way. Ref 14 Risk of Flooding the, site is an area of high water table known to flood. Ref 15 Air quality and greenhouse gas emissions, mitigation of electric charging is unrealistic and idealistic. Ref 16 Efficient and Renewable Energy mitigation is unclear. Ref 17 Natural resources, mitigation does not encourage the use of brownfield land or enhance soil quality. Ref 18 Welsh Language mitigation is incorrect the schools are unable to accept additional pupils.		of a green infrastructure strategy for the site. A sensitive design approach to the right of way, rather than its diversion, should not result in adverse health impacts to residents using it, other than temporary affects during construction phases. The positive score in the IIA is reasonable. Ref 4 Affordable Housing – it is not clear what point is being made in respect of affordable housing. Ref 5 Access – The IIA refers to the site being within 1km of cultural and leisure facilities, including sports and social centres and accordingly records a positive score. The IIA does not claim to 'improve' access, merely that that the facilities are accessible from the site. The positive score in the IIA is reasonable. Ref 6 strong and cohesive communities – The IIA records a significant positive score as the site would provide homes near to an existing community, with good access to employment opportunities as well as health and education. The site relates well to the existing form and pattern of development and with several linkage points into the existing settlement and community. It represents a logical extension to the settlement whereby new residents can integrate with the existing community and provided the basis to contribute to a strong and cohesive community. The issue of education

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					and health capacity is commend on in Ref 2 and 3 above. Ref 10 Biodiversity – The site is presently open countryside which is in use as agricultural land. Although it has a public right of way through it, the site is in private ownership and is not 'green space'. The site's primary wildlife value is with hedgerows and mature trees and these can be safeguarded as part of the detailed design of development. No objection has been made to the site by Natural Resources Wales. In terms of the green barrier the justification for this is set out in the Green Barrier Review Background Paper and in summary the drawing back of the site is not considered to undermine the objective of the designation, which is to prevent coalescence of Ewloe with Northop Hall and Connah's Quay, Shotton and Aston. The wooded valley to the west of the site (designated as a wildlife site) forms a firm and defensible boundary to the expansion of the settlement. The IIA scores an overall negative effect in terms of biodiversity but this does not take account of the preparation of detailed ecological surveys of the site. Ref 11 landscape and townscape – The land rises slightly from the existing levels of adjoining development but this is not to extent that it would overshadow or have a dominating effect on existing residents. The additional housing would represent an extension of existing estate type housing development and would not be inherently out of character with existing

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					development. Although the site represents a sizeable addition to Ewloe Green, it must also be seen in the context of the settlement of Ewloe as a whole. It is accepted that any development will have an impact on landscape but a detailed landscape appraisal of the site identifies that the irregular shape of the site, existing hedgerows and trees and help soften the appearance of development in the landscape, when combined with additional landscaping measures and green infrastructure network. The IIA identifies a potential negative impact but recognizes this can be mitigated through the sensitive design of new development. Ref 13 Water Resources – No objection has been to the site by NRW in terms of standing water on parts of the site having wildlife value. This standing water is as a result of present surface water run off and is not a permanent pond. A detailed ecological study has been undertaken on the site. A detailed Geo-Environmental Study of the site has not identified any existing water extraction licences relating to the site and no objection has been from either NRW or Welsh Water. The IIA refers to the need for a surface water drainage strategy for the site which will need to comply with present national requirements for a Sustainable Urban Drainage System. Ref 14 Flood Risk – The site does not sit within C1 or C2 flood Risk as defined in the Development Advice Maps produced by NRW to

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					support the Welsh Government TAN15 Flood Risk. No objection has made by NRW to the site in terms of flood risk. Parts of the site however, are defined in the Development Advice Map as being at risk of surface water flooding. This will need to be addressed as part of a detailed layout for the site alongside a Sustainable Urban Drainage Scheme, in conjunction with green Space Strategy. Ref 16 Efficient and renewable Energy - Residential development on the site would need to comply with prevailing building regulations in terms of energy efficiency. However, the Plan also includes policy EN12 whereby new large housing developments are required to maximize the potential for renewable energy. This is a relevant consideration for the detailed design stage for the development. Ref 17 Natural resources – The lack of suitable and developable brownfield sites in the County necessitates the use of greenfield sites in terms of meeting the requirement for housing in the Plan. Existing brownfield sites sit within areas which are at risk of flooding, are contaminated and lie adjacent to international nature conservation designations. Ref 18 Welsh Language – The issue of school capacity is commented on in Ref 2 above.

How to Use/Navigate and Interpret the Plan

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1094	How to Use/Navigate and Interpret the Plan	Object	I attended the LDP Consultation at Heulwen Close Hope. Documents were made available but did not appear to be properly typeset. No effort was made to make the documents easy to read, fonts used were too small, the text had not been expanded even though there was space available. See the 'How to Register ' Form.		Accepted. At the Hope drop in session the copies of Background Paper 8 Candidate / Alternative Sites had been printed in error in portrait rather than landscape mode. The effect of this was to make the text small. Officers at the session apologized. The document was available on the Council's website as part of the LDP supporting documents and at pre-advertised deposit consultation venues where documents could be inspected. Officers at the session also had two laptops which could have been used to view the document more easily. The availability of the document electronically allowed a user to zoom in and enlarge the text for ease of viewing. The two guides on how to register and comment via the Portal essentially present 'screenshots' from the Objective consultation portal which are annotated with 'notes' to provide guidance to the reader. It would be difficult to 'typeset' such a document.

Strategic Context

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1017	Strategic Context	Object	Paragraph 3.25 – the Council suggests that this should reference the TfN work programme including the Strategic Transport Plan and West & Wales OAR.	Paragraph 3.25 – the Council suggests that this should reference the TfN work programme including the Strategic Transport Plan and West & Wales	Not accepted. The objector seeks the inclusion of reference to two documents in the strategic context of the Plan. However, the objector has not identified what the specific strategies, projects and priorities are from these two documents, that warrant mention in the Plan. This section of the Plan has sought to provide a summary of the key national, regional and local references that are directly relevant to the LDP. There are numerous plans, strategies and initiatives that could have been included in this section of the Plan but the Council has only included key documents which are of direct relevance to the preparation of the Plan. In the absence of further justification / explanation form the objector it is not considered that the two documents should be included.

County Profile / Overview

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
123	County Profile / Overview	Object	3.28 Based on 2014 projections, the County is forecast to increase in population from 154,088 in 2015 to 156,899 in 2030 Do you need to check these figures? Population increase of 2811 and you want to build several thousand new homes?	3.28 Based on 2014 projections, the County is forecast to increase in population from 154,088 in 2015 to 156,899 in 2030 Do you need to check these figures? Population increase of 2811 and you want to build several thousand new homes?	Not accepted. Population forecasts are one component of how the Plans housing requirement figure has been calculated. A further consideration is the projected increase in households arising from people living longer, couples separating etc. The Plan also seeks to contribute to achieving growth aspirations both for Flintshire and the wider sub-region and part of this will be in-migration
1018	County Profile / Overview	Object	Paragraph 3.28 – should the reference to “cross broader” possibly be amended to “cross border”? In addition, the Council supports that this references both inbound and outbound commuter trips.	Paragraph 3.28 – should the reference to “cross broader” possibly be amended to “cross border”? In addition, the Council supports that this references both inbound and outbound commuter trips.	Accepted. Noted. The fifth sentence of para 3.28 should refer to ‘cross border’ not ‘cross broader’ and is clearly a typographical error and can be subsequently amended, without the need for a Focussed Change.

Key Issues and Drivers for Change

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
894	Key Issues and Drivers for Change	Object	The Table following paragraph 3.30 in the Introduction helpfully identifies a number of key issues and drivers that have informed the preparation of the Plan. Clearly the economic and job creation points are central to informing the economic-led strategy that is central to the Plan. In addition, it is of note that the previous UDP Inspector's comments on the approach to defining settlement boundaries on individual settlements rather than identifying urban areas was backward looking and that a fundamental review of open countryside and green barriers in parts of the County was needed. Furthermore, there is an acknowledgement that new development should be in the most sustainable locations and that new housing sites should be viable and deliverable in terms of contributing to housing land supply. The need to deliver affordable housing in an innovative and flexible manner is also a key driver. In light of the above, the representor contends that whilst these issues have been identified and intended to drive the direction and future strategy in the Plan, it at present does not fully respond to these and is, therefore, unsound. We expand on this further below.	Drury Lane site to be allocated within the plan	Not accepted. The table following para 3.30 specifically states 'The need to assess [bold – my emphasis] the comments of the UDP Inspector who considered that the approach to defining settlement boundaries based on individual settlements rather than identifying urban areas was backward looking and also considered that the time was rapidly approaching whereby a fundamental review of open countryside and green barriers in parts of the County was needed' The earlier Key Messages consultation document presented 6 options for categorising settlements. Option 3 was a 'fresh approach for the LDP defining settlement categories based primarily on whether settlements are urban and rural' and option 4 was 'a hybrid approach combining the urban areas in Option 3 with the lower three bands from Option 2'. Following consideration of consultation feedback, the subsequent Strategic Options document contained the following commentary on p8 'There was general consensus that the UDP approach was rather basic and somewhat outdated and that there was a need for a more refined and informed approach to categorising settlements. Although there was some support for the concept of urban areas, a five tier hierarchy was considered more appropriate in terms of representing settlements which exist now and are easily recognised, rather than seeking to create 'new' groupings of settlement

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					into urban areas, which would not be recognisable to, or supported by the public'. The Strategic Options document explained the preferred approach 'The Plan's settlement hierarchy is therefore Option 2a i.e. a 5 tier settlement hierarchy adjusted to take account of proximity and functional relationships to higher level settlements. This option is considered to take a much more refined approach than that contained within the UDP and is based on sustainability considerations. The settlement hierarchy provides a flexible and logical basis for the formulation of a number of spatial options'. No objections have been to the Plans spatial strategy by Welsh Government. Given that the Council has documented its approach to a settlement hierarchy and defining settlement boundaries, it is not considered that the Plan is unsound.

Forming the Plan's Strategy from This Context

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
264	Forming the Plan's Strategy from This Context	Object	Objection 11: The Plan does not reflect the reservations expressed during consultation The lack of sympathetic locally-specific insight was in fact identified during previous consultation exercises but the message has not percolated into the Plan: at the consultative workshops, participants stated that the Plan "needs to identify what is unique" about an area; needs to be "locally-specific in terms of key environment features" also should pay attention to the "historic environment"; and needs to acknowledge the "rural hinterland" in some areas of Flintshire. These points have not been addressed properly in the updated Deposit LDP. In the 2016 Workshops with Planning Aid Wales, consultees expressed the following views: • that the track record of new development in Flintshire so far was that it was not accompanied with an improvement in infrastructure • that Chester had not historically taken its fair share of housing and only now was starting to open up its own green belt land, the inference being that Flintshire was mainly providing new housing for people working in surrounding counties • that measures were need to boost the Welsh language and that an additional Welsh-medium school needed to be designated in Flintshire if it wants to meet		Not accepted. The written statement of the Plan is intended to be a clear and concise statement of land use policies and proposals for the County and it would not be appropriate for it to become an all embracing statement of 'all things' Flintshire. The written statement sets out earlier in the Introductory Chapter a brief overview and profile of the County. The Plan must also be read in conjunction with the accompanying evidence base. In terms of identifying 'what is unique about an area' and being 'locally specific in terms of key environmental features', the Plan has to be read in conjunction with a wide range of supporting datasets relevant to built and historic heritage (listed buildings, conservation areas, archaeological features etc), natural environment (the Landmap landscape resource, international, national and local wildlife designations, protected species, tree preservation orders etc). It is not considered that rewriting the written statement to include such information for every area of the Plan would be helpful or productive. In terms of the 'rural hinterland', the Plans policies define settlement boundaries and policy STR2 in conjunction with PC2 will protect open countryside on the edge of settlements. Policy EN4 also seeks to protect landscape character through the utilization of the national Landmap dataset on landscape character. Settlement

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			required Welsh Government targets on Welsh language (especially when suggesting a highly ambitious housing programme) None of these valid points have been addressed by the Deposit Plan. Not compliant with PPW paragraph: 1.30, 3.21		audits were undertaken to inform the Plan by looking at the sustainability of each settlement in terms of character, role, accessibility, services and facilities. The assessment of candidate and alternative sites also looked at the landscape implications of development and whether a site related more closely to open countryside or built development. In terms of the objectors points from the Planning Aid Wales consultation events on the Preferred Strategy, each will be commented on below: • Development and infrastructure – new development is required to mitigate against the impacts arising from it in terms of providing new or improved infrastructure. Any infrastructure improvements must be reasonably related in scale and kind to the development concerned and must not be a 'wish list'. Policy STR6 of the Deposit Plan sets out what infrastructure may be sought as part of new development and is supported by a Background Paper 'Infrastructure Plan'. • Chester housing provision – in the context of the LDP, Chester and Cheshire West is providing through its Local Plan an appropriate level of development and is making provision at Chester through the green belt release at Wrexham Road to facilitate a strategic mixed use development. Any arguments that Chester may previously have placed pressure on adjoining local authorities is not presently applicable as CWAC, Wrexham and Flintshire

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					are all seeking to meet their own needs for development through their respective development plans. • Welsh language Schools – It is not the role of the development plan per se to 'boost' the Welsh Language in Flintshire. Rather, it is necessary to look at the effects of the development plan on the Welsh language and to devise policy approaches where a negative impact is identified. Para 3.27 of PPW states 'Planning authorities must consider the likely effects of their development plans on the use of the Welsh language as part of the Sustainability Appraisal. Planning authorities should seek to ensure a broad distribution and phasing of development that takes into account the ability of the area or community to accommodate development without adversely impacting use of the Welsh language'. Para 3.27 of PPW then states 'Development plans should include a statement on how planning authorities have taken the needs and interests of the Welsh language into account in plan preparation and how any policies relating to the Welsh language interact with other plan policies'. The Plan has done this through the IIA and a separate Background paper. For information, a new Welsh medium school will be developed as part of a legal obligation for the Croes Atti development in Flint. Whether a need for an additional Welsh speaking school still exists is

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					the remit of the local Education Authority within FCC. In the context of this, the objector claims that the Plan is not compliant with PPW in terms of two particular paragraphs: • para 1.30 of PPW provides general advice on 'Managing New Development' and is concerned with the Development Management process, rather than LDP's. It is considered by the Council that the Plan, when applied as a whole, will contribute to improving the social, economic, environmental and cultural well-being of the County. • para 3.21 of PPW forms part of a section in PPW entitled 'promoting Healthier Places'. The Plan is accompanied by an Integrated Impact Assessment, which includes a Health Impact Assessment, and this is has not demonstrated that the Plan will impact on health. This objection has not provided any evidence as to how the Plan will impact on health and not be compliant with PPW.
521	Forming the Plan's Strategy from This Context		The LDP vision is flawed 9.3 Statement 1 These proposals are premised on a need for "lasting balance". This invites compromise at a time when nothing less than an absolute declaration of carbon reduction values and parameters for		Not accepted. The Plan has been prepared in the context of national planning guidance in PPW10. Para 1.17 states 'A plan-led approach is the most effective way to secure sustainable development through the planning system and it is essential that plans are adopted and kept under review. Legislation secures a presumption

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			open-land conservation will satisfy the need to address those long-term, factors of nature that are outside the control of the council. Inadequate reference to available "brown-field" The plan (8.1 Key Issues and Drivers) refers to "extensive area of brownfield" but does not refer to them by specific topographic reference. Considerations for "sustainable development" 13.25 The explanation of "Sustainable development" is correct but, by admission of mitigation measures rather than adoption of measures to REDUCE the effects of (local) climate change the plan fails to be "sustainable". Considerations for Growth 2.4 The plan refers to growth as if it is an inherently a parameter of success and benefice. In reality, growth is never sustainable indefinitely. It has to have an end-point. In the real world, successive growth is always constrained once resources have been exhausted. Considerations for Prosperity Mentions "prosperity" in a subjective		in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated' [bold- Council emphasis]. The table below para 3.30 identifies a number of key issues and drivers for change. The 8th point provides a clear geographic reference point by explaining that the County has areas of brownfield land 'in and around the River Dee and Dee Estuary'. It further explains that these areas of brownfield land are unsuitable for development for a variety of reasons'. It is unclear which part of the plan or supporting document is being referred to but it must surely be the case that if the effects of climate change can successfully be 'mitigated' then this in effect 'reduces' the effect of climate change as stated. There would not therefore appear to be any tension or conflict in the plan that questions sustainability. As referred to above Welsh Government includes reference to economic considerations as part of sustainable development. Furthermore, Welsh Government sets out in para 2.20 onwards of PPW that economic considerations must be looked at alongside social, cultural, environmental considerations. Under 'economic' considerations there is clear reference to 'growth'.

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			context but fails to refer to the WG document "Prosperity for all" (27 June 2019) Encouragement to large-scale development The Plan, with its clearly de-marked open-spaces, is a "green-light", an estatebuilder's charter, to potential large-scale building development. Everything in the Plan is slewed to encourage extensive building on land which would present the potential developer with the easiest and most cost effective option. Climate change/Climate Emergency 9.6 (15) To minimise the causes of climate change is insufficient. Government imperative is to REDUCE causes of climate-change. The Plan makes no reference to the Welsh Government Committent to tackling climate change and committent to transitioning to a low-carbon economy The Plan fails to acknowledge the 29 April 2019 WG declaration that there is a climate emergency in Wales The council attitude towards the popular views The ethos of presentation of the plan to		The Plan has been prepared in the context of the earlier Wales Spatial Plan and the more recent draft National Development Framework, both of which reference this part of NE Wales as being a growth hub. Further considerations are the Deeside Enterprise Zone and the Growth Deal, both of which seek to promote economic growth. Open spaces and green spaces are protected in the plan and this would prevent their development. The plan, as required by Welsh Government guidance, specifically identifies the sites and locations where housing development should be focused and in doing so, provides the certainty for the public and developers as to exactly what the plan's intention is for these sites. This is not unusual. For development sites to be allocated in the plan for housing, they must be sustainable, viable and deliverable. The Plan must provide a housing land supply to meet its housing requirement figure in a manner which is viable and deliverable. The Plan has sought to identify site allocations which are in sustainable locations and which are viable and deliverable and this is best achieved through larger sites. It represents a move away from the UDP where a larger number of smaller allocated sites were not always in hindsight attractive or viable to be developed. The new allocations are only a small part of the overall supply of housing land and will also include small sites and

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			council members shows disdain and lack of respect for the views of ordinary members of the public. In his presentation to the council meeting of 23 July 2019, Planning Officer Andrew Roberts referred to "Provision of Infrastructure" -slide#17 This seeks to denigrate and dismiss the frequently expressed, commonly held concerns of ordinary members of the public		windfall development on both brownfield and greenfield sites. The Plan has had regard to climate change considerations as this is required in terms of adherence to PPW10. Policy STR5 and the accompanying detailed policies clearly provides a framework of policies with which to address climate change issues. The Plan clearly references PPW10 throughout and there is no objection from Welsh Government in their formal representations on the Plan in terms of climate change. The Plan has taken a pro-active approach in terms of allocating two sites for solar farms and identifying Solar Indicative Local Search Areas following a Renewable Energy Assessment for the County. The Plan is not considered deficient merely because it has not referenced the Welsh Government declaration of a climate emergency. In the presentation to Council this particular slide sought to identify the realism that members of the public object to most development proposals on the basis of lack of infrastructure such as schools and health facilities. The slide explained that infrastructure providers had been involved in the Plan's preparation and that there were mechanisms to address capacity through for instance developer contributions. Reference was made to the Infrastructure Plan that had been prepared to accompany the Deposit LDP and that there were no 'showstoppers' identified. The slide was not disrespectful and was an

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					honest representation of and discussion about infrastructure issues. The presentation of the deposit Plan to Council Members was a logical and essential precursor to then making the plan available for public consultation. The objector fails to understand or acknowledge that all of the relevant infrastructure providers have been involved in the plan making process from an early stage, so that they can understand and plan for the planned growth in the LDP from the perspective of their own organisations and infrastructure capacity. The Plans preparation has involved several stages of engagement and consultation which has formed the Plan is a logical step by step manner. The earlier stages of preparation involved a Key Stakeholder Forum comprising representatives from a wide range of organizations, statutory service providers, business and environmental groups. This included discussion with a Flintshire Youth Forum on 7th May 2019.
734	Forming the Plan's Strategy from This Context	Object	LDP VISION AND OBJECTIVES 4.1. On review of the Vision, it is considered that it is lacking in detail. For example, there is no reference or commitment to the LDP delivering, in the very least, the minimum housing and employment needs of the County, nor is there any detail on where these needs will be met (for example, directing new development towards sustainable locations). It is considered		Not accepted. Welsh Government advises in para 5.11 of Development Plans Manual 3 that each LDP must contain a vision and specifically advises a vision should 'be a concise, focused and positive statement'. It is considered that the Plan's vision accords with the guidance in Development Plans Manual 3.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			that the Vision should be expanded to include a commitment to achieve the needs of the County in sustainable towns and settlements over the Plan period and with it meet the need of current generations, whilst safeguarding the needs of future generations. 4.2. Turning to the LDP objectives, our Client is generally supportive of all 19. However, and linked to the comments above, it is considered that Objective 11 should be amended to read as follows: "Ensuring that Flintshire has the right amount, size and type of new housing to support economic development and to meet the minimum housing needs of the County in full, including both market and affordable housing' 4.3. As a leading housebuilder in North Wales, our Client is committed to the delivery of high-quality housing though good design. This includes the provision of green infrastructure as part of development proposals, alongside sustainable drainage systems. Our Client supports the Council's ambition to deliver growth and prosperity which enhances community life, balanced against the need to protect the natural and historic environment where possible.		The Plan's vision is for the whole County and clearly addressed the need for sustainable development and meeting the needs of its residents in terms of the environment, economy and social considerations. However, it is not considered necessary for the vision to go into detail about housing provision as that is achieved in the Plans strategic policies. It is the relationship between the Vision, translated through the objectives, to the plan policies which set out how much, how and where growth will happen that is key to reading the plan as a whole. The objectives include the details on how the vision of the plan will be achieved. The vision and objectives have been developed through public and key stakeholder consultation via the key messages document in Spring 2016. The feedback from this consultation has directly informed the final vision and objectives for the plan. The vision and objectives therefore reflect the ambitions of these consultees for Flintshire as well as the priorities set by national planning policy and local plans/strategies for the area. The objector suggests amendments to the wording of objective 11 which currently states "a range of housing need." This covers both affordable and market needs, as well as specialist housing needs, it is not necessary to specify the housing types.
821	Forming the Plan's Strategy	Support	Objective 14 and Paragraph 14.5 Objective 14 of the Deposit Plan states		Support noted.

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	from This Context		that the Council will: "Support the provision of sustainable tourism development." Paragraph 14.5 also recognises that: "sustainable tourism development has the potential to be a significant contributor to Flintshire's economy. Tourism development also has the potential to contribute positively to the range of social, economic and environmental objectives of the Plan…" Bourne Leisure endorses the Councils' recognition of the importance of tourism to the area's economy. It is vital for Bourne Leisure to operate within a positive policy context that encourages investment in its holiday parks, to widen and increase the quality of the tourism offer which is necessary to attract large visitor numbers who in turn support the local economy through the creation of jobs, facilitating further investment and through visitor spending. The Company considers that Objective 14 and paragraph 14.5 are consistent with paragraph 5.5.3 of Planning Policy Wales (PPW) Ed.10 which states that "in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy…".		

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887	Forming the Plan's Strategy from This Context	Support	We generally support the objectives set out in the table following paragraph 3.41. Specifically, those that relate to Delivering Growth and Prosperity and which include ensuring that the Council has the right amount of new housing to support economic development and to meet a range of housing needs (Objective 11) and to ensure housing takes place in sustainable locations where sites are viable and deliverable (Objective 12). The representor agrees that the delivery of the right sites for residential development in the right locations, that are both viable and deliverable are key to meeting the objectives of the Council and that the land at Drury Lane, Drury is a suitable location for development that will help achieve these objectives.		Support noted. See rep id914 for comments on DRU001 land at Drury Lane.

The Growth Strategy of the Plan

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
611	The Growth Strategy of the Plan	Support	I and my wife welcome the Deposit Local Development Plan support it and do not want it to change.		Support noted.

Employment Growth

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1135	Employment Growth	Support	Housing requirement is 2,597 units above WG 2014 based 10yr migration variant and 3,000 units above principal projection. Annual build rate 465 p/a for plan is slightly above past 10yr build rate 427 units p/a, but significantly below past 5yr build rate 568 d/pa since 2015. Council concluded that WG 2014 based projections are not appropriate as predicated on recessionary and negative trends which would not deliver on the Council's, regional, or WG's economic growth aspirations for Flintshire and wider area. Council considers the job and homes target to be aspirational but deliverable (see comments on delivery). While evidence shows that based on recent delivery rates the housing requirement could be higher, Council consider recent green belt releases across the border in Cheshire and significant housing allocations in the neighbouring plans of Wrexham and Denbighshire, have a bearing on the scale of homes the plan should provide for. Plan aims to promote economic development, capitalising on County's role as regional economic hub and assist delivery of regional strategies through projects in the North Wales Economic Ambition Board Growth Deal. In particular the Growth Deal identifies key projects around Warren Hall, Broughton,		Support is noted.

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			Northern Gateway and Deeside. The emerging NDF (Policy 18: North Wales Coastal Settlements) also recognises the importance of Deeside as an important growth driver in the sub-region, which should be the focus for housing, employment and key services. The focus for the Council's strategy is the allocation of two strategic sites at Warren Hall and Northern Gateway (incorporating Deeside Enterprise Zone) providing a catalyst for growth in Flintshire. Collectively these sites aim to deliver 8-10,000 jobs and 1625 homes (1300 within the plan period).In terms of spatial distribution, 47% of housing growth is directed to main service centres (Tier 1) 36% to local service centres (Tier 2) and 17% to Tiers 3-5 (sustainable settlements, defined villages & undefined villages). The majority of new allocations outside of the strategic allocations are located in Tier 1 and Tier 2 settlements. WG does not object to the principle of this approach. WG considers the projections have been taken into account by Council, along with other relevant policy considerations in 4.2.6–4.2.8 PPW10. WG is broadly supportive of the strategy, level of homes and jobs proposed, considers it aligns with national policy and is in general conformity with emerging NDF.		

The Preferred Strategy

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
121	The Preferred Strategy	Support	I fully support the Plan that has been developed. The plan satisfies the Tests of Soundness and responds to the Strategic Policies in the various headings that are listed. It acts to preserve the local environment whilst also creating sustainable communities supporting business, prosperity and protecting the environment. Housing growth has been provide for in excess of the number required up to 2030		Accepted. The support for the settlement boundary for Greenfield and the reasons for excluding / preventing development on the named sites, is noted.
285	The Preferred Strategy	Support	I support the Plan that has been proposed which more than provides for the housing growth required within Flintshire		Accepted. The support for the settlement boundary for Greenfield and the reasons for excluding / preventing development on the named sites, is noted.
1095	The Preferred Strategy	Support	In terms of the Candidate sites I support the FCC Classification sites ref HCAC 001, 002, 003, 005, 006, 007, 008, 009, 010, 011, 012, 013, 014, 016, 017, 018, 023. Sites 015, 021, 024, 025, 026, 028 should not be classified as Amber but should be Red. 022 minimal need for route to be protected. 029 should not be classified as Amber but should be Green. I do not support 004 because it will increase ribbon development for several miles, this site has previously been		Accepted. The support for the non-inclusion within the settlement boundary of HCAC of the named sites is noted although no reasoning on each site is given. The objector then refers to the colour coding which has been applied to a small number of Candidate Sites. The objector argues that six candidate sites should not have been identified as amber, but as red. However, i) this was a point in time assessment as to whether a site broadly accorded with the Plans Preferred Strategy and ii) the objector offers no reasoning as to why the colour coding should be amended. The objector considers that HCAC025 should have been classed as red, but the site adjoins

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			rejected in the UDP, STR5 Transport and Accessibility para 5.43 Active Travel initiative - there is no evidence of any progress plans or links with neighbouring authorities .		the defined settlement boundary of HCAC and therefore broadly speaking complies with the Preferred Strategy. However the conclusion of the detailed site assessment, in Background Paper 8, clearly identifies why the site is not included in the Plan. The objector comments that there is a minimal need for HCAC022 to be safeguarded. This candidate site refers to the line of the Hope – Caergwrle bypass which was protected in the UDP but has not been carried over into the LDP. In terms of the allocated housing site at Wrexham Road, Abermorddu (HCAC004), it is evident that with a site frontage of approx. 300m, the site will not increase ribbon development by several miles. The site was recommended by the UDP Inspector to be allocated for housing but was not included by the Council in the adopted UDP. In terms of policy STR5, it is not the role of the LDP of the LDP to set out in detail what progress has been on Active Travel, as this is a matter for the Active Travel Team. The role of the LDP is to ensure that new development has regard to Active Travel routes and proposals to ensure that new development delivers sustainable means of travel for everyday activities.

Strategic Policies - General

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
245	Strategic Policies	Object	Objection 2: FCC does not have control of the variables required/guaranteed to make this ambitious plan successful The growth plans for Flintshire are channelled through the North Wales Economic Ambition Board, with the North Wales Growth Vision promising around 12000 jobs and a growth rate of 2.8% per annum. The NWEAB makes it clear though that the success of the venture is “co-dependent” on the success of other/component projects: the Nuclear Sector Deal, Wylfa Newydd, Growth Track 360 and the Welsh Government’s Trunk Road programme for North Wales (see “Moving NW forward strategy 2017”, NWEAB). But most of these projects are yet to get off the ground so a time lag, and the grants applied for, to achieve step change, have not yet met full expectations. The Deposit LDP, relies heavily on the North Wales Growth Vision and these projects delivering the ambitious employment target. On the back of this, the Plan calls for a highly ambitious new house building programme to soak up the projected numbers of people taking up 8000-10000 jobs. The UK has barely emerged out of austerity and business investment and confidence is low. The IMF has forecast global and national economic slowdown and reduced its growth rate projections. The resolution of our membership of the EU and the possible negative effect of Brexit upon business confidence and growth are as yet a		Not accepted. Whilst the objector is essentially opposed to a housing allocation close to where they live, they have made a large number of detailed representations objecting to a number of areas of the plan, but where the statements made are often subjective, confusing, selective, and are not supported by evidence, particularly of harm or that affects the soundness of the plan. That said the Council has attempted to interpret and respond to these objections in the best way it can given the above. The Plan has not sought to deliberately overprovide for housing in the context of taking an inappropriate, unjustified or harmful approach. Rather, the Plan has been prepared in the context of a regional growth strategy which is part of Welsh Government Policy and recently re-affirmed in the draft NDF. The Plan has not sought to unnecessarily allocate greenfield sites or agricultural land for housing. In the absence of brownfield land which is suitable be allocated for residential (flood risk, contamination and nature conservation) the Council has had to look at sensible urban extensions on the edge of sustainable settlements. The Council has sought to minimise the loss of Best and Most Versatile agricultural land and this approach recognises that agricultural land must be balanced against other planning

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			matter of conjecture. Flintshire's major employer, Airbus, is caught up in escalating tension over trade tariffs between Europe and the US/Boeing. If Brexit takes place then legal/regulatory cross-border agreements and legal/regulatory frameworks (whether specifically Welsh/UK or whether with Europe or the wider world) will need to be renegotiated and redrawn, and this will extend the period of uncertainty. Flintshire CC seems to be predicating its plans on the "old" pre-Brexit, pre-recession, pre-austerity world of high growth. Not compliant with PPW paragraph: 1.1 Deposit LDP Para 3.48 shows ELR does not indicate significant potential for jobs growth Para 3.50: the stated ambitious jobs total is in excess of the upper projections for total jobs. Para 5.8 Flintshire's aspirations are excessive given all the accumulated evidence showing difficult economic times ahead. Para 5.10 stresses a partnership approach, but this places power over the result to the goodwill of others which may be strong or weak. Para 6.10 No evidence of scenario planning having taken place for Brexit		considerations. Welsh Government and in particular their Agricultural Division, accepts the rationale for loss of BMV land, has supported the overall approach in respect of agricultural land and has not objected to the HN1.6 allocation. The Housing Balance Sheet demonstrates how the Plan can meet its housing requirement figure through various sources of 'supply' and part of this is to incorporate a flexibility allowance. The 'over-allocation' element is in effect the 'flexibility' allowance. Welsh Government explain in paras 5.58 and 5.59 of the Development Plan Manual 3 (now adopted) that it is rare for all of a Plans allocations to come forward and how a Plan will not be effective if it cannot accommodate changing circumstances. Welsh Government specifically state 'This means that a flexibility allowance must be embedded into the Plan'[The Councils emphasis in bold]. The guidance explains that it will be for each lpa to determine the level of flexibility allowance based on local considerations but that 'the starting point for such considerations should be 10% flexibility with any variation robustly evidenced'. Flexibility allowances typically sit within the range of 10-20% and the Plan sits comfortably at the mid point. Given concerns expressed by housebuilders about delivery as part of the UDP, it is considered that a slightly

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					higher flexibility of 14.4% is more realistic and supports the soundness of the plan. The Plan explains how it has sought, through the flexibility allowance, to provide a range of housing sites which are capable of delivering this element of the housing balance sheet. The Plan has not unnecessarily sought to allocate sites and has not allocated 'last resort' sites. In the absence of suitable brownfield land, the Plan has had to focus on greenfield sites. Many of the settlements in the top three tiers of the settlement hierarchy are bounded by BMV agricultural land and it would therefore be naive to expect there to be no loss. BMV agricultural land is one of a number of key constraints that need to be balanced when seeking to implement the Plans spatial strategy in terms of development allocations and these include green barriers, flood risk and environmental considerations. In many of the settlements within the County there is BMV agricultural land which would need to be utilised to identify allocations. Mold is a Tier 1 Main Service Centre and is a sustainable settlement but suffers from green barrier and flood risk constraints. The Plans approach to minimizing the loss of BMV agricultural land has been supported in principle and the Mold allocation has not been objected to by WG. The site between Denbigh Road and Gwernaffield Rd (along with further land to the south) was put forward by the landowner and

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					this would have been an informed decision based on how it would affect the farm holding. Welsh Government has supported in principle the approach that the Council has adopted in seeking to minimise the loss of agricultural land and has not objected to site HN1.6. The Welsh Government guidance in paras 3.54 and 3.55 is concerned with protecting BMV as a finite resource and is not seeking to protect such land because of its landscape character, as this is dealt with elsewhere in PPW. The Deposit Plan represents the Council's Plan that it considers 'sound' and which is released for public consultation. It represents the outcome of the requirement to review the UDP given it has time expired and that there is insufficient housing land to support national policy requirements for this. It therefore shows revised settlement boundaries where for instance a new site has been allocated for housing. It will be for the Inspector to decide whether the allocation / settlement boundary should be retained in the adopted Plan. objection 2 – The allocation is sustainable, sitting on the edge of a Tier 1 main Service Centre, and will help meet the Plans County wide housing requirement figure. The site has a housebuilder on board and it is considered to be viable and deliverable.

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					There is no cast iron “guarantee” that the Council can give to the Plan’s complete implementation. Instead the Council has provided an explanation of the rationale behind the strategy, supported by an extensive evidence base. It is for the objector to question the soundness of the Plan by demonstrating with their own evidence how the plan is not sound, will not “succeed”, and why. Despite the multiple objections made and detailed commentaries within those, much of these commentaries are subjective opinion, and is not supported by evidence that questions plan soundness. The objector is also very dismissive of the need for any ambition in the plan and paints a very pessimistic view of prospects for economic growth and prosperity. In contrast, without some form of ambition there would be no progress or economic growth whatsoever, negating the need for strategies like the NWEAB Growth Vision or Welsh Government’s NDF. The plan takes the lead from this more positive expression of national and regional growth intentions, and also plans ahead to 2030. The objector also criticises the Growth Deal and its project aims as essentially premature and unimplemented, but the objector fails to acknowledge that the funding package bid for to secure investment in the Growth Deal projects and infrastructure is now in place. The objector is also critical of the Council for not

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					taking account of post-Brexit impacts on the economy and growth but it is difficult to foresee what these would be at present, and the plan has an end date of 2030 which is well beyond formal separation. The objector questions the context for the job growth target but the lower end of the range identified is only slightly above the job projections prepared by the Council's consultants who conclude in their deposit 'Employment and Housing Advice' Background Paper that the job target is not unrealistic. Whilst the objector's focus is on rejecting housing allocation HN1-6, stating that there are "ample alternatives", they do not say where these alternative sites are or how they are superior to the allocation objected to, having regard to a broad range of constraints and planning considerations. Whilst the objector states that the Plan is not consistent with the NDF, they do not say how or why it is not, and the Welsh Government in their formal comments on the LDP state that "the Welsh Government is broadly supportive of the strategy, level of homes and jobs proposed, considers it aligns with national policy and is in general conformity with the emerging NDF". Whilst the objector states that there is poor evidence of housing demand, the delivery rate

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					in the first four years of the plan period provides this evidence, where the rate is healthy and almost identical to the average planned provision in the Plan.
260	Strategic Policies	Object	Objection 9: The Deposit LDP proposes no special language policy to protect/promote Welsh speaking in the face of extensive housing development in Flintshire The footnote to Appendix 1 to Background Paper 12 quite clearly states that "Broadly Welsh speaking has declined since the 2001 census (14.4% in 2001 to 13.2.% in 2011), partly due to a fall in the numbers of Welsh speaking but also due to an increase in non-Welsh speakers living in the County". Table 3.4 states a key issue is that "Fluency in Welsh in Flintshire appears to be increasing though the rate of rise in non-fluency is faster, suggesting an overall decline of Welsh speakers within the County". Towards the end of the document, it seeks to tie in the IIA/App E scoring and notes that "Rates of Welsh speaking in Mold are some of the highest in the Count…… and there is a risk that these rates would be diluted to some extent due to the cumulative effect of development in Mold, although given the good access to Welsh-language medium schools here it could also be an effective means of providing a large number of residents in Flintshire with Welsh learning opportunities depending on the capacity of schools.". This optimism would be very welcome if there were clear plans to increase infrastructure such as a new Welsh-medium	include a special language policy to protect/promote Welsh speaking in the face of extensive housing development in Flintshire	Not accepted. The footnote to Appendix 1 of the Background Paper 12 is pointing out that the decrease in the percentage figures from 2001 to 2011 Census data is due partly to the increase in non Welsh speakers in the County. So that even though there is an actual slight decrease in Welsh speakers the % figure shows a bigger reduction due to more non speaking people living in the area rather than an actual large decline in Welsh Speakers. There is reason for optimism since there is more than sufficient capacity within the Welsh Language Education system in Mold and there are clear plans to increase that capacity too. Ysgol Maes Garmon the Welsh High School in Mold has capacity to accommodate an increase in pupil numbers. At the present time (March 2020) there are 182 spare pupil places at Maes Garmon. Also Ysgol Glanrafon the Welsh Language primary school also has some spare places (12) and is due to be expanded to accommodate an increase in demand. An extension to the school is due to be built this year increasing capacity of the school from 309 to 356. The objectors reference to the allocation not being compliant with para 1.34 is not

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			school and/or increasing the number of places in a Welsh medium school, as part of a concerted effort to put in place a language policy by which Flintshire could consider how housing developments might help to support/promote/protect the Welsh Language but none of these building blocks are in place. Considering how ambitious the Plan is for employment and housing targets, it is surprisingly unambitious on Welsh language issues in the context of housing development. Not compliant with PPW paragraph: 1.19, 1.34(ii), 2.19, 3.26 Deposit LDP Para 5.34 The Welsh Language Background Paper has significant weaknesses, a dubious evidence base, dubious analysis and arrives at a dubious conclusion - that no special language policy is required		applicable to development plans as this section of PPW is concerned with planning applications and there is no planning application on the site. In terms of para 1.19 of PPW, the Council considers that sufficient information has been published to enable a clear explanation as to why housing allocations have been made. The Sustainability Appraisal was part of the Integrated Impact Assessment (IIA) of the LDP has taken account of the Welsh Language. The details of the IIA in relation the Welsh Language are fully explained in Appendix 2 of the Background Paper 12. The objector criticises the plan for failing to be ambitious enough in tackling “Welsh language issues” but fails to explain or define what these are, what ambition should be promoted, and in a land use plan context, what harm the plan does to the Welsh language. Without this it is difficult for the Council to understand and consider how the soundness of the plan is challenged.
266	Strategic Policies	Object	Here is a summary of the various designation and associated comments on flood risk analysis on Site H1.6/MOL044/45, using only direct quotes from the documentation (but I have applied bold font to highlight critical comments). Background Paper: “Consideration of Candidate Sites against Preferred Strategy” Nov 2107: MOL025: Complies with preferred strategy however there are site constraints that would need to		Not accepted. Firstly the objector incorrectly refers to candidate sites as “designations” as candidate sites are put forward by landowners or other interested parties. It is entirely for the Council to assess the appropriateness of these sites and the area to allocate. For site HN1-6 the site is very clearly identified on the proposals map of the deposit Plan. The Council does not understand the objector’s confusion as there is no ambiguity, and also

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			be overcome to allow the site to be developed FCC Strategic Flood Risk Assessment, July 2018: MOL044 (3.94Ha): Currently in flood risk area and at risk of climate change; Highly vulnerable development category; Plan allocations should not be made for such development and planning applications not proposed; High risk of flooding from rivers and sea. Probability is greater than 1 in 100 or 1 in 200 sea, therefore presumption against site development; consider removal based on DAM C2 MOL045 (8.3Ha) FCA required to address surface water; Highly vulnerable development category; No constraints relating to river or coastal flooding, other than to avoid increasing the risk elsewhere. Integrated Impact Assessment, Appendix E: H1.6 MOL044 & MOL045 & MOL025 (10.6Ha) Site contains a small area of surface water flood risk in the southern portion and the vehicular access onto Denbigh Road will be outside Zone C2; careful consideration should be given to the potential impacts of the proposed development on the quality of nearby waterbodies particularly during the construction phase Background Paper: Assessment of candidate sites and alternative sites, Sept 2019:MOL025/MOL045 (8.28Ha) The site can be considered along with the site to the north thereby enabling improved vehicular access to Denbigh Road and better links with existing development in the locality….The site, in conjunction with MOL044, is		the objector attended two separate public drop-in sessions and spoke at length to an officer on both occasions. This would have provided ample opportunity to query any uncertainty over boundaries. Despite quoting at length from the Council's evidence, all the objector concludes from this is that it is "variable", without explaining what this means or why it renders the site HN1-6 or the plan as a whole, not sound. NRW have been part of the earlier engagement phases of the Plans preparation, being an important member of the Key Stakeholder Forum. NRW have been consulted on candidate sites and alternative sites and also consulted on possible development sites. NRW were formally consulted on the Key Messages document, Strategic Options and Preferred Strategy. No objection has been made by NRW on the Deposit Plan in respect of the Mold allocation. In the absence of an objection from the relevant statutory body it is evident that there is a not a flood risk issues with the site. The Candidate Site Register forms the basis for sites considered throughout the preparation of the Plan. The site comprises all of candidate sites MOL025/045 and part of MOL044 in order to avoid flood risk areas and also to reduce the visual impact of built development from Denbigh Rd. The Council consulted on the Deposit Plan and the proposals maps

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			considered suitable as an allocation. But MOL044 is a known flood risk with a presumption against development and developing MOL045 could exacerbate MOL044's flood risk even further. This shifting of boundaries sends the message that this site is complex and highly problematic and likely to become even more problematic, even with SuDs, in the event of significant rainfall events creating overland flow and fast run-off, on a sloped site with known drainage capacity issues, in a known flood area.		which accompanied the written statement clearly showed the boundary of the housing allocation and settlement boundary. There is no statutory requirement that a Plan housing allocation has to follow exactly the boundary of a candidate site. There is no confusion over what the boundary of the allocation is. MOL025/045 do not fall within an area of C1 or C2 flood risk as defined on the Development Advice Maps produced by NRW. A pocket of surface water floodrisk exists to the north west of Alwyn Close. The north western part of MOL044 sits within a C2 flood risk area within the DAM and accordingly the site boundary has been drawn back to exclude this flood risk area. The brief design guidance for this site in the written statement in policy HN1 stipulates that development, with the exception of the new access road onto Denbigh Rd, will not take place on MOL044. NRW have been consulted on the Deposit Plan and they have no statutory objection to the site. In this context it is not considered that the Plan, nor the specific allocation is non-compliant with PPW or fails the tests of soundness
261	Strategic Policies	Object	Background Paper 12 is a difficult document to digest (as the writer acknowledges in the confused debate outlined through paragraphs 4.7, 4.8 and 4.9). Either the consultants employed have done a rather poor job of their research, or their analysis, or their interpretation, or their dissemination of the		It is not clear what point the objector is making in this objection in relation to the background paper and the independent language research carried out. Rather than the "confusion" which the objector infers, the fundamental issue highlighted by paragraphs 4.7 to 4.9 of the Background Paper is that it demonstrates the

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			results to FCC, or FCC have written a poor research brief and/or (as inferred) are unable to interpret the end results. The Paper reaches a conclusion that no special language policy is needed in the planning context, despite its own admission that the analysis is poor. This document needs to be rewritten and possibly the research needs to be repeated, after reviewing the brief, as the process is clearly not sound. There is no process offered by which Flintshire could operationalise the legal requirement, through the planning system, to (1) defend current levels of Welsh speaking in Flintshire and in Mold, and (2) to contribute, in the planning context, to WG's target of one million Welsh speakers by 2050 There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 1.34(ii), 2.19, 3.26 Deposit LDP Para 5.34 The Welsh Language Background Paper has significant weaknesses, a dubious evidence base, dubious analysis and arrives at a dubious conclusion - that no special language policy is required		difficulty of linking language research to evidence of planning harm, something the objector also fails to do in other related objections referencing Welsh language. Whilst the objector feels the Council's evidence is "dubious", they offer no tenable alternative assessment or evidence of harm or need for a policy. The objectors reference to the allocation not being compliant with para 1.34 is not applicable to development plans as this section of PPW is concerned with planning applications and there is no planning application on the site. In terms of para 1.19 of PPW, the Council considers that sufficient information has been published to enable a clear explanation as to why housing allocations have been made.
281	Strategic Policies	Object	Objection 14: Absence of key documents to support decision making by FCC (and by Mold Town Council in its Plan feeding into the Deposit LDP) Decisions on planning matters, the allocation of candidate sites, the rejection of other sites, decisions to develop in open countryside have, at times, been made in the absence of key documents such as the Green Barrier Review and Background Paper on site assessment. Flintshire CC's Planning		Not accepted. It is difficult to understand the point being made in relation to absence of documents as the objector has made detailed reference to the Council's extensive evidence base in multiple objections. The objector also appears to have been very selective when highlighting extracts from the evidence base, which when taken and understood in their full

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			Committee has been tasked with producing a LDP before the official paper of the Green Barrier Review (and other key documents) became available in September 2019. Under the circumstances there is the possibility that the Green Barrier Review becomes a rubber stamping exercise for decisions already taken, rather than a document written free of pre-conceptions on new site allocations. The review was not available to either FCC or to MTC until after the LDP and MTC Plans were published. In effect this invalidates both MTC and FCC plans. Therefore those decisions about which sites to allocate were made without reference to consistent approaches to protecting open countryside, which is unsound. Background Paper 1 on Green Barrier Review states that its role is to assist in safeguarding the countryside from encroachment and to protect the setting of an urban area. This applies where a settlement has a particularly open or sensitive edge and an open countryside. setting as in the case of MOL045/H1.6. It can also apply where a settlement has a particular historic value. The Review (Sept 2019, p5) also states that it is not the case that "every single urban edge requires a green barrier to prevent encroachment but more a consideration of settlement form and the nature of the urban edge and adjoining countryside".There is no point in producing a Green Barrier Review if it does not inform planning decisions, and crucially, shape the underlying discussions that precede the decisions to release sites. There is insufficient reasoned justification		context actually do not support the point being made by the objector. For example, as part of the UDP land was put forward for development by a third party as an 'omission' site and this considered by the UDP Inspector. The site was submitted in isolation and there were no other sites submitted on adjoining land. The comments of the Inspector must be considered in the context of the preparation of the UDP wherein four housing allocations in Mold were proposed by the Council and accepted by the Inspector. The Inspector therefore felt that this site, in isolation, would represent a significant incursion into open countryside, but also that there were also concerns about the provision of a satisfactory vehicular access. The objector's selective quotation from the UDP Inspector does not convey the full context or meaning behind what the Inspector actually said. The Inspector's comments in full are ''The site is a single field to the north of Gwernaffield Road. Whilst there is development to the east, it is estate type housing which turns its back on the site. Because of its size, at over 8 ha, development on the site would result in a significant incursion into the countryside to the west of the town. I am told there are concerns about providing a suitable access to the site which also weigh against its allocation'. The Council is now preparing a different development plan, within the context of

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			offered Not compliant with PPW 1.19 and 3.40		updated national guidance and with a new housing need to meet. A completely different set of candidate sites (and later alternative sites) were presented for consideration and assessment. In looking at Mold, which is a Tier Main Service Centre, the southern part of the town is well defined by the line of the A494(T) bypass, to the north and east by green barrier and flood risk and the south west by green barrier. This leaves the north west of Mold as the logical area of search for development as it not affected by the same key designations and constraints. This was recognised by Mold Town Council, as part of the development of the Mold Town Plan which predates the LDP and is a material consideration. This identified the fields to the north and south of Gwernaffield Rd as being suitable in principle of housing. The site represents a sizeable extension into open countryside but, in conjunction with the proposed new access onto Denbigh Rd, it represents a logical extension to the form and pattern of development. The site is also well defined by strong physical features on the ground. The new road avoids having to access the site through small residential roads within adjoining estate type development. The existing hedgerows along Pool House Lane has the potential to be reinforced through additional landscaping. Furthermore, the lack of built development on the northernmost part of the allocation can provide an open landscaped greenspace setting to the site

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					when viewed from Denbigh Rd. This has the benefit of mitigating the extension of the site into open countryside. Contrary to the objector's view that no evidence has been made available relating to site selection, the Council published a Background Paper which provides a summary response of the assessment of candidate and alternative sites. This explains why the candidate sites were considered appropriate and suitable to be allocated in the Plan. The Council also produced a Background paper on Agricultural land which commented specifically on the Mold allocation. Welsh Government have supported in principle the approach taken to the Plan minimising the loss of BMV agricultural land and Welsh Government have not objected to the site. Sites have also been appraised by independent and experienced consultants as part of the sustainability appraisal in the IIA. The preparation of the LDP has been overseen by the Council's Planning Strategy Group. This is a core working group of 9 Members plus a Chair who have no decision making or approval powers. Rather, their role has been to endorse the Plan at various stages of its preparation before making a recommendation that the plan is considered by Cabinet / Council. Although the membership of PSG is taken from Planning Committee Members, the actual Planning Committee has had no involvement in the Plan. The

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					membership of PSG has remained fairly consistent over the several years taken to progress the Plan to Deposit stage and this has ensured knowledge and familiarity to be gained and a good working relationship with Officers established. PSG has been presented with key evidence to support the plan's development throughout the Plan's preparation. PSG gave detailed consideration to candidate sites and alternative assessments as part of filtering down possible allocations into the final list of allocations which appeared in the Plan. PSG also considered the green barrier at a series of meeting, workshops and site visits, prior to considering sites, a sequentially logical and sustainable process. The review focused on whether green barriers were still fit for purpose in the light of WG guidance in PPW10 and also whether new green barriers proposed as part of candidate site submissions, had any merit or not. The green barrier review was clearly not a rubber stamping exercise but did necessitate consideration as to whether possible housing allocations within the existing UDP green barrier would undermine the purpose of the respective green barrier designations. This is set out in the green barrier review background paper and the candidate sites assessment background paper. Mold Town Council prepared the Mold Town Plan in the light of existing UDP designations

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					and information. In looking at Mold, and with reference to PPW and the purpose of a green barrier, there is a clear need for a green barrier to protect the narrow gap between the south western edge of the town and Gwernymynydd. To the north of and north east of Mold there is a need to protect the narrow gap between Mold and Mynydd Isa and to protect the openness of the gap between Mold and the outlying villages of Sychdyn and New Brighton. To the north west of Mold there is no justification for a green barrier given that there is no strategic gap that needs to be protected. The nearest settlement is Rhydymwyn which is approximately 3km from the edge of Mold and is categorized as a Tier 4 Defined Village where planned growth is not being made in the context of policy STR2. The need to prevent open countryside from encroachment nor the need to protect the setting of an urban area are considered of sufficient importance to warrant green barrier designation to the north west of Mold. It is also the case that green barrier designations are not based on the landscape quality of the land concerned, but the specific purposes set out in PPW. Land need not have any inherent landscape or other quality for it to warrant green barrier designation. To wrap the green barrier around the north western edge of Mold, would be to virtually encircle Mold within a green barrier and offer no scope for future growth and development. A further purpose of green barrier designation, as set out in PPW,

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					is to 'manage urban form through controlled expansion of urban areas' and this is what the green barriers achieve in Mold, by seeking to protect key gaps and to enable scope for an extension to the urban area. The north west of Mold is therefore the logical and sustainable place to plan for Mold's future long term growth.
372	Strategic Policies	Object	The underlying rationale of the Deposit LDP is that Flintshire has an abundance of employment land that, in theory, be used to generate an unprecedented number of jobs to Flintshire. In order to soak up this abundance, and house the projected number of workers and their families, a massive amount of houses are said to be "needed". For FCC's Deposit Plan to succeed it would require all the "co-dependent" infrastructure projects to succeed, all investments and bids to be successful, and all the political and economic conditions to be favourable for the next ten years. This is the wrong time for such an ambitious plan deploying an unproven strategy, based upon a highly aspirational projection of employment-led growth, which relies on factors that FCC is not in control of, during a period of great economic uncertainty. I have demonstrated, with evidence, that the Plan is not sound and made several detailed objections and comments across the board. In summary, there is insufficient reasoned justification in many parts of the plan, and it should be rejected as it stands.		Not accepted. These matters are already addressed in more detail against the objector's individual objections. That said, the objector's conclusions highlight the often subjective, selective and confusing nature of much of the representations made which lack evidence to substantiate the points made. For example: The objector refers to Mold being a "special case" but the reasons provided do not really distinguish this uniqueness to the Council, given that Mold is considered to be the County's most viable and vibrant town centre and service centre. The objector criticises the Council's assessment of sites for being a "subjective analysis" but fails to recognise that this is a matter of planning judgement rather than a mathematical exercise, but then makes the statement that the settlement strategy needs to be more "nuanced" but without explaining to

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					the Council what is meant by this highly subjective comment. The objector refers to the land being "actively farmed" whereas in fact it is pasture or forage area used for general grazing and silage production. This is no different to hundreds of hectares of land in the same use if Flintshire. All of the 'issues' raised by the objector to site HN1-6, for example flood risk and drainage, have been subject of consultation with relevant and statutory consultees and there are no objections from these bodies to the site's allocation. The objector criticises the plan for exceeding Welsh Government projections of housing growth but has failed to recognise the Ministerial advice given in 2014 to all LPAs which is still relevant, advising not to project forward recessionary trends that affect current population and household projections, as a basis for setting housing requirements in LDPs. The objector is also reminded that the Plan is in line with both the North Wales Growth Vision and the Welsh Government draft NDF, where the latter point has been confirmed by Welsh Government in their formal comments on the deposit LDP. In objecting to site HN1-6 the objector refers to "ample choice" of sites elsewhere, but fails to

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					say where these sites are, or how they are preferable to the allocation objected to. In referring to the underlying rationale of the LDP, the objector feels that the job growth target, which the Council accepts is to a degree aspirational, is “unprecedented”, without saying why this is or why it cannot be achieved or indeed aspired to. Reference to the rationale for growth option 6, from which the jobs target and housing requirement have been drawn, explains the relationship and rationale, and also the papers prepared by the Council’s employment consultants conclude that this job ambition is achievable. In terms of housing demand not being present, the delivery rate of new housing in the first four years of the plan period indicate a healthy demand, and this rate almost exactly matches the average level of provision for housing made by the plan. The objector also fails to recognise that the funding bid to support the NWEAB Growth Deal has now been secured from UK and Welsh Governments to fund investment and infrastructure to promote economic growth and prosperity. The objector states that this is the “wrong time for such an ambitious plan deploying and unproven strategy”, but notwithstanding the significant evidence base produced to support and justify the plan, the proof of any strategy can only be in the successful implementation of it over time. The objector is reminded that in their formal comments on the deposit LDP the

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					Welsh Government stated that "the Welsh Government is broadly supportive of the strategy, level of homes and jobs proposed, considers it aligns with national policy and is in general conformity with the emerging NDF". Whilst the objector feels they have "demonstrated with evidence" why they feel the plan is not sound, from the Council's perspective the objector has provided a lengthy, detailed, selective, and sometimes confusing narrative as a critique of the Council's plan and evidence base, but contrary to their statement has not demonstrated with evidence what harm the plan or site HN1-6 causes that challenge the plan or site's soundness. To illustrate this last point, the objector concludes that "the site assessment of HN1-6 needs to be revisited to remedy information gaps, and to reflect the full range of information that is now available", but does not say how or what the remedy is, what the gaps are, what information is now available and how it changes the context for this site, why this information was not provided with the representation, or what the more suitable alternative site is?
374	Strategic Policies	Object	The underlying rationale of the Deposit LDP is that Flintshire has an abundance of employment land that, in theory, be used to generate an unprecedented number of jobs to Flintshire. In order to soak up this abundance, and house the projected number		see response to id 372

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			of workers and their families, a massive amount of houses are said to be “needed”. For FCC’s Deposit Plan to succeed it would require all the “co-dependent” infrastructure projects to succeed, all investments and bids to be successful, and all the political and economic conditions to be favourable for the next ten years. This is the wrong time for such an ambitious plan deploying an unproven strategy, based upon a highly aspirational projection of employment-led growth, which relies on factors that FCC is not in control of, during a period of great economic uncertainty. I have demonstrated, with evidence, that the Plan is not sound and made several detailed objections and comments across the board. In summary, there is insufficient reasoned justification in many parts of the plan, and it should be rejected as it stands.		

Strategic Policies - Creating Sustainable Places and Communities - General

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
17	Strategic Policies - Creating Sustainable Places and Communities	Object	Sustainable developments should include how the schools, medical services and shop needs are impacted by large scale developments. FCC should have 100% accurate data on school sizes and admission forecasts	Sustainable developments should include how the schools, medical services and shop needs are impacted by large scale developments. FCC should have 100% accurate data on school sizes and admission forecasts	Not Accepted. The LDP and all site allocations within it are informed by a robust evidence base. Gathering this evidence base involves consultation with statutory consultees including education, health, highways and utility companies to identify if the site would be suitable and sustainable to develop, and what the impact the development would have on each service/facility. For instance, Betsi Cadwaladr University Health Board are a Member of the Key Stakeholder Forum which met during the earlier engagement phases of the Plans preparation. All of the sites allocated within the plan have been through this rigorous process and statutory consultees have not identified any major constraints that would prevent a site from being developed sustainably. In addition to this, an Integrated Impact Assessment (IIA) has been conducted by an independent specialist to assess the Plan and allocated sites, to ensure they are sustainable. It must be stressed that the Plan's new allocations will not deliver completed houses until 2023-24 and will be developed over a number of years. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is

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					no formal objection from either statutory body to the Plan nor allocation. No objection to the Plan or allocations has been made by the Local Education Authority. The commentary of the Wrexham LDP Inspector referenced in detail above, establishes that it is normal practice for new development to address capacity issues through developer contributions. The new allocations will not deliver completed houses until 2023-24 and will take several years for the development to be completed. The impact on infrastructure will therefore be gradual and will not be in 'one hit'. This gives the Local Education Authority time to address how the growth in the Plan can be accommodated in terms of school capacity. The Planning Service continues to work with the LEA to secure appropriate mitigation for the delivery of planned LDP sites. No objection to the Plan or allocation has been made by Betsi Cadwaladr University Health Board. Flintshire has a number of relatively new Primary Health Care Centres and the issue is one of lack of sufficient staff including GPs, rather than a lack of facilities as also commented on by the Wrexham LDP Inspector above. As stated in the preceding paragraph in relation to education capacity, there is ample time for the Health Board to plan for how it intends to meet the health care needs of the Plan's growth levels. The Council continues to work with the Health Board in

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					securing the appropriate provision of infrastructure such as health for the delivery of LDP sites.
247	Strategic Policies - Creating Sustainable Places and Communities	Object	Objection 3: FCC's ambitious plans places disproportionate pressure on Mold's infrastructure, given that it is not a designated growth area according to the Welsh Government's National Development Framework and is not on the rail network Mold is not a Welsh Government designated growth area although it is a Tier 1 settlement for Flintshire. The National Development Framework (NDF) for Wales 2020-2040 states that "most large scale growth to jobs and housing will happen in Cardiff, Newport, the Valleys, Swansea Bay and Llanelli, Wrexham and Deeside". Mold is not listed as a growth area for jobs or housing for the foreseeable future, so excessive development is not needed, yet Mold is taking a greater share of new housing targets than might be considered equitable. Crucially, Mold does not have a railway station, so the Growth Track 360 project will have limited impact. In terms of accessibility to Deeside and the Enterprise Zone for jobs or for going further afield in England, the only feasible mode of transport for Mold residents will still be by car. Some 20,000 people commute every day from Flintshire to work outside the county and this trend indicates the risk that an		Not accepted. Mold is a vibrant town which is the administrative centre for the County and sits well in terms of the growth triangle concept of Wrexham Chester and Deeside in the former Wales Spatial Plan and the principle of Wrexham and Deeside as a focus for growth in the draft NDF. It is not considered that the settlement hierarchy and spatial strategy in respect of Mold is contrary to PPW10 or the NDF. Mold has always been in the highest tier of settlements from the Clwyd Structure Plan through to the Delyn Local Plan and the UDP. The LDP adopts a consistent approach as the settlement audit and settlement hierarchy work in the Key Messages document clearly shows that Mold meets the criteria for being classed in the upper tier of the settlement hierarchy and site comfortably along the other settlements identified within Tier 1. Mold is not the only Tier 1 settlement to not have a railway station as Saltney, Connah's Quay, Queensferry and Holywell do not. There are also alternative public transport options to the Rail Network, Mold is easily accessible by bus where it is possible to catch service 5 from Mold Bus Station and arrive at locations within Deeside Industrial park between 06.42 and 06.48 and the last bus back to Mold is 18.03.

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			overdeveloped Mold would become a car-based dormitory town for workers in Deeside, Merseyside and NW England workers as bus routes/frequencies are also inadequate Topic Paper 7 on the Spatial Strategy notes (on p3) the advice in the Wales Spatial Plan that developments should be located "so as to minimise demand for travel especially by private car". So, development in Mold intended to support employment growth in Deeside can only add significantly to existing road travel and congestion. In Background Paper 3, the Infrastructure Plan, Figure 2 shows a map of "Flintshire's County Rail Routes and Regional Network Connections" (p20). Mold is not even named on the map which is very telling. There is insufficient reasoned justification offered Not compliant with PPW paragraph 1.17, 1.19, 2.19, 4.1, 4.6, 4.1.36, 5.4.13 Deposit LDP Para 5.13 allows for some nuancing of the settlement strategy but does not choose to do so for Mold which has unique features to be considered Para 5.30 & 5.31 Despite the stated commitment to local distinctiveness, historic assets and unprotected assets, this plan does not actually apply this when assessing settlements and sites		In addition, service no.6 provides an hourly service between Mold and Pantymwyn along Gwernaffield Rd whilst on Denbigh Road service 14 provides a bus every 2 hours between Denbigh and Mold and service 126 an hourly bus service between Mold and Holywell. This edge of town allocation is clearly accessible on foot and by bus to a range of facilities and is only approximately a 1200m walk from Mold Bus Station where other key services are available: • X4 – Mold, Broughton, Chester every 30 mins • 5 – Ellesmere Port, Deeside Industrial park, Queensferry, Buckley, Mold every 1 hr • 28 – Flint, Mold • 29 – Mold, Wrexham • X1 – Ruthin, Mold, Chester. Residents of the new development will be able to access facilities and services without being wholly dependent on a private car for all journeys. It is therefore possible to travel for work purposes. It should also be stressed that Mold includes existing sources of employment as well as employment allocations to facilitate further employment development that would not require residents to travel outside of the town. The objector argues that the LDP has not considered "local distinctiveness, historic assets and unprotected assets" as part of the site selection process, however does not

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			Objection 8: Poor analysis of the ongoing effects of successive large housing developments on Welsh language and community cohesion in Mold and site H1.6 Background Paper 12 notes that Mold is an exception within Flintshire, being the only main settlement where there are relatively high levels of Welsh speaking (at 20%+). It quotes TAN 20 which states that that the Welsh language is "part of the social and cultural fabric" of Welsh life (para 3.25). It also states in paragraph 3.26 that "planning authorities must consider the likely effects of their development plans on the use of the Welsh language." In paragraph 3.10, it is claimed that housing development should be avoided in places where Welsh speaking is more common and might be diluted by too much development. Yet there is no attempt to give Mold special status in line with TAN 20 warnings. Paragraph 4.5 claims that housing development in recent years has had no detrimental effect in Mold but offers no evidence. Background Paper on "Agricultural Land", states that "The land between Denbigh Road and Gwernaffield Rd has the advantage in that it can be served by a new road directly off Denbigh Road. This can not only serve		provide any evidence of what the plan has failed to recognise. The candidate site assessment process involved the identification of such assets to inform site selection within the plan. Objection 8: The objector criticises the plan for its impact upon the Welsh language in Mold but fails to explain what harm the plan actually does to the Welsh language. Without this it is difficult for the Council to understand and consider how the soundness of the plan is challenged. The objector highlights that the Council have produced background evidence on the Welsh Language which identifies Mold as an area where the Welsh language is more dominant within the County. The objector miss quotes background paper 12 and TAN20, which do not seek to discourage residential development in areas of high Welsh speaking. TAN20 (3.8) states "Welsh language considerations may be relevant to the LPA's site selection process. For instance, it may be more appropriate and sustainable in some areas to meet housing need through one large housing allocation, supplemented by a phasing scheme; in others however, a number of smaller sites spread across a number of settlements might be preferable. The size and tenure of dwellings may also affect whether a development has a positive or negative effect on the language." The Council consider that the allocation of HN1.6 in Mold which is a Tier 1 settlement, is appropriate and sustainable for a settlement of

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			the proposed allocation but adjoining parcels of land in a future development plan." So if the H1.6 site is given over to development, then other sites (most likely the even bigger sites to the south of Gwernaffield Road) will then be put forward. Once there is development on the north side of Gwernaffield Road, FCC/developers will argue that it is lopsided and that development should be allowed on the south side of Gwernaffield Road. Such an argument is already being put forward for another site in Mold under the LDP. This is a stealthy and undemocratic path towards massive demographic and cultural changes in Mold that would drastically dilute its rural town culture, its town/county appeal, its Welsh culture and language, its sense of space, and notions of placemaking. Even the LDP's site assessments documents recognise that development at such a high level would be undesirable.		this size, and considers that sufficient information has been published to enable a clear explanation as to why housing allocations have been made.
265	Strategic Policies - Creating Sustainable Places and Communities	Object	The site on Gwernaffield Road / Denbigh Road, MOL045/H1.6 is a large Grade 2 field that is actively farmed. The current regime seems to be cultivating three crops of silage plus the provision of grazing for dairy cattle but local residents also recall seeing it cultivated for forage maize in recent times. Regarding Tan 1, I am not clear whether it allows a site (such as		Not accepted. The UDP is a time expired development plan, and once adopted the LDP will replace the UDP for Flintshire. The process of producing the LDP includes reviewing the settlement boundaries and identifying housing allocations in order to meet the Plan's housing requirement, which are then made available in the Deposit LDP for public consultation. The Council consider the allocation of the site at Denbigh Road, Mold to

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			MOL045/H1.6) that is outside the settlement boundaries (under the UDP and for the first half of 2019) to be moved inside the settlement barrier (for the last three months or so at the time of writing) presumably for the purpose of deliberately making it accessible for development under the Deposit LDP. Coincidentally, a developer has expressed interest in the site. I am unclear about the decision-making process for this change of status and it is not explained in the documentation. As such I would consider the process unsound. There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 1.34(ii)Referral needed, 3.40 Deposit LDP Para 9.1 refers to settlement boundaries but it is not clear how/why/when the H1.6 site was placed within the settlement boundary of Mold some time during 2019 as under the UDP it is in open countryside Para 12.15 stated that new development must sit comfortably in its landscape setting. Clearly this is at odds with development on site H1.6 classed as open countryside under UDP.		be appropriate and sustainable for this Tier 1 settlement, and the extension of the settlement boundary to incorporate this allocated site is logical. The status of the settlement boundaries will not be changed until the LDP is formally adopted, this will not happen until the Deposit LDP has been through a public examination process. The Council have followed the appropriate procedures to amending the settlement boundaries as part of the LDP process.

Strategic Policies - Supporting a Prosperous Economy - General

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
998	Strategic Policies - Supporting a Prosperous Economy	Object	Paragraph 6.3 – states that economic forecasts suggested negative growth in key sectors. As the LDP is reliant on the 2 strategic sites to meet the jobs/employment land requirements ("potential for the two sites to yield between 8,000–10,000 jobs over the plan period"), how does this fit with paragraph 5.9 regrading jobs growth defining the strategy and level of housing? However, the LDP also allocates a range of general employment sites to enable start-ups, expansion, new investment etc – will these also contribute towards the jobs/ land requirements set out in policies STR1 and PE1? And are these policies consistent?		Not accepted. Policy STR1 Strategic Growth sets out the broad quantums of development that the Plan provides for. Policy PE1 General Employment Land Allocations shows the breakdown of employment land allocated between the strategic sites and the range of other employment allocations. It is unclear why the objector considers the two policies might be inconsistent. The Plan explains that the Welsh Government population and household projections are low as they are based on a period of recession and that they should not be relied upon going forward. The Plan therefore considered a range of household forecasts in order to set a more ambitious but sustainable and deliverable figure. Alongside this the Plan also considered a jobs based projection figure and there is broad alignment between the two approaches. The Plan has to have regard to the economic context of the growth ambitions of Welsh Government for the region and therefore sought to take a more positive approach based on the likely contribution from the two strategic sites. However, the range of other employment allocations merely provides further flexibility as they are long standing employment allocations and have few other more suitable uses. WG in their formal representations to the deposit LDP support the levels of jobs and housing growth proposed,

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					the location of growth, and also consider the plan is in broad conformity with the draft NDF.

Strategic Policies - Meeting Housing Needs - General

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
282	Strategic Policies - Meeting Housing Needs		Objection 15: Candidate Site Assessment Process – scant analysis/information and subjective, inconsistent analysis It would be reasonable to suppose that given that MOL025/MOL044/H1.6 is BMV land and that the Preferred LDP Growth strategy is "ambitious" and "aspirational" (FCC's own words) then the decision to allocate a greenfield site would require very refined arguments, that would closely demonstrate (beyond any doubt) the need for housing on this particular site, in this particular part of town, and a solid evidence base proving the inability to meet demand in any other way. There is no such reasoned justification to be found. Although there is a Candidate Sites assessment document stating how this process should work, and a further document on the sites, there is no detailed/transparent assessment of candidate sites using objective criteria. This is contrast to the assessment of employment land where objective criteria were established that were then scored numerically (in Future Sites Scoping Exercise in App 8). The site assessments in the Background Paper 8 are littered with anomalies. For instance, in its assessment of OL023 (Land north of Queens Park and Hendy Road, 4Ha), the commentary states the following:	Remove Sites in Mold: H1.6/MOL044/MOL045/ MOL025 Closer study of Background Paper 8 reveals that in the assessment of the largest sites in Mold, they all repeat the mantra that the MOL025/044/045/H1.6 site is preferable for development, but the reasoning is inconsistent, citing features that could just as easily apply to the H1.6 site. The other sites (e.g. MOL002, MOL007, MOL019, MOL024, MOL041) are said to be: open countryside, too conspicuous in the landscape, not very urban etc. It seems clear to me that the assessor has decided that the H1.6 site is to be the sacrificial lamb that will not be defended/protected, in	Not accepted. The objector criticises the Council's assessment of sites for being a "subjective analysis" but fails to recognise that this is a matter of planning judgement rather than a mathematical exercise. Contrary to the objector's view that minimal evidence has been made available relating to site selection, the Council published a Background Paper which provides a summary response of the assessment of candidate and alternative sites. This explains why the candidate sites were considered appropriate and suitable to be allocated in the Plan. The Council also produced a Background paper on Agricultural land which commented specifically on the Mold allocation. Welsh Government have supported in principle the approach taken to the Plan minimising the loss of BMV agricultural land and Welsh Government have not objected to the site. Sites have also been appraised by independent and experienced consultants as part of the sustainability appraisal in the IIA. The preparation of the LDP has been overseen by the Council's Planning Strategy Group. This is a core working group of 9 Members plus a Chair who have no decision making or approval powers. Rather, their role has been to endorse the Plan at various stages of its preparation before making a

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			"Site for Protection - It is not possible or practicable to designate land in the development plan on the basis of it being agricultural land. Information relating to agricultural land quality is held by Welsh Government but accurate results require on site survey work to establish the exact quality. Any development proposals arising in such sites may be likely to be required to undertake detailed on-site assessments to establish whether it is best and most versatile agricultural land. This information would then be considered in the planning balance in assessing development proposals." However, the above comment applies equally to the MOL025/044/045 site i.e. the land between Gwernaffield Rd and Denbigh Rd, so why is it not being protected? There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 3. H1.6/MOL044/MOL045/MOL025 Closer study of Background Paper 8 reveals that in the assessment of the largest sites in Mold, they all repeat the mantra that the MOL025/044/045/H1.6 site is preferable for development, but the reasoning is inconsistent, citing features that could just as easily apply to the H1.6 site. The other sites (e.g. MOL002, MOL007, MOL019, MOL024,	order to save the other sites. Perhaps they feel that there has been "enough development already" in the south/south west area of Mold. If so, I would point to the UDP Inspector's guidance, last time around, that he/she was not convinced by the argument that an accessible area needs a period of respite (see S3.5.38 of the Inspector's report). Clearly, MOL025/044/045 is a long way from being the best option for a number of reasons which singly and cumulatively make it a poor choice compared to some of the other sites available	recommendation that the plan is considered by Cabinet / Council. Although the membership of PSG is taken from Planning Committee Members, the actual Planning Committee has had no involvement in the Plan. The membership of PSG has remained fairly consistent over the several years taken to progress the Plan to Deposit stage and this has ensured knowledge and familiarity to be gained and a good working relationship with Officers established. PSG has been presented with key evidence to support the plan's development throughout the Plan's preparation. PSG gave detailed consideration to candidate sites and alternative assessments as part of filtering down possible allocations into the final list of allocations which appeared in the Plan. The comments on individual sites in Background Paper 8 in terms of landscape character and whether sites better relate to open countryside or urban form must also be considered in the context of a wide range of other assessment factors and material planning considerations. The summary assessments in BP08 are only a summary of whether or not a site is suitable or not to be allocated and is the 'front- end' of a detailed assessment database. It is the case that in terms of strategic constraints including flood risk, green barrier designations and the line of the bypass, the north western part of the

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			MOL041) are said to be: open countryside, too conspicuous in the landscape, not very urban etc. It seems clear to me that the assessor has decided that the H1.6 site is to be the sacrificial lamb that will not be defended/protected, in order to save the other sites. Perhaps they feel that there has been "enough development already" in the south/south west area of Mold. If so, I would point to the UDP Inspector's guidance, last time around, that he/she was not convinced by the argument that an accessible area needs a period of respite (see S3.5.38 of the Inspector's report). Clearly, MOL025/044/045 is a long way from being the best option for a number of reasons which singly and cumulatively make it a poor choice compared to some of the other sites available: (1) it is the most actively farmed of these sites; (2) it sits most prominently within a green landscape, visible from major approaches to Mold (3) is the most obviously "open countryside" site of them all with rolling hills on three sides. (The UDP Inspector alluded to the "significant incursion" into the countryside represented by		town is the only practicable area of search for housing allocations. This is also recognised in the Mold Town Plan produced by the Town Council. The objector refers to the land being "actively farmed" whereas in fact it is pasture or forage area used for general grazing and silage production. This is no different to hundreds of hectares of land in the same use in Flintshire. All of the 'issues' raised by the objector to site HN1-6, for example flood risk and drainage, have been subject of consultation with relevant and statutory consultees and there are no objections from these bodies to the site's allocation. The site represents a sizeable extension into open countryside but, in conjunction with the proposed new access onto Denbigh Rd, it represents a logical extension to the form and pattern of development. The site is also well defined by strong physical features on the ground. The new road avoids having to access the site through small residential roads within adjoining estate type development. The existing hedgerows along Pool House Lane has the potential to be reinforced through additional landscaping. Furthermore, the lack of built development on the northernmost part of the allocation can provide an open landscaped greenspace setting to the site when viewed from Denbigh

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			developing this site); (4) has the least favourable location in terms of the road infrastructure; (5) has a significant mains trunk water pipe on site prone to emergency flooding; (6) is a flood risk; (7) sits in close proximity to a chemical factory (8) it sits in an area of Physical Environment Deprivation according to The Welsh index of Multiple Deprivation (12th worst out of 1909) In the Housing Land Monitoring Report Para 3.5, FCC claim that "the LDP will ensure that sites can be identified based on a rigorous and transparent assessment and against an agreed spatial strategy rather than on an ad hoc basis." That should surely apply to all the site assessments and documents but as shown above the assessments are not objective, rigorous or transparent. There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 3.40		Rd. This has the benefit of mitigating the extension of the site into open countryside. The allocation of the site provides a new access onto Denbigh Road which is an 'A' road. Highways Development Management Officers have no objection to the creation of a new access, nor to the impact of traffic generated from the development, on the road network. The site may be in an area of Physical Environment Deprivation based on the Welsh Index but it is not explained why this should prevent new development from providing a quality residential environment which would benefit future residents. In respect of proximity to Synthite there are residential properties closer than the allocated site, which is separated by a buffer of open land. No objections to the allocation have been made from Health and Safety Executive or from any other statutory consultee. Whilst the objector feels they have "demonstrated with evidence" why they feel the plan is not sound, from the Council's perspective the objector has provided a lengthy, detailed, selective, and sometimes confusing narrative as a critique of the Council's plan and evidence base, but contrary to their statement has not demonstrated with evidence what harm the

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					plan or site HN1-6 causes that challenge the plan or site's soundness.

Strategic Policies - Valuing the Environment - General

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624	Strategic Policies - Valuing the Environment		Strongly support the policies aimed at protecting and enhancing the natural environment of the County in general and Pantymwyn in particular, especially EN 2,4,5,6,7 and 9, and more widely EN19. Urge that they are rigorously applied in Pantymwyn in order to safeguard its visual character, local biodiversity and its surrounding countryside.		Support noted.
912	Strategic Policies - Valuing the Environment		Relocate “Policy STR16 -Strategic Planning for Minerals” to “Section 6 – Supporting a Prosperous Economy”.	Relocate “Policy STR16 -Strategic Planning for Minerals” to “Section 6 – Supporting a Prosperous Economy”.	Not Accepted. Policy STR16 is one of just 16 strategic policies which need to be read together (as recognised in Development Plans Manual 3) and in conjunction with the supporting detailed development management policies. The economic role of the minerals industry is recognised by the Plan but it does not occur in 'employment areas' and is typically located in open countryside where minerals exist and often these are in sensitive areas in terms of landscape and ecology. The policy is properly included within the 'environment' policies within the Plan.

Policy STR1

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
252	STR1: Strategic Growth	Object	Gladman refer the Council to the draft NDF which recognises Wrexham and Deeside as key growth locations. It is important that the Plan reflects this and provides a sufficient scale of growth to Deeside. The Plan will need to include sufficient allocations and a flexible approach to ensure delivery.It is important that the scale of growth proposed in the FLDP is sufficient to meet needs and also respond to the growth ambitions of the area. The council will need to be able to demonstrate through robust evidence that this is the case.	The council will need to be able to demonstrate through robust evidence that this is the case.	Not accepted. The broad statements within the objection seem to simply repeat the same emphasis already found within the draft NDF and do not focus on what the particular soundness issue is with the LDP policy STR1. The NDF is also not yet finalized but with a proposed adoption date of autumn 2020 which will coincide with the LDP's Examination, the Council considers that its contribution to the NDF's growth ambitions for Wrexham and Flintshire can be met by the LDP, accepting also that the timeframes for the two strategies are different, with the NDF covering a longer time period than the LDP extending to 2040. It is also the case that the housing growth need assessed in the NDF is not directly compatible with the method for deriving housing requirements in LDPs. That said, when the housing need for Wrexham and Flintshire in the draft NDF is annualized and compared to the annualized cumulative housing requirements in the Flintshire and Wrexham LDPs, there is a high degree of conformity with the growth ambitions of the NDF. The objector is asked to note the formal comments of Welsh Government on the Deposit LDP where they consider it to be in general conformity with the draft NDF.
320	STR1: Strategic Growth	Object	The Local Authority has failed to meet housing needs for Flintshire. Land has been submitted to cover these affordable housing needs in a well based location with good amenities but this has not		Not accepted. The LDP identifies a need for 6,950 homes over the plan period (2015 to 2030) and makes provision for 7,950 homes to meet the identified need. This need has been accommodated within the plan through a

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			been considered for developement , why ? Housing has been added on the land nearer to towns but if land submitted has good local connections to towns then why has it not been considered? It fails to deliver the required amount of affordable housing requirements set out for Flintshire and failed to consider all land submitted for this. No explanation as to why areas have been excluded.		combination of allocated land for new residential development, committed sites which already have planning permission for new homes and windfall sites which come forward during the plan period. In addition to this a flexibility allowance of 14.4% or 1,000 homes has been included within the plan. It is not clear from the objector how the Council has failed to meet the identified need for housing. The Council have assessed over 800 candidate sites when preparing the LDP. It would not be sustainable to allocate all these sites as they are not needed, and many are unsuitable for development for a variety to reasons, please see Background Paper 8 for more detail as to why sites have not been allocated within the plan. As explained above the LDP has a housing requirement of 6,950 and makes provision for 7,950 homes within the plan. Policy STR2 of the plan sets out the settlement hierarchy, development has been directed towards the more sustainable locations with greater access to services and facilities (Tiers 1, 2 and 3). Policy HN3 of the plan sets out the affordable housing requirement across each housing market area within Flintshire. These range from 15% up to 40% on site provision of affordable housing depending on the housing market area. The Local Housing Market Assessment (LHMA) is a key piece of

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					evidence used to inform the housing requirement within development plans. Flintshire's LHMA has informed the LDP and policy HN3 on affordable housing. The LHMA (2018) sets out a need for 238 affordable dwellings each year over a five year period. This need is not a target but should be used to inform the housing requirement within a development plan alongside other key pieces of evidence such as economic growth and population/household projections. It would be unsustainable to simply align the housing requirement within the plan with the LHMA without taking into consideration these other factors. The development of affordable housing requires significant subsidy, either through on site market housing or financial subsidy in the form of grants. To meet the need within the LHMA for 238 affordable dwellings every year for five years would require either a significant form of financial subsidy that is not available or a level of housing provision within the plan that would be unsustainable and likely undeliverable. The LDP will provide for a significant proportion of the affordable housing need identified by the LHMA and as Background Paper 7 highlights there are in fact other mechanisms to deliver more affordable housing outside of the allocations within the plan.
410	STR1: Strategic Growth	Object	The HBF objects to the proposed level of housing growth as it is not considered to be aspirational enough and plans to build fewer homes each year than in recent	The plan should recognise the growth ambition of the area and allocate a higher	Not accepted. The objector criticizes the Council in terms of the level of housing growth planned for on the basis that this growth is not "aspirational" enough. The objector goes on to

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			years. This higher level of development has been achieved without a plan in place and it would be logical that house building is likely to increase with the certainty of allocated sites. Flintshire Council has also always been strong supporters of the past build rate method as seen by the Councils own HOUSING LAND MONITORING STATEMENT APRIL 2018, where they include a past build rate calculation even though this is not allowed to be used by TAN 1. They note the fact that they on average over the last three years have been delivering more homes than the plan requires proving the demand in the area. Further, the Draft NDF states 'In accordance with the NDF Spatial Strategy, growth in the North region should be focussed on the main existing built-up areas of Wrexham-Deeside.' Therefore, the HBF considers that the level of housing proposed should be more ambitious to align with the clear growth aspirations of the NDF and the now agreed North Wales Growth Deal. If the opportunity to provide for this growth is not provided by the LDP then the next opportunity to reconsider will be either at plan review or at possibly a Strategic Development Plan (SPD) the earliest of which will be four years following this plans adoption.	number of homes, using the higher figure identified in growth options table on page 29 of 7,350 plus the flexibility allowance.	state that the LDP "plans to build fewer homes than in recent years". Neither of these points is correct or substantiated, for a number of reasons. Firstly the HBF do not say what the "aspirational" target should be and nor does it provide any policy context contained in PPW10 or elsewhere, to explain why this is the key driver for setting a housing requirement figure in an LDP, as opposed to the guidance the Council has been following in relation to providing housing in the LDP that is sustainable, viable, deliverable, supported by evidence, and therefore a sound proposition. The HBF's aspirational approach is open-ended and unevidenced and it is hardly a sensible way to plan to meet housing needs in a development plan context, and demonstrate soundness. The objector fails to acknowledge the degree to which the housing requirement figure is already significantly above Welsh Government projected household growth trends, as shown in successive recent National projections from either 2011, 2014, or now more recently the 2018 based projections released by Welsh Government. The plan makes provision for housing at 2-3 times this projected growth trend for Flintshire. The only expression that the HBF provide to help quantify this need for greater "aspiration" is to propose the upper limit of the housing range projected on growth option 6 which is 7,350 units or just 400 more than the 6,950 allocated in the plan. This is hardly the "aspirational"

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					step change being inferred by the HBF above that already set out and evidenced and justified by the Council in the plan, and represents just 27 more units per annum over the plan period. Such a minimal level of change is already more than catered for by the Council's far more ambitious but sensible 14.4% flexibility allowance or over-provision, by the level of actual homes delivered so far during the plan period above requirement, and the level of windfall permissions that have come into the supply above the allowances made, as evidenced by the 2019 Housing land statement. The objector refers to the early delivery rates experienced being in excess of the average planned requirement and uses this to argue for a higher, but unspecified, provision. In doing this the objector ignores the level of flexibility included which results in an average provision of housing in the plan of 530 dpa, which when compared with the average actual delivery rate over the first four years of the plan (2015-2019) of 536 dpa, shows a very close alignment between the LDP and actual delivery. Whilst the objector refers to the early delivery rates being achieved without a plan in place, this does not mean that there is no supply of sustainable sites as clearly there is, in order for such rates to have been achieved. The plan has and retains a healthy supply of deliverable commitments and the LDP trajectory assumes that this will be the main source of supply early on, emphasizing a part

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					of the approach set out in the plan's strategy which is to ensure that the committed land bank in Flintshire is brought forward. It is not surprising therefore that in a rising market with available sites, these planned delivery rates are being achieved. Whilst the plan has made adequate provision for housing to match these rates it does not as stated by the objector "build homes" – that is the role of its members in combination with market forces and demand coming from potential buyers. The objector feels that housebuilding is likely to increase but offers no evidence or analysis to support this. In fact the delivery rate of 536 dpa over the first 4 years of the plan represents a fall from the three year rate available at the time plan was placed on deposit (568 dpa). Also the annual delivery figures within this average demonstrate significant variability where for two of the four years delivery topped 600 units in each year, whereas for the other two years the level was low to mid 400s, which is below the average plan requirement and well below the average plan level provided by the plan. This variability indicates a significant inconsistency in delivery by the market and industry and a variability in demand, and suggests significant uncertainty on the part of the industry to sustain delivery rates any higher that already planned for, throughout the plan period. The objector is correct in saying that the Council has promoted the merits of using the completions method alongside others in

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					monitoring land supply, simply because it serves as a performance measure for the industry's capacity to deliver new homes as discussed above. It is also difficult to affect this method unlike the residual method within TAN1 which has resulted in too much unplanned speculative development, which has proved damaging to the plan making process and to communities throughout Wales. This has now clearly been acknowledged by Welsh Government and the Minister where TAN1 is proposed for deletion in its entirety. The objector should also note that without an adopted LDP the Council was not bound by the formal advice in TAN1 in terms of how it monitored or presented land supply, other than the requirement to continue to do so to support the production of the LDP. In terms of the reference to the draft NDF and North Wales Growth Vision the Plan is in conformity with both of these contexts. In terms of the draft NDF, whilst the objector fails to reference the differing time periods of the 15 year LDP and the 20 year NDF where the latter extends beyond the former, they also fail to note that the cumulative annualized housing requirement of the Flintshire and Wrexham LDPs are in line with the annualized need for the region identified in the NDF. It is also a fact that Welsh Government in its formal comments on the LDP have said they are "generally supportive of the spatial strategy and level of homes and jobs proposed and have no fundamental concerns in this respect".

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					They also state that they consider the plan to be in general conformity with the draft NDF. Given that the Flintshire LDP at the stage reached is one of the few to be able to demonstrate it is providing or delivering housing at the planned rate, the Council considers that the objector's concerns are unfounded and do not challenge the soundness of the plan.
331	STR1: Strategic Growth	Object	The Vision and Strategic Objectives of the Plan are acknowledged and the Council's economic ambition and future aspirations for job growth in the County are also supported, however, we are of the view that the level of proposed housing growth is insufficient. Whilst the previous draft policy outlined a figure of 7645 new homes to be provided and the Deposit Plan increases this by 305 dwellings, the housing requirement of 6950 remains unchanged. In fact, this equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 dwellings per annum and 573 dwellings per annum over the last 5 years. Completions in the first three years of the Plan period have also averaged 563. The Plan as drafted, therefore proposes a housing target which results in less homes being built each year than in recent years. If the Council fail to plan for a higher quantum	Need to increase the housing target.	Not accepted. It is disappointing that the representations from Anwyl, albeit by a different agent, simply repeat the same points made at previous stages of consultation on the plan namely the Growth Options stage and the consultation on the Preferred Strategy. Despite the Council in each subsequent consultation document explaining how the Plan has been informed by previous consultation feedback (as also clearly audited in the Initial Consultation Document), Anwyl repeat the points at the deposit stage but do not provide anything new for the Council to consider that it hasn't already reviewed previously. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or

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			of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection (as in Option 6) is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A stepchange in housing and employment land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. It is our firm view this Plan will not assist the County in raising its profile or competing with neighbouring authorities such as Wrexham. In this regard, the Local Plan as written is a backward step and it does not seek to maximise the opportunity for economic and social development within the County.		understanding the basis of the arguments put forward. The objector refers to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the development Industry or the objector's company specifically has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst the objector refers to the delivery rate over the first three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. The objector also fails to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s, both under the long term planned average in

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					the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate. The objector states that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their support for the employment levels, the objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment rage in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth, then converted to dwelling need. Instead they

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					state that a higher figure “could” be achieved but fail to set out what the higher figure ‘could be’ or ‘should be’ or provide evidence to justify a higher figure. The objector refers to a consequence of failing to increase the housing requirement being increased commuting into Flintshire, however as the Council have already referenced above, it (and Welsh Government) consider that the respective growth levels are appropriate. There is also no direct link between the employment and housing growth proposed and so if a higher housing figure were allowed for, and the level of jobs aspired to did not materialize but the houses were built, this could increase the already high levels of daily out-commuting from the County. The objector also fails to recognize that in order to create the conditions for the population growth to demand the level of housing allocated in the plan, requires a high level of net migration to the County to be achieved, and sustained above recent trends. This is why Growth Option 4 serves to corroborate the levels of housing growth identified in option 6 as they are similar, but where option 4 relies on the highest level of net migration seen in the 10 years prior to the plan period, being achieved consistently throughout the plan period. This is a significant assumption in its own right, and to push housing requirement beyond this already aspirational level would be unrealistic.

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					The objector refers to the need for the County to "raised its profile" but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire's perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit. Rather than taking the opportunity to focus on the soundness of the LDP, the objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' instead anecdotally referring to a 'figure' (which is actually a broad range) of 2,300-4,500 dwellings. This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing

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					requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. The objector refers to the inadequacy of a 14.4% flexibility allowance but does not say why or what the appropriate level should be. They will also not (at the time of making representations) have had the benefit of reviewing the latest Welsh Government 2018 based household projections recently published, which show even lower projected household growth trends than either from the previous 2011 or 2014 projections previously referenced by the Council. Against the principal variant of the 2018 projections, the LDP provision is three times the projected growth, and over twice the amount projected by the highest growth variant. The Council do not understand how this is not sufficiently aspirational above the projections they are required by PPW to refer to as a starting point for setting a housing requirement. The objector makes reference to a small scale appeal decision from 2015 that predates any formal consultation stages on the LDP to give weight to the concept of transposing unmet demand from one plan to another. The Council is unaware of the national planning guidance to follow in this, and with reference to the appeal decision, this was made at a time when

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					the now discredited approach to giving significant weight to speculative developments by TAN1 has been recognized by the Minister for the harm it has caused both to the plan making process and to communities in general. TAN 1 is proposed for deletion in its entirety. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number of other earlier plans that may also have failed to 'deliver'. The objector does draw legitimacy for their position from Paragraph 4.2.3 of PPW which they quote from in terms of "As part of the development plan process planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there

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					was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector. As a final point, given that the Council understands that the objector has control of or interest in a number of sites within the LDP housing supply balance sheet, there is concern that this leaves the objector and therefore the Council vulnerable to criticism about the objector's capacity to deliver sites it has an interest in, let alone any further sites it proposes to add. The concern is that this will simply lead to land banking of sites for the future rather than delivery within the plan period.
334	STR1: Strategic Growth	Object	It is important that the Council's approach in the LDP accurately reflects the housing needs of the area. The Council's figure of 6950 has been derived from examining needs between 2015 and 2030 (i.e. after the end date of the last UDP). It does not make any allowance for the substantial shortfall in delivery in the UDP up to 2015. It is important to acknowledge that these are dwellings which should have been delivered to meet past need but which	Proposed Change a) The figure of 7950 in policy STR1 for housing need should be increased pto take account of the past unmet need; or b) If past unmet need is not included the contingency figure	Not Accepted. In their formal comments on the deposit Plan Welsh Government state that they are "broadly supportive of the strategy, level of housing and jobs proposed, considers it [the plan] aligns with national policy and is in general conformity with the emerging NDF". The objector spends more time in the past referring to the UDP, than focusing on the main point of the Deposit LDP consultation which was to consider whether the plan as published is sound. The predominant purpose

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			have not been delivered. This lack of provision cannot simply be ignored in the Plan. If every Council in Wales took the same approach (i.e. seeking to wipe clear their housing debt from past Development Plan periods) it would create the equivalent of a never ending rising national debt in relation to meeting actual housing needs. It would certainly not meet the national policy objective of meeting housing needs through the Plan process. In that sense, without making appropriate provision for past shortfalls in delivery, the shortfall would fail to meet the appropriate tests of soundness as it would not seek to meet assessed needs (Test 2 as set out in the Soundness Self-Assessment Background Paper, Paper 11). Using the Council's own settlement growth table between April 2000 and April 2015 there was a total delivery of 4645 dwellings over the plan period. The UDP required 7400 dwellings to be provided (or 493 per annum) over that period. There is therefore a shortfall in the required provision for the UDP of 2755 units. As significant additional housing is likely to be required over the plan period to ensure identified needs are met, these should be provided through additional allocations (rather than seeking to rely on windfalls). An alternative would be to consider the introduction of contingency sites which would be brought in during later phases of the plan should the level	needs to be increased to reflect past under delivery to 2500 giving a total requirement of 9850 units.	of the objection also seems to be based on defining the largest housing number possible without any evidential support or assessment of the sustainability and deliverability of the 11,105 homes proposed, or where the additional sustainable and deliverable sites are to provide the additional 4,000+ homes proposed. The objector incorrectly refers to the LDP growth options stating that each was presented as a range, when only the employment driven option 6 was a range, this being the product of an aspirational job growth being presented as a range from which the resulted housing need was derived. The objector states that they do not consider selecting a mid-point from option 6 projected housing growth is reasonable but don't explain why, other than the approach is not "ambitious enough". Instead they state that to be more ambitious the Council should have selected the upper end of the growth range, a measure of housing ambition just 400 greater that the selected mid-point figure. The key point ignored by the objector and as set out in the Plan is that the selection of a mid-point from option 6 was also informed by reference to growth option 4 which was a more traditional demographic projection derived option where the high variant level of migration used to derive option 4 and its resultant level of housing requirement, was in line with that derived at the mid-point of the range of housing requirement derived from option 6. This translates into a level of ambition that sets a challenging but achievable housing requirement, ensuring compliance with PPW in

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			of delivery not meet identified need. We have commented on the potential for contingency sites to be included in our comments on STR11 and Section 13. Proposed Change a) The figure of 7950 in policy STR1 for housing need should be increased pto take account of the past unmet need; or b) If past unmet need is not included the contingency figure needs to be increased to reflect past under delivery to 2500 giving a total requirement of 9850 units.		terms of sustainability and deliverability of the plans housing requirement, to the extent that a development plan can actually deliver the housing it provides, as endorsed by Welsh Government. The objector also ignores the fact that the chosen housing requirement figure is significantly in excess of the formal published Welsh Government Household Projections both at the time that the growth options were derived (2011-Based WG Projections) and now where with the recent publication of the 2018-based WG Projections, the differential from the projection household growth and the LDP requirement is now even greater. The figure proposed by the objector would in fact be over 4 times the official projected growth but no assessment of the impact of this excess of growth over need has been made by the objector. Following the objector's logic in relation to adding undelivered growth from a previous plan, it is a fact that the UDP requirement was based on the actual level of WG projected growth at the time, and given that the LDP requirement is well in excess of the present level of projected growth, if the projected need shortfall case is accepted (which the Council does not), then the LDP requirement has in effect 'mopped up' any previous under-provision, by setting a requirement that is far in excess of present projections. The main emphasis of the objector's case for a higher housing requirement figure is based on the premise that the LDP should not only

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					make sufficient provision for the assessed need during its plan period (2015-2030) but should also look backwards and also account for under-delivered housing from the previous UDP plan period. The objector lays blame for an apparent under-deliver solely on the UDP for this but is silent on the role that the economic climate, actual level of demand coming from potential house buyers, or the willingness, capacity or ability of developers to deliver new homes, as it is these factors that determine delivery as development plans do not deliver housing, rather they make sufficient provision for housing to come forward to meet the assessed requirement. Unhelpfully the objector does not direct the Council to the relevant passage in PPW, the Development Plans Manual or relevant guidance that sets out the concept of transposing under-provision from one plan period to another, or the mechanism for doing so. Equally there is no precedent with other LDPs in Wales for where this has been accepted. If the Council were to entertain the concept that under-delivery carry over should be considered then it is not clear from the objector's focus on just the last development plan, the UDP, why the concept should be time limited to just this plan. After all the objector states that it is a fundamental principle affecting soundness of the LDP that it should cater for un-delivered historical need, which therefore should not be limited to just the UDP as other plans historically may also have failed to deliver in the way the objector suggests for the UDP. Clearly the flaw in the argument is then how far back do you go to

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					address 'historical need'? Also, extending the principle and the objector's logic, if the UDP had over-delivered housing in relation to the requirement in that plan, then presumably the objector would accept that the LDP assessed need would be reduced by the level of over-provision in the previous plan? Without reference to where in National guidance or precedent it is accepted that the under-provision from a previous plan should be added to the requirement to the current plan under development, the Council does not see how this can be a soundness issue that challenges the strategy of the LDP. The objector refers to an old appeal decision to justify the principle of carrying over an alleged 'under-provision' but the Inspector in that decision does not say this. Instead the appeal at the time made was simply applying the principles in TAN1 of allowing speculative development, that Welsh Government now accept had adverse impacts on communities and the plan making process, resulting in the conclusion that this and other Councils have argued for some time, that TAN1 is no longer fit for purpose. This recognizes that the planning process was disadvantaged by the process facilitated by TAN1. The objector's simplistic exercise in arriving at a large housing number has no evidential basis to support its sustainability or deliverability and does not assess (other than land proposed by the objector in objections to

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					HN11) what or where there are sufficient sustainable and deliverable sites to meet the radically increased proposed housing requirement, and in fact only offers in relation to objections to HN11 26 units towards the additional 4,155 units proposed, itself leaving a shortfall of 4,129 units to be found somehow, somewhere. This does not appear to be either a sustainable or sound proposition to provide certainty of delivery for the LDP housing requirement. In order to deliver the level of housing proposed by the objector, the development industry fueled by consistent market demand would have to complete 740 new homes every year for the entire LDP plan period. By the objector's own analysis of build rates (564 units per annum), this is almost 200 or 31% higher than the average the industry has been able to achieve in the first 3 years of the LDP plan period, where there has been an unconstrained supply as evidenced by the level of commitments in the housing balance sheet supplemented by significant speculative permissions granted under TAN1. With the addition of completions data for 2018-19 the average rate of delivery in the first 4 years of the plan is now 536 dpa and whilst above the plan's annualized housing requirement, is in line with the actual level of provision in the plan of 530 dpa. The short term delivery trend 2015-19 also masks the fact that even in a period of market demand with developers bringing forward sites, there is significant variability in the actual annual delivery where the range of delivery has reached 600 in two of the four years, but in others has only

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					achieved low to mid 400s. It is this variability in a rising market with land clearly available, that questions the ability to consistently year on year deliver housing completions at the rate suggested by the objector. Also in terms of growth ambition, the LDP is in conformity with the level of need and ambition contained within the draft NDF, a fact supported by the Welsh Government in their comments on the LDP growth strategy. Providing housing at the levels suggested by the objector will be in direct conflict with the National Development Framework and also logically mean that if a higher level of growth is to be accepted for Flintshire than in the NDF, then this should also be applied to Wrexham which the NDF groups with Flintshire as the focus for future growth and development, as to otherwise treat the two contributor areas so differently would be unsustainable. There is no evidence from the objector or the industry to show how such a high level of housing delivery is either sustainable, needed, or deliverable throughout the LDP plan period. The objector has made reference to the LDP trajectory and the fact that in the last 2 years of the trajectory there may be a shortfall in housing provision of 1,389 units, quoting from paragraph 3.1.4 of LDP Background Paper 10, which means that the plan requirement should be increased and/or 'contingency sites' should be added to the plan to come forward later in the plan period. The Council do not accept these arguments and consider that the

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					objector has mis-interpreted the correct position as set out in paragraph 3.1.4. This is not a correct quotation from the document as paragraph 3.1.4 actually states “while the trajectory currently shows a supply of less than five years in the last two years of the Plan period, this is not surprising as the Plan’s housing land supply will have largely been built out by the end of the Plan period and while the Plan’s housing requirement will have been accommodated, to achieve a five year supply in the last two years of the Plan would necessitate the provision of land for some 1,389 additional dwellings beyond the plan period (based on extrapolating the Plan’s average annual requirement of 436 [typo should be 463] dwellings pa for 3 years beyond the LDP period, as required in para. 5.2 of TAN 1)” [Council’s emphasis in bold]. This is quite different from the objector’s interpretation. The objector has also already acknowledged that the plan has over-delivered in the first four years of the plan period which would compensate for any later plan period shortfall in the trajectory, assuming that the plan goes all the way to its end date without review. There is a requirement to review the position with the plan four years after adoption, and as part of this that housing delivery will be monitored against the trajectory as part of the annual AMR process. Given the intention to delete TAN1 it is also not yet clear what mechanisms will be put in place that determine what variance over what period away from the trajectory would trigger action on the part of the Council.

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337	STR1: Strategic Growth	Object	The Vision and Strategic Objectives of the Plan are acknowledged and the Council's economic ambition and future aspirations for job growth in the County are also supported, however, we are of the view that the level of proposed housing growth is insufficient. Whilst the previous draft policy outlined a figure of 7645 new homes to be provided and the Deposit Plan increases this by 305 dwellings, the housing requirement of 6950 remains unchanged. In fact, this equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 dwellings per annum and 573 dwellings per annum over the last 5 years. Completions in the first three years of the Plan period have also averaged 563. The Plan as drafted, therefore proposes a housing target which results in less homes being built each year than in recent years. If the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection (as in Option 6) is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A stepchange in housing and employment	Need to increase housing target	Not accepted. It is disappointing that the representations from Anwyl, albeit by a different agent, simply repeat the same points made at previous stages of consultation on the plan namely the Growth Options stage and the consultation on the Preferred Strategy. Despite the Council in each subsequent consultation document explaining how the Plan has been informed by previous consultation feedback (as also clearly audited in the Initial Consultation Document), Anwyl repeat the points at the deposit stage but do not provide anything new for the Council to consider that it hasn't already reviewed previously. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector refers to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the

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			land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. It is our firm view this Plan will not assist the County in raising its profile or competing with neighbouring authorities such as Wrexham. In this regard, the Local Plan as written is a backward step and it does not seek to maximise the opportunity for economic and social development within the County.		development Industry or the objector's company specifically has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst the objector refers to the delivery rate over the first three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. The objector also fails to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s, both under the long term planned average in the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate. The objector states that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by

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					the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their support for the employment levels, the objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment rage in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth, then converted to dwelling need. Instead they state that a higher figure "could" be achieved but fail to set out what the higher figure 'could be' or 'should be' or provide evidence to justify a higher figure. The objector refers to a consequence of failing to increase the housing requirement being increased commuting into Flintshire, however as the Council have already referenced above, it (and Welsh Government) consider that the respective growth levels are appropriate.

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					There is also no direct link between the employment and housing growth proposed and so if a higher housing figure were allowed for, and the level of jobs aspired to did not materialize but the houses were built, this could increase the already high levels of daily out-commuting from the County. The objector also fails to recognize that in order to create the conditions for the population growth to demand the level of housing allocated in the plan, requires a high level of net migration to the County to be achieved, and sustained above recent trends. This is why Growth Option 4 serves to corroborate the levels of housing growth identified in option 6 as they are similar, but where option 4 relies on the highest level of net migration seen in the 10 years prior to the plan period, being achieved consistently throughout the plan period. This is a significant assumption in its own right, and to push housing requirement beyond this already aspirational level would be unrealistic. The objector refers to the need for the County to “raised its profile” but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire’s perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already

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					acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit. Rather than taking the opportunity to focus on the soundness of the LDP, the objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' instead anecdotally referring to a 'figure' (which is actually a broad range) of 2,300-4,500 dwellings. This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. The objector refers to the inadequacy of a 14.4% flexibility allowance but does not say why or what the appropriate level should be. They will also not (at the time of making representations) have had the benefit of reviewing the latest Welsh Government 2018

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					based household projections recently published, which show even lower projected household growth trends than either from the previous 2011 or 2014 projections previously referenced by the Council. Against the principal variant of the 2018 projections, the LDP provision is three times the projected growth, and over twice the amount projected by the highest growth variant. The Council do not understand how this is not sufficiently aspirational above the projections they are required by PPW to refer to as a starting point for setting a housing requirement. The objector makes reference to a small scale appeal decision from 2015 that predates any formal consultation stages on the LDP to give weight to the concept of transposing unmet demand from one plan to another. The Council is unaware of the national planning guidance to follow in this, and with reference to the appeal decision, this was made at a time when the now discredited approach to giving significant weight to speculative developments by TAN1 has been recognized by the Minister for the harm it has caused both to the plan making process and to communities in general. TAN 1 is proposed for deletion in its entirety. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where

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					this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number of other earlier plans that may also have failed to 'deliver'. The objector does draw legitimacy for their position from Paragraph 4.2.3 of PPW which they quote from in terms of "As part of the development plan process planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector.

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					As a final point, given that the Council understands that the objector has control of or interest in a number of sites within the LDP housing supply balance sheet, there is concern that this leaves the objector and therefore the Council vulnerable to criticism about the objector's capacity to deliver sites it has an interest in, let alone any further sites it proposes to add. The concern is that this will simply lead to land banking of sites for the future rather than delivery within the plan period.
385	STR1: Strategic Growth	Object	The Vision and Strategic Objectives of the Plan are acknowledged and the Council's economic ambition and future aspirations for job growth in the County are also supported, however, we are of the view that the level of proposed housing growth is insufficient. Whilst the previous draft policy outlined a figure of 7645 new homes to be provided and the Deposit Plan increases this by 305 dwellings, the housing requirement of 6950 remains unchanged. In fact, this equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 dwellings per annum and 573 dwellings per annum over the last 5 years. Completions in the first three years of the Plan period have also averaged 563. The Plan as drafted, therefore proposes a housing target which results in less homes being built	Need to increase housing target.	Not accepted. It is disappointing that the representations from Anwyl, albeit by a different agent, simply repeat the same points made at previous stages of consultation on the plan namely the Growth Options stage and the consultation on the Preferred Strategy. Despite the Council in each subsequent consultation document explaining how the Plan has been informed by previous consultation feedback (as also clearly audited in the Initial Consultation Document), Anwyl repeat the points at the deposit stage but do not provide anything new for the Council to consider that it hasn't already reviewed previously. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply

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			each year than in recent years. If the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection (as in Option 6) is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A stepchange in housing and employment land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. It is our firm view this Plan will not assist the County in raising its profile or competing with neighbouring authorities such as Wrexham. In this regard, the Local Plan as written is a backward step and it does not seek to maximise the opportunity for economic and social development within the County.		much weight to in considering or understanding the basis of the arguments put forward. The objector refers to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the development Industry or the objector's company specifically has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst the objector refers to the delivery rate over the first three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. The objector also fails to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s,

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					both under the long term planned average in the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate. The objector states that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their support for the employment levels, the objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment rage in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth,

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					then converted to dwelling need. Instead they state that a higher figure "could" be achieved but fail to set out what the higher figure 'could be' or 'should be' or provide evidence to justify a higher figure. The objector refers to a consequence of failing to increase the housing requirement being increased commuting into Flintshire, however as the Council have already referenced above, it (and Welsh Government) consider that the respective growth levels are appropriate. There is also no direct link between the employment and housing growth proposed and so if a higher housing figure were allowed for, and the level of jobs aspired to did not materialize but the houses were built, this could increase the already high levels of daily out-commuting from the County. The objector also fails to recognize that in order to create the conditions for the population growth to demand the level of housing allocated in the plan, requires a high level of net migration to the County to be achieved, and sustained above recent trends. This is why Growth Option 4 serves to corroborate the levels of housing growth identified in option 6 as they are similar, but where option 4 relies on the highest level of net migration seen in the 10 years prior to the plan period, being achieved consistently throughout the plan period. This is a significant assumption in its own right, and to push housing requirement beyond this already aspirational level would be unrealistic.

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					The objector refers to the need for the County to "raised its profile" but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire's perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit. Rather than taking the opportunity to focus on the soundness of the LDP, the objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' instead anecdotally referring to a 'figure' (which is actually a broad range) of 2,300-4,500 dwellings. This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing

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					requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. The objector refers to the inadequacy of a 14.4% flexibility allowance but does not say why or what the appropriate level should be. They will also not (at the time of making representations) have had the benefit of reviewing the latest Welsh Government 2018 based household projections recently published, which show even lower projected household growth trends than either from the previous 2011 or 2014 projections previously referenced by the Council. Against the principal variant of the 2018 projections, the LDP provision is three times the projected growth, and over twice the amount projected by the highest growth variant. The Council do not understand how this is not sufficiently aspirational above the projections they are required by PPW to refer to as a starting point for setting a housing requirement. The objector makes reference to a small scale appeal decision from 2015 that predates any formal consultation stages on the LDP to give weight to the concept of transposing unmet demand from one plan to another. The Council is unaware of the national planning guidance to follow in this, and with reference to the appeal decision, this was made at a time when

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					the now discredited approach to giving significant weight to speculative developments by TAN1 has been recognized by the Minister for the harm it has caused both to the plan making process and to communities in general. TAN 1 is proposed for deletion in its entirety. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number of other earlier plans that may also have failed to 'deliver'. The objector does draw legitimacy for their position from Paragraph 4.2.3 of PPW which they quote from in terms of "As part of the development plan process planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there

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					was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector. As a final point, given that the Council understands that the objector has control of or interest in a number of sites within the LDP housing supply balance sheet, there is concern that this leaves the objector and therefore the Council vulnerable to criticism about the objector's capacity to deliver sites it has an interest in, let alone any further sites it proposes to add. The concern is that this will simply lead to land banking of sites for the future rather than delivery within the plan period.
332	STR1: Strategic Growth	Object	The Vision and Strategic Objectives of the Plan are acknowledged and the Council's economic ambition and future aspirations for job growth in the County are also supported, however, we are of the view that the level of proposed housing growth is insufficient. Whilst the previous draft policy outlined a figure of 7645 new homes to be provided and the Deposit Plan increases this by 305 dwellings, the housing requirement of 6950 remains unchanged. In fact, this	Need to increase housing target.	Not accepted. It is disappointing that the representations from Anwyl, albeit by a different agent, simply repeat the same points made at previous stages of consultation on the plan namely the Growth Options stage and the consultation on the Preferred Strategy. Despite the Council in each subsequent consultation document explaining how the Plan has been informed by previous consultation feedback (as also clearly audited in the Initial Consultation Document),

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			equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 dwellings per annum and 573 dwellings per annum over the last 5 years. Completions in the first three years of the Plan period have also averaged 563. The Plan as drafted, therefore proposes a housing target which results in less homes being built each year than in recent years. If the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection (as in Option 6) is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A stepchange in housing and employment land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. It is our firm view this Plan will not assist the County in raising its profile or competing with neighbouring authorities such as Wrexham. In this regard, the Local Plan as written is a backward step and it does		Anwyl repeat the points at the deposit stage but do not provide anything new for the Council to consider that it hasn't already reviewed previously. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector refers to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the development Industry or the objector's company specifically has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst the objector refers to the delivery rate over the first

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			not seek to maximise the opportunity for economic and social development within the County.		three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. The objector also fails to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s, both under the long term planned average in the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate. The objector states that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their support for the employment levels, the

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					objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment rage in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth, then converted to dwelling need. Instead they state that a higher figure "could" be achieved but fail to set out what the higher figure 'could be' or 'should be' or provide evidence to justify a higher figure. The objector refers to a consequence of failing to increase the housing requirement being increased commuting into Flintshire, however as the Council have already referenced above, it (and Welsh Government) consider that the respective growth levels are appropriate. There is also no direct link between the employment and housing growth proposed and so if a higher housing figure were allowed for, and the level of jobs aspired to did not materialize but the houses were built, this could increase the already high levels of daily out-commuting from the County. The objector also fails to recognize that in order to create the conditions for the population growth to demand the level of housing allocated in the plan, requires a high level of net migration to the County to be achieved, and sustained above recent trends. This is why Growth

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					Option 4 serves to corroborate the levels of housing growth identified in option 6 as they are similar, but where option 4 relies on the highest level of net migration seen in the 10 years prior to the plan period, being achieved consistently throughout the plan period. This is a significant assumption in its own right, and to push housing requirement beyond this already aspirational level would be unrealistic. The objector refers to the need for the County to "raised its profile" but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire's perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit. Rather than taking the opportunity to focus on the soundness of the LDP, the objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this

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					proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' instead anecdotally referring to a 'figure' (which is actually a broad range) of 2,300-4,500 dwellings. This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. The objector refers to the inadequacy of a 14.4% flexibility allowance but does not say why or what the appropriate level should be. They will also not (at the time of making representations) have had the benefit of reviewing the latest Welsh Government 2018 based household projections recently published, which show even lower projected household growth trends than either from the previous 2011 or 2014 projections previously referenced by the Council. Against the principal variant of the 2018 projections, the LDP provision is three times the projected growth, and over twice the amount projected by the highest growth variant. The Council do not understand how this is not sufficiently aspirational above the projections they are

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					required by PPW to refer to as a starting point for setting a housing requirement. The objector makes reference to a small scale appeal decision from 2015 that predates any formal consultation stages on the LDP to give weight to the concept of transposing unmet demand from one plan to another. The Council is unaware of the national planning guidance to follow in this, and with reference to the appeal decision, this was made at a time when the now discredited approach to giving significant weight to speculative developments by TAN1 has been recognized by the Minister for the harm it has caused both to the plan making process and to communities in general. TAN 1 is proposed for deletion in its entirety. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number of other earlier plans that may also have failed to 'deliver'. The objector does draw legitimacy for their position from Paragraph 4.2.3 of PPW which they quote from in terms of "As part of the development plan process planning authorities need to understand their local housing market

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					and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector. As a final point, given that the Council understands that the objector has control of or interest in a number of sites within the LDP housing supply balance sheet, there is concern that this leaves the objector and therefore the Council vulnerable to criticism about the objector's capacity to deliver sites it has an interest in, let alone any further sites it proposes to add. The concern is that this will simply lead to land banking of sites for the future rather than delivery within the plan period.

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341	STR1: Strategic Growth	Object	The Vision and Strategic Objectives of the Plan are acknowledged and the Council's economic ambition and future aspirations for job growth in the County are also supported, however, we are of the view that the level of proposed housing growth is insufficient. Whilst the previous draft policy outlined a figure of 7645 new homes to be provided and the Deposit Plan increases this by 305 dwellings, the housing requirement of 6950 remains unchanged. In fact, this equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 dwellings per annum and 573 dwellings per annum over the last 5 years. Completions in the first three years of the Plan period have also averaged 563. The Plan as drafted, therefore proposes a housing target which results in less homes being built each year than in recent years. If the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection (as in Option 6) is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A stepchange in housing and employment	Need to increase housing target	Not accepted. It is disappointing that the representations from Anwyl, albeit by a different agent, simply repeat the same points made at previous stages of consultation on the plan namely the Growth Options stage and the consultation on the Preferred Strategy. Despite the Council in each subsequent consultation document explaining how the Plan has been informed by previous consultation feedback (as also clearly audited in the Initial Consultation Document), Anwyl repeat the points at the deposit stage but do not provide anything new for the Council to consider that it hasn't already reviewed previously. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector refers to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the

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			land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. It is our firm view this Plan will not assist the County in raising its profile or competing with neighbouring authorities such as Wrexham. In this regard, the Local Plan as written is a backward step and it does not seek to maximise the opportunity for economic and social development within the County.		development Industry or the objector's company specifically has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst the objector refers to the delivery rate over the first three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. The objector also fails to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s, both under the long term planned average in the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate. The objector states that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by

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					the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their support for the employment levels, the objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment rage in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth, then converted to dwelling need. Instead they state that a higher figure "could" be achieved but fail to set out what the higher figure 'could be' or 'should be' or provide evidence to justify a higher figure. The objector refers to a consequence of failing to increase the housing requirement being increased commuting into Flintshire, however as the Council have already referenced above, it (and Welsh Government) consider that the respective growth levels are appropriate.

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					There is also no direct link between the employment and housing growth proposed and so if a higher housing figure were allowed for, and the level of jobs aspired to did not materialize but the houses were built, this could increase the already high levels of daily out-commuting from the County. The objector also fails to recognize that in order to create the conditions for the population growth to demand the level of housing allocated in the plan, requires a high level of net migration to the County to be achieved, and sustained above recent trends. This is why Growth Option 4 serves to corroborate the levels of housing growth identified in option 6 as they are similar, but where option 4 relies on the highest level of net migration seen in the 10 years prior to the plan period, being achieved consistently throughout the plan period. This is a significant assumption in its own right, and to push housing requirement beyond this already aspirational level would be unrealistic. The objector refers to the need for the County to “raised its profile” but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire’s perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already

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					acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit. Rather than taking the opportunity to focus on the soundness of the LDP, the objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' instead anecdotally referring to a 'figure' (which is actually a broad range) of 2,300-4,500 dwellings. This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. The objector refers to the inadequacy of a 14.4% flexibility allowance but does not say why or what the appropriate level should be. They will also not (at the time of making representations) have had the benefit of reviewing the latest Welsh Government 2018

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					based household projections recently published, which show even lower projected household growth trends than either from the previous 2011 or 2014 projections previously referenced by the Council. Against the principal variant of the 2018 projections, the LDP provision is three times the projected growth, and over twice the amount projected by the highest growth variant. The Council do not understand how this is not sufficiently aspirational above the projections they are required by PPW to refer to as a starting point for setting a housing requirement. The objector makes reference to a small scale appeal decision from 2015 that predates any formal consultation stages on the LDP to give weight to the concept of transposing unmet demand from one plan to another. The Council is unaware of the national planning guidance to follow in this, and with reference to the appeal decision, this was made at a time when the now discredited approach to giving significant weight to speculative developments by TAN1 has been recognized by the Minister for the harm it has caused both to the plan making process and to communities in general. TAN 1 is proposed for deletion in its entirety. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where

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					this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number of other earlier plans that may also have failed to 'deliver'. The objector does draw legitimacy for their position from Paragraph 4.2.3 of PPW which they quote from in terms of "As part of the development plan process planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector.

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					As a final point, given that the Council understands that the objector has control of or interest in a number of sites within the LDP housing supply balance sheet, there is concern that this leaves the objector and therefore the Council vulnerable to criticism about the objector's capacity to deliver sites it has an interest in, let alone any further sites it proposes to add. The concern is that this will simply lead to land banking of sites for the future rather than delivery within the plan period.
365	STR1: Strategic Growth	Object	The Vision and Strategic Objectives of the Plan are acknowledged and the Council's economic ambition and future aspirations for job growth in the County are also supported, however, we are of the view that the level of proposed housing growth is insufficient. Whilst the previous draft policy outlined a figure of 7645 new homes to be provided and the Deposit Plan increases this by 305 dwellings, the housing requirement of 6950 remains unchanged. In fact, this equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 dwellings per annum and 573 dwellings per annum over the last 5 years. Completions in the first three years of the Plan period have also averaged 563. The Plan as drafted, therefore proposes a housing target which results in less homes being built	Need to increase housing target	Not accepted. It is disappointing that the representations from Anwyl, albeit by a different agent, simply repeat the same points made at previous stages of consultation on the plan namely the Growth Options stage and the consultation on the Preferred Strategy. Despite the Council in each subsequent consultation document explaining how the Plan has been informed by previous consultation feedback (as also clearly audited in the Initial Consultation Document), Anwyl repeat the points at the deposit stage but do not provide anything new for the Council to consider that it hasn't already reviewed previously. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply

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			each year than in recent years. If the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection (as in Option 6) is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A stepchange in housing and employment land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. It is our firm view this Plan will not assist the County in raising its profile or competing with neighbouring authorities such as Wrexham. In this regard, the Local Plan as written is a backward step and it does not seek to maximise the opportunity for economic and social development within the County.		much weight to in considering or understanding the basis of the arguments put forward. The objector refers to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the development Industry or the objector's company specifically has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst the objector refers to the delivery rate over the first three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. The objector also fails to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s,

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					both under the long term planned average in the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate. The objector states that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their support for the employment levels, the objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment rage in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth,

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					then converted to dwelling need. Instead they state that a higher figure "could" be achieved but fail to set out what the higher figure 'could be' or 'should be' or provide evidence to justify a higher figure. The objector refers to a consequence of failing to increase the housing requirement being increased commuting into Flintshire, however as the Council have already referenced above, it (and Welsh Government) consider that the respective growth levels are appropriate. There is also no direct link between the employment and housing growth proposed and so if a higher housing figure were allowed for, and the level of jobs aspired to did not materialize but the houses were built, this could increase the already high levels of daily out-commuting from the County. The objector also fails to recognize that in order to create the conditions for the population growth to demand the level of housing allocated in the plan, requires a high level of net migration to the County to be achieved, and sustained above recent trends. This is why Growth Option 4 serves to corroborate the levels of housing growth identified in option 6 as they are similar, but where option 4 relies on the highest level of net migration seen in the 10 years prior to the plan period, being achieved consistently throughout the plan period. This is a significant assumption in its own right, and to push housing requirement beyond this already aspirational level would be unrealistic.

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					The objector refers to the need for the County to "raised its profile" but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire's perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit. Rather than taking the opportunity to focus on the soundness of the LDP, the objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' instead anecdotally referring to a 'figure' (which is actually a broad range) of 2,300-4,500 dwellings. This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing

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					requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. The objector refers to the inadequacy of a 14.4% flexibility allowance but does not say why or what the appropriate level should be. They will also not (at the time of making representations) have had the benefit of reviewing the latest Welsh Government 2018 based household projections recently published, which show even lower projected household growth trends than either from the previous 2011 or 2014 projections previously referenced by the Council. Against the principal variant of the 2018 projections, the LDP provision is three times the projected growth, and over twice the amount projected by the highest growth variant. The Council do not understand how this is not sufficiently aspirational above the projections they are required by PPW to refer to as a starting point for setting a housing requirement. The objector makes reference to a small scale appeal decision from 2015 that predates any formal consultation stages on the LDP to give weight to the concept of transposing unmet demand from one plan to another. The Council is unaware of the national planning guidance to follow in this, and with reference to the appeal decision, this was made at a time when

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					the now discredited approach to giving significant weight to speculative developments by TAN1 has been recognized by the Minister for the harm it has caused both to the plan making process and to communities in general. TAN 1 is proposed for deletion in its entirety. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number of other earlier plans that may also have failed to 'deliver'. The objector does draw legitimacy for their position from Paragraph 4.2.3 of PPW which they quote from in terms of "As part of the development plan process planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there

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					was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector. As a final point, given that the Council understands that the objector has control of or interest in a number of sites within the LDP housing supply balance sheet, there is concern that this leaves the objector and therefore the Council vulnerable to criticism about the objector's capacity to deliver sites it has an interest in, let alone any further sites it proposes to add. The concern is that this will simply lead to land banking of sites for the future rather than delivery within the plan period.
386	STR1: Strategic Growth	Object	The Vision and Strategic Objectives of the Plan are acknowledged and the Council's economic ambition and future aspirations for job growth in the County are also supported, however, we are of the view that the level of proposed housing growth is insufficient. Whilst the previous draft policy outlined a figure of 7645 new homes to be provided and the Deposit Plan increases this by 305 dwellings, the housing requirement of 6950 remains unchanged. In fact, this	Need to increase housing target.	Not accepted. It is disappointing that the representations from Anwyl, albeit by a different agent, simply repeat the same points made at previous stages of consultation on the plan namely the Growth Options stage and the consultation on the Preferred Strategy. Despite the Council in each subsequent consultation document explaining how the Plan has been informed by previous consultation feedback (as also clearly audited in the Initial Consultation Document),

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			equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 427 dwellings per annum and 573 dwellings per annum over the last 5 years. Completions in the first three years of the Plan period have also averaged 563. The Plan as drafted, therefore proposes a housing target which results in less homes being built each year than in recent years. If the Council fail to plan for a higher quantum of housing, levels of commuting into Flintshire will increase, subsequently perpetuating the use of unsustainable modes of transport. The use of an employment-led projection (as in Option 6) is supported, however, this should be accompanied by a higher level of household growth than is currently demonstrated to encourage more sustainable commuting habits. A stepchange in housing and employment land delivery is now required and the continued approach to strategic growth now set out in the Deposit Plan is not ambitious enough and will not make the significant contribution that is needed to reducing affordable housing need and raising the profile of the County. It is our firm view this Plan will not assist the County in raising its profile or competing with neighbouring authorities such as Wrexham. In this regard, the Local Plan as written is a backward step and it does		Anwyl repeat the points at the deposit stage but do not provide anything new for the Council to consider that it hasn't already reviewed previously. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector refers to the recent trends in housing delivery to make the point that based on a short term trend, the LDP housing requirement should be increased and the short term rate applied over the entire plan period. That is the limit of the empirical justification for a higher housing requirement and no evidence is provided to show for example how the development Industry or the objector's company specifically has the ability or capacity to sustain higher delivery rates for the entire plan period, the inference being a limitless capacity to build. There is also no reference to the ability of supporting infrastructure to be provided to support a higher level of growth. This does not seem wholly tenable to the Council and ignores the reality of the variable economic climate, post Brexit future uncertainties and a lack of focus on the deliverability of sites in the plan. Whilst the

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			not seek to maximise the opportunity for economic and social development within the County.		objector refers to the delivery rate over the first three years of the plan period at 563 dpa, a fourth years' data is now available which shows that this rate has fallen significantly over just one year to 536 dpa. The objector also fails to note the significant year on year variability in delivery in just the first four years where despite there being a rising market and available sites, the rate varies from two years where it exceeded 600 dpa, to the other two years where it only achieved low to mid 400s, both under the long term planned average in the LDP. This does not suggest an ability to sustain high rates over the entire plan period. Also whilst the LDP housing requirement averages 463 dpa, the plan has actually made provision for 530 dpa to come forward, in line with the current actual delivery rate. The objector states that they are generally supportive of the "employment-led projection allowing for 8-10,000 job" but fail to recognize that the employment projections prepared by the Council are slightly lower than this more aspirational figure, which to use their term does represent something of a 'step change' in employment ambition. This is deliberate in order to support the aspirations of the North Wales Economic Ambition Board (NWEAB) and the Draft NDF, where Welsh Government state that the LDP is in general conformity with this. Welsh Government are also supportive of the level of housing and employment growth in the plan stating they have "no fundamental concerns in this respect". Notwithstanding their

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					support for the employment levels, the objector feels that the housing requirement is not ambitious enough but again fail to recognize from the Council's evidence base that the housing requirement is derived directly from the employment rage in Growth Option 6 where the housing figure is arrived at by running the projections 'in reverse' from the 8-10,000 jobs to determine the population and labour force change required to support that, and from this the level of household growth, then converted to dwelling need. Instead they state that a higher figure "could" be achieved but fail to set out what the higher figure 'could be' or 'should be' or provide evidence to justify a higher figure. The objector refers to a consequence of failing to increase the housing requirement being increased commuting into Flintshire, however as the Council have already referenced above, it (and Welsh Government) consider that the respective growth levels are appropriate. There is also no direct link between the employment and housing growth proposed and so if a higher housing figure were allowed for, and the level of jobs aspired to did not materialize but the houses were built, this could increase the already high levels of daily out-commuting from the County. The objector also fails to recognize that in order to create the conditions for the population growth to demand the level of housing allocated in the plan, requires a high level of net migration to the County to be achieved, and sustained

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					above recent trends. This is why Growth Option 4 serves to corroborate the levels of housing growth identified in option 6 as they are similar, but where option 4 relies on the highest level of net migration seen in the 10 years prior to the plan period, being achieved consistently throughout the plan period. This is a significant assumption in its own right, and to push housing requirement beyond this already aspirational level would be unrealistic. The objector refers to the need for the County to "raised its profile" but the Council are unclear what is meant by this. They also refer to the Council being in competition with Wrexham whereas clearly the Welsh Government via the draft NDF see the two authorities as providing the focus for growth in the area. The Council believes it can meet this requirement of the NDF from Flintshire's perspective and Welsh Government confirm that they consider the LDP in conformity with the NDF. The NWEAB via the Growth Vision and Growth Deal for North Wales already acknowledge the contribution that Flintshire and Wrexham make in terms of housing to support economic growth, encouraging the other authorities in North Wales to follow suit. Rather than taking the opportunity to focus on the soundness of the LDP, the objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period.

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					Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' instead anecdotally referring to a 'figure' (which is actually a broad range) of 2,300-4,500 dwellings. This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. The objector refers to the inadequacy of a 14.4% flexibility allowance but does not say why or what the appropriate level should be. They will also not (at the time of making representations) have had the benefit of reviewing the latest Welsh Government 2018 based household projections recently published, which show even lower projected household growth trends than either from the previous 2011 or 2014 projections previously referenced by the Council. Against the principal variant of the 2018 projections, the LDP provision is three times the projected growth, and over twice the amount projected by the highest growth variant. The Council do not understand how this is not sufficiently aspirational above the projections they are

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					required by PPW to refer to as a starting point for setting a housing requirement. The objector makes reference to a small scale appeal decision from 2015 that predates any formal consultation stages on the LDP to give weight to the concept of transposing unmet demand from one plan to another. The Council is unaware of the national planning guidance to follow in this, and with reference to the appeal decision, this was made at a time when the now discredited approach to giving significant weight to speculative developments by TAN1 has been recognized by the Minister for the harm it has caused both to the plan making process and to communities in general. TAN 1 is proposed for deletion in its entirety. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number of other earlier plans that may also have failed to 'deliver'. The objector does draw legitimacy for their position from Paragraph 4.2.3 of PPW which they quote from in terms of "As part of the development plan process planning authorities need to understand their local housing market

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					and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector. As a final point, given that the Council understands that the objector has control of or interest in a number of sites within the LDP housing supply balance sheet, there is concern that this leaves the objector and therefore the Council vulnerable to criticism about the objector's capacity to deliver sites it has an interest in, let alone any further sites it proposes to add. The concern is that this will simply lead to land banking of sites for the future rather than delivery within the plan period.

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523	STR1: Strategic Growth	Object	The need for 7950 houses in Flintshire over the 15 years of the plan is primarily justified on the provision of 8-10,000 jobs and inward migration. The high projection for new jobs is mainly based upon the amount of employment land available in the County, particularly in the Deeside Enterprise Zone area. In the current economic climate, with political uncertainty and national economic slowdown these ambitious plans appear to be highly unrealistic. In the plan (para 3.27) the County is forecast to increase in population by 2,811 by 2030, even allowing for inward migration the need to provide 7950 houses over the 15 years of the plan appears to be excessive. The WG's draft NDF (Dec 2018), estimates that on average 8,300 homes are required annually in Wales for the period 2018/19 to 2022/23. It estimates that 19% of the homes required in Wales should be provided in North Wales. This equates to 1577 houses across the seven planning authorities in North Wales. We calculate that the LDP's for the seven planning authorities identify a need of 2163 houses per year on average throughout the life of the plans. This would provide 37% more than is required by the draft NDF. It is therefore suggested that the housing need for Flintshire should be considerably scaled back. The jobs growth is primarily based upon the fact that there is nearly 140 hectares of employment land available in	It is suggested that the housing need for Flintshire should be considerably scaled back.	Not accepted. The objector refers to the plan's housing 'need' as being 7,950, but the LDP housing requirement is 6,950 with a 14.4% contingency resulting in an overall provision for 7,950 homes to meet the lower requirement. It is also not the case that the job requirement is simply based on the amount of employment land provided in the plan, as it is based on the ability of the two large strategic sites to deliver jobs, referenced to the employment projections identified in the Employment Land background paper prepared by the County. It is also partly deliberately aspirational as this aligns with the intentions behind the North Wales Economic Ambition Board Growth Vision for North Wales from which the Growth Deal has been agreed by UK and Welsh Governments to support and fund infrastructure, projects and skills development all geared to improving economic activity, prosperity and well-being in a North Wales context. Whilst the objector considers the LDP housing provision to be "excessive" this is not characterized or explained in terms of either the harm this level of housing provision would result in, or by how much it is in 'excess', save for a reference to the low level Welsh Government 2011 based projections. In doing this the objector fails to recognize ministerial advice provided in 2014 which is still in place, that advised Local Authorities not to simply

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			Flintshire, mainly in the Deeside Enterprise Zone. Whilst there are high aspirations to create large number of jobs there is little track record at the moment of these being created despite the advantageous offerings within the Enterprise Zone The LDP allows for a contingency of 14.4% beyond the housing need. Whilst 6950 houses are needed in the LDP, Flintshire is looking to provide planning permission for 7950. This contingency of simply adding 1000 properties to the housing need does not appear a very sound scientific approach. We would have thought a figure could be estimated based on previous experience in the Flintshire area. Other North Wales Planning Authorities LDPs have included a contingency of only 10%. In Flintshire there have been 1691 completions in the first three years of the plan (563 per year). The planning authority has identified 1771 commitments as of 1/4/2018 and has 'conservatively' allowed for 1320 new roproperties in small sites and windfalls. These figures should now be updated, but should give Flintshire CC confidence of being able to achieve it		project negative recessionary trend period's forward in terms of planning for future growth. The objector refers to a misalignment with the housing identified in the draft National Development Framework and apportions this out across all North Wales Authorities and from this concludes that Flintshire's LDP requirement should be "scaled back". No explanation is given for this conclusion, or whether other North Wales Authorities should also scale back and the mechanism for doing this, and the objector also fails to acknowledge the difference between the LDP housing requirement figure and how it is derived, and the NDF figures which relate to housing need based on affordable shortfalls and which are therefore not directly comparable. Of most relevance is the fact that in their formal comments on the Deposit LDP the Welsh Government are satisfied that the LDP is in general conformity with the draft NDF. The objector refers to the unscientific nature of allowing for a contingency on top of the housing requirement figure, and feels that there should be enough certainty taking account of identified commitments and the allowances made for windfall and small sites, to negate the need for a high contingency level. The objector then however refers to other Authorities who have used 10% as a contingency level. The provision of a contingency is a requirement of the Welsh Government LDP Manual which refers to 10%

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					as a starting point. Even if the Council followed the 10% lead of other North Wales Authorities this would still add almost 700 units to the LDP housing requirement as a contingency, but where for some of those authorities the level of contingency used has not been sufficient to ensure either delivery of sufficient sites or the maintenance of a 5 year land supply, post LDP adoption. It is the Council's view that the level of contingency allowed for is balanced and proportionate to help facilitate the delivery of sufficient homes to meet the plan's housing requirement figure.
583	STR1: Strategic Growth	Object	The policy is headed "Strategic Growth" and indicates that 7950 new homes will be provided to meet the requirement of 6950. In considering the appropriateness of the 6950 requirement set out in the LDP, it is necessary to firstly examine how this figure has been arrived at. As part of the Council's earlier Preferred Strategy Consultation the figure of 6950 was derived from the Technical Paper headed "Population and Household Projections with Dwelling and Employment Impacts (Nov 2017)". Each of the Options in that document presented numbers in a range. The Preferred Option selected by the Council was for between 6550 and 7350 units. The Council therefore chose a midpoint between the two which gave them 6950 units (and they have then added a contingency). v) Proposed Change a) The figure of 7950 in policy STR1 for	a) The figure of 7950 in policy STR1 for housing need should be replaced by 11, 105 to take account of the past unmet need; or b) If past unmet need is not included the contingency figure needs to be increased to reflect past under delivery to 2500 giving a total requirement of 9850 units.	Not Accepted. In their formal comments on the deposit Plan Welsh Government state that they are "broadly supportive of the strategy, level of housing and jobs proposed, considers it [the plan] aligns with national policy and is in general conformity with the emerging NDF". The objector spends more time in the past referring to the UDP, than focusing on the main point of the Deposit LDP consultation which was to consider whether the plan as published is sound. The predominant purpose of the objection also seems to be based on defining the largest housing number possible without any evidential support or assessment of the sustainability and deliverability of the 11,105 homes proposed, or where the additional sustainable and deliverable sites are to provide the additional 4,000+ homes proposed. The objector incorrectly refers to the LDP growth options stating that each was presented as a range, when only the

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			housing need should be replaced by 11, 105 to take account of the past unmet need; or b) If past unmet need is not included the contingency figure needs to be increased to reflect past under delivery to 2500 giving a total requirement of 9850 units.		employment driven option 6 was a range, this being the product of an aspirational job growth being presented as a range from which the resulted housing need was derived. The objector states that they do not consider selecting a mid-point from option 6 projected housing growth is reasonable but don't explain why, other than the approach is not "ambitious enough". Instead they state that to be more ambitious the Council should have selected the upper end of the growth range, a measure of housing ambition just 400 greater that the selected mid-point figure. The key point ignored by the objector and as set out in the Plan is that the selection of a mid-point from option 6 was also informed by reference to growth option 4 which was a more traditional demographic projection derived option where the high variant level of migration used to derive option 4 and its resultant level of housing requirement, was in line with that derived at the mid-point of the range of housing requirement derived from option 6. This translates into a level of ambition that sets a challenging but achievable housing requirement, ensuring compliance with PPW in terms of sustainability and deliverability of the plans housing requirement, to the extent that a development plan can actually deliver the housing it provides, as endorsed by Welsh Government. The objector also ignores the fact that the chosen housing requirement figure is significantly in excess of the formal published Welsh Government Household

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					Projections both at the time that the growth options were derived (2011-Based WG Projections) and now where, with the recent publication of the 2018-based WG Projections, the differential from the projection household growth and the LDP requirement is now even greater. The figure proposed by the objector would in fact be over 4 times the official projected growth but no assessment of the impact of this excess of growth over need has been made by the objector. Following the objector's logic in relation to adding undelivered growth from a previous plan, it is a fact that the UDP requirement was based on the actual level of WG projected growth at the time, and given that the LDP requirement is well in excess of the present level of projected growth, if the projected need shortfall case is accepted (which the Council does not), then the LDP requirement has in effect 'mopped up' any previous under-provision, by setting a requirement that is far in excess of present projections. The main emphasis of the objector's case for a higher housing requirement figure is based on the premise that the LDP should not only make sufficient provision for the assessed need during its plan period (2015-2030) but should also look backwards and also account for under-delivered housing from the previous UDP plan period. The objector lays blame for an apparent under-deliver solely on the UDP for this but is silent on the role that the economic climate, actual level of demand

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					coming from potential house buyers, or the willingness, capacity or ability of developers to deliver new homes, as it is these factors that determine delivery as development plans do not deliver housing, rather they make sufficient provision for housing to come forward to meet the assessed requirement. Unhelpfully the objector does not direct the Council to the relevant passage in PPW, the Development Plans Manual or relevant guidance that sets out the concept of transposing under-provision from one plan period to another, or the mechanism for doing so. Equally there is no precedent with other LDPs in Wales for where this has been accepted. If the Council were to entertain the concept that under-delivery carry over should be considered then it is not clear from the objector's focus on just the last development plan, the UDP, why the concept should be time limited to just this plan. After all the objector states that it is a fundamental principle affecting soundness of the LDP that it should cater for un-delivered historical need, which therefore should not be limited to just the UDP as other plans historically may also have failed to deliver in the way the objector suggests for the UDP. Clearly the flaw in the argument is then how far back do you go to address 'historical need'? Also, extending the principle and the objector's logic, if the UDP had over-delivered housing in relation to the requirement in that plan, then presumably the objector would accept that the LDP assessed need would be reduced by the level of over-provision in the previous plan? Without reference to where in National guidance or

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					precedent it is accepted that the under-provision from a previous plan should be added to the requirement to the current plan under development, the Council does not see how this can be a soundness issue that challenges the strategy of the LDP. The objector refers to an old appeal decision to justify the principle of carrying over an alleged 'under-provision' but the Inspector in that decision does not say this. Instead the appeal at the time made was simply applying the principles in TAN1 of allowing speculative development, that Welsh Government now accept had adverse impacts on communities and the plan making process, resulting in the conclusion that this and other Councils have argued for some time, that TAN1 is no longer fit for purpose. This recognizes that the planning process was disadvantaged by the process facilitated by TAN1. The objector's simplistic exercise in arriving at a large housing number has no evidential basis to support its sustainability or deliverability and does not assess (other than land proposed by the objector in objections to HN11) what or where there are sufficient sustainable and deliverable sites to meet the radically increased proposed housing requirement, and in fact only offers in relation to objections to HN11 66 units (at Isa Farm, Mynydd Isa) towards the additional 4,155 units proposed, itself leaving a shortfall of 4,089 units to be found somehow, somewhere. This

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					does not appear to be either a sustainable or sound proposition to provide certainty of delivery for the LDP housing requirement. In order to deliver the level of housing proposed by the objector, the development industry fueled by consistent market demand would have to complete 740 new homes every year for the entire LDP plan period. By the objector's own analysis of build rates (564 units per annum), this is almost 200 or 31% higher than the average the industry has been able to achieve in the first 3 years of the LDP plan period, where there has been an unconstrained supply as evidenced by the level of commitments in the housing balance sheet supplemented by significant speculative permissions granted under TAN1. With the addition of completions data for 2018-19 the average rate of delivery in the first 4 years of the plan is now 536 dpa and whilst above the plan's annualized housing requirement, is in line with the actual level of provision in the plan of 530 dpa. The short term delivery trend 2015-19 also masks the fact that even in a period of market demand with developers bringing forward sites, there is significant variability in the actual annual delivery where the range of delivery has reached 600 in two of the four years, but in others has only achieved low to mid 400s. It is this variability in a rising market with land clearly available, that questions the ability to consistently year on year deliver housing completions at the rate suggested by the objector. Also in terms of growth ambition, the LDP is in conformity with the level of need and ambition contained

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					within the draft NDF, a fact supported by the Welsh Government in their comments on the LDP growth strategy. Providing housing at the levels suggested by the objector will be in direct conflict with the National Development Framework and also logically mean that if a higher level of growth is to be accepted for Flintshire than in the NDF, then this should also be applied to Wrexham which the NDF groups with Flintshire as the focus for future growth and development, as to otherwise treat the two contributor areas so differently would be unsustainable. There is no evidence from the objector or the industry to show how such a high level of housing delivery is either sustainable, needed, or deliverable throughout the LDP plan period. The objector has made reference to the LDP trajectory and the fact that in the last 2 years of the trajectory there may be a shortfall in housing provision of 1,389 units, quoting from paragraph 3.1.4 of LDP Background Paper 10, which means that the plan requirement should be increased and/or 'contingency sites' should be added to the plan to come forward later in the plan period. The Council do not accept these arguments and consider that the objector has mis-interpreted the correct position as set out in paragraph 3.1.4. This is not a correct quotation from the document as paragraph 3.1.4 actually states "while the trajectory currently shows a supply of less than five years in the last two years of the Plan period, this is not surprising as the Plan's

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					housing land supply will have largely been built out by the end of the Plan period and while the Plan's housing requirement will have been accommodated, to achieve a five year supply in the last two years of the Plan would necessitate the provision of land for some 1,389 additional dwellings beyond the plan period (based on extrapolating the Plan's average annual requirement of 436 [typo should be 463] dwellings pa for 3 years beyond the LDP period, as required in para. 5.2 of TAN 1)" [Council's emphasis in bold]. This is quite different from the objector's interpretation. The objector has also already acknowledged that the plan has over-delivered in the first four years of the plan period which would compensate for any later plan period shortfall in the trajectory, assuming that the plan goes all the way to its end date without review. There is a requirement to review the position with the plan four years after adoption, and as part of this that housing delivery will be monitored against the trajectory as part of the annual AMR process. Given the intention to delete TAN1 it is also not yet clear what mechanisms will be put in place that determine what variance over what period away from the trajectory would trigger action on the part of the Council.
605	STR1: Strategic Growth	Object	These proposals are disproportionate to any need for additional housing in the anticipated time-scale. The proposals DO NOTHING to REDUCE the effects of climate change. Given the flooding I see all round the county after a heavy	Remove allocations on greenfield land.	Not accepted. Whilst the objector references that the growth strategy of the plan is disproportionate to the need for additional housing, no indication is given as to what would be an appropriate level

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			rainfall, these plans do nothing to improve things. They do not recognise that open-space between existing settlements in the county is precious and must be preserved, as the highest priority. I am very concerned that the council thinks it is acceptable to build on open land which, would then lose its function as an “buffer”/ absorber and retainer of rain water. It makes no mention of the need to plant more trees. I would be very happy to see more woodland and forests in Flintshire. This plan should have marked on it reserved areas for tree-planting. I would like to see a tax (equal to VAT) when builders proposed to develop a “green” site for more than one dwelling. This would make big-building firms try harder to re-purpose existing built-up sites rather than take the easy route of taking away our green-spaces. This DLP will lead to increases in population and requirement for transport. This would have consequent strains on local infrastructure such as schools, transport * health-care. This plan contains nothing that would appeal to my grandchildren and therefore I can offer NO support for it.		of need to be met or any justification for this. The purpose of the deposit consultation was to allow the objector to view the plan and consider whether it represents a sound plan and if not, why it doesn’t and what is the alternative. In terms of the objector’s view that the plan is silent on climate change, they have clearly failed to note the strategic and policy framework within the plan that deals with climate change, flood risk, and environmental protection. These are found for example in policies STR13 Natural and Built Environment, Green Networks and Infrastructure, STR14 Climate Change and Environmental Protection or detailed policies that include EN2 Green Infrastructure, EN6 Sites of Biodiversity Importance, EN7 Development Affecting Trees, Woodland and Hedgerows, or EN14 Flood Risk. Such requirements have influenced the strategy of the plan and location of proposed development, as well as form policies to control how development takes place in relation to them. The Council have sought to develop a sustainable strategy avoiding unprotected areas at risk of flooding in line with national guidance and policy. The Council has also involved Natural Resources Wales as a statutory consultee in the plan making process and NRW do not object to the overall strategy of the plan or locations for housing development. Where growth is required, the most logical and sustainable way to plan for this is the sustainable expansion of existing settlements and the plan’s settlement hierarchy identifies the most suitable and sustainable locations in terms of supporting

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					services, facilities and infrastructure. If the Council had been able to identify suitable and sequentially preferable brown field site opportunities to locate housing development then it would have promoted such sites first. The fact that it hasn't confirms the point that whilst brown field land exists in parts of the County it is mainly found around Deeside and the developed coast where flood risk and the separation of employment land from the main settlement hierarchy forms a predominant constraint to the sustainable location of residential development, and where if the Council had followed such a strategy would have been in direct conflict with the objectors concern about flood risk. Wherever development takes place, developers are required by the policies set out earlier to mitigate and accommodate the impacts of development through developer obligations and contributions that seek to integrate new development into communities by ensuring that the infrastructure is there or is improved to accommodate the new development and population. Typically this includes contributions to the provision of open space, play space, highway improvements, affordable housing, sustainable urban drainage systems, green infrastructure and school places which can be both direct provision and/or the payment of substantial sums to facilitate delivery. Notwithstanding the objector's view that the plan offers little to future generations, it cannot as inferred by the objector simply plan for or accommodate the needs of the present alone or maintain a status quo with no

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					change, as guided by the Well-Being of Future Generations Act it has to take a longer term and more positive view of the needs of future generations.
637	STR1: Strategic Growth	Object	TW has concerns over the lack of consistency between the proposed housing requirement and Flintshire's economic growth targets. TW considers that the Council as a minimum should be planning for the upper end of the housing requirement. This would increase the housing requirement to 7,350 rather than 6,950; and a flexibility allowance should be added to this higher figure. This would derive a housing figure of 8,410 for the Plan period. That said, TW considers that the housing requirement should be significantly higher based on an alignment with an economic aspiration aligning with the growth objectives of the Welsh Assembly The principle of Flintshire County Council's approach to aligning housing need with economic growth targets and providing a 14.4% uplift to allow for flexibility and uncertainty in the housing land supply is welcomed. However, TW is concerned that a target of 463 dpa remains well below the level that is necessary to support and align with economic growth aspirations of Flintshire and the wider North Wales region. TW therefore considers that at the very least, a housing target at the top of the Council's OAHN range for Option 6, 590 dwellings,	In order to address the conflict detailed above, and ensure that the policy is sound, TW requests that the Council: 1 Plans for a longer plan period and ensures that the FLDP, when adopted, covers at least a 15-year plan period (ideally 20-years) to ensure longevity and, to provide certainty to the development industry. 2 Increases its housing requirement above the upper end of its objectively assessed housing need (using this upper end figure as a starting point) to deliver aspirational levels of housing and employment to align with national policy. 3 Review commuting	Not Accepted. In their formal comments on the Deposit LDP the Welsh Government have stated that they are "generally supportive of the spatial strategy and level of homes and jobs proposed and have no fundamental concerns in this respect". Welsh Government also state that they consider "it [the plan] aligns with national policy and is in general conformity with the emerging NDF". Given this, the Council is unclear as to where the objector is drawing their central point of objection from when they state on a number of occasions that the LDP is out of alignment with the growth objectives of Welsh Government. It would have been helpful if the objector had either said what these growth aspirations were, quantified how the LDP is at odds with them, or at least provided the reference point to Welsh Government policy or guidance for the Council to better understand the point being made. Whilst the objector has also provided a separate 'technical paper' to assess the growth options considered at an earlier stage in the plan process, whilst the paper is more of a narrative than technical exercise, the time to have commented on those options was at the Preferred Strategy stage in November 2017. The clear focus of the Deposit LDP stage was to seek views on the soundness of the plan as published and this serves to characterize a thread that runs throughout the objection

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			plus an uplift of at least 14%, would be the minimum that the Council should plan for. This would equate to a housing target of 560dpa; and better align with the delivery rates that the Council are currently sustaining. As required by PPW10, the Council has assessed alternative options relating to the housing requirement, but TW does not consider that the Council has been suitably aspirational in its approach TW would suggest that the Council maintains the commuting rate constant at 40% for the purposes of planning for housing and not seek to artificially supress the housing Plan's figure by virtue of a metric that it simply cannot control. This is likely to increase the housing requirement significantly. TW has concerns regarding the proposed plan period and notes that on adoption of the FLDP, it will be backdated to 2015. TW considers that the Council should adopt a much longer plan period. Assuming an adoption in 2021 at the very earliest, this will only effectively cover a 9- year period until 2030. TW considers that it would be more appropriate to look forward to a 15-year or 20-year plan period post adoption to provide more long-term certainty and ensure the longevity of the Plan.	patterns to reflect the current position (40%) and to factor this into the housing requirement	which relates to an attempt to 're-open' the opportunities for Taylor Wimpey to engage in the plan process now, to compensate for their inability to do so at the appropriate time earlier in the process. Notwithstanding this a separate rebuttal statement has been prepared by the Council to the technical note submitted by Lichfields on behalf of Taylor Wimpey and Redrow. The objector has concerns about a lack of consistency between the proposed housing requirement and the economic growth target but whilst they state their support in principle for a job growth led strategy they contradict this by stating that "housing is a driver for economic growth", which is perhaps not unsurprising from the perspective of a housing developer. The premise of the LDP strategy from the outset has been to not allow housing alone to dominate the approach of the plan, but rather to recognize its importance as part of the infrastructure necessary to support economic activity, wealth generation and well-being. They also fail to recognise that the processes for arriving at the plan's housing requirement and aspirational job figure are very different. In essence housing requirements are driven by reference to formally published national projections of household change whereas there are no similar projections at the national level of expected or anticipated job growth in each local authority area. This is why it is acceptable to have a broad portfolio of available employment land to facilitate job

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					growth, but where the housing sites to deliver the requirement must be clearly identified along with evidence of their deliverability. There is also no direct formulaic relationship that the Council is aware of between housing requirements and levels of job growth sought in development plans. The objector goes on to reference that this creates a mis-match with Welsh Government growth ambition but does not elaborate on this and as stated earlier, is at odds with the Welsh Government's own view of the growth levels in the LDP, and alignment with national policy and emerging NDF. The objector's view is that the Council are not being ambitious enough with their housing requirement but the only quantification of this lack of ambition is their view that the base requirement should be 400 units higher. The Council does not understand how 400 more units spread over the 15 year plan period represents such a step change in ambition. Given the objector considers that the requirement could be slightly higher, it also follows that at the level set in the Deposit LDP, there is no dispute that the requirement cannot be delivered. This means that a core aim of PPW is met and as such the requirement as set out in the LDP cannot be unsound, although it is not clear how a much higher requirement would be. The objector states several times that they feel the requirement should be "significantly higher" but on each occasion they fail to set out what such a significantly higher figure should be. This is unhelpful both to their case and for the Council to try to understand their stance.

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					The objector makes reference to the past ten year economic cycle as being recession driven and states there is also no certainty as to the effects of Brexit. In doing so however, they criticize the Council for referencing uncertainty about a post-brexit future which they say is "unjustified and unnecessary". This is naive as all the Council are doing is reflecting a national uncertainty and is part of the approach the Council has taken to balance its LDP strategy to enable realistically deliverable levels of growth both housing and jobs, without allowing one element of growth to dominate or run ahead of economic realities or actual levels of demand, that has yet to materialize. The LDP strategy is in broad alignment with the emerging NDF which is also confirmed in the formal comments of Welsh Government, and the plan seeks to support the emerging Growth Deal for North Wales which is at an early stage of inception prior to implementation. Whilst the Growth Deal has 20 year job growth aspirations, it does not specify housing provision. Nor is there any Strategic Development Plan context yet developed in a North Wales context to drive issues like housing apportionment or longer term planning timeframes as advocated by the objector for the LDP. The objector makes reference to the need to maintain previous high levels of commuting rates (40%) as opposed to the assumptions made as part of developing the LDP growth

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					options. To support this they state that the Council are assuming that higher levels of job growth can be sustained from the same population but they have failed to recognise that in order to achieve the level of housing growth set out in the plan, net migration into the County will need to be encouraged at consistently high levels. This is the step change in attracting 'new' people into the county to sustain job growth and improve internal self-sufficiency within the economy that the strategic growth is based on, thereby reducing the dependency on commuting out of the County. If the levels of migration do not materialize then the level of housing required would be much lower, as indicated by the low levels of household growth shown in the recently published Welsh Government 2018 Based National Projections.(REFER TO JANINE RE COMMUTING ASSUMPTION). The objector also criticizes the Council for setting a 15 year plan period housing requirement which aims to provide an average of 463 dwellings per annum, when the short term three year delivery rate at the start of the plan period is higher at 564 dwellings per annum. On the basis of this short term trend they advocate that this should be the delivery level throughout the 15 years (and longer as their preference) of the plan period. This fails to acknowledge the fact that the long term delivery trend over the last ten years is 448 dwelling per annum, a period during which the UDP was adopted and its sites were available

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					for development. It also fails to reflect updated information from the 2019 land supply statement that shows that completions on 2018-19 were 454, thereby reducing the average delivery during the plan period to date from 564 to 536. The objector states that if the Council can deliver these higher rates in the short term, then they can throughout the plan. This ignores the fact that the Plan does not deliver housing directly it simply makes adequate provision for the development of the number of homes set out in the housing requirement figure. It is the interaction of developer intentions, developer capacity, and market demand that create the conditions for delivery. With reference to the first four years of the plan period, whilst average level of delivery is 536 units p.a., this masks a significant degree of variability in the year on year delivery despite there being a rising housing market and available development land. In years 1 and 3 of the plan period completions exceeded 600 per annum but in the other years only reached low to mid 400s. This variability alongside the reducing delivery average questions the ability to sustain higher delivery rates consistently throughout the plan period and there is no evidence to show that this can be done. The delivery rate of 536 dpa is also in line with the plan's average level of provision for housing at 530 dpa. The objector also considers that the plan period should be significantly extended to between 15 and 20 years beyond the adoption

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					date of the plan, which at its maximum would provide for a 25 year plan period. The Council is not aware of any other LDP in Wales that has such a plan period or, in relation to the Flintshire LDP how it would be realistic or practical to plan with any certainty over such a long timeframe, given also the need to provide certainty to communities and to demonstrate the deliverability of the plan, which is challenging enough to evidence over 15 years let alone 25.
738	STR1: Strategic Growth	Object	Policy STR1: Strategic Growth Policy STR1 maintains the previous position set out in the Preferred Strategy, planning for a housing requirement of 6,950 homes up to 2030. However, unlike the Preferred Strategy, the LDP is proposing a flexibility factor of 14.4%, identifying land with the ability to deliver a claimed 7,950 homes during the LDP period. Our Client welcomes the inclusion of a flexibility factor in excess of 10% which was originally proposed in the Preferred Strategy. We comment on the sources of supply to meet this minimum requirement later in this Representation. On review of Policy STR1, we would request that part iii) be amended to include the word “minimum” before “housing” – the housing requirement should be treated as a minimum figure. Indeed, the Council itself is accepting that an over-provision of housing can be accommodated in the County by	On review of Policy STR1, we would request that part iii) be amended to include the word “minimum” before “housing” – the housing requirement should be treated as a minimum figure. Indeed, the Council itself is accepting that an over-provision of housing can be accommodated in the County by identifying sources of supply for an additional 1,000 homes.	Not accepted . The objector provides a lengthy narrative to support their representation much of which repeats the Deposit LDP and/or PPW. Within this the objector has a number of linked concerns relating to the strategic approach to growth in the LDP. The first of these relates to the plan period and the timing of the proposed adoption of the LDP, leaving 9 years of the plan period post adoption. Whilst the objector refers to there being a ‘policy vacuum’ for some time, it is not clear what is meant by this as the UDP whilst expired is still in line with many areas of PPW and is the starting point for making decisions on applications; PPW itself is national planning policy, along with the TANs that support it. Notwithstanding this they advocate extending the LDP plan period to 2034, and also imply it should look retrospectively as far back as 2000 to address unmet housing needs. They are in effect advocating a 34 year plan period but provide no evidential basis to explain or justify how this

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			identifying sources of supply for an additional 1,000 homes.		is sustainable, what growth levels are deliverable during this period and where the sites are that would be needed to address this lengthy plan period. There is also the problem of looking too far into the future from the perspective that it becomes more difficult via the housing trajectory to predict what will happen on development sites in the future. It is the Council's view that the plan period should remain as defined and the plan be examined on this basis, particularly in the context of housing delivery where, as the objector themselves acknowledge, the plan has so far delivered housing at or slightly above the rate planned for. The annual monitoring of the plan and the plan review process within the Regulations are the means to assess the performance of the plan and the need to update it, and the Council is bound by both of these requirements. The objector also feels the vision statement of the plan should be far more detailed but that would be counter intuitive to the normal purpose of a vision statement which in a short passage is intended to capture the essence of the plan's approach. It is the strategic objectives that provide the more detailed expression of the vision and set out the key policy strands from which the Council has developed the strategic and detailed policies in the plan. The objector's general support for all 19 objectives is duly noted with the exception of the point made in relation to objective 11 which relates to housing provision, where the

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					objector requests the addition of the word 'minimum' before 'housing needs'. This is confusing and not fully explained and implies to the Council that the objector is advocating only meeting the lowest or 'minimum' needs, which are expressed in the low level Welsh Government household growth projections. The Council has already explained why it has significantly varied from these projections in its background paper, supported by Ministerial advice provided in 2014 which is still relevant. The objector refers back to the UDP period and speculates that there is "probably" a shortfall in provision of housing from that plan, that the Council should calculate what this was, and that this should be added to the requirement for the LDP period to compensate for under-delivery. With respect it is for the objector to evidence this if they feel it is of relevance. Also the objector refers to the UDP failing to deliver houses, but it is the role of any development plan to make sufficient provision (through sites) for the housing requirement to be met. The mechanism for how housing is provided relies on the interaction with the market including the prevailing economic conditions, the capacity of developers to build, and the level of demand coming from potential buyers. The objector refers to the average level of provision in the first three years of the plan as evidence of strong demand, but with the benefit of a fourth year of completions in 2019,

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					it is evident that the average completion rate has reduced to 536 per annum. What the objector has also failed to recognise is that within this average there is significant variability in annual delivery, as whilst completions exceeded 600 for two of the four years, in the others they were low to mid 400s. This significant level of variability is at a time when there are sufficient deliverable commitments available, supplemented by speculative schemes that have consent, and illustrate the Council's concern of not seeking to set an unachievable housing requirement where consistently high delivery rates cannot be achieved and maintained by the development industry. The objector fails to recognize that the average level of overall provision made by the plan is 530 dpa which is directly in line with the up to date delivery rate. The only evidential basis the objector provides for increasing the LDP housing requirement is to raise it by 400 units to 7,350 which is the upper end of the growth option 6 range. Given the point already made about completions in the first four years, this has already been more than recovered by those completion rates, over and above the average planned level for the whole of the LDP period. The objector's point about adding an unspecified UDP 'shortfall' is not well made or supported by evidence of what the shortfall is or how and from where enough additional sites would be found, save of course for the land being promoted in Penyffordd, which on its

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					own would not significantly address the 400 unit increase advocated by the objector, let alone the addition of a more substantial apparent UDP shortfall. It is therefore difficult for the Council to understand the alleged failings of the plan at the strategic level from the case being made. The objector has also failed to reflect that the UDP and LDP time periods are separate time periods and do not overlap, and where the calculation of housing requirement was based on the prevailing circumstances at the time and supporting evidence base. The Welsh Government projected levels of household growth are also very different, with the housing requirement of the UDP based solely on the level of projected household growth at the time (converted into a dwelling need), whereas the projected growth during the LDP plan period is only around 36% of the LDP housing requirement when compared to the latest published 2018 based Household Projections. Even if the Council were to accept the principle of transposing an apparent under-provision of housing from a previous plan and adding it to the planned provision in the new plan, which it does not, the degree to which the LDP housing requirement exceeds the Welsh Government Projected growth could be argued to more than compensate for any such shortfall. The objector advocates a plan period being extended to 2034 but only proposes the addition of 400 units to the housing requirement to address the additional housing

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					that would be required during this extended plan period. Extending the current planned requirement in the LDP of 463 units per annum for another 4 years would mean that there would be an additional requirement for 1,852 more homes that presently allocated, but apart from a relatively small site in Penyffordd, the objector offers no evidence or alternative proposals to show how this extended plan period requirement could be met from sustainable deliverable sites, or how this could be accommodated within the LDP housing trajectory. There is therefore nothing for the Council to assess or compare to show how such a proposal is in any way a sound proposition over and above the position it presents and justifies via the deposit plan. The Welsh Government have not objected to the Council's housing trajectory as part of their formal comments on the deposit LDP and are satisfied that the trajectory is compliant with the guidance in the LDP Manual edition 3. Whilst the objector expresses concern about reliance on commitments in the early part of the trajectory this is sensible and logical as these are the sites within the LDP balance sheet that are the commitments that already have permission and do not have to await the adoption of the LDP to come forward. It is also this assessed pool of commitments that has provided for the delivery rates supported by the objector in the early years of the plan period, and as per the Preferred Strategy of the plan it is right that this land bank of

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					permitted sites makes an appropriate commitment to the LDP housing requirement. The objector also fails to recognize that a number of the sites allocated in the plan also already have planning consent and are already contributing units to the LDP supply and/or are capable of early delivery. That said it is also a false assumption made by the objector that the level of commitments and early years delivery rates are predominantly 'propped up' by speculative sites granted on appeal as there is little evidence to sustain this, and none presented by the objector. Indeed it is also the case that where inappropriate speculative sites have come forward they have been refused. The objector is concerned about deviation away from the housing trajectory in the second half of the plan period but doesn't provide any evidence to quantify by how much this deviation would be or which are the sites they feel will not come forward. It is therefore difficult to give any weight to the point being made and clearly from the recent consultation by Welsh Government on the Future of Housing Delivery via the Planning System the old mechanism of monitoring land supply via TAN1 is to be deleted and replaced by monitoring against the housing Trajectory. Whilst Welsh Government have not yet said what the mechanisms or actions would be if delivery varied significantly away from the trajectory, clearly the plan's monitoring framework and requirement to produce an AMR will ensure this is closely monitored. In

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					terms of the point made by the objector about the potential for recent large speculative windfalls to skew the assumptions made for windfall supply in the LDP balance sheet, the Council has accounted for this by reviewing the windfall trends over an 18 year period and by reducing the allowance by 50% of that trend, also in the knowledge that in terms of the more recent trend years, speculative sites have not contributed more than 50% of the overall windfall provision. Whilst the objector is concerned about the future supply of windfall sites even at the modest levels proposed, which they support, they have failed to note the findings of the Urban Capacity Study carried out to support the balance sheet and specifically the setting of the windfall and small sites allowance in the LDP. This shows a reasonable and healthy potential supply within existing settlements to support the allowances made.
742	STR1: Strategic Growth	Object	In response to the housing trajectory, our Client has the following observations: Ø There is a significant reliance on existing commitments during the period 2018-19 to 2021-22. It will be imperative that these commitments deliver if the Council is going to be able to demonstrate a five-year supply post-adoption, particularly given that no significant housing contribution is expected from allocated sites until 2021-22. It would be prudent, supported by evidence, to ensure that enough of the proposed site allocations are capable of early delivery during the	Ø There is a significant reliance on existing commitments during the period 2018-19 to 2021-22. It will be imperative that these commitments deliver if the Council is going to be able to demonstrate a five-year supply post-adoption, particularly given that	Not accepted . The objector provides a lengthy narrative to support their representation much of which repeats the Deposit LDP and/or PPW. Within this the objector has a number of linked concerns relating to the strategic approach to growth in the LDP. The first of these relates to the plan period and the timing of the proposed adoption of the LDP, leaving 9 years of the plan period post adoption. Whilst the objector refers to there being a 'policy vacuum' for some time, it is not clear what is meant by this as the UDP whilst expired is still in line with

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			Plan period; Ø For the period 2023-24 onwards, the housing trajectory is heavily reliant on allocated and windfall sites in order for delivery to remain above the annual LDP requirement. However, given the lack of brownfield land availability in the County (as part of the justification for the release of greenfield sites), our Client is concerned that delivery could slip beyond the Council's estimations during the second half of the LDP period. It should be noted that historic windfall trends have taken account of the fact that speculative housing applications on greenfield sites have been granted planning permission in the absence of a five-year housing land supply.	no significant housing contribution is expected from allocated sites until 2021-22. It would be prudent, supported by evidence, to ensure that enough of the proposed site allocations are capable of early delivery during the Plan period; Ø For the period 2023-24 onwards, the housing trajectory is heavily reliant on allocated and windfall sites in order for delivery to remain above the annual LDP requirement. However, given the lack of brownfield land availability in the County (as part of the justification for the release of greenfield sites), our Client is concerned that delivery could slip beyond the Council's estimations during the	many areas of PPW and is the starting point for making decisions on applications; PPW itself is national planning policy, along with the TANs that support it. Notwithstanding this they advocate extending the LDP plan period to 2034, and also imply it should look retrospectively as far back as 2000 to address unmet housing needs. They are in effect advocating a 34 year plan period but provide no evidential basis to explain or justify how this is sustainable, what growth levels are deliverable during this period and where the sites are that would be needed to address this lengthy plan period. There is also the problem of looking too far into the future from the perspective that it becomes more difficult via the housing trajectory to predict what will happen on development sites in the future. It is the Council's view that the plan period should remain as defined and the plan be examined on this basis, particularly in the context of housing delivery where, as the objector themselves acknowledge, the plan has so far delivered housing at or slightly above the rate planned for. The annual monitoring of the plan and the plan review process within the Regulations are the means to assess the performance of the plan and the need to update it, and the Council is bound by both of these requirements. The objector also feels the vision statement of the plan should be far more detailed but that would be counter intuitive to the normal purpose of a vision statement which in a short

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				second half of the LDP period. It should be noted that historic windfall trends have taken account of the fact that speculative housing applications on greenfield sites have been granted planning permission in the absence of a five-year housing land supply.	passage is intended to capture the essence of the plan's approach. It is the strategic objectives that provide the more detailed expression of the vision and set out the key policy strands from which the Council has developed the strategic and detailed policies in the plan. The objector's general support for all 19 objectives is duly noted with the exception of the point made in relation to objective 11 which relates to housing provision, where the objector requests the addition of the word 'minimum' before 'housing needs'. This is confusing and not fully explained and implies to the Council that the objector is advocating only meeting the lowest or 'minimum' needs, which are expressed in the low level Welsh Government household growth projections. The Council has already explained why it has significantly varied from these projections in its background paper, supported by Ministerial advice provided in 2014 which is still relevant. The objector refers back to the UDP period and speculates that there is "probably" a shortfall in provision of housing from that plan, that the Council should calculate what this was, and that this should be added to the requirement for the LDP period to compensate for under-delivery. With respect it is for the objector to evidence this if they feel it is of relevance. Also the objector refers to the UDP failing to deliver houses, but it is the role of any development plan to make sufficient provision (through sites) for the housing requirement to be met. The mechanism for

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					how housing is provided relies on the interaction with the market including the prevailing economic conditions, the capacity of developers to build, and the level of demand coming from potential buyers. The objector refers to the average level of provision in the first three years of the plan as evidence of strong demand, but with the benefit of a fourth year of completions in 2019, it is evident that the average completion rate has reduced to 536 per annum. What the objector has also failed to recognise is that within this average there is significant variability in annual delivery, as whilst completions exceeded 600 for two of the four years, in the others they were low to mid 400s. This significant level of variability is at a time when there are sufficient deliverable commitments available, supplemented by speculative schemes that have consent, and illustrate the Council's concern of not seeking to set an unachievable housing requirement where consistently high delivery rates cannot be achieved and maintained by the development industry. The objector fails to recognize that the average level of overall provision made by the plan is 530 dpa which is directly in line with the up to date delivery rate. The only evidential basis the objector provides for increasing the LDP housing requirement is to raise it by 400 units to 7,350 which is the upper end of the growth option 6 range. Given the point already made about completions in the first four years, this has already been more

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					than recovered by those completion rates, over and above the average planned level for the whole of the LDP period. The objector's point about adding an unspecified UDP 'shortfall' is not well made or supported by evidence of what the shortfall is or how and from where enough additional sites would be found, save of course for the land being promoted in Penyffordd, which on its own would not significantly address the 400 unit increase advocated by the objector, let alone the addition of a more substantial apparent UDP shortfall. It is therefore difficult for the Council to understand the alleged failings of the plan at the strategic level from the case being made. The objector has also failed to reflect that the UDP and LDP time periods are separate time periods and do not overlap, and where the calculation of housing requirement was based on the prevailing circumstances at the time and supporting evidence base. The Welsh Government projected levels of household growth are also very different, with the housing requirement of the UDP based solely on the level of projected household growth at the time (converted into a dwelling need), whereas the projected growth during the LDP plan period is only around 36% of the LDP housing requirement when compared to the latest published 2018 based Household Projections. Even if the Council were to accept the principle of transposing an apparent under-provision of housing from a previous plan and adding it to the planned

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					provision in the new plan, which it does not, the degree to which the LDP housing requirement exceeds the Welsh Government Projected growth could be argued to more than compensate for any such shortfall. The objector advocates a plan period being extended to 2034 but only proposes the addition of 400 units to the housing requirement to address the additional housing that would be required during this extended plan period. Extending the current planned requirement in the LDP of 463 units per annum for another 4 years would mean that there would be an additional requirement for 1,852 more homes that presently allocated, but apart from a relatively small site in Penyffordd, the objector offers no evidence or alternative proposals to show how this extended plan period requirement could be met from sustainable deliverable sites, or how this could be accommodated within the LDP housing trajectory. There is therefore nothing for the Council to assess or compare to show how such a proposal is in any way a sound proposition over and above the position it presents and justifies via the deposit plan. The Welsh Government have not objected to the Council's housing trajectory as part of their formal comments on the deposit LDP and are satisfied that the trajectory is compliant with the guidance in the LDP Manual edition 3. Whilst the objector expresses concern about reliance on commitments in the early part of

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					the trajectory this is sensible and logical as these are the sites within the LDP balance sheet that are the commitments that already have permission and do not have to await the adoption of the LDP to come forward. It is also this assessed pool of commitments that has provided for the delivery rates supported by the objector in the early years of the plan period, and as per the Preferred Strategy of the plan it is right that this land bank of permitted sites makes an appropriate commitment to the LDP housing requirement. The objector also fails to recognize that a number of the sites allocated in the plan also already have planning consent and are already contributing units to the LDP supply and/or are capable of early delivery. That said it is also a false assumption made by the objector that the level of commitments and early years delivery rates are predominantly 'propped up' by speculative sites granted on appeal as there is little evidence to sustain this, and none presented by the objector. Indeed it is also the case that where inappropriate speculative sites have come forward they have been refused. The objector is concerned about deviation away from the housing trajectory in the second half of the plan period but doesn't provide any evidence to quantify by how much this deviation would be or which are the sites they feel will not come forward. It is therefore difficult to give any weight to the point being made and clearly from the recent consultation by Welsh Government on the Future of

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					Housing Delivery via the Planning System the old mechanism of monitoring land supply via TAN1 is to be deleted and replaced by monitoring against the housing Trajectory. Whilst Welsh Government have not yet said what the mechanisms or actions would be if delivery varied significantly away from the trajectory, clearly the plan's monitoring framework and requirement to produce an AMR will ensure this is closely monitored. In terms of the point made by the objector about the potential for recent large speculative windfalls to skew the assumptions made for windfall supply in the LDP balance sheet, the Council has accounted for this by reviewing the windfall trends over an 18 year period and by reducing the allowance by 50% of that trend, also in the knowledge that in terms of the more recent trend years, speculative sites have not contributed more than 50% of the overall windfall provision. Whilst the objector is concerned about the future supply of windfall sites even at the modest levels proposed, which they support, they have failed to note the findings of the Urban Capacity Study carried out to support the balance sheet and specifically the setting of the windfall and small sites allowance in the LDP. This shows a reasonable and healthy potential supply within existing settlements to support the allowances made.
761	STR1: Strategic Growth	Object	Higher Kinnerton is a desirable place to live and as a result its properties are sought-after and house prices are high, relative to Flintshire generally. The	Finally, as the Warren Hall development is included in the LDP, the Community Council	Not accepted. Although the Community Council have submitted a representation in relation to policy

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			"village feel" and attractive rural setting are both important appealing features. So too are its proximity to good transport links to Chester and other local employment centres and the good reputation of the village school, Ysgol Derwen. The village's desirability has unsurprisingly attracted developers. Recent notable developments have been "Babylon Fields" (approx. 30 houses) which commenced in 2012 and "Kinnerton Meadows" which is currently ongoing and will total 56 new homes. In addition, it is envisaged that the nearby Warren Hall mixed-use development will include a significant residential element of up to 300 houses. The Community Council and the village community itself recognise the need for new housing in the county and accept that Higher Kinnerton may accommodate some of this growth over the life of the LDP. However, the community feels that development should not come at the cost of a continuing decline in local infrastructure (road, transport, access to health provision, education) and local village amenities (post office, shops, pubs). These vital services have not kept pace with the growth of the community. The recent design of residential developments has also contributed to the growth and reliance of residents' use of their cars as the main means of transport and has added to parking problems within the village. This problem has been	consider that the case for further development within the current village boundary is substantially weakened and should not be supported.	STR1 and the growth strategy of the LDP, it is not clear from the representation whether and on what basis they are either objecting to, or supporting this aspect of the plan?

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			recognised nationally in a recent project document (Transport for New Homes 2018). The community would welcome the opportunity to influence positively the type and form of new development going forward, including Warren Hall, maximising the benefits of development while mitigating any negative impacts on the existing community as far as possible. Finally, as the Warren Hall development is included in the LDP, the Community Council consider that the case for further development within the current village boundary is substantially weakened and should not be supported.		
787	STR1: Strategic Growth	Object	TESTS OF SOUNDNESS 9.1. This Section of the Representation goes on to consider the three tests of "soundness" to which plan-making should accord, as set out within the LDPM. Test 1: Does the Plan fit? 9.2. For the reasons set out in this Representation, our Client is concerned that the Deposit Plan evidence base is lacking in detail in terms of whether it is planning to address any housing shortfall from the UDP period, whilst continuing to place reliance on some previous UDP housing allocations which have	he housing requirement should take account of the identified affordability needs across the County as set out in the LHMA such that they are provided for in full during the LDP period; Ø Any historic housing delivery shortfall from the UDP period should be planned for and met during the LDP period; this would justify a housing requirement of at least	Not accepted. Each of objectors points are addressed in turn: Test 1: The objector appears to have misunderstood Test 1 which is to do with whether the LDP is onsist4ent with other Plans. The objector questions the Council's view that there is no reference in PPW to the requirement for unmet need from a previous plan period to be added on to the new plan period, but then fail to actually point out where this is. They also fail to explain why it is sufficient to go back to just the previous plan, when following the logic put forward of the legitimacy of addressing historical under-delivery, there are any number

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			historically failed to come forward and deliver as expected. Test 2: Is the Plan appropriate? The housing requirement should take account of the identified affordability needs across the County as set out in the LHMA such that they are provided for in full during the LDP period; Any historic housing delivery shortfall from the UDP period should be planned for and met during the LDP period; this would justify a housing requirement of at least 7,350 dwellings as per the upper figure set out under Option 6 of the Preferred Strategy Growth Options; Test 3: Will the Plan deliver? The proposed housing allocations contain two sites which were previous allocations in the UDP, and which have failed to come forward. There is no evidence to offer any certainty that they will come forward in the future. Accordingly,	7,350 dwellings as per the upper figure set out under Option 6 of the Preferred Strategy Growth Options; Test 3: Will the Plan deliver? Ø The proposed housing allocations contain two sites which were previous allocations in the UDP, and which have failed to come forward. There is no evidence to offer any certainty that they will come forward in the future. Accordingly, our Client is concerned that by continuing to rely on these sites and extant commitments in the short-term (given the timescales for delivery of the larger allocations), the Council may be unable	of other earlier plans that may also have failed to 'deliver'. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP as advocated by the objector. The Plans approach is sound and there is no objection from Welsh Government in this respect. The Well Street The site was allocated in the UDP and it is accepted that the site owners, Welsh Government, have been slow to release the site to the market. However, the site has no technical or other constraints which would prevent it from coming forward and is in a sustainable location on the edge of a Main Service Centre. The sale of the site to a housing association is nearing completion and that housing association has commissioned the necessary background work to submit a

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			our Client is concerned that by continuing to rely on these sites and extant commitments in the short-term (given the timescales for delivery of the larger allocations), the Council may be unable to demonstrate a five-year housing land supply given the lack of any smaller site allocations in the Sustainable Villages which would be capable of early delivery; The role of the Tier 3: Sustainable Villages in the settlement hierarchy is being overlooked, with only two allocations across 22 settlements. The spatial strategy needs to be reviewed, with more housing directed towards the Sustainable Villages in line with the Preferred Strategy. A minimum of 20% of future housing growth should be directed/split amongst the 22 Sustainable Villages as opposed to the 14% which is currently proposed. The Council's housing requirement is not proposing to meet all of the identified affordable need set out within the LHMA. Our Client considers that the LDP should be planning to meet	to demonstrate a five-year housing land supply given the lack of any smaller site allocations in the Sustainable Villages which would be capable of early delivery; Ø The role of the Tier 3: Sustainable Villages in the settlement hierarchy is being overlooked, with only two allocations across 22 settlements. Ø The spatial strategy needs to be reviewed, with more housing directed towards the Sustainable Villages in line with the Preferred Strategy. A minimum of 20% of future housing growth should be directed/split amongst the 22 Sustainable Villages as	planning application for a market / affordable housing development as soon as possible. In view of this recent change in circumstances the site is considered to be viable and deliverable. Given that the site is already within the settlement boundary and is allocated in the adopted UDP, a planning application need not await adoption of the LDP. The allocation is considered to be sound and is justifiably allocated in the Plan. The site was allocated in the UDP and whilst it is acknowledged that the site owners have been slow to release the site there are no physical constraints to the development of the site and as part of the preparation of the Plan, discussions were held with the landowner and agent and the need for the site to be available for development was stressed if it is to be allocated in the LDP. The owners responded by undertaking background studies and confirmed that the site is genuinely available for development. Since the Plan was placed on Deposit it is understood that discussions have taken place between the owners / agent and house builders. The site has no technical or other constraints which would prevent development from taking place and in the light of the renewed commitment for the land owner, is considered to be appropriate to be carried over into the LDP. The allocation is considered to be sound and is justifiably allocated in the Plan.

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			considerably more than just 55% of this need, and in doing so an uplift to the overall housing requirement is needed alongside the allocation and release of additional housing	opposed to the 14% which is currently proposed. Ø The Council's housing requirement is not proposing to meet all of the identified affordable need set out within the LHMA. Our Client considers that the LDP should be planning to meet considerably more than just 55% of this need, and in doing so an uplift to the overall housing requirement is needed alongside the allocation and release of additional housing	Test 2 The objector fails to acknowledge that the LHMA figure is a snapshot of housing need over a five year period and cannot be simply extrapolated over the fifteen year period of the LDP. The LHMA figure of 238 is an inflated need owing to the LHMA methodology which includes a calculation of the backlog of need as well as future need predicted over a short time period, which is the 5 year lifetime of the Study. It is not correct to extrapolate this at the level identified, across the whole Plan period as the backlog of affordable need should be met within the five years of the LHMA. The objector also fails to acknowledge that there are other sources of affordable housing delivery other than the allocated residential development sites. For example the Council have a successful track record of developing affordable housing via the SHARP (Strategic Housing and Regeneration Programme) and NEW Homes (North East Wales Homes and Property Management). These two schemes specialise in the delivery of social and intermediate rental homes, the SHARP programme has a commitment to deliver 500 new affordable dwellings by 2021, please see

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					details of completed and forthcoming schemes on the Flintshire Council website. In addition to this the Council will continue to work with its Registered Social Landlord partners to deliver more affordable housing in Flintshire as part of the Social Housing Grant (SHG) programme funded by Welsh Government. Collectively these mechanisms of delivery alongside the development of affordable housing by private developers has resulted in Flintshire achieving the highest average annual delivery rate in North Wales over the last ten years.The majority of this delivery comes from RSLs and schemes such as the SHARP programme rather than private developers, therefore we do not rely on allocated LDP sites to deliver all of the affordable housing that Flintshire needs. The approach is considered to be sound. The objectors point about UDP carry over has been addressed above. Test 3: The two housing allocations carried over from the UDP are commented on above and are viable and deliverable and therefore not unsound.

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					The Plan was accompanied by a Housing Land Supply Background Paper which contained a housing trajectory and demonstrated that a 5 year supply could be achieved and maintained. However, the need for a 5 year supply has now been removed following the revocation of TAN1 and instread housing must be delivered in accordance with ther Plans housing trajectory, which is clearly the case. The objector proposes 3 sites of which one in Drury already has planning permission. However, in respect of the objectors other two sites in Northop Hall and Carmel, the objector fails to demonstrate how these can be delivered any quicker than the Plans housing allocations. The role of Tier 3 settlements has not been overlooked and the objector fails to explain why the proportion should be increased above that earmarked for more sustainable Tier 1 and 2 settlements. There is no objection from Welsh Government to the broad distribution of development. The objectors concern regarding providing for all of the need identified in the LHMA has been addressed above. In conclusion, the objector has provided no evidence that the Plan is unsound.

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852	STR1: Strategic Growth	Object	Employment growth 3.48, 3.50 and section 10 8,000 to 10,000 new jobs are overly ambitious based on the information provided in the LDP and the LAs reliance on private companies to deliver them. With the budget pressures on FCC and regeneration no longer being a priority it would be better to reduce this new jobs number and make it smaller and deliverable. No reference is made to Brexit, and the potential loss of thousands of jobs in the county with the warnings from companies like Airbus. In the emerging NDF Brexit is mentioned and FCC should take the same approach with what the regional LAs are doing to mitigate against leaving the EU, if indeed they are in position to do anything? Housing Growth and its sustainable location 3.53 maintaining a 5 year minimum supply of housing land - update in line with WG announcement on 9 October 2019 Preferred strategy 3.65 housing growth of 7,950 dwellings in Flintshire is not in line with emerging		Para 3.48 of the Employment Land Review did not identify a significant need for employment land or job growth as it was affected by previous take up rates during a recessionary economic period. The rest of the paragraph explains how it is necessary for the Plan to have regard to a wider context which is expressed through the regional commitment to achieving growth. Para 3.50 accepts that the Plans job target of 8-10,000 jobs is ambitious in the context of job projection scenarios but notes that it is not that far in excess of the upper projection figure of 7,200. Whilst the Plan focuses on job growth from the two strategic mixed use allocations, the paragraph goes on to reference the flexibility offered by the Plans suite of employment allocations. The paragraph references the importance of the Deeside Enterprise zone and the North Wales Growth Vision to create 120,000 jobs by 2035. This section of the Plan then goes on in para 3.52 to explain how further work was undertaken with specialist consultants in the form of a Further Employment Growth Scenarios Assessment which identified a job growth / employment land need of 7,200 jobs and 50.6ha of employment Land. It explains that the Plans job growth target is deliberately more aspirational in order to reflect FLi8ntshire's position as a sub-regional economic hub, contributor to the Growth Vision and also as a major contributor to

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			NDF of 19,400 across the whole of the N.Wales region. It needs re-visiting to comply and align with the national policy		output and growth in the Welsh economy as a whole. The implications of Brexit on the economy in terms of timescale and impact (whether negative or positive) are still not known. However, what is known is that Welsh Government has identified this part of Wales as a growth triangle in the Wales Spatial Plan and as a growth hub in the draft National Development Framework. Flintshire also sits at the heart of the Growth Deal and in this context it would be inappropriate for the Plan to plan for no or low growth. The National Development Framework is still a draft document and the timescales are different to the LDP's, with the NDF covering a longer period up to 2040. It is also the case that the housing growth need assessed in the NDF is not directly compatible with the method for deriving housing requirements in LDPs. In this context Welsh Government published a supplementary 'Explanatory Note – Housing Need' in Dec 2019 which stated 'While it is expected that there will be a clear alignment between the estimates of housing need and the Housing Requirements set out in LDPs and SDPs, they are not the same and therefore are not expected to match'. Nevertheless, when the housing need for Wrexham and Flintshire in the draft NDF is annualized and compared to the annualized cumulative housing requirements in the Flintshire and

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					Wrexham LDPs, there is a high degree of conformity with the growth ambitions of the NDF. It must be noted that in their formal representations on the Deposit Plan, Welsh Government stated that 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect'.
590	STR1: Strategic Growth	Object	The policy is headed "Strategic Growth" and indicates that 7950 new homes will be provided to meet the requirement of 6950. We do not believe it is appropriate for the Council to simply pick a midpoint between the figures in the Preferred Option. The Population and Household Projection Background Paper acknowledged that it was appropriate for the Council to show some "ambition" in terms of economic growth and household provision. A figure of 1000 units amounts to 14.4% contingency. In LDP Background Paper number 10 on Housing Land Supply and Delivery (Sept 2019) the Council argue that this is higher than other Local Planning Authorities. They also argue that it is only slightly higher than the 13.8% contingency which was built into the UDP. As set out above, the UDP fell well short of its required delivery (a shortfall of 2755 units out of a requirement of	The policy is headed "Strategic Growth" and indicates that 7950 new homes will be provided to meet the requirement of 6950. We do not believe it is appropriate for the Council to simply pick a midpoint between the figures in the Preferred Option.	Not Accepted. In their formal comments on the deposit Plan Welsh Government state that they are "broadly supportive of the strategy, level of housing and jobs proposed, considers it [the plan] aligns with national policy and is in general conformity with the emerging NDF". The objector spends more time in the past referring to the UDP, than focusing on the main point of the Deposit LDP consultation which was to consider whether the plan as published is sound. The predominant purpose of the objection also seems to be based on defining the largest housing number possible without any evidential support or assessment of the sustainability and deliverability of the 11,105 homes proposed, or where the additional sustainable and deliverable sites are to provide the additional 4,000+ homes proposed. The objector incorrectly refers to the LDP growth options stating that each was presented as a range, when only the employment driven option 6 was a range, this

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			7400 units). This amounts to a 37% under delivery even with the contingency. The Council also acknowledge that of the 41 sites allocated in the UDP, 13 did not come forward for development (32%). In other words, over the previous plan period from 2000 to 2015 one third of the sites allocated for housing delivery did not come forward. Whilst the Council blame this on a general housing slow down, they fail to acknowledge that evidence of delivery (or lack of it) of the actual housing strategy in terms of the settlement hierarchy demonstrates that a significant element of under delivery was that sites where allocated in settlements which were not viable for housing development as a result of the internal housing market. The Council's own Settlement Growth Schedule over the UDP period showed that the growth rates over settlements within the same category varied substantially with some exceeding growth rates and with others providing virtually no growth. This resulted from a lack of assessment of the viability of sites which has now been continued into the current LDP. The Council have not assessed the viability of allocated sites as part of the LDP contrary to National Planning Policy (we comment further on this in relation to policy HN1). Therefore, the previous UDP had a 37% shortfall in delivery of the overall housing requirement through		being the product of an aspirational job growth being presented as a range from which the resulted housing need was derived. The objector states that they do not consider selecting a mid-point from option 6 projected housing growth is reasonable but don't explain why, other than the approach is not "ambitious enough". Instead they state that to be more ambitious the Council should have selected the upper end of the growth range, a measure of housing ambition just 400 greater that the selected mid-point figure. The key point ignored by the objector and as set out in the Plan is that the selection of a mid-point from option 6 was also informed by reference to growth option 4 which was a more traditional demographic projection derived option where the high variant level of migration used to derive option 4 and its resultant level of housing requirement, was in line with that derived at the mid-point of the range of housing requirement derived from option 6. This translates into a level of ambition that sets a challenging but achievable housing requirement, ensuring compliance with PPW in terms of sustainability and deliverability of the plans housing requirement, to the extent that a development plan can actually deliver the housing it provides, as endorsed by Welsh Government. The objector also ignores the fact that the chosen housing requirement figure is significantly in excess of the formal published Welsh Government Household Projections both at the time that the growth

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			all sources. Of those sites allocated only two thirds came forward over the plan period. Either using the overall delivery figure or that specifically relating to allocations, it can be seen that the shortfall was between 32% and 37%		options were derived (2011-Based WG Projections) and now where, with the recent publication of the 2018-based WG Projections, the differential from the projection household growth and the LDP requirement is now even greater. The figure proposed by the objector would in fact be over 4 times the official projected growth but no assessment of the impact of this excess of growth over need has been made by the objector. Following the objector's logic in relation to adding undelivered growth from a previous plan, it is a fact that the UDP requirement was based on the actual level of WG projected growth at the time, and given that the LDP requirement is well in excess of the present level of projected growth, if the projected need shortfall case is accepted (which the Council does not), then the LDP requirement has in effect 'mopped up' any previous under-provision, by setting a requirement that is far in excess of present projections. The main emphasis of the objector's case for a higher housing requirement figure is based on the premise that the LDP should not only make sufficient provision for the assessed need during its plan period (2015-2030) but should also look backwards and also account for under-delivered housing from the previous UDP plan period. The objector lays blame for an apparent under-deliver solely on the UDP for this but is silent on the role that the economic climate, actual level of demand coming from potential house buyers, or the

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					willingness, capacity or ability of developers to deliver new homes, as it is these factors that determine delivery as development plans do not deliver housing, rather they make sufficient provision for housing to come forward to meet the assessed requirement. Unhelpfully the objector does not direct the Council to the relevant passage in PPW, the Development Plans Manual or relevant guidance that sets out the concept of transposing under-provision from one plan period to another, or the mechanism for doing so. Equally there is no precedent with other LDPs in Wales for where this has been accepted. If the Council were to entertain the concept that under-delivery carry over should be considered then it is not clear from the objector's focus on just the last development plan, the UDP, why the concept should be time limited to just this plan. After all the objector states that it is a fundamental principle affecting soundness of the LDP that it should cater for un-delivered historical need, which therefore should not be limited to just the UDP as other plans historically may also have failed to deliver in the way the objector suggests for the UDP. Clearly the flaw in the argument is then how far back do you go to address 'historical need'? Also, extending the principle and the objector's logic, if the UDP had over-delivered housing in relation to the requirement in that plan, then presumably the objector would accept that the LDP assessed need would be reduced by the level of over-provision in the previous plan? Without reference to where in National guidance or precedent it is accepted that the under-

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					provision from a previous plan should be added to the requirement to the current plan under development, the Council does not see how this can be a soundness issue that challenges the strategy of the LDP. The objector refers to an old appeal decision to justify the principle of carrying over an alleged 'under-provision' but the Inspector in that decision does not say this. Instead the appeal at the time made was simply applying the principles in TAN1 of allowing speculative development, that Welsh Government now accept had adverse impacts on communities and the plan making process, resulting in the conclusion that this and other Councils have argued for some time, that TAN1 is no longer fit for purpose. This recognizes that the planning process was disadvantaged by the process facilitated by TAN1. The objector's simplistic exercise in arriving at a large housing number has no evidential basis to support its sustainability or deliverability and does not assess (other than land proposed by the objector in objections to HN11) what or where there are sufficient sustainable and deliverable sites to meet the radically increased proposed housing requirement, and in fact only offers in relation to objections to HN11 66 units (at Isa Farm, Mynydd Isa) towards the additional 4,155 units proposed, itself leaving a shortfall of 4,089 units to be found somehow, somewhere. This does not appear to be either a sustainable or

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					sound proposition to provide certainty of delivery for the LDP housing requirement. In order to deliver the level of housing proposed by the objector, the development industry fueled by consistent market demand would have to complete 740 new homes every year for the entire LDP plan period. By the objector's own analysis of build rates (564 units per annum), this is almost 200 or 31% higher than the average the industry has been able to achieve in the first 3 years of the LDP plan period, where there has been an unconstrained supply as evidenced by the level of commitments in the housing balance sheet supplemented by significant speculative permissions granted under TAN1. With the addition of completions data for 2018-19 the average rate of delivery in the first 4 years of the plan is now 536 dpa and whilst above the plan's annualized housing requirement, is in line with the actual level of provision in the plan of 530 dpa. The short term delivery trend 2015-19 also masks the fact that even in a period of market demand with developers bringing forward sites, there is significant variability in the actual annual delivery where the range of delivery has reached 600 in two of the four years, but in others has only achieved low to mid 400s. It is this variability in a rising market with land clearly available, that questions the ability to consistently year on year deliver housing completions at the rate suggested by the objector. Also in terms of growth ambition, the LDP is in conformity with the level of need and ambition contained within the draft NDF, a fact supported by the

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					Welsh Government in their comments on the LDP growth strategy. Providing housing at the levels suggested by the objector will be in direct conflict with the National Development Framework and also logically mean that if a higher level of growth is to be accepted for Flintshire than in the NDF, then this should also be applied to Wrexham which the NDF groups with Flintshire as the focus for future growth and development, as to otherwise treat the two contributor areas so differently would be unsustainable. There is no evidence from the objector or the industry to show how such a high level of housing delivery is either sustainable, needed, or deliverable throughout the LDP plan period. The objector has made reference to the LDP trajectory and the fact that in the last 2 years of the trajectory there may be a shortfall in housing provision of 1,389 units, quoting from paragraph 3.1.4 of LDP Background Paper 10, which means that the plan requirement should be increased and/or 'contingency sites' should be added to the plan to come forward later in the plan period. The Council do not accept these arguments and consider that the objector has mis-interpreted the correct position as set out in paragraph 3.1.4. This is not a correct quotation from the document as paragraph 3.1.4 actually states "while the trajectory currently shows a supply of less than five years in the last two years of the Plan period, this is not surprising as the Plan's housing land supply will have largely been

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					built out by the end of the Plan period and while the Plan's housing requirement will have been accommodated, to achieve a five year supply in the last two years of the Plan would necessitate the provision of land for some 1,389 additional dwellings beyond the plan period (based on extrapolating the Plan's average annual requirement of 436 [typo should be 463] dwellings pa for 3 years beyond the LDP period, as required in para. 5.2 of TAN 1)" [Council's emphasis in bold]. This is quite different from the objector's interpretation. The objector has also already acknowledged that the plan has over-delivered in the first four years of the plan period which would compensate for any later plan period shortfall in the trajectory, assuming that the plan goes all the way to its end date without review. There is a requirement to review the position with the plan four years after adoption, and as part of this that housing delivery will be monitored against the trajectory as part of the annual AMR process. Given the intention to delete TAN1 it is also not yet clear what mechanisms will be put in place that determine what variance over what period away from the trajectory would trigger action on the part of the Council.
910	STR1: Strategic Growth	Object	This policy should include reference to the RTS, MTAN1 and the NWRAWP annual report in the evidence base.	This policy should include reference to the RTS, MTAN1 and the NWRAWP annual report in the evidence base.	Not accepted. It is not made clear by the objector as to why, in relation to policy STR1 which sets out the strategic growth proposed by the plan in terms of employment and housing, there needs to be reference in the policy to the Regional Technical Statement (RTS), minerals Planning Guidance (MTAN1)

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					or the North Wales Regional Aggregates Working Party annual report as part of the evidence base. The objector does not explain how the lack of reference to these makes policy STR1 unsound. All three are rightly part of the evidence base to the LDP, but are referred to in their proper context and place in support of the strategic and detailed policies relating to minerals development including STR15 and EN23-EN27.
918	STR1: Strategic Growth	Object	As housing delivery is central to the ability of a local authority area to create jobs and attract new employers in, or facilitate existing employers to expand, it is not clear that the quantum of development proposed in STR1 is going to be sufficient or whether it is sufficiently flexible to adjust if the Council are successful in creating more jobs over and above their maximum projections. In terms of soundness it does not meet Test 2 in that we do not consider that it is supported by a robust evidence base as the job creation target appears to have been determined by going to the projections and then just adding a bit extra, without justifying why. As a result of this we do not consider that it meets Test 3 either as it is not clear on what level of job creation the housing requirement has been set and as such, if more jobs are created than expected, how will a corresponding increase in housing be delivered in the County. Whilst a flexibility allowance has been	As a result of this we do not consider that it meets Test 3 either as it is not clear on what level of job creation the housing requirement has been set and as such, if more jobs are created than expected, how will a corresponding increase in housing be delivered in the County. Whilst a flexibility allowance has been included to the housing requirement, the Council do not go as far as actually identifying sufficient allocations in order to help deliver this and it will very much be left to the market to deliver these.	Not accepted. Not unsurprisingly the objector as a housing developer is taking a housing first approach to growth whereas the LDP strategy is based on an employment led approach where housing is part of the supporting infrastructure to help achieve and support job growth. This approach is reflective of the stance taken by the draft NDF for the area as well as being the central focus for the North Wales Growth Vision. Having set such a strategy for the LDP, the Welsh Government in their formal comments on the deposit plan state that they are “generally supportive of the spatial strategy and level of homes and jobs proposed and have no fundamental concerns in this respect”. They also consider the LDP to be in general conformity with the emerging NDF. Given this the Council is unsure from the objection made as to how the plan is unsound, as the objector simply speculates that they are not sure there is enough housing allocated in the plan in the event that more jobs are created than expected. Whilst the objector criticizes the robustness of the Council’s evidence base they provide no evidence or

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			included to the housing requirement, the Council do not go as far as actually identifying sufficient allocations in order to help deliver this and it will very much be left to the market to deliver these. The preparation of the LDP provides the opportunity to plan for this and it is therefore, surprising that the Council are not taking the opportunity to plan positively for the County.		assessment of where the evidence falls short, and themselves go beyond the aspirational approach taken by the Council in setting its job growth target just above the upper limit of the job projections, and speculate on an even higher job target on a 'what if?' basis, without providing any evidence of how an even higher job target is achievable, what empirical basis this has, and which sites will accommodate the higher figure? It is therefore difficult for the Council to give weight to such speculative and unsubstantiated general commentary. The objector further proposes a speculative question as to how housing provision would be increased if more jobs are created, and the likely logical answers would include building out LDP housing sites fully, assistance from the 14.4% flexibility built into the housing requirement figure, and if it came to it, triggering a plan review. The objector mistakenly states that the Council don't go as far as to allocate sites to accommodate the flexibility built into the plan leaving it "to the market to deliver these". This is totally counter-intuitive to the purpose of the development plan which is to identify housing sites as allocations and this is what the Council has done, including sufficient sites to accommodate the 14.4% flexibility. The objector is directed to the housing balance sheet in the Housing Supply Background Paper 10 published alongside the deposit Plan for consultation where it clearly shows the residual requirement as 874 having taken

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					account of completions, commitments, small and windfall allowances, and contribution from strategic sites, and where with the addition of 14.4% of the overall requirement (+1,000 units) the plan finds sufficient allocations to provide 1,874 units to meet the residual requirement plus flexibility. The deposit consultation was the objector's opportunity to state why the LDP was unsound, in what way, evidence this, and to suggest sustainable alternatives, yet none of these have been provided by the objector.
920	STR1: Strategic Growth	Object	Housing Requirement Policy STR1 'Strategic Growth' In regard to the supply of housing land across the Authority over the plan period as set out in Policy STR1, it is noted that there are clear differences between the WG projections for this plan period, and the growth projections which the Deposit Plan is based on. Whilst the dwelling requirements proposed within the Deposit Plan are welcomed, it is considered that there is still a significant shortfall in the overall dwelling requirement provided within the Deposit LDP, particularly when considered against the WG's 2014 figures. We therefore object to Policy STR1.	Whilst the dwelling requirements proposed within the Deposit Plan are welcomed, it is considered that there is still a significant shortfall in the overall dwelling requirement provided within the Deposit LDP, particularly when considered against the WG's 2014 figures.	Not accepted. The objector firstly confuses policy STR1 Strategic Growth which is where the housing requirement figure (rather than "demand" as referred by the objector) is referenced, with policy STR11 Provision of Sustainable Housing Sites but the Council have taken this to be an objection to STR1. Confusingly whilst the objector "welcomes" the overall dwelling requirement in the LDP they state that this is a conservative position in relation to the approach to stimulating the housing market. However the plan's strategy is employment-led rather than being housing driven as inferred, and in any event the Council considers it has provided sufficient housing plus 14.4% contingency to facilitate the objector's own approach. The objector's main point in relation to STR1 appears to be that when compared to the 2014 based Welsh Government household projections, the LDP housing requirement figure represents a "significant shortfall" to the growth projected in the 2014 Welsh Government projections.

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					Whilst the objector provides no assessment or analysis of the data to illustrate this point, the Council are confused as the consistent trends shown in household change in consecutive Welsh Government projections from 2011, 2014, and now 2018 all show low levels of household growth in Flintshire, that are significantly below the housing requirement set in the plan. The Council therefore do not understand the point about the LDP figure being a "shortfall" on the projections. The true position is entirely the opposite and to illustrate this the projected household growth from the 2014 Welsh Government projections for the plan period 2015-2030 was 305 per annum from the Hi variant projection, and 250 pa from the principal projection. These levels of projected change are similar when households are converted to dwellings and are significantly below the levels of growth required and provided for in the LDP (463/530 dpa respectively). The objector should also note that Welsh Government have recently published its 2018 based household projections which show for Flintshire a falling level of household change, with equivalent change for 2015-2030 at around 232 pa for the hi variant, and 166 pa for the principal projection.
950	STR1: Strategic Growth	Object	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target, which is considered too low. Jobs target does not correlate with housing target. Also, despite the policy suggesting the	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target, which is	Not accepted. The objector makes a number of subjective and superficial statements in relation to the growth planned for in policy STR1 but does not provide any empirical evidence or reasoned arguments to support these statements. For example it is stated that

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			focus of development will be located at sustainable employment locations many housing sites are not located to take advantage of this and moreover, insufficient employment provision is being identified. Policy should be expressed as a minimum.	considered too low. Policy should be expressed as a minimum.	the housing requirement is “too low” but there is nothing provided to explain why? by how much? or what is the ‘correct’ figure? Equally the jobs target is said to be “too low” and does not “correlate” with the housing target but again it is not explained how it is too low, by how much, what is the correct level, and what is the nature of the correlation between employment and housing targets. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector simply seems to be saying the housing and employment targets are too low and should be higher but without saying why, by how much or provide supporting evidence to justify this. The objector has had every opportunity with reference to the Council’s evidence base supporting the growth promoted by policy STR1 to provide evidence and explanation to support the very basic points made, but has failed to do this. The Council does not see how from the points made and lack of corroboration, that the plan’s soundness is in any way challenged.
965	STR1: Strategic Growth	Object	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target,	Target housing requirement is too low. Jobs target does not	Not accepted. The objector makes a number of subjective and superficial statements in relation to the growth planned for in policy

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			which is considered too low. Jobs target does not correlate with housing target. Also, despite the policy suggesting the focus of development will be located at sustainable employment locations many housing sites are not located to take advantage of this and moreover, insufficient employment provision is being identified. Policy should be expressed as a minimum. Policy should be expressed as a minimum.	reflect or correlate with the employment growth target, which is considered too low. Jobs target does not correlate with housing target. Policy should be expressed as a minimum.	STR1 but does not provide any empirical evidence or reasoned arguments to support these statements. For example it is stated that the housing requirement is “too low” but there is nothing provided to explain why? by how much? or what is the ‘correct’ figure? Equally the jobs target is said to be “too low” and does not “correlate” with the housing target but again it is not explained how it is too low, by how much, what is the correct level, and what is the nature of the correlation between employment and housing targets. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector simply seems to be saying the housing and employment targets are too low and should be higher but without saying why, by how much or provide supporting evidence to justify this. The objector has had every opportunity with reference to the Council’s evidence base supporting the growth promoted by policy STR1 to provide evidence and explanation to support the very basic points made, but has failed to do this. The Council does not see how from the points made and lack of corroboration, that the plan’s soundness is in any way challenged.

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983	STR1: Strategic Growth	Object	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target, which is considered too low. Jobs target does not correlate with housing target. Also, despite the policy suggesting the focus of development will be located at sustainable employment locations many housing sites are not located to take advantage of this and moreover, insufficient employment provision is being identified. Policy should be expressed as a minimum.	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target, which is considered too low. Policy should be expressed as a minimum.	Not accepted. The objector makes a number of subjective and superficial statements in relation to the growth planned for in policy STR1 but does not provide any empirical evidence or reasoned arguments to support these statements. For example it is stated that the housing requirement is “too low” but there is nothing provided to explain why? by how much? or what is the ‘correct’ figure? Equally the jobs target is said to be “too low” and does not “correlate” with the housing target but again it is not explained how it is too low, by how much, what is the correct level, and what is the nature of the correlation between employment and housing targets. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector simply seems to be saying the housing and employment targets are too low and should be higher but without saying why, by how much or provide supporting evidence to justify this. The objector has had every opportunity with reference to the Council’s evidence base supporting the growth promoted by policy STR1 to provide evidence and explanation to support the very basic points made, but has failed to do this. The Council does not see how from the points made and lack of

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					corroboration, that the plan's soundness is in any way challenged.
685	STR1: Strategic Growth	Object	The Plan proposes a housing target of 7950 units. An analysis of the sites demonstrates that a number of those sites have had planning permission or have been around for a considerable period of time and have not been delivered. They should be removed from the allocated sites resulting in the need to accommodate another 342 units. The strategic site at Warren Hall (STR3B) near Broughton is isolated and does not have any relationship to facilities. It is therefore not a sustainable option for residential development and the lack of facilities mean that even if residential development comes forward in that location the need for facilities will delay delivery over many years. It is unrealistic to expect that allocation to be brought forward and therefore that represents a further shortfall in housing. Council's target per annum: 7950 To meet that target it is necessary to: Increase the allocations by 660 to allow for over-reliance on windfall sites. Increase the allowance by 300 to allow for the non-delivery of the Warren Hall site. Increase the allowance by 342 to allow for non-delivery of sites within Appendix Increase the allowance by 16% or 1272 units to reflect under-provision against the past five years delivery pattern. These figures taken together suggest	Increase Housing target and the number of allocations. Allocate site at Llys Ben	Not accepted. The objector states that the plan proposes a housing target of 7,950 but it does not. The housing requirement of the LDP is 6,950 to which 14.4% flexibility has been added so that the plan provides for 7,950 homes. The objector then refers to "an analysis of sites in Appendix 1" which relates to the appendix to the deposit LDP written statement where the housing commitments that the plan's housing supply balance sheet refers to are listed. The objector's analysis is selective and has failed to cross reference to the more detailed land availability statement from which the list is drawn, and as a result has made assumptions about the status of the sites listed in the objection, that are inaccurate and out of date. Had the objector referred to the land availability statement they would have been able to factually check the actual status of each site. The outcome of the 'analysis' carried out is therefore factually incorrect and the assumption that 342 units on committed sites, rather than 'allocated sites' as the objector refers to them, won't come forward is also false. To illustrate, the objector refers to the F G Whitley's depot site and claims no developer is on board and so the site won't come forward. They have failed to note that Whitley's are actually the developers, are currently on site with 11 units under construction and the remaining 28 due for

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			that there should be an overall housing target of 10,500 units which is very significantly more than the number put forward by the Council and is more reflective of the amount of allocations that will be needed to deliver housing and the Council's jobs-led strategy. Sites to accommodate a further 2500 units are needed		completion by 2023. There is a similar pattern of assumptions made for the other sites referred to: a site simply referred to as 'Caerwys' is actually the former Summer Hill Farm site where the objector states "no housebuilder on board" but where a developer is on site, 5 properties are under construction with the site due for completion in 2023; the station yard site in Pontybodkin now has reserved matters approval and is being marketed for sale; The site east of Gronant Hill is a Council owned site, only gained permission in 2018 and not 2016 as referred to by the objector, and is part of the Council's Strategic Housing and Regeneration Programme to build 500 affordable homes on Council land with its developer partner Wates Residential; the site at Kinnerton Lane has 31 complete properties with a further 13 under construction and due for completion in 2021; the Bromfield Timber site has commenced and not lapsed, and whilst not part of the 5 year supply from 2019, can still deliver during the plan period; the former Sewage Works site has 35 units built, 10 under construction and will be completed in 2020; finally the Altbridge House site (41 units) has been removed from the 2019 land availability statement as is not relied on as a commitment. So from the analysis carried out by the objector, and when the facts from the land availability study are considered, there are only 41 units that the Council relies on as commitments that are no longer counted towards supply, rather than the 342 speculated by the objector. In terms of the loss of 41 units, the plan already has over-

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					provided 1,000 units above the requirement to cater for sites not coming forward, and as the plan has over-recovered delivered housing in the early years of the plan period above the average requirement, then these in combination provide the flexibility to absorb such minor changes to commitments. Equally, since the committed sites were listed in appendix 1 of the deposit LDP (based on 2018 land availability statement) further windfall permissions have been added as new commitments which are recorded in the 2019 land availability statement now on the Council's website. There is therefore no shortfall in housing from these sites. The objector criticizes the strategic site at Warren Hall Broughton stating it is isolated and does not have any relationship to facilities and as such is not a suitable location for residential development and that even if residential development comes forward the need for facilities will delay delivery of the housing "over many years". These are again uninformed assumptions and the objector has failed to note that the site is a 'mixed use' site where policy STR3 identifies that range of uses including of course sustainable employment opportunities and a commercial hub to support both residential and employment uses. The site at Llys Ben promoted by the objector provides no such supporting facilities. The objector also fails to acknowledge the fact that spatially the Warren Hall site is near to the local service centre at

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					Broughton and is in spatial and accessibility terms in closer proximity to this centre, than Llys Ben is to its nearest service centre at Connah's Quay. It is also the case that the facilities available at Broughton to support nearby residential growth are superior to those in Connah's Quay. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely manner. There is therefore no shortfall in housing from this site. The objector summarises their position in terms of the housing requirement and this compounds the errors and assumptions made: the objector states the LDP target is 7,950 but this is incorrect; the objector states that a figure of 660 is required to allow for over-reliance on windfalls but this figure seems plucked from the air as the previous alleged shortfall suggested by the objector was 342 units of which only 41 is factually not relied on as a commitment, so there is no over-reliance as suggested; the objector suggests that the

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					housing requirement should be increased by 300 to account for the non-delivery of housing at Warren Hall but this has been shown to be not the case and unnecessary; the objector proposes to increase the requirement by a further 342 to account for under-delivery of windfall sites but this seems to be a double counting on the purpose of the 660 units referenced earlier in the objection which itself is unjustified; the objector also suggests the need to increase the requirement by a further 16% or 1,272 units although these levels are not explained other than to reflect under-provision against the past five years delivery pattern. The Council are baffled by this last point as the past four to five years delivery has been at or slightly above the average provision made in the Plan. Cumulatively the objector contrives with no empirical evidence a suggested requirement of 10,500 units stating that this is 2,500 more than the present target, but in fact is an increased requirement of 3,550 units. Apart from a small site at Llys Ben the objector identifies no other sustainable and deliverable sites to deliver this uplift and without this it is difficult to conceive of how this is at all deliverable, sustainable or sound. To illustrate, the objector has referred to recent delivery rates as evidence of the need for more sites but the delivery rate in the first 4 years of the plan is 536 dpa whereas the average provision in the plan is 530 dpa, so very closely aligned. The figure advocated by the objector is

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					equivalent to 700 dpa or a difference to the current delivery rate of 164 dpa but the objector does not explain how the industry can provide such a high rate consistently, year on year, for the entire plan period. Without any evidence in support, this does not appear to be a reasonable, realistic or achievable proposition. Finally, in promoting the site at Llys Ben the objector has failed to reference relevant planning history for the site which was refused permission for housing by the Council and was also refused by a Planning Inspector when that decision was appealed. The central thread behind refusal is the site's unsuitability for housing due to its location and relationship to the open countryside where the site's contribution to the settlement setting and its openness is protected by a green barrier designation. These planning circumstances have not changed since the appeal refusal.
1100	STR1: Strategic Growth	Object	STR1 – outlines the requirement for 6950 houses within the plan period and makes provision for 7950 houses with a 14% flexibility. This is seen as a conservative estimates given the economic growth aspirations for the plan and should be seen as a minimum figure. The settlement hierarchy approach in STR2 is logical and supported Mold town is Tier 1 Main Service Centre and it is agreed that Mold is a sizeable town which has a full range of services and employment. In order to	Should allocate land for development between upper Bryn Coch and Llys Ambrose Off Ruthin Road, Mold	Not accepted. The objector refers to the housing requirement as an 'estimate' but fails to acknowledge the approach to deriving this figure clearly set out in the Council's evidence base. This includes how the housing figure has been derived from the level of employment growth defined by growth option 6, but where the objector feels the housing figure will not meet the employment ambition. The objector is concerned that a "sufficient number of sites and allocations is identified" but does not say whether this is within the housing requirement of the plan with the

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			ensure the minimum target it is important that sufficient number of sites are allocated. Policy STR11 set out the two strategic sites, and the overall housing figures. Policy HN 1 sets out the allocations for each settlement tier. Para 5.12 sets out the fact that the plan seeks to distribute development to the most sustainable settlements. It is considers that the allocation are in the first 3 tiers of settlement are too heavily reliant on large sites. It is also asserted that the LDP is too heavily reliant on small and windfall sites. For the above reasons it is considered that the model for meeting the housing requirement is flawed and there is a risk that the requirement will not be met. The model does not provide for sufficient dwellings in Mold. It is also unclear why the allocated site HN1(6) Land between Denbigh Rd and Gwernaffield Rd is deemed more appropriate. Than Candidate Site MOL040. Which is a more sustainable site. Aside from the green barrier location there is no logical reasons why site HN1(6) is preferred .		added flexibility, or whether the housing requirement should be increased. If it is the latter, the objector unfortunately does not say what the figure should be or provide supporting evidence to justify this. The objector simply offers a single site in Mold on behalf of their client but fails to acknowledge that this is legacy land in the ownership of their client, remaining after significant development on the periphery of Mold has already occurred on their land. They also fail to acknowledge the green barrier status of this land established via the UDP and where, notwithstanding reference to 20 year old opinions, more recently the UDP Inspector agreed with the designation of the land as green barrier in the adopted UDP, and their client did not object to this at that time. The objector notes that the two strategic sites allocated in the LDP at Northern Gateway and Warren Hall are not located in Tier 1 Main Service Centres, and this is entirely logical as by definition they are ‘strategic’ mixed use development sites that at the scale and mix of sites proposed, if attached to a single centre may have the potential to overwhelm that settlement and its infrastructure. That is why these sites are where they are. The objector is concerned that too much reliance is placed on too few ‘large’ allocations and that there is an imbalance in terms of the distribution of growth within the settlement hierarchy. The approach of the LDP strategy

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					contrasts with that of the UDP where a large number of small allocations were provided but where sites were either slow to come forward and due to lack of scale, did not deliver the economies demanded by the development sector today in terms of efficiencies in build and materials, or sufficient scale to make sites viable to deliver the infrastructure and policy requirements. The objector also fails to acknowledge that the distribution of allocations also needs to be balanced against the location of commitments in order to paint the full and more accurate picture of where development is planned. The scale of allocations made is therefore considered to be sustainable, viable and deliverable and whilst a considerable amount of due diligence and back ground study work has occurred to support the deliverability of the allocated sites, no such evidence is presented to illustrate the same position for the site being promoted. The objector also feels that there is too much reliance on allowances made for small and windfall sites and wrongly states that simply perpetuating past delivery rates will not be achievable. With reference to the background evidence provided to support the LDP, the allowances made for small and windfall sites are set at 50% of the 18 year trend for development in these categories and therefore take a modest and conservative approach to the future delivery from these sources. This is considered to be sensible and realistic, a point fully supported by the Home Builders

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					Federation in their comments on policy STR11 of the plan as follows “The HBF supports the Councils approach to windfall sites and commitments as identified with the Housing Balance sheet and the level of flexibility proposed. The HBF also supports the spatial strategy and the mix of both larger and smaller sites proposed”. The Council has also produced an Urban Capacity Study as part of the evidence to support the plan’s approach to the provision of housing, which confirms that there is a realistic future supply of both potential small and windfall sites to support the assumptions made. The objector criticizes the Council for not allocating enough sites in Mold and implies that Mold is the only Main Service Centre which is not correct with reference to the settlement hierarchy. They fail to acknowledge that with the combination of commitments and allocations the main centres are taking proportionately a significant element of growth and that this is relatively balanced between centres with Mold on a par with other centres at the same level. The objector then focusses on just one allocation in Mold and, without providing an in-depth critique of its soundness, does not understand why it is preferable to their client’s land in green barrier on the western edge of Mold. Whilst criticizing the accessibility of the allocated site HN1-6 to the town centre and by other means than the car, they then promote the alternative site on the basis of its proximity to the Mold by-pass and

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					the ease of commuting out of the settlement by car. The assessment of each candidate site is presented as part of the Council's evidence base for the objector to compare and contrast, and clearly a key point which they seek to diminish, is the established green barrier status of their site, which is not the case for the allocation referenced, amongst other differences.
1171	STR1: Strategic Growth	Object	Using the figures set out in Table 1 (see full representation), 3,389 dwellings were built between 2007 and 2015 at an average of 376 dwellings per year during the UDP period. This would leave the need for 4,011 dwellings to be built during the UDP period 2000-2006, at a rate of 573 dwellings per year. We would request that the Council provides evidence of delivery rates during this period in order for all parties to establish whether the housing needs during the previous UDP period were met in full or not. The rates of housing delivery for the period 2016 to 2018 have averaged 563 dwellings a year, which demonstrates a strong market demand and ability to deliver homes in Flintshire. Moving forward, it is important to understand the extent of any shortfall in housing delivery from the previous UDP period given that our Client is firmly of the view that should be met and provided for during the LDP period moving forward, in addition to the identified requirement for at least 6,950 homes. Given that in all probability the	Given that in all probability the housing needs of the UDP period were not met in full, this will result in an increase to the overall LDP housing requirement (when making an allowance for the shortfall from the previous UDP period), and with it the need to identify and release more land across the County in order to maintain a 14.4% flexibility factor. Given the shortage of brownfield land and the recognition of the need to protect existing employment sites, this will necessitate further greenfield release.	Not accepted. The objector provides a lengthy narrative to support their representation much of which repeats the Deposit LDP and/or PPW. Within this the objector has a number of linked concerns relating to the strategic approach to growth in the LDP. The first of these relates to the plan period and the timing of the proposed adoption of the LDP, leaving 9 years of the plan period post adoption. Whilst the objector refers to there being a 'policy vacuum' for some time, it is not clear what is meant by this as the UDP whilst expired is still in line with many areas of PPW and is the starting point for making decisions on applications; PPW itself is national planning policy, along with the TANs that support it. Notwithstanding this they advocate extending the LDP plan period to 2034, and also imply it should look retrospectively as far back as 2000 to address unmet housing needs. They are in effect advocating a 34 year plan period but provide no evidential basis to explain or justify how this is sustainable, what growth levels are deliverable during this period and where the sites are that would be needed to address this lengthy plan period. There is also

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			housing needs of the UDP period were not met in full, this will result in an increase to the overall LDP housing requirement (when making an allowance for the shortfall from the previous UDP period), and with it the need to identify and release more land across the County in order to maintain a 14.4% flexibility factor. Given the shortage of brownfield land and the recognition of the need to protect existing employment sites, this will necessitate further greenfield release. Based on recent rates of delivery, there is no reason to believe that any shortfall from the UDP period cannot be met moving forward during the LDP period provided sufficient land is allocated on which to meet any shortfall. This would justify a housing requirement of at least 7,350 dwellings as per the upper figure set out under Option 6 of the Preferred Strategy Growth Options. - There is a significant reliance on existing commitments during the period 2018-19 to 2021-22. It will be imperative that these commitments deliver if the Council is going to be able to demonstrate a five-year supply post-adoption, particularly given that no significant housing contribution is expected from allocated sites until 2021-22. It would be prudent, supported by evidence, to ensure that enough of the proposed site allocations are capable of early delivery during the Plan period; and - For the period 2023-24 onwards, the		the problem of looking too far into the future from the perspective that it becomes more difficult via the housing trajectory to predict what will happen on development sites in the future. It is the Council's view that the plan period should remain as defined and the plan be examined on this basis, particularly in the context of housing delivery where, as the objector themselves acknowledge, the plan has so far delivered housing at or slightly above the rate planned for. The annual monitoring of the plan and the plan review process within the Regulations are the means to assess the performance of the plan and the need to update it, and the Council is bound by both of these requirements. The objector also feels the vision statement of the plan should be far more detailed but that would be counter intuitive to the normal purpose of a vision statement which in a short passage is intended to capture the essence of the plan's approach. It is the strategic objectives that provide the more detailed expression of the vision and set out the key policy strands from which the Council has developed the strategic and detailed policies in the plan. The objector's general support for all 19 objectives is duly noted with the exception of the point made in relation to objective 11 which relates to housing provision, where the objector requests the addition of the word 'minimum' before 'housing needs'. This is confusing and not fully explained and implies to the Council that the objector is advocating

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			housing trajectory is heavily reliant on allocate		only meeting the lowest or 'minimum' needs, which are expressed in the low level Welsh Government household growth projections. The Council has already explained why it has significantly varied from these projections in its background paper, supported by Ministerial advice provided in 2014 which is still relevant. The objector refers back to the UDP period and speculates that there is "probably" a shortfall in provision of housing from that plan, that the Council should calculate what this was, and that this should be added to the requirement for the LDP period to compensate for under-delivery. With respect it is for the objector to evidence this if they feel it is of relevance. Also the objector refers to the UDP failing to deliver houses, but it is the role of any development plan to make sufficient provision (through sites) for the housing requirement to be met. The mechanism for how housing is provided relies on the interaction with the market including the prevailing economic conditions, the capacity of developers to build, and the level of demand coming from potential buyers. The objector refers to the average level of provision in the first three years of the plan as evidence of strong demand, but with the benefit of a fourth year of completions in 2019, it is evident that the average completion rate has reduced to 536 per annum. What the objector has also failed to recognise is that within this average there is significant

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					variability in annual delivery, as whilst completions exceeded 600 for two of the four years, in the others they were low to mid 400s. This significant level of variability is at a time when there are sufficient deliverable commitments available, supplemented by speculative schemes that have consent, and illustrate the Council's concern of not seeking to set an unachievable housing requirement where consistently high delivery rates cannot be achieved and maintained by the development industry. The objector also fails to recognize that the average level of overall provision made by the plan is 530 dpa which is directly in line with the up to date delivery rate. The only evidential basis the objector provides for increasing the LDP housing requirement is to raise it by 400 units to 7,350 which is the upper end of the growth option 6 range. Given the point already made about completions in the first four years, this has already been more than recovered by those completion rates, over and above the average planned level for the whole of the LDP period. The objector's point about adding an unspecified UDP 'shortfall' is not well made or supported by evidence of what the shortfall is or how and from where enough additional sites would be found, save of course for the land being promoted in Penyffordd, which on its own would not significantly address the 400 unit increase advocated by the objector, let alone the addition of a more substantial apparent UDP shortfall. It is therefore difficult

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					for the Council to understand the alleged failings of the plan at the strategic level from the case being made. The objector has also failed to reflect that the UDP and LDP time periods are separate time periods and do not overlap, and where the calculation of housing requirement was based on the prevailing circumstances at the time and supporting evidence base. The Welsh Government projected levels of household growth are also very different, with the housing requirement of the UDP based solely on the level of projected household growth at the time (converted into a dwelling need), whereas the projected growth during the LDP plan period is only around 36% of the LDP housing requirement when compared to the latest published 2018 based Household Projections. Even if the Council were to accept the principle of transposing an apparent under-provision of housing from a previous plan and adding it to the planned provision in the new plan, which it does not, the degree to which the LDP housing requirement exceeds the Welsh Government Projected growth could be argued to more than compensate for any such shortfall. The objector advocates a plan period being extended to 2034 but only proposes the addition of 400 units to the housing requirement to address the additional housing that would be required during this extended plan period. Extending the current planned requirement in the LDP of 463 units per annum for another 4 years would mean that

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					there would be an additional requirement for 1,852 more homes that presently allocated, but apart from a relatively small site in Penyffordd, the objector offers no evidence or alternative proposals to show how this extended plan period requirement could be met from sustainable deliverable sites, or how this could be accommodated within the LDP housing trajectory. There is therefore nothing for the Council to assess or compare to show how such a proposal is in any way a sound proposition over and above the position it presents and justifies via the deposit plan.
1187	STR1: Strategic Growth	Object	Category C Affordable Housing - general. Affordable Housing Authority Wide Target - The Affordable Housing Background Paper states the affordable housing target for the plan is 1,981 homes. This should be included within a policy in the plan. Policy STR1: Strategic Growth could be amended to state "7,950 homes are provided of which xxx are affordable". The target does not include the contribution from windfall sites (Table 6). It should do. The affordable housing target in the plan should be derived from all components of supply to ensure it is realistic in its aspiration and for monitoring purposes. ? Spatial Distribution of Affordable Housing Supply – the Affordable Housing Background Paper includes an analysis of affordable housing contributions by housing component. A table setting out anticipated affordable housing	Policy STR1: Strategic Growth could be amended to state "7,950 homes are provided of which xxx are affordable". The target does not include the contribution from windfall sites (Table 6). It should do. The affordable housing target in the plan should be derived from all components of supply to ensure it is realistic in its aspiration and for monitoring purposes. A table setting out anticipated affordable housing contributions	Accepted. The affordable housing Background Paper will be updated with a table showing the anticipated affordable housing supply by settlement tier, and will include the expected contribution from windfall sites with ten or more units in line with the guidance set out within DPM3. The affordable housing target will also be revised to include the expected contribution from windfall sites with ten or more units.

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			contributions by settlement tier and component of supply in line with guidance in the DPM (Ed. 3) would be helpful aiding clarity of the plan and effective monitoring.	by settlement tier and component of supply in line with guidance in the DPM (Ed. 3) would be helpful aiding clarity of the plan and effective monitoring	
1254	STR1: Strategic Growth	Object	The level of growth proposed is insufficient to meet development needs and fails to account for the significant potential growth resulting from MDA opportunities. Furthermore, the proposed levels of employment and housing growth do not match. STR1 makes provision for some 8,000 – 10,000 new jobs (i.e. a range of jobs) yet identified a need for only 7,950 new homes. In particular, the proposed housing target is wholly insufficient to meet local needs given the expected local, sub-regional and regional growth opportunities identified in the emerging Plan. The housing target also fails to account for previous significant under-provision of housing throughout the previous plan period, and it cannot be sound to simply dismiss this significant undersupply over an extended period. In its current state the Deposit Plan also risks major long term issues such as a loss of highly skilled workers and economically active population – the result will mean less spending within the	Increase housing target	Not accepted. The objector refers to the plan's housing 'need' as being 7,950, but the LDP housing requirement is 6,950 with a 14.4% contingency resulting in an overall provision for 7,950 homes to meet the lower requirement. The objector fails to acknowledge the degree to which the housing requirement figure is already significantly above Welsh Government projected household growth trends, as shown in successive recent National projections from either 2011, 2014, or now more recently the 2018 based projections released by Welsh Government. The plan makes provision for housing at 2-3 times this projected growth trend for Flintshire. The premise of the LDP strategy from the outset has been to not allow housing alone to dominate the approach of the plan, but rather to recognize its importance as part of the infrastructure necessary to support economic activity, wealth generation and well-being. They also fail to recognise that the processes for arriving at the plan's housing requirement and aspirational job figure are very different. In essence housing requirements are driven by

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			local area which can have a detrimental impact upon the local businesses within Broughton and Flintshire as a whole. An example of this is reflective of the recent success Airbus has had in their apprenticeship programme – the company has announced a record number of apprentices have been hired this year within their Broughton site. The company will continue to train and develop young workers, however there is a real risk the lack of housing will deter such people from staying in Flintshire. With an identified shortage of homes already, and an underestimated housing target, Flintshire risks losing these young highly skilled population to surrounding areas. This will have an impact upon the long term future of local businesses and the wider economy in Flintshire. Therefore, the number of new homes required is significantly higher than is being planned for and STR1 should be updated to increase the housing requirement and specifically state the housing requirement as a minimum number to achieve. We also have concerns with the distribution of growth and associated allocation of sites. These concerns are addressed in the context of the respective policies.		reference to formally published national projections of household change whereas there are no similar projections at the national level of expected or anticipated job growth in each local authority area. This is why it is acceptable to have a broad portfolio of available employment land to facilitate job growth, but where the housing sites to deliver the requirement must be clearly identified along with evidence of their deliverability. There is also no direct formulaic relationship that the Council is aware of between housing requirements and levels of job growth sought in development plans The objector states “The housing target also fails to account for previous significant under-provision of housing throughout the previous plan period, and it cannot be sound to simply dismiss this significant under supply over an extended period.” This is not supported by evidence of what the shortfall is. The objector has failed to reflect that the UDP and LDP time periods are separate time periods and do not overlap, and where the calculation of housing requirement was based on the prevailing circumstances at the time and supporting evidence base. The Welsh Government projected levels of household growth are also very different, with the housing requirement of the UDP based solely on the level of projected household growth at the time (converted into a dwelling need), whereas the projected growth during the LDP plan period is only around 36% of the LDP housing requirement when

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			The council are advised to apply caution to the continued allocation or identification of sites which have failed to come forward for development over a considerable period. As such additional sites must be identified.		compared to the latest published 2018 based Household Projections. Even if the Council were to accept the principle of transposing an apparent under-provision of housing from a previous plan and adding it to the planned provision in the new plan, which it does not, the degree to which the LDP housing requirement exceeds the Welsh Government Projected growth could be argued to more than compensate for any such shortfall.
1274	STR1: Strategic Growth	Object	The level of growth proposed is insufficient to meet development needs and fails to account for the significant potential growth resulting from MDA opportunities. Furthermore, the proposed levels of employment and housing growth do not match. STR1 makes provision for some 8,000 – 10,000 new jobs (i.e. a range of jobs) yet identified a need for only 7,950 new homes. In particular, the proposed housing target is wholly insufficient to meet local needs given the expected local, sub-regional and regional growth opportunities identified in the emerging Plan. The housing target also fails to account for previous significant under-provision of housing throughout the previous plan period, and it cannot be sound to simply dismiss this significant undersupply over an extended period. Therefore, the number of new homes required is significantly higher than is	The council are advised to apply caution to the continued allocation or identification of sites which have failed to come forward for development over a considerable period. As such additional sites must be identified.	Not accepted. The objector refers to the plan's housing 'need' as being 7,950, but the LDP housing requirement is 6,950 with a 14.4% contingency resulting in an overall provision for 7,950 homes to meet the lower requirement. The objector fails to acknowledge the degree to which the housing requirement figure is already significantly above Welsh Government projected household growth trends, as shown in successive recent National projections from either 2011, 2014, or now more recently the 2018 based projections released by Welsh Government. The plan makes provision for housing at 2-3 times this projected growth trend for Flintshire. The premise of the LDP strategy from the outset has been to not allow housing alone to dominate the approach of the plan, but rather to recognize its importance as part of the infrastructure necessary to support economic activity, wealth generation and well-being. They also fail to recognise that the processes

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			being planned for and STR1 should be updated to increase the housing requirement and specifically state the housing requirement as a minimum number to achieve. We also have concerns with the distribution of growth and associated allocation of sites. These concerns are addressed in the context of the respective policies. The council are advised to apply caution to the continued allocation or identification of sites which have failed to come forward for development over a considerable period. As such additional sites must be identified.		for arriving at the plan's housing requirement and aspirational job figure are very different. In essence housing requirements are driven by reference to formally published national projections of household change whereas there are no similar projections at the national level of expected or anticipated job growth in each local authority area. This is why it is acceptable to have a broad portfolio of available employment land to facilitate job growth, but where the housing sites to deliver the requirement must be clearly identified along with evidence of their deliverability. There is also no direct formulaic relationship that the Council is aware of between housing requirements and levels of job growth sought in development plans The objector states "The housing target also fails to account for previous significant under-provision of housing throughout the previous plan period, and it cannot be sound to simply dismiss this significant undersupply over an extended period." This is not supported by evidence of what the shortfall is. The objector has failed to reflect that the UDP and LDP time periods are separate time periods and do not overlap, and where the calculation of housing requirement was based on the prevailing circumstances at the time and supporting evidence base. The Welsh Government projected levels of household growth are also very different, with the housing requirement of the UDP based solely on the level of projected household growth at the time (converted into a

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					dwelling need), whereas the projected growth during the LDP plan period is only around 36% of the LDP housing requirement when compared to the latest published 2018 based Household Projections. Even if the Council were to accept the principle of transposing an apparent under-provision of housing from a previous plan and adding it to the planned provision in the new plan, which it does not, the degree to which the LDP housing requirement exceeds the Welsh Government Projected growth could be argued to more than compensate for any such shortfall.
707	STR1: Strategic Growth	Object	This Representation is submitted having regard to our land interests in the settlements of Ewloe and Holywell, further details of which are provided later in this Representation. Policy STR1 maintains the previous position set out in the Preferred Strategy, planning for a housing requirement of 6,950 homes up to 2030. However, unlike the Preferred Strategy, the LDP is proposing a flexibility factor of 14.4%, identifying land with the ability to deliver a claimed 7,950 homes during the LDP period. We welcome the inclusion of a flexibility factor in excess of 10% which was originally proposed in the Preferred Strategy. We comment on the sources of supply to meet this minimum requirement later in this Representation. General Comments On review of Policy STR1, we would request that part iii) be amended to include the word “minimum”	On review of Policy STR1, we would request that part iii) be amended to include the word “minimum” before “housing” – the housing requirement should be treated as a minimum figure. Indeed, the Council itself is accepting that an over-provision of housing can be accommodated in the County by identifying sources of supply for an additional 1,000 homes.	Not accepted. The objector provides a lengthy narrative to support their representation much of which repeats the Deposit LDP and/or PPW. Within this the objector has a number of linked concerns relating to the strategic approach to growth in the LDP. The first of these relates to the plan period and the timing of the proposed adoption of the LDP, leaving 9 years of the plan period post adoption. Whilst the objector refers to there being a ‘policy vacuum’ for some time, it is not clear what is meant by this as the UDP whilst expired is still in line with many areas of PPW and is the starting point for making decisions on applications; PPW itself is national planning policy, along with the TANs that support it. Notwithstanding this they advocate extending the LDP plan period to 2034, and also imply it should look retrospectively as far back as 2000 to address unmet housing needs. They are in effect advocating a 34 year plan period but provide no evidential basis to explain or

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			before “housing” – the housing requirement should be treated as a minimum figure. Indeed, the Council itself is accepting that an over-provision of housing can be accommodated in the County by identifying sources of supply for an additional 1,000 homes.		justify how this is sustainable, what growth levels are deliverable during this period and where the sites are that would be needed to address this lengthy plan period. There is also the problem of looking too far into the future from the perspective that it becomes more difficult via the housing trajectory to predict what will happen on development sites in the future. It is the Council’s view that the plan period should remain as defined and the plan be examined on this basis, particularly in the context of housing delivery where, as the objector themselves acknowledge, the plan has so far delivered housing at or slightly above the rate planned for. The annual monitoring of the plan and the plan review process within the Regulations are the means to assess the performance of the plan and the need to update it, and the Council is bound by both of these requirements. The objector also feels the vision statement of the plan should be far more detailed but that would be counter intuitive to the normal purpose of a vision statement which in a short passage is intended to capture the essence of the plan’s approach. It is the strategic objectives that provide the more detailed expression of the vision and set out the key policy strands from which the Council has developed the strategic and detailed policies in the plan. The objector’s general support for all 19 objectives is duly noted with the exception of the point made in relation to objective 11 which relates to housing provision, where the

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					objector requests the addition of the word 'minimum' before 'housing needs'. This is confusing and not fully explained and implies to the Council that the objector is advocating only meeting the lowest or 'minimum' needs, which are expressed in the low level Welsh Government household growth projections. The Council has already explained why it has significantly varied from these projections in its background paper, supported by Ministerial advice provided in 2014 which is still relevant. The objector refers back to the UDP period and speculates that there is "probably" a shortfall in provision of housing from that plan, that the Council should calculate what this was, and that this should be added to the requirement for the LDP period to compensate for under-delivery. With respect it is for the objector to evidence this if they feel it is of relevance. Also the objector refers to the UDP failing to deliver houses, but it is the role of any development plan to make sufficient provision (through sites) for the housing requirement to be met. The mechanism for how housing is provided relies on the interaction with the market including the prevailing economic conditions, the capacity of developers to build, and the level of demand coming from potential buyers. The objector refers to the average level of provision in the first three years of the plan as evidence of strong demand, but with the benefit of a fourth year of completions in 2019,

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					it is evident that the average completion rate has reduced to 536 per annum. What the objector has also failed to recognise is that within this average there is significant variability in annual delivery, as whilst completions exceeded 600 for two of the four years, in the others they were low to mid 400s. This significant level of variability is at a time when there are sufficient deliverable commitments available, supplemented by speculative schemes that have consent, and illustrate the Council's concern of not seeking to set an unachievable housing requirement where consistently high delivery rates cannot be achieved and maintained by the development industry. The objector also fails to recognize that the average level of provision made by the plan is 530 dpa which is directly in line with the up to date delivery rate. The only evidential basis the objector provides for increasing the LDP housing requirement is to raise it by 400 units to 7,350 which is the upper end of the growth option 6 range. Given the point already made about completions in the first four years, this has already been more than recovered by those completion rates, over and above the average planned level for the whole of the LDP period. The objector's point about adding an unspecified UDP 'shortfall' is not well made or supported by evidence of what the shortfall is or how and from where enough additional sites would be found, save of course for the land being promoted in Holywell and Ewloe, which

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					on its own would not significantly address the 400 unit increase advocated by the objector, let alone the addition of a more substantial apparent UDP shortfall. It is therefore difficult for the Council to understand the alleged failings of the plan at the strategic level from the case being made. The objector has also failed to reflect that the UDP and LDP time periods are separate time periods and do not overlap, and where the calculation of housing requirement was based on the prevailing circumstances at the time and supporting evidence base. The Welsh Government projected levels of household growth are also very different, with the housing requirement of the UDP based solely on the level of projected household growth at the time (converted into a dwelling need), whereas the projected growth during the LDP plan period is only around 36% of the LDP housing requirement when compared to the latest published 2018 based Household Projections. Even if the Council were to accept the principle of transposing an apparent under-provision of housing from a previous plan and adding it to the planned provision in the new plan, which it does not, the degree to which the LDP housing requirement exceeds the Welsh Government Projected growth could be argued to more than compensate for any such shortfall. The objector advocates a plan period being extended to 2034 but only proposes the addition of 400 units to the housing requirement to address the additional housing

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					that would be required during this extended plan period. Extending the current planned requirement in the LDP of 463 units per annum for another 4 years would mean that there would be an additional requirement for 1,852 more homes that presently allocated, but apart from a relatively small sites in Holywell and Ewloe, the objector offers no evidence or alternative proposals to show how this extended plan period requirement could be met from sustainable deliverable sites, or how this could be accommodated within the LDP housing trajectory. There is therefore nothing for the Council to assess or compare to show how such a proposal is in any way a sound proposition over and above the position it presents and justifies via the deposit plan. The Welsh Government have not objected to the Council's housing trajectory as part of their formal comments on the deposit LDP and are satisfied that the trajectory is compliant with the guidance in the LDP Manual edition 3. Whilst the objector expresses concern about reliance on commitments in the early part of the trajectory this is sensible and logical as these are the sites within the LDP balance sheet that are the commitments that already have permission and do not have to await the adoption of the LDP to come forward. It is also this assessed pool of commitments that has provided for the delivery rates supported by the objector in the early years of the plan period, and as per the Preferred Strategy of the plan it is right that this land bank of

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					permitted sites makes an appropriate commitment to the LDP housing requirement. The objector also fails to recognize that a number of the sites allocated in the plan also already have planning consent and are already contributing units to the LDP supply and/or are capable of early delivery. That said it is also a false assumption made by the objector that the level of commitments and early years delivery rates are predominantly 'propped up' by speculative sites granted on appeal as there is little evidence to sustain this, and none presented by the objector. Indeed it is also the case that where inappropriate speculative sites have come forward they have been refused. The objector is concerned about deviation away from the housing trajectory in the second half of the plan period but doesn't provide any evidence to quantify by how much this deviation would be or which are the sites they feel will not come forward. It is therefore difficult to give any weight to the point being made and clearly from the recent consultation by Welsh Government on the Future of Housing Delivery via the Planning System the old mechanism of monitoring land supply via TAN1 is to be deleted and replaced by monitoring against the housing Trajectory. Whilst Welsh Government have not yet said what the mechanisms or actions would be if delivery varied significantly away from the trajectory, clearly the plan's monitoring framework and requirement to produce an AMR will ensure this is closely monitored. In

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					terms of the point made by the objector about the potential for recent large speculative windfalls to skew the assumptions made for windfall supply in the LDP balance sheet, the Council has accounted for this by reviewing the windfall trends over an 18 year period and by reducing the allowance by 50% of that trend, also in the knowledge that in terms of the more recent trend years, speculative sites have not contributed more than 50% of the overall windfall provision. Whilst the objector is concerned about the future supply of windfall sites even at the modest levels proposed, which they support, they have failed to note the findings of the Urban Capacity Study carried out to support the balance sheet and specifically the setting of the windfall and small sites allowance in the LDP. This shows a reasonable and healthy potential supply within existing settlements to support the allowances made.
790	STR1: Strategic Growth	Object	Comments on behalf of Redrow Homes Ltd in respect of Policy STR1. The Plan proposes an average annual level of housing completions of 463 dwellings per annum (dpa), despite representations made at the time of the consultation on the Preferred Strategy, this proposed level of provision has not changed; no documents appear to be available to explain why representations made at the time were not considered legitimate. However, notwithstanding this, the Technical Paper 'population and household projections with dwelling and	the Technical Paper 'population and household projections with dwelling and employment impacts' which was published at the same time indicates a dwelling requirement derived from the employment led growth option of between 480 and 540 dwellings (Table 3.3); it is not explained how this	Not accepted. The objector refers to comments made on growth options at the Preferred Strategy stage and queries why these were not considered to be 'legitimate'. There is nothing to suggest that the Council did not consider the comments made and in fact these were reported to its internal Planning Strategy Group as part of progressing the plan and reporting back on comments made at the Pre-Deposit stage of the plan process, a stage designed as the name implies to inform the deposit stage of the process. The important opportunity provided to the objector was to comment on the

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			employment impacts' which was published at the same time indicates a dwelling requirement derived from the employment led growth option of between 480 and 540 dwellings (Table 3.3); it is not explained how this assessment then translates into the, significantly lower, proposed figure for provision.	assessment then translates into the, significantly lower, proposed figure for provision.	soundness of the housing requirement in the deposit plan, and to provide evidence and justification to support any objection to that proposition. If the objector has failed to provide that evidence at the deposit stage, that is not a direct concern of the Council. The objector refers to the technical paper published at the time of the Preferred Strategy entitled 'Population and Household Projections with Dwelling and Employment Impacts', and specifically refers to table 3.3 of that document not clearly explaining the difference between the housing requirement figure published in the Deposit LDP (6,950/463 dpa) and the range presented from the growth option of between 480 – 540 dpa. With reference to table 3.3 in the background paper, the objector firstly ignores the point that the Council have made clear through its approach to the deposit LDP strategy that it has adopted the mid-point of the option 6 housing growth range which is clearly identified in table 3.34 as 6,950 dwellings, the figure that also appears in policy STR1 of the deposit LDP as the housing requirement or need to be met. Dividing this by the 15 year plan period gives the annualized requirement of 463 dpa. The objector's reference to the higher figures in the table is as a result of adding at that time a 10% contingency to the baseline requirement. In the second column of table 3.3 this adds 700 units to the 6,950 requirement, providing an overall provision for 7,650 units or 510 dpa. In fact since the preferred strategy, the level of

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					homes actually provided for in the plan has increased as the contingency has gone up to 14.4% meaning that the plan overall provides for 7,950 homes at an annual rate of 530 dpa. The objector refers to the mismatch between the 15 year average plan requirement of 463 dpa when compared with the average annual delivery rate for housing over just the first three years of the plan period which averages 568 dpa. The objector uses this short term trend to infer that the housing requirement should be higher because of this level of provision. That said the objector presents no evidence whatsoever to show how this rate can be sustained over the entire plan period and in fact having produced the 2019 Housing Land Supply Statement it is clear that this delivery rate is both falling and has extreme variability when the year on year levels are compared. Adding a fourth year of completions reduces the average delivery rate to 536 dpa which when compared to the average provision within the LDP of 530 dpa is in very close alignment. The objector has also failed to comment on the fact that within the average delivery rate calculated over the first four years of the plan, whilst delivery in two years has topped 600 dpa, in the other two years has only achieved low to mid 400s which is below the average LDP requirement let alone the actual homes provided for in the plan. The range of variability is also significant at over 200 between two consecutive years, raising obvious concerns about the ability of either

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					'demand' as the objector refers to it as, or the ability of the industry to build, to be sustained at consistently high rates throughout the entire plan period. The objector refers to the high level of delivery being achieved whilst there has been a "housing land shortfall" but this does not make sense as how has such a healthy level of housing delivery occurred without there being suitable and available land. The objector seems to be confusing the Council's inability to formally demonstrate a land supply because of TAN1, with the fact that the Council has a significant committed supply that has clearly supported the delivery rates discussed above. Neither is this delivery substantially supported by speculative sites granted permission under TAN1 rules as these have yet to substantially deliver. Reference is made by the objector to the background paper 'Employment and Housing Advice' prepared by the Council's employment consultants BE Group, where the objector infers from a partial quote from paragraph 4.3 of that paper that the consultants are supporting a growth target above the LDP level and at the level of the short term delivery rates. This is neither an accurate quotation from the document, or what the paragraph actually refers to. The full paragraph actually states "As can be seen from the table, since 2015 housing completions have averaged above the decade average and 2015, 2016

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					and 2018 have performed above the 2015-2030 annual target of 463 dwellings (for the LDP requirement of 6,950 dwellings over the forecast period). The 2015-2018 average of 568 dwelling completions is above the target level and represents a strong start to the actual growth for the planning period. It also suggests that such growth targets are supportable in Flintshire". [The Council's emphasis in bold]. The clear and correct interpretation from what is actually said is that dwelling completions in the short term give a positive indication that the plan's housing target (the requirement) is achievable. The objector also reflects that in paragraph 4.4 of the same document short term employment trends have been negative, whereas as short term housing delivery trends are positive. Apart from ignoring the vagaries of BRES employment survey data from which the job change data is drawn, the objector also illustrates the danger of relying on very short terms trends to project accurate provision over the length of the plan period without this becoming a purely speculative exercise. The objector then switches from need, which is the basis for setting an LDP housing requirement, to 'demand' which is evidenced in their terms by three years of housing completions, and also switch context from a "period of economic decline" in the previous paragraph of their objection to "a period of reasonable economic stability", to make the point that the three year average completion rate ('demand') is a

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					reasonable reflection of general demand that by inference, should be carried through the whole plan period. This ignores the previous point made in response that the average delivery rate has fallen to 536 dpa, and that this is in line with the average provision in the plan at 530 dpa, contrary therefore to the statement made by the objector that "housing demand is well in excess of the proposed level of provision". This is not the case from the factual evidence available. Whilst the objector criticizes the Council's approach to projections and the production of a number of growth options to determine the correct level for the plan, with these based on empirical evidence, no evidential basis is provided to justify the statement that "a higher level of housing growth, above 570 dpa, is required". The only justification for this is the short term delivery trend, but as the Council has explained above this has dropped and is in close alignment with the average level of provision in the plan. It also follows that if the objector feels the requirement could be higher, there can be no doubt that the requirement as put forward in the plan is deliverable, and is therefore sound. In relation to provision of affordable housing the background paper explains that there are a number of sources for provision rather than just emphasising the role of the plan or planning system as put forward by the objector. In suggesting that the overall housing

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					requirement should be higher, the objector is silent on the capacity of his client or the industry in general to deliver higher rates of affordable housing, given that the industry has generally objected to the 40% affordable housing levels proposed in policy, let alone having the capacity to meet the suggested need for 51% affordable proposed in the draft National Development Framework. The Council is confused by the point made that the projections used do not explicitly set out the assumptions behind them, as the main assumptions used to base each growth option were explained in the technical paper. The information behind the assumptions such as headship rates or migration trends is also publicly available and the objector was also free to provide their own projections during the consultation period on the deposit plan to both counter the continuing low level of projected household growth indicated by the 2011, 2014 and now 2018 based Welsh Government projections, as well as to support a higher LDP housing requirement than set out in the plan, but the objector has provided no such projections. The objector also provides mixed messages as on the one hand feels that the recent delivery rate is sustainable throughout the plan period, but also concludes without any form or justification that “an annual increase of at least 150 dwellings over that proposed appears justified, on top of which one should also add a proportionately increased flexibility allowance”. This would add

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					a minimum of 2,250 units to the requirement of 6,950 resulting in a requirement of 9,200. To that the objector adds flexibility but does not say at what rate, but assuming the 14.4% in the LDP is applied that would add a further 1,325 units making an overall provision of 10,525 units to be provided at an annual average of 701 dpa. This is in excess of any delivery rate quoted by the objector by a margin of 30% above, or 165 units per annum more than the current average delivery rate that either represents 'demand' by the market or what can be achieved by the industry. There is no evidence to show how this step change above market demand is deliverable or where the additional sites are that would be required to achieve it. Comparing this level of growth to the latest 2018 based Welsh Government projections shows that the even when compared to the high variant projected growth (232 dpa) the suggested level of growth is over 200% in excess of the projected trend. All that is offered by the objector is that "there are significant other opportunities for development in the County" but such an approach without evidence or justification, is purely speculative and simply makes provision for developers landbanks. The objector refers to a separate 'assessment' made by Lichfields on behalf of Redrow and Taylor Wimpey in collaboration where, because of the extent of the note, this has been responded to separately by way of a rebuttal statement by the Council.

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933	STR1: Strategic Growth	Object	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target, which is considered too low. Jobs target does not correlate with housing target. Also, despite the policy suggesting the focus of development will be located at sustainable employment locations many housing sites are not located to take advantage of this and moreover, insufficient employment provision is being identified. Policy should be expressed as a minimum.	Target housing requirement is too low. Jobs target does not correlate with housing target. Policy should be expressed as a minimum.	Not accepted. The objector makes a number of subjective and superficial statements in relation to the growth planned for in policy STR1 but does not provide any empirical evidence or reasoned arguments to support these statements. For example it is stated that the housing requirement is “too low” but there is nothing provided to explain why? by how much? or what is the ‘correct’ figure? Equally the jobs target is said to be “too low” and does not “correlate” with the housing target but again it is not explained how it is too low, by how much, what is the correct level, and what is the nature of the correlation between employment and housing targets. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector simply seems to be saying the housing and employment targets are too low and should be higher but without saying why, by how much or provide supporting evidence to justify this. The objector has had every opportunity with reference to the Council’s evidence base supporting the growth promoted by policy STR1 to provide evidence and explanation to support the very basic points made, but has failed to do this. The Council does not see how from the points made and lack of

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					corroboration, that the plan's soundness is in any way challenged.
939	STR1: Strategic Growth	Object	It is noted that the strategy is to seek to meet an aspirational employment growth scenario which is in excess of employment forecasts, instead based on the capacity figures of the strategic sites. In addition, that the housing land requirement is derived from this employment led growth scenario, which plans for housing above that indicated by household projections. While this is similar to the approach to plan positively for economic growth taken in the adopted Cheshire West and Chester Local Plan (although Cheshire West's approach is based on household projections uplifted for economic growth, rather than the jobs growth and employment land availability approach taken by Flintshire), this will require the retention and attraction of working age people or increased commuting to achieve these ambitions. It is not clear what level of in-migration or commuting is expected to be required from surrounding authority areas, however, it is recognised that it is extremely difficult to predict with any accuracy where people will choose to live and work. It would be helpful to clarify the reasons for the differences from the LDP Preferred Strategy 2017, which proposed an employment land figure of 223 ha, as compared to 139.67 ha in the Deposit	It would be helpful to clarify the reasons for the differences from the LDP Preferred Strategy 2017, which proposed an employment land figure of 223 ha, as compared to 139.67 ha in the Deposit Plan. PE1 (paragraph 10.1) states that this includes losses etc, so it is a net requirement, however, how is this linked to the number of jobs which remains unchanged at 8-10,000? Furthermore, the Council would like to understand how the differences in the sizes of the strategic sites from that in the Preferred Strategy, i.e. Warren Hall was 57 ha, but is now 74 ha, and Northern Gateway was 100 ha, but is now 72.4 ha.	Not accepted. It is noted that Cheshire West are also pursuing a positive economic growth strategy in their development plan and the Council have not objected to this. Whilst the objector recounts their understanding of the Council's strategy, the strategic sites in the LDP serve to illustrate that sufficient employment land is provided to meet the aspirational job target, along with other sites clearly identified under policy PE1. These are on long standing established employment locations where following the ELR there were no suitable alternative uses proposed for these sites, and it was established that they are still fit for purpose in providing a range and choice of sites for investors. Whilst Cheshire West's economic growth strategy is similar, Flintshire is less reliant on projected growth actually coming to fruition and that is why there is a broader range of employment site choice presented in a portfolio of sites to allow greater flexibility as well as capacity for job growth to occur. Flintshire's strategy is also aligned with the North Wales Economic Ambition Board's Growth Vision for North Wales as well as the collaborative work done via the Mersey Dee Alliance. Welsh Government are also satisfied with the level of housing and jobs growth in the plan and "have no concerns". They also consider that the LDP is in conformity with the draft National Development Framework, the Welsh Government's national development plan for Wales.

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			Plan. PE1 (paragraph 10.1) states that this includes losses etc, so it is a net requirement, however, how is this linked to the number of jobs which remains unchanged at 8-10,000? Furthermore, the Council would like to understand how the differences in the sizes of the strategic sites from that in the Preferred Strategy, i.e. Warren Hall was 57 ha, but is now 74 ha, and Northern Gateway was 100 ha, but is now 72.4 ha.		Like Cheshire West the strategy does rely on the attraction of working age people to meet a population change that is significantly above Welsh Government population and household projections, and where assumptions about net migration to achieve the level of population growth above projections are set out in the growth options considered for the plan, particularly option 4 which is clearly used to corroborate option 6 as the resulting population and household growth are very similar, and where for option 4 migration is assumed to be at the highest level achieved in Flintshire in the last ten years. The level of commuting assumed from the population has also been reduced in terms of the growth aimed for, on the basis of achieving a higher level of self-containment that is currently the case. Commuting is also two way as Cheshire West should acknowledge, where given the proximity of the two authorities Flintshire's role as an economic hub transcends administrative boundaries. The Council do not understand the point being made about how the employment land number has been reduced from 224 ha in the preferred strategy to 139 ha in the deposit plan, as this is explained on a site by site basis by the table under paragraph 10.1 of the deposit plan written statement on page 129. Equally CWAC could have queried anything that wasn't clear from this by contacting officers directly or via

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					the LDP helpline, but the Council is not aware of any such approach.
980	STR1: Strategic Growth	Object	OBJECTION: The objection is that the projections are out of date: 1. The LPA's data are from 2011, 2014 and the Welsh Government Projections which stated that the Wales population projections 2017, (2016based) will increase 3.1% per Millionby 2026, and 4.6% per Million by 2041. But the up-to-date ONS 2018 Projections tell a very different story of decline: Wales 2018 at 3.1% and 2043 at 3.1% EW.EU request that the Plan's Housing Projection is revisited using the ONS 2018 Data for Housing Projection	the projections are out of date:	Not accepted. Whilst the objector refers to the use of out of date Welsh Government projections they do not say what impact this has on the strategy of the LDP or the soundness of the plan. Equally the objector fails to recognise that the plan has taken account of the 2014 projections published following agreement of the Preferred Strategy where despite slightly higher household change trends, these were still substantially lower that the Preferred Strategy housing requirement figure and did not therefore impact on the strategic approach being taken by the Council. The objector has also failed to acknowledge that even later trends have been considered alongside the deposit LDP as whilst the Welsh Government produced 2017 based population projections they did not publish related household projections. Instead the Council provided its own 2017 based household projections produced by the Research and Information Unit at Conwy County Council to again determine if later trend projections had any impact on the plan's strategy. The background paper produced by the Research Unit in fact compares the 2011 and 2014 Welsh Government figures with their own 2017 projections to conclude that none of the trends affect the stance taken in the LDP in relation to setting a housing requirement. The objector refers to population trends as far ahead as 2043 but fails to acknowledge that it is the household projections that are of more

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					use in determining a housing requirement, as well as the fact that the LDP plan period only runs to 2030 in terms of planning for housing needs. Finally recently released Welsh Government 2018 based household projections show a falling projected trend in household change with even the hi variant only indicating projected growth at half the level provided for in the LDP based on supporting its economic growth strategy.
1004	STR1: Strategic Growth	Object	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target, which is considered too low. Jobs target does not correlate with housing target. Also, despite the policy suggesting the focus of development will be located at sustainable employment locations many housing sites are not located to take advantage of this and moreover, insufficient employment provision is being identified. Policy should be expressed as a minimum.	Target housing requirement is too low. Jobs target does not reflect or correlate with the employment growth target, which is considered too low. Policy should be expressed as a minimum.	Not accepted. The objector makes a number of subjective and superficial statements in relation to the growth planned for in policy STR1 but does not provide any empirical evidence or reasoned arguments to support these statements. For example it is stated that the housing requirement is “too low” but there is nothing provided to explain why? by how much? or what is the ‘correct’ figure? Equally the jobs target is said to be “too low” and does not “correlate” with the housing target but again it is not explained how it is too low, by how much, what is the correct level, and what is the nature of the correlation between employment and housing targets. The opportunity given to the objector during the deposit consultation was to consider the soundness of the LDP as published and if this was questioned, to say how the plan is unsound and why, and what the preferable alternative is. The objector has not done this and despite objecting has provided nothing that the Council can apply much weight to in considering or understanding the basis of the arguments put forward. The objector simply

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					seems to be saying the housing and employment targets are too low and should be higher but without saying why, by how much or provide supporting evidence to justify this. The objector has had every opportunity with reference to the Council's evidence base supporting the growth promoted by policy STR1 to provide evidence and explanation to support the very basic points made, but has failed to do this. The Council does not see how from the points made and lack of corroboration, that the plan's soundness is in any way challenged.
1130	STR1: Strategic Growth	Support	The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect. It is pleasing to note the Deposit Plan has been prepared having regard to the guidance in DPM 3, particularly Chapter 5 and the de-risking checklist. This puts the Council in a good position moving forward to the examination stage. Further comments are set out in the annex to this letter with additional guidance contained in the draft LDP Manual (3rd Edition). In moving forward to the LDP examination, demonstrating delivery of the plan will be essential. The development planning system in Wales is evidence-led; demonstrating how a plan is shaped by this evidence is a key requirement of the examination. Demonstrating the delivery and viability of all sites in the plan is critical,		Noted. The Council notes the support from Welsh Government for the Plan's strategy and proposed levels of growth, and the recognition of the evidential basis for this that is in line with the requirements of the Development Plans Manual edition 3.

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			particularly development proposed on strategic sites and other large housing/employment allocations which are integral to the strategy/objectives of the plan.		
1150	STR1: Strategic Growth	Object	Category C - Deeside Enterprise Zone – spatial identification The Council has not spatially allocated the Deeside Enterprise Zone (EZ) on the proposals map. The EZ should be shown spatially in the plan. Part of the EZ boundary is within a green barrier designation EN11.15 Sealand-Cheshire Border. It is not clear how/why a green wedge designation should be shown in an EZ. Would this preclude maximising economic opportunities within the EZ? This will be for the relevant Department of Welsh Government to comment on.	The Council has not spatially allocated the Deeside Enterprise Zone (EZ) on the proposals map. The EZ should be shown spatially in the plan.	Not accepted. The Enterprise Zone (EZ) is not a planning land use designation and was derived with Welsh Government to support funding/financial relief measures to facilitate economic investment in key sites specifically identified within the EZ such as Deeside Industrial Park and Principle Employment Area. The EZ boundary was not drawn up in a planning land use context and nor did its creation involve planners. Reference to the extent of the EZ could be made on the constraints map that's sits alongside the LDP Proposals Map.
1172	STR1: Strategic Growth	Object	LDP Housing Trajectory Background Paper 10 'Housing Land Supply and Delivery' sets out the Council's proposed housing trajectory for the proposed LDP period up to 2030. These figures are also reliant on 120 dwellings a year coming forward on a consistent basis from large and small windfall sites, which the Background Paper considers to be a conservative estimation (applying a 50% discount to both). In response to the housing trajectory, our Client has the following observations: - There is a significant reliance on existing commitments during the period 2018-19	To safeguard against this, our Client considers that more housing land should be allocated to come forward during the Plan period.	Not accepted. The objector provides a lengthy narrative to support their representation much of which repeats the Deposit LDP and/or PPW. Within this the objector has a number of linked concerns relating to the strategic approach to growth in the LDP. The first of these relates to the plan period and the timing of the proposed adoption of the LDP, leaving 9 years of the plan period post adoption. Whilst the objector refers to there being a 'policy vacuum' for some time, it is not clear what is meant by this as the UDP whilst expired is still in line with many areas of PPW and is the starting point for making decisions on applications; PPW itself is national planning

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			to 2021-22. It will be imperative that these commitments deliver if the Council is going to be able to demonstrate a five-year supply post-adoption, particularly given that no significant housing contribution is expected from allocated sites until 2021-22. It would be prudent, supported by evidence, to ensure that enough of the proposed site allocations are capable of early delivery during the Plan period; and - For the period 2023-24 onwards, the housing trajectory is heavily reliant on allocated and windfall sites in order for delivery to remain above the annual LDP requirement. However, given the lack of brownfield land availability in the County (as part of the justification for the release of greenfield sites), our Client is concerned that delivery could slip beyond the Council's estimations during the second half of the LDP period. It should be noted that historic windfall trends have taken account of the fact that speculative housing applications on greenfield sites have been granted planning permission in the absence of a five-year housing land supply. Clearly, this would not be the Council's intention once the LDP is adopted. Together, these could duly impact on windfall delivery rates in a number of the Tier 1, 2 and 3 locations in the settlement hierarchy. Paragraph 2.5.4 of the Background Paper refers to previous windfall delivery rates on large		policy, along with the TANs that support it. Notwithstanding this they advocate extending the LDP plan period to 2034, and also imply it should look retrospectively as far back as 2000 to address unmet housing needs. They are in effect advocating a 34 year plan period but provide no evidential basis to explain or justify how this is sustainable, what growth levels are deliverable during this period and where the sites are that would be needed to address this lengthy plan period. There is also the problem of looking too far into the future from the perspective that it becomes more difficult via the housing trajectory to predict what will happen on development sites in the future. It is the Council's view that the plan period should remain as defined and the plan be examined on this basis, particularly in the context of housing delivery where, as the objector themselves acknowledge, the plan has so far delivered housing at or slightly above the rate planned for. The annual monitoring of the plan and the plan review process within the Regulations are the means to assess the performance of the plan and the need to update it, and the Council is bound by both of these requirements. The objector also feels the vision statement of the plan should be far more detailed but that would be counter intuitive to the normal purpose of a vision statement which in a short passage is intended to capture the essence of the plan's approach. It is the strategic objectives that provide the more detailed

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			and small sites. In doing so, the Council has applied		expression of the vision and set out the key policy strands from which the Council has developed the strategic and detailed policies in the plan. The objector's general support for all 19 objectives is duly noted with the exception of the point made in relation to objective 11 which relates to housing provision, where the objector requests the addition of the word 'minimum' before 'housing needs'. This is confusing and not fully explained and implies to the Council that the objector is advocating only meeting the lowest or 'minimum' needs, which are expressed in the low level Welsh Government household growth projections. The Council has already explained why it has significantly varied from these projections in its background paper, supported by Ministerial advice provided in 2014 which is still relevant. The objector refers back to the UDP period and speculates that there is "probably" a shortfall in provision of housing from that plan, that the Council should calculate what this was, and that this should be added to the requirement for the LDP period to compensate for under-delivery. With respect it is for the objector to evidence this if they feel it is of relevance. Also the objector refers to the UDP failing to deliver houses, but it is the role of any development plan to make sufficient provision (through sites) for the housing requirement to be met. The mechanism for how housing is provided relies on the interaction with the market including the prevailing economic conditions, the capacity of

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					developers to build, and the level of demand coming from potential buyers. The objector refers to the average level of provision in the first three years of the plan as evidence of strong demand, but with the benefit of a fourth year of completions in 2019, it is evident that the average completion rate has reduced to 536 per annum. What the objector has also failed to recognise is that within this average there is significant variability in annual delivery, as whilst completions exceeded 600 for two of the four years, in the others they were low to mid 400s. This significant level of variability is at a time when there are sufficient deliverable commitments available, supplemented by speculative schemes that have consent, and illustrate the Council's concern of not seeking to set an unachievable housing requirement where consistently high delivery rates cannot be achieved and maintained by the development industry. The objector fails to recognize that the average level of overall provision made by the plan is 530 dpa which is directly in line with the up to date delivery rate. The only evidential basis the objector provides for increasing the LDP housing requirement is to raise it by 400 units to 7,350 which is the upper end of the growth option 6 range. Given the point already made about completions in the first four years, this has already been more than recovered by those completion rates,

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					over and above the average planned level for the whole of the LDP period. The objector's point about adding an unspecified UDP 'shortfall' is not well made or supported by evidence of what the shortfall is or how and from where enough additional sites would be found, save of course for the land being promoted in Penyffordd, which on its own would not significantly address the 400 unit increase advocated by the objector, let alone the addition of a more substantial apparent UDP shortfall. It is therefore difficult for the Council to understand the alleged failings of the plan at the strategic level from the case being made. The objector has also failed to reflect that the UDP and LDP time periods are separate time periods and do not overlap, and where the calculation of housing requirement was based on the prevailing circumstances at the time and supporting evidence base. The Welsh Government projected levels of household growth are also very different, with the housing requirement of the UDP based solely on the level of projected household growth at the time (converted into a dwelling need), whereas the projected growth during the LDP plan period is only around 36% of the LDP housing requirement when compared to the latest published 2018 based Household Projections. Even if the Council were to accept the principle of transposing an apparent under-provision of housing from a previous plan and adding it to the planned provision in the new plan, which it does not,

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					the degree to which the LDP housing requirement exceeds the Welsh Government Projected growth could be argued to more than compensate for any such shortfall. The objector advocates a plan period being extended to 2034 but only proposes the addition of 400 units to the housing requirement to address the additional housing that would be required during this extended plan period. Extending the current planned requirement in the LDP of 463 units per annum for another 4 years would mean that there would be an additional requirement for 1,852 more homes that presently allocated, but apart from a relatively small site in Penyffordd, the objector offers no evidence or alternative proposals to show how this extended plan period requirement could be met from sustainable deliverable sites, or how this could be accommodated within the LDP housing trajectory. There is therefore nothing for the Council to assess or compare to show how such a proposal is in any way a sound proposition over and above the position it presents and justifies via the deposit plan. The Welsh Government have not objected to the Council's housing trajectory as part of their formal comments on the deposit LDP and are satisfied that the trajectory is compliant with the guidance in the LDP Manual edition 3. Whilst the objector expresses concern about reliance on commitments in the early part of the trajectory this is sensible and logical as

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					these are the sites within the LDP balance sheet that are the commitments that already have permission and do not have to await the adoption of the LDP to come forward. It is also this assessed pool of commitments that has provided for the delivery rates supported by the objector in the early years of the plan period, and as per the Preferred Strategy of the plan it is right that this land bank of permitted sites makes an appropriate commitment to the LDP housing requirement. The objector also fails to recognize that a number of the sites allocated in the plan also already have planning consent and are already contributing units to the LDP supply and/or are capable of early delivery. That said it is also a false assumption made by the objector that the level of commitments and early years delivery rates are predominantly 'propped up' by speculative sites granted on appeal as there is little evidence to sustain this, and none presented by the objector. Indeed it is also the case that where inappropriate speculative sites have come forward they have been refused. The objector is concerned about deviation away from the housing trajectory in the second half of the plan period but doesn't provide any evidence to quantify by how much this deviation would be or which are the sites they feel will not come forward. It is therefore difficult to give any weight to the point being made and clearly from the recent consultation by Welsh Government on the Future of Housing Delivery via the Planning System the

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					old mechanism of monitoring land supply via TAN1 is to be deleted and replaced by monitoring against the housing Trajectory. Whilst Welsh Government have not yet said what the mechanisms or actions would be if delivery varied significantly away from the trajectory, clearly the plan's monitoring framework and requirement to produce an AMR will ensure this is closely monitored. In terms of the point made by the objector about the potential for recent large speculative windfalls to skew the assumptions made for windfall supply in the LDP balance sheet, the Council has accounted for this by reviewing the windfall trends over an 18 year period and by reducing the allowance by 50% of that trend, also in the knowledge that in terms of the more recent trend years, speculative sites have not contributed more than 50% of the overall windfall provision. Whilst the objector is concerned about the future supply of windfall sites even at the modest levels proposed, which they support, they have failed to note the findings of the Urban Capacity Study carried out to support the balance sheet and specifically the setting of the windfall and small sites allowance in the LDP. This shows a reasonable and healthy potential supply within existing settlements to support the allowances made.

Policy STR2

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
29	STR2: The Location of Development	Support	I fully support the classification of Gwernaffield as a Tier 4, defined village settlement.		Accepted. The support for the designation of Gwernaffield as a Tier 4 Defined Village is noted.
39	STR2: The Location of Development	Object	Policy STR2. The settlement hierarchy does not allow sufficient flexibility for the even distribution of new development across the County which is primarily being directed to the eastern half. The rigidity of the settlement hierarchy definitions mitigates against a more balanced distribution of housing development. As there are more Tier 3 and 4 settlements in the west there should be more allocations or settlement boundary changes to compensate for this uneven distribution where this would not create harm.	The settlement boundary in Trelawnyd should be changed to include part of site TLD001 and policies STR2,11 and HN1 amended accordingly to allow more flexibility of housing opportunities in Tier 3 and 4 settlements especially in the west of the County.	Not accepted. The settlement hierarchy in policy STR2 is based on a comprehensive suite of Settlement Audits which were published as part of the earlier Key Messages document alongside options in terms of categorizing settlements. This established that the most sustainable settlements are generally those in the eastern part of the County. The subsequent Strategic Options document then looked at 5 distinct spatial options for how growth should be distributed throughout the County. Option 1 was entitled ‘proportional distribution’ and involved the amount of development in each settlement being based on where a settlement is in the settlement hierarchy. Following an assessment of consultation responses, Option 5 which was a ‘Sustainable Distribution plus refined approach to rural settlements’. This option involved planned growth through allocations in the first three tiers of the settlement hierarchy and provision in the bottom two tiers through local needs based housing development. This is felt to be a far more sustainable approach as it is based on the relative sustainability of settlements rather than the “even distribution” advocated, which ignores this main principle. Although it is acknowledged that the new allocations are in the eastern half of the County, it must be stressed that the Plans housing

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					supply comprises more than just new allocations. The Housing Balance Sheet comprises completions that have already taken pace in the first 4 years of the Plan period, housing commitments that have a valid planning permission at present and allowances for small site and large site windfalls. As part of this wider housing supply there will be scope for housing in the western part of the County. In Tier 4 Defined Villages such as Trelawnyd policy STR2 focuses on schemes which bring about local needs affordable housing either through small scale exceptions schemes on the edge of settlement boundaries or windfall sites within settlement boundaries, and allows an element of market housing where necessary to deliver local needs housing. The settlement of Trelawnyd has a relatively compact shape with development to the north and south of the A5151 London Rd. The southern part of the settlement features a conservation area and to the west and north of the settlement is the Clwydian Range and Dee Valley AONB which is a landscape of national importance. The candidate site promoted by the objector adjoins the western edge of the settlement on the south side of the road and forms part of the designated AONB. This is a statutory landscape of national significance where PPW states 'National Parks and AONBs are of equal status in terms of landscape and scenic beauty, and must both be afforded the highest status of protection from inappropriate developments'. There is a firm defensible edge

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					to existing built development and the site forms an integral part of the wider agricultural landscape which affords far reaching views across the AONB. Development on any part of the site would harm the character and appearance of the locality and the objector fails to identify what “part” of the site they feel could be developed, or how this could sensibly be delineated. Land on the eastern edge of the settlement on the north side of London Rd offers scope for an affordable housing exceptions scheme where there would be no harm to the AONB. The objector seeks revisions to policy HN1 to allow more scope for housing in tier 3 and 4 settlements in the West of the County, and specifically site TLD001 in Trelawnyd. As set out above TLD001 is not considered appropriate for allocation in policy HN1.
47	STR2: The Location of Development	Support	we welcome the classification that Gwernaffield is a 'Tier 4' Rural Defined Village with a settlement boundary this surely emphasising that the above development should certainly never be allowed to progress any further.		Support is noted.
85	STR2: The Location of Development	Support	I wish to register my support for the plan in relation to the village of Pantymwyn. and its proposed classification as a Tier 4 defined village and the non inclusion of 5 candidate development sites as a Tier 4 village and for other reasons		Support Noted.

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126	STR2: The Location of Development	Support	I wish to thank the council for a very thorough and responsible Local development plan. For example, you have recognized that my home, Pantymwyn, is to be defined as a Tier 4 village. This recognizes the strong community nature of such an established community, which would be seriously changed by any further development. Thank you. This is a thank you for recognizing the importance of the natural environment in Flintshire. You state in (Environment) 8.1 that 'Flintshire has a high quality NATURAL and built environment which is one of it's primary assets. This provides a context for PROTECTING important landscapes, biodiversity and habitats, attracting investment, promoting tourism and ensuring the county is a sustainable place to live and work.' Where I live in Pantymwyn there is an abandoned area between pen y fron road and Cilcain road which has returned to wild meadow and woodland. With no management it is a thriving		Support noted.

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			ecological community. The abundance of cowslips and orchids in Spring I have not seen since the 1970's and that is just one example. I am a trained ecologist and carry out many surveys in the area for different organisations such as the RSPB, BYO, NW wildlife trust. Thank you for recognizing the importance of such areas, for controlling the amount of development allowed and making my life and that of the village safe, settled and enriched.		
136	STR2: The Location of Development	Object	The Joint Committee broadly supports the overall strategy set out in the plan, which allows for a level of growth in sustainable centres whilst seeking to protect key environmental assets such as the AONB. The focus on locating employment and housing growth in strategic sites and main services centres, all of which are outside the AONB or its immediate setting, is supported, together with the recognition that limited growth in a number of the rural settlements in and around the AONB will be necessary to meet local needs and help sustain essential services for both residents and visitors. Strategic Policy STR13 'Natural and Built Environment, Green Networks and Infrastructure' has		Not accepted. The settlement hierarchy in STR2 is based on a comprehensive suite of Settlement Audits which informed the earlier Key Messages document and Strategic Options consultations. Tier 5 'Undefined Settlements' are those which have the least facilities and services and often poor accessibility and therefore represent the least sustainable settlements in the County. Given this, and their small size they do not have the same policy approach as the other settlements, in that they do not have a defined settlement boundary. The policy wording in criteria e. of STR2 permits only sensitive and small scale housing developments which take the form of either infill or rounding off. A further policy proviso is that developments must be for local needs affordable housing. In many respects the approach is similar to small scale exceptions schemes, but without the delineation of a settlement boundary. The explanation in para 5.16 further explains the

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			the full support of the Committee, notably the commitment to 'conserve, protect and enhance the quality of … the Clwydian Range and Dee Valley AONB'. The Joint Committee supports the proposed 5 tier settlement hierarchy, noting that most rural settlements in the AONB or within its immediate setting are classed as Tier 4 Defined Villages (Cilcain, Gwernymynydd, Nannerch, Nercwys, Pantymwyn and Trelawnyd) or Tier 5 Undefined Villages (Afonwen, Cadole, Gwaenysgor and Llanasa) where limited development will be permitted in the form of infill development, rounding off of the settlement or local needs affordable housing. Whilst it is possible to assess where development will be permitted in the Defined Villages, which have settlement boundaries, it is less clear where development might take place in the Tier 5 settlements. The committee would suggest that additional safeguards to prevent the unacceptable expansion of these settlement is required to set out more precise criteria against which proposals will be judged.		policy wording by stating 'In these lower tier settlements, development needs to be sensitively conceived and designed …. and to respect the character and appearance of the site and its surroundings'. The implementation of the policy requires an analysis of the form and pattern of built development in each of the settlements and the relationship between built development and open countryside. The success or otherwise of a proposed development is whether it respects the present development pattern and respects the character and appearance of the locality. These are concepts which are embodied throughout the Plan and particularly in policies PC2 and PC3. By way of example, in the case of Afonwen there are distinct blocks of built development to the north and south of the A541. Even without the benefit of a settlement boundary, this pattern of development is clearly recognizable and provides a firm evidential basis with which to consider development proposals. In this context it is not considered that further detailed guidance is necessary.

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212	STR2: The Location of Development	Object	We do not feel that allocating large scale Housing in villages that do not have a primary school e.g. New Brighton, Alltami can be considered "sustainable". This will encourage car use, and contrary to Active travel policies, since school will be too far for children to walk. (See current application for 97 houses in New Brighton ref 060220)	Remove any villages without a school from "Sustainable category" e.g. New Brighton and place in lower tier	Not accepted. The designation of New Brighton as a Tier 3 sustainable settlement is based on the earlier Settlement Audit. Although recognising that New Brighton does not have a school it does have a range of other services and facilities and bus service between Mold and Buckley and onto Chester. Both Sychdyn and Mynydd Isa have a school and New Brighton sits between the two. In this context it is considered that New Brighton is properly recorded as a Tier 3 Sustainable Settlement. Mynydd Isa has a school on a split site and these are 1.1km and 1.7km from the New Brighton site. The route follows pavements and is capable of providing a safe and convenient route to school. The school at Sychdyn is located 1.25km from the site and measures are presently being considered to secure a safe and convenient route. A planning application is presently under consideration on the allocated site and this will involve provide a further opportunity to assess of the sustainability of the site in terms of accessing schools. It is not accepted that any settlements without a school should be removed from tier 3 Sustainable Settlements category as settlement categorization is based on a combination of factors.

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272	STR2: The Location of Development	Object	Objections to affordable housing exceptions policy in Tier 2,3,4 and 5 settlements and the affordable housing policy within the Tier 3 and 4 settlement boundaries. please refer to attached pdf file below for detailed objection. Objection to Policy STR2 Location of development: Rural exception sites and Tier 3 and 4 villages. The need for affordable housing in the rural area is strongly supported and whilst the sentiment of the rural exceptions policy is well meaning, it is not fit for purpose. Reliance on STR2 (ii) through the exceptions policy simply will not work. It is a flawed policy which has provided no meaningful affordable housing contribution in the rural areas. Attempts have been made to elicit a response from the local planning authority as to how many rural exception dwellings have been provided in the county since its introduction. These have included Freedom of Information requests but no evidence has been produced regarding the numbers, if any, of exceptional site	The rural exceptions policy needs to be changed to allow on site market housing as cross subsidy for affordable housing. This need not involve excessive development out of character with the rural settlement	Not accepted. The provision of small scale affordable housing exceptions in STR2 as further explained in HN4-D is a means of providing affordable housing on the edges of settlements. The approach is fully in line with PPW (para 4.2.34). However, para 4.2.34 of PPW specifically states 'Affordable housing exception sites are not appropriate for market housing'. Unless there is a change to national planning guidance it would not be appropriate to amend the Plan to include an element of market housing / cross subsidisation on exceptions schemes. Whilst the objector in a lengthy statement criticises the Council for a lack of clarity in relation to elements of STR2, from above the Council is satisfied that the policy aligns with PPW, and where Welsh Government have no issues with the spatial strategy of the plan. Having criticised a lack of clarity, the objector fails to define what "on site market housing" means, at what scale, what mechanisms there would be for "cross subsidy", or what "excessive development" means. Without this clearer expression of what is sought via the objection, it is difficult to see how the soundness of the plan is challenged.

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			dwellings that have been either approved or built. The only such development is the Maes Y Goron site at Lixwm. This 25 unit site was granted in 2007 and, although the cooperation and negotiation between the developer and the planning authority was well intentioned, it has been fraught with difficulty ever since. It represented the first and only attempt to bring forward a rural exception site in the county. The lessons learned have demonstrated that the exceptions Policy HSG11 of the UDP is an ineffective mechanism to bring forward local needs housing in the rural area. In light of this experience it is surprising and disappointing that the planning authority reproduces exactly the same policy in the clear knowledge that it has failed. In response to an enquiry on a different site it was stated that, “The policy has worked well in terms of preventing market dwellings in these settlements but has perhaps worked less well in terms of the		

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			numbers of affordable houses it has delivered". This is a clear admission of its failure. If it is serious in seeking to provide affordable housing in the rural area, then it must re-think its policy. Otherwise it might as well acknowledge that there is no prospect of helping the rural community provide the type of housing that it needs. Implementation Statement 3 of the current UDP (Monitoring the Plan), states that "The Council will continuously monitor the effectiveness of policies and proposals in the Plan and will respond to changing economic, social, environmental and legislative circumstances in order to review and update the Plan". Paragraph 20.13 of the explanatory text emphasises how important this is in terms of measuring the effectiveness of its policies and proposals. "It is important that the policies and proposals in the UDP are regularly monitored and reviewed in order to gauge their effectiveness as they are implemented. Regular monitoring will indicate whether or not the Plan's aims are being met and will ensure that it remains the		

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			most appropriate and locally accepted response to current issues of environmental, social and economic importance". LDP Manual paragraph 5.2.2.2 advises that existing planning policies should be reviewed to assess their effectiveness and reiterates this later by saying that useful sources of existing information include the appraisal and monitoring of previous/extant Development Plans. The planning authority clearly have not done so in relation to the effectiveness and intent of this policy. Review should also have been triggered by RTPI Cymru's research carried out by Cardiff University and published in January 2019 which highlighted the failure of this policy nationally. With regard to the Tier 3 villages and criterion iii) of the policy it is hard to see how this will realise any affordable housing. The affordable housing area/units threshold applies to sites capable of accommodating 10 or more units. However, there are no undeveloped sites of such a size within any of the Tier 3 villages		

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			and it follows that no affordable house would be provided. Any such site has already been developed. For the Tier 4 defined villages, the policy would permit windfall market housing where it is essential to the delivery of affordable housing. Whilst this is a step in the right direction there is a lack of clarity as to how it will operate. Paragraph 5.15 states that, “in the case of windfall sites, scope exists for limited market housing where it can clearly facilitate local needs affordable housing. The additional flexibility arising from allowing market housing should help improve the viability of local needs affordable housing”. No further clarity is provided in Policy HN3 Affordable Housing.		
269	STR2: The Location of Development	Support	As a resident of Pantymwyn I am pleased to see that the village is classified as a Tier 4 Defined Village. This classification accurately defines the nature of the existing village and places upon it the restrictions on any future developments which will		Support noted.

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			ensure that its character remains essentially unchanged for the foreseeable future. I note the possible impact on Pantymwyn of Policies HN3 and HN4-D with regard to Affordable Housing but, as the Plan does not set out a case for the creation of Affordable Housing in the village, I believe the parameters set out in the Plan for such developments should provide reassurance to existing residents. Given that my focus has been on the village of Pantymwyn, I consider that the draft LDP is a well researched and structured blueprint for the future of land development in the village and fior the County as a whole.		
208	STR2: The Location of Development	Support	I would like to put forward the site of the present India Restaurant on Hawarden Road, Hope. It could be a site that could fit in with the new Welsh Assembly Self Build Scheme, which has funding of £210 million and would be a valuable addition to the LDP housing policy and would fit in with policy STR2. It would also be a useful addition to the housing allocation in Hope.	Inclusion of additional india restaurant site on Hawarden Road, Hope.	Not accepted. The former Indian Restaurant at Hawarden Road Hope is within the settlement of HCAC in both the adopted UDP and the Deposit LDP. The development of the site has been previously constrained by its location on the line of the Hope – Caergwrle Bypass, although this road scheme has now been dropped by the Council. Given its location within the settlement boundary it could be developed for a variety of types of housing as set out in STR2. The Plan makes an allowance for small site windfalls and the site could be delivered as part of this. However, the restaurant has recently been trading again.

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373	STR2: The Location of Development	Object	Leeswood is classed as a Sustainable Settlement with a projected growth rate of 14%. Leeswood consists of some 800 homes. New homes projected for the 15 year LDP period = 14% x 800 = 112. New homes Approved for Leeswood since 03 Dec 2012* = 26 (includes Ivy Cottage = 7 homes and Wales Living Space = 13 homes). New homes under consideration (Site for > 10 homes) = 22 + 4 apartments (Pontybodkin Hill). New homes shown as Preferred Allocations under LDP = 0. New homes needed to allow for projected growth of 14% = circa 60 shortfall (at Nov 2019). (* 26 homes since 03 Dec 2012 ... includes for build start date slipping > 2015 / start of LDP).	Since 03 Dec 2012 ... 3 large schemes (7, 8 and 5 homes each) account for 77% of the 26 new homes Approved and delivered for Leeswood in the last 7 years. 4 individual homes and a pair of semi-bungalows have been Approved, so Total = 6 homes Approved over 7 years on sites < 2 homes. Changes:- Leeswood needs a ' > 10 homes site' under Preferred Allocations in LDP to allow for projected growth of 14% = circa 60 new homes shortfall (at Nov 2019).	Not accepted. The table below para 5.13 of the Deposit LDP sets out an apportionment of growth across the 5 tiers of the settlement hierarchy. Accordingly, 14% of the Plans total housing provision will be directed to Tier 3 Sustainable Settlements. It does not mean that every settlement within tier 3 will grow by 14%. Leeswood has undeveloped land within the settlement and there is presently a planning application for 26 houses at the former Laura Ashley site. However, in the adjoining settlement of Coedtalon / Pontybodkin there is a housing allocation carried over from the UDP and the bulk of this now has detailed planning permission. These are all brownfield sites and the focus in these two settlements in this Plan period should be for these to be developed. Allocating further greenfield land would detract from the delivery of these sites.
342	STR2: The Location of Development	Object	See attached representation. Unable to complete this box due to word restriction		Not accepted. The Plan does not assign specific growth bands or targets for specific settlements and the objector has argued against “apportioning a strict percentage growth” in its

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			The Plan therefore seeks to distribute development spatially across the County and emphasises the need for a settlement strategy to provide the basis for a spatial pattern of housing development. The site sits on the edge of the settlement of New Brighton which is designated as a 'Sustainable Village'. A greater proportion of development will be directed to the top three tiers of the settlement hierarchy which includes New Brighton. A broad brush distribution of housing, based on the pre deposit published version of the plan is set out below. The broad apportionment of growth may be further refined as the Plan progresses. • Tier 1 Main Service Centre 40-45% • Tier 2 Local Service Centre 35-40% • Tier 3 Sustainable Villages 15-20% • Tier 4 Defined Villages 1-2%		previous representation to policy STR2, objection reference 333. Growth over the Plan period in a settlement can be achieved through a variety of sources of supply including allocations, completions, commitments and windfalls. It is evident that New Brighton has seen substantial growth in the past few years with the development of the UDP allocation (Elan Homes) and a recent windfall development by Edwards Homes. The Plan has allocated a new site at Cae Isa on which there is a present planning application. Part of this allocated site is already within the settlement boundary. It is not considered that given the size of the settlement, a further allocation is necessary or appropriate in this settlement. Further commentary on the specifics of the promoted site on the eastern edge of the settlement is set out in response to other representations.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			• Tier 5 Undefined Villages 0-1% Future housing development surrounding the New Brighton settlement should be encouraged and supported in the local plan given the growth figures that are set out above.		
368	STR2: The Location of Development	Support	See attached representation. Unable to complete this box due to word restriction Policy STR2 sets out the Spatial Strategy and location of development for the County. The Policy is clear that the majority of development will be directed to the top three tiers of the settlement hierarchy as it is these settlements which are evidenced as being the most sustainable settlements in terms of the settlement audits. 4.2. Paragraph 5.13 of the LDP explains that the Plan does not seek to apportion development spatially using numerical or mechanistic methods relating to growth		Not accepted. Support for the policy is noted. However, the Plan does not assign specific growth bands or targets for specific settlements and the objector has argued against "apportioning a strict percentage growth" in its previous representation to policy STR2, objection reference 333. Growth over the Plan period in a settlement can be achieved through a variety of sources of supply including allocations, completions, commitments and windfalls. It is evident that Flint has seen substantial growth over the UDP period with the strategic Croes Atti development and that further development on remaining phases of this scheme will take place over the next few years. The Plan makes a further allocation on land at Northop Road, Flint which was previously proposed for development in the UDP, but not carried over into the adopted UDP. Both sites are considered to be sustainable and deliverable over the Plan period, particularly given that Anwyl Land are the applicant on a planning application at the Northop Rd site. With the remaining units at Croes Atti and the new allocation at Northop Road it is not considered

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			bands, rates, targets or quotas. Rather, the Plan seeks to distribute development in a sustainable manner having regard to the settlement hierarchy and by identifying the most sustainable settlements and sites. 4.3. Flint is identified as a Main Service Centre in the Deposit Plan and we agree with this designation in view of the sustainability of Flint and its wide range of services and facilities. Tier 1 settlements are intended to provide 47% of the Plan's housing requirements. This is a minor up lift from the Preferred Strategy breakdown of 40-45% of the total proportion of growth in the County. This approach is supported by our client in principle, as it seeks to provide an appropriate level of housing for each settlement. However, it is recommended that any targets provided are given as a minimum to ensure full flexibility and to assist Flintshire in maintaining		appropriate or necessary for a further large scale allocation at Croes Atti.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			their five-year supply of housing. Apportioning a strict percentage growth to each settlement as undertaken within the existing failed UDP may result in Flintshire continuing to under deliver on their housing supply and stop the market from being able to deliver sustainable housing sites. 4.4. Allowing further growth to the Main Service Centres with Sites which are readily available and unconstrained will help to ensure sufficient flexibility and deliverability of housing. The proposed allocation at Northop Road (HN1-4) is fully in accordance with Policy STR2. 4.5. The whole of the Site can be delivered within the plan period, the majority of which within the first 5 years. (There are no deliverability issues associated with this Site which can provide market and affordable homes).		
333	STR2: The Location of Development	Support	4.1. Policy STR2 sets out the Spatial Strategy and location of development for the County. The Policy is clear that the majority of		Support noted. However, it is not clear what the objector means by the “failed UDP” as they

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			development will be directed to the top three tiers of the settlement hierarchy as it is these settlements which are evidenced as being the most sustainable settlements in terms of the settlement audits. 4.2. Paragraph 5.13 of the LDP explains that the Plan does not seek to apportion development spatially using numerical or mechanistic methods relating to growth bands, rates, targets or quotas. Rather, the Plan seeks to distribute development in a sustainable manner having regard to the settlement hierarchy and by identifying the most sustainable settlements and sites. 4.3. Mold is identified as a Main Service Centre in the Deposit Plan and we agree with this designation in view of the sustainability of Mold and its wide range of services and facilities. Tier 1 settlements are intended to provide 47% of the Plan's housing requirements. This is a minor up lift from the Preferred Strategy breakdown of 40-45% of the total proportion of growth in the County. This approach is supported by our client in principle, as it seeks to provide an appropriate level of housing for each settlement. However, it is recommended that any targets provided are given as a minimum to ensure full flexibility		benefitted from numerous permissions granted under that policy framework. In addition, whilst from a developer perspective and for landbank purposes it may be preferable to have more "readily available and unconstrained" sites, the purpose of the LDP is to assess need and make suitable, sustainable, and deliverable provision to meet this.

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			and to assist Flintshire in maintaining their five-year supply of housing. Apportioning a strict percentage growth to each settlement as undertaken within the existing failed UDP may result in Flintshire continuing to under deliver on their housing supply and stop the market from being able to deliver sustainable housing sites. 4.4. Allowing further growth to the Main Service Centres with Sites which are readily available and unconstrained will help to ensure sufficient flexibility and deliverability of housing. The proposed allocation at land between Denbigh Road and Gwernaffield Road is fully in accordance with Policy STR2. The whole Site can be delivered within the plan period (market and affordable homes) and there are no deliverability issues associated with this Site.		
338	STR2: The Location of Development	Object	See attached representation. Unable to complete this box due to word restriction. Anwyl Homes firmly believes that additional development should be apportioned to Flint given the locational advantages in terms of sustainability and connectivity with wider North Wales, the North West		Not accepted. The Plan does not assign specific growth bands or targets for specific settlements and the objector has argued against "apportioning a strict percentage growth" in its previous representation to policy STR2, objection reference 333. Growth over the Plan period in a settlement can be achieved through a variety of sources of supply including allocations, completions, commitments and windfalls. It is evident that Flint has seen

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			of England and direct rail connections to London.		substantial growth over the UDP period with the strategic Croes Atti development and that further development on remaining phases of this scheme will take place over the next few years. The Plan makes a further allocation on land at Northop Road, Flint which was previously proposed for development in the UDP, but not carried over into the adopted UDP. Both sites are considered to be sustainable and deliverable over the Plan period, particularly given that Anwyl Land are the applicant on a planning application at the Northop Rd site. With the remaining units at Croes Atti and the new allocation at Northop Road it is not considered appropriate or necessary for a further large scale allocation at Croes Atti.
354	STR2: The Location of Development	Support	I feel the settlement boundaries within my village (Leeswood) have been sensibly placed and strongly support their retention , with no development outside of those boundaries		Support is noted.
381	STR2: The Location of Development	Object	The proposed housing development project on Ash Lane, Hawarden will place considerable extra strain on existing facilities within Hawarden such as schools, medical services and the existing road network. Attempting to access the medical services is already very difficult. The volume of traffic on both Ash Lane and Gladstone Way is already high, as	I believe that the planned construction of 288 houses on Ash Lane, Hawarden should be reconsidered.	Not accepted. It is accepted that new development will create pressure on existing services and facilities. However, Betsi Cadwaladr University Health Board have not objected to the Plan nor this allocation. Similarly, the Local Education Authority have not objected to the Plan nor this site. Both parties have been stakeholders in the Plans preparation and the lpa is continuing to work with each party to ensure that additional capacity can be provided. It must be stressed that completions on the site are not anticipated until 2023/4 and

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			is the speed at which some of the vehicles travel.		the site will be developed over several years, and this gives time for capacity and mitigation measures to be put in place. In terms of highway capacity, the Councils Highways Development management Officers have no objection to the proposed development. Any issues relating to the enforcement of speed limits on local roads are a matter for the police to enforce.
387	STR2: The Location of Development	Support	See attached representation. Unable to complete this box due to word restriction. Policy STR2 sets out the Spatial Strategy and location of development for the County. The Policy is clear that the majority of development will be directed to the top three tiers of the settlement hierarchy as it is these settlements which are evidenced as being the most sustainable settlements in terms of the settlement audits. 4.2. Paragraph 5.13 of the LDP explains that the Plan does not seek to apportion development spatially using numerical or mechanistic methods relating to growth bands, rates, targets or quotas. Rather, the Plan seeks to		Not accepted. The support for the policy is noted. However, the Plan does not assign specific growth bands or targets for specific settlements and the objector has argued against “apportioning a strict percentage growth” in its previous representation to policy STR2, objection reference 333. Growth over the Plan period in a settlement can be achieved through a variety of sources of supply including allocations, completions, commitments and windfalls. It is evident that Mold has seen substantial growth over the UDP period through allocated sites and windfall development. The Plan makes two further allocations at Maes Gwern where Wates are presently developing 160 units and the new allocation at Denbigh Rd / Gwernaffield Rd, which the objector is promoting. Both sites are considered to be sustainable and deliverable over the Plan period, It is considered that sufficient provision for growth through new allocations has been made in Mold and other

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			distribute development in a sustainable manner having regard to the settlement hierarchy and by identifying the most sustainable settlements and sites. 4.3. Mold is identified as a Main Service Centre in the Deposit Plan and we agree with this designation in view of the sustainability of Mold and its wide range of services and facilities. Tier 1 settlements are intended to provide 47% of the Plan's housing requirements. This is a minor up lift from the Preferred Strategy breakdown of 40-45% of the total proportion of growth in the County. This approach is supported by our client in principle, as it seeks to provide an appropriate level of housing for each settlement. However, it is recommended that any targets provided are given as a minimum to ensure full flexibility and to assist Flintshire in maintaining their five-year supply of housing. Apportioning a strict percentage growth to each settlement as undertaken within the existing failed UDP may result in Flintshire continuing to under deliver on their housing supply and stop the market from being able to deliver		Tier 1 Main Service Centres. It is not considered that any additional growth should be apportioned to the Tier 1 settlements.

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			sustainable housing sites. 4.4. Allowing further growth to the Main Service Centres with Sites which are readily available and unconstrained will help to ensure sufficient flexibility and deliverability of housing. We contend that residential development at the land to the South of Gwernaffield Road is fully in accordance with Policy STR2. The Site can deliver a significant element of housing within the plan period (market and affordable homes) and should be allocated within the Local Plan as there are no deliverability issues associated with this Site.		
423	STR2: The Location of Development	Support	supportive of the FLDP directing housing growth the housing growth the sustainable settlement and using the settlement hierarchy as a basis for this.		Support is noted.
451	STR2: The Location of Development		As Nannerch is a defined village there is little prospect of any realistic development despite some good proposed candidate sites suggested from the outset. There is talk in the policy of protecting the rural communities, pubs, schools halls etc but in reality there doesn't seem to be		Not accepted. The LDP has focused growth towards the higher tier settlements of the plan (Tiers 1, 2 and 3) where it is more sustainable to allocate sites close to existing services and facilities, and reduce the need to travel in line with national planning policy (PPW10). Nannerch is a Tier 4 'Defined Village' which

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			any flexibility outside the very restrictive settlement boundary. We are concerned at the prospect of no new housing until 2030 and loss of inward investment that any new development may bring. 9.25. Opportunities to expand the network for walking and cycling along old railway lines should be proactively sought and encouraged where possible. 9.36. Public Houses should be treated as 'assets of community value' as they are in England to ensure that they are safeguarded. We don't think you policy is strong enough in this aspect. 9.37. With so few sites earmarked for cemetery extensions, there should be the flexibility to extend other cemetery's under this plan should the need arise. 10.6. Every effort should be made to permit sympathetic farm diversification. This is specifically important in the AONB to increase tourism opportunities. 12.21. The AONB Supplementary Planning Guidance Note should be implemented in all applications in the AONB. 12.85. Whereas we are not opposed to the safeguarding of jobs that the extension to the quarrying that Fron Haul may bring, and we have currently not received any opposition, careful consideration		benefits from some services and facilities to sustain local needs. Policies within the plan enable small scale local needs housing within rural areas such as Nannerch, either as windfall sites within the settlement boundaries or as small exception sites on the edge of settlement boundaries for affordable housing. Windfall market housing will only be permitted on sites when it is essential to delivering affordable housing. Policies STR2 and HN4-D specifically provide the opportunity to develop local needs housing within Tier 4 Defined Villages such as Nannerch therefore it is not necessary to allocate a site to meet future needs.

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			should be given to the Semi Natural Woodland that screens it from the A451 and AONB and any protected species such as Dormice. Any permission should ideally be a short term extension with realistic dates to allow the quarrying without the long term future threat of quarrying over decades.		
475	STR2: The Location of Development	Object	UDP policies GEN3, HSG4, HSG6 (Possibly STR2 Location of Development in the LDP) I have been advised that any building /development on the land adjacent to Mountain View Afonwen would not be allowed due to the fact that the land has been redesignated as open countryside. The site is sustainable as is borders the A541 has mains sewerage, water, electricity and is served by bus routes. The plan does not make any consideration for the smaller hamlets like Afonwen. Small controlled infill development should be considered to sustain and grow these hamlets and stop them being stockbroker belts where only people working away from the area can afford to buy.	seeks allocated site	Not accepted. It is disappointing that the objector has sought to put forward the site at this late stage in the Plans preparation. An earlier submission at candidate site stage or at Alternative Sites (Preferred Strategy) stage would have enabled a full assessment and comparison alongside other sites. It is disappointing that the site is submitted without a Sustainability Appraisal as required by Welsh Government in the Development Plan Manual 3 in Diagram 8 'Any new sites proposed at Deposit stage will be required to submit an SA with their site submission'. The site is approximately 0.34 acres in size. The site is located in Afonwen on the A541 Mold to Denbigh road. The site being promoted is located outside the settlement boundary in the adopted UDP and therefore in open countryside. This is the same as the Deposit LDP where the site sits within open countryside. The site does not comply with the Preferred Strategy as Afonwen is a tier 5 Undefined Village which does not have a settlement boundary and where no new allocations will be made. The lowest Tier

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					(5) comprises small settlements which have a poor level of services and facilities, and often poor accessibility and are the least sustainable settlement in the County. Afonwen has few facilities and services and residents would be dependent on car based travel to access everyday needs in the nearest sustainable settlement or service centre. The designation of Afonwen as a Tier 5 settlement does not mean that no development can take place over the Plan period. New development which provides for local needs based affordable housing can take place in line with policy STR2, provided that it represents sensitive small scale housing in the form of infill or rounding off. The proposed site is clearly out of step with the policy approach given that the site does not relate to the main built part of Afonwen some 400m to the east. Appendix 1 of the LDP written statement clearly indicates a planning permission for 19 units at the former Wilcox Coachworks. There is therefore scope for development to be delivered in Afonwen. The site does not act as an infill site and it is considered to form an illogical intensification of the existing sporadic pattern of development. Although it is acknowledged that the site was a brownfield site, the garage has been long gone and, although a little untidy, it now presents an open character along with the adjoining

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					undeveloped land and reads as part of the surrounding countryside when viewed from the A541. On the adjoining land to the east a planning application (056703) for three dwellings was refused on 05/07/17 and a subsequent appeal was dismissed on the basis that the Inspector considered that it would be contrary to national and local policy given its open countryside location and that it would not represent sustainable development. The approach regarding Tier 4 and 5 settlements in policy STR2 recognises the need to provide for opportunities for new housing to meet local needs provided that each proposal and site is sustainable and appropriate. Policy STR2 allows small scale affordable housing proposals in the form of infill or rounding off development. Afonwen has distinct blocks of development on both the north and south side of the A541 and the site is located some 450m to the west of this and therefore not considered to meet the requirements of STR2e. Although it is recognised that there are mains supplies that are achievable for the site, it is considered that there are overwhelming negative factors which outweigh these few factors which on their own do not define sustainable development. A number of consultation responses from key stakeholders are set out below:

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					Highways: Highways have objections to the site due to limited visibility, it appears impracticable to create a new access onto the A541. Any development of the site should be limited to ensure that traffic movements do not exceed those of the current permitted use. Ecology: With regards to ecology, The Council's Ecologist team carried out a desktop assessment (in the light of Covid -19 restrictions) and considered that the regenerating scrub more mature trees and disturbed ground with rubble/debris had. the potential for nesting birds, badger and the debris can provide refugia for amphibians and reptiles. The Ecologist commented 'However I am aware that the adjacent site is subject of a planning application and photos of that site show that it has already been cleared and the boundary trees cut back and which may apply to the whole site. Without photos or being able to undertake a site visit I can't confirm what is actually present'. Any application would need a statement with regards to the habitats and species present on site and the measures to avoid, mitigate, compensate, enhance and manage wildlife features. This might just relate to the boundary features.

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					Protected Landscape: Another constraint to the site is that the landscape is protected. NRW have been consulted and responded 'This site is located within the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty. NRW consider a carefully designed scheme could be accommodated on the site. At this stage NRW cannot comment upon its capacity for multiple dwellings, we provide the LPA with some guidance below on how to consider capacity within the allocation'. NRW Contextual appraisal response: The A541 has a strong rural character. There are scattered residential properties along the roadside. They are largely set back from the road edge within gardens/ behind hedgerows with trees. The site contains a number of trees. It is not clear which of these trees could be retained if the site were allocated for housing. NRW would advise the following landscape planning objectives need to be addressed by any future planning scheme. NRW recommend the LPA consider these in deciding the capacity of this site for residential allocation: NRW advise that a site appraisal which considers landscape and visual issues should be submitted with any planning application to ensure the scheme is integrated into the AONB without any adverse effects, the appraisal document should consider the following:

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					• Retain a green frontage to the site. This might entail a grass verge, new hedgerow boundary with scattered trees behind the highway sight line. • Set the building frontage back from this boundary within garden space. • Keep the site access simple and avoid walls, brick piers, over-elaborate detailing. • Utility uses of external space are to be hidden from view (e.g. car parking, bin stores). • The council's arboriculture officer needs to provide advice on the value of existing trees, root protection zones and the site's capacity for one or more houses. Further constrains include that he submitted site is situated on a Secondary B aquifer which has low sensitivity, however there is potential for gross contamination at this site due to its previous use as petrol station. As part of any planning application for this site we would advise planning conditions be imposed to ensure that risks associated with any contamination at the site are appropriately managed. Additionally, this site is adjacent to a potentially contaminative land use/historical land use and surface water/groundwater features.

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					The site is also immediately adjacent to a major road and a noise impact assessment would be necessary. Although some information has been provided: one site plan, drawing and picture. There have been no background studies or technical reports provided to illustrate how the development may overcome the above mentioned constraints. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that the site can be development adequately. In conclusion the site does not comply with the Plans Strategy in respect of the spatial distribution of development. It is considered that development of this prominent site would result in residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site contains many constrains that have not been addressed. The site is not considered to be necessary or appropriate as an allocation.
627	STR2: The Location of Development	Object	Our client's specific interest relates to the settlement of Northop, which is identified as a 'Tier 3 - Sustainable Settlement'. We agree that it is appropriate to identify Northop as a Tier 3 Sustainable Settlement. However, we have 4 key grounds for objection to Policy STR2, as follows: 1. The quantum of development distributed to the	The distribution of development to the Sustainable Settlements and in particular Northop, should be increased. Please see supporting statement.	Not accepted. The Deposit Plan explains in the table below para 3.58 the spatial options that were considered and the commentary for option 5 (the chosen option) clearly states that 'Development….based on identifying the most sustainable settlements and sites'. As explained in para 5.13, the Plans approach to distributing development has moved away from the UDP approach of growth rates, which gives the impression that every settlement has to have

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			Tier 3 Sustainable Settlements; 2. The absence of any employment land requirement or allocations for the the Tier 3 Sustainable Settlements; 3. The level of development apportioned to each Tier 3 Sustainable Settlement, and specifically Northop; and, 4. The types of development permitted within Tier 3 Sustainable Settlements under part (iii)(c) of the policy. 3.2 We address each point in turn.		planned growth. This section of the Plan specifically states 'The Plan intentionally avoids creating a perception that every settlement in every tier must contribute towards growth through having a housing allocation'. 1. The quantum of development distributed to the Tier 3 Sustainable Settlements: Para 5.3.5 of the Preferred Strategy document identified a broad apportionment of growth to each of the 5 tiers of the settlement hierarchy. The paragraph clearly states ' This is indicative at present, being based on completions during the first two years of the LDP period, commitments as at April 2017 and the initial results of the assessment of Candidate Sites against the Preferred Strategy. The broad apportionment of growth may be further refined as the Plan progresses'. In the Deposit LDP the apportionment to Tier 3 settlements is 14% which is only slightly below, and broadly in line with that shown in the Preferred Strategy. This is not a significant reduction as 1% of the Plans housing requirement of 6,950 would equate to 69 dwellings. There is no justification for the objectors assertion that 'there does not appear to have been any regard for meeting local housing needs in rural areas'. The fact that there is no housing allocation in a settlement does not mean that there can be no growth in a settlement. Growth could already have been achieved through completions in the first four

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					years of the Plan period, through existing commitments and through allowances for small site and large site windfalls. This provides scope for development throughout the settlement tiers and across County. However, planned growth through new allocations has been focussed on the most sustainable settlements which relate to the growth area in the north eastern part of the County. It is of note that Welsh Government have made representations on the Plan and stated 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect' and offered 'support in principle' for 'The scale and location of homes and jobs'. 2. The absence of any employment land requirement or allocations for the Tier 3 Sustainable Settlements: Policy STR2 does not by itself provide guidance in respect of the spatial distribution of employment development, other than to specify that employment development will take place on allocated sites and in principal Employment Areas. The County has a well- established network of existing employment areas focused particularly in the Deeside area, along the Dee Estuary and in some of the key settlements. Employment allocations have been identified through the two strategic sites (STR2) and the employment allocations (PE1) as well as additional flexibility provided through the

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					identification of Principal Employment Areas and PE3 and PE5. The Plan does not take the approach of seeking to apportion employment growth across the settlement hierarchy or to rural areas. For rural areas the Plan adopts a flexible policy approach through PE3, PE4 and the tourism policies. A flexible approach to employment development is considered more appropriate in rural areas than identifying and allocating sites for employment development for which there may be no need. In the case of Northop there is still extant planning permission for office use at Northop Country Park and Northop College (part of Colleg Cambria) submitted proposals at Alternative Site submission stage for an expansion to the existing campus on the north side of the road, for a mixed use educational based development. The Employment Land Study establishes that there is sufficient range and type of employment land and there is no need for further allocations for this Plan period. The focus of the Plan is to deliver existing employment sites, particularly the two strategic sites. 3. The level of development apportioned to each Tier 3 Sustainable Settlement, and specifically Northop: As commented on above the Plans spatial strategy is not premised on assigning a set amount of growth to each settlement in each tier of the settlement hierarchy. Such a mechanistic and rigid approach was considered as part of

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					the earlier consultation stages and was generally not looked upon favourably, either by the Council or by the housebuilding industry. It has no regard to the particular characteristics and circumstances of each settlement and does not represent an informed or sustainable approach to distributing development across the County. With 22 sustainable settlements across the County it simply cannot be case that every single settlement has a housing allocation. The objector questions whether the sites identified in Northop in the Urban capacity Study will be delivered. The intention of the Urban Capacity Study was to establish through detailed survey and assessment work whether the Plans annual allowances in the Housing Balance Sheet for small sites and large site windfalls are realistic and achievable. The findings of the UCS is that the allowances are a conservative estimate of what may be delivered having regard to i) past trends and ii) the findings of the Study. It is not necessary for every single site in the UCS to be delivered. The key point is that the Plan's policies allow for development in Northop through completions, commitments, allowances for windfalls and small scale affordable housing exceptions sites, and it would also be counter-intuitive to the principle of encouraging commitments or windfalls to come forward, if more land were also allocated.. The Plan has demonstrated how its housing requirement can be delivered through the

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					various elements in the Housing Balance Sheet. The spatial strategy has sought to identify the most sustainable settlements and sites which sit comfortably with the County wide and regional growth strategy. Although Northop is seen as a sustainable settlement, and delivered housing in the UDP period, this does not mean that it has to have a housing allocation in the LDP. It is a relatively small settlement, and despite have the presence of the college and proximity to the A55, has a historic character as reflected by the conservation area. Furthermore, the absence of an allocation in one settlement, is not considered to make the Plan unsound, when provision for housing has been made elsewhere. There is some uncertainty over the timing and detail of the progression of the red route linking the A55(T) with the A494(T). It is unlikely that this will be implemented until the later stages of the Plan period and therefore its implications and further consideration as to the role of Northop as a settlement is better undertaken as part of the LDP Review. 4. The types of development permitted within Tier 3 Sustainable Settlements under part (iii)(c) of the policy. In terms of criteria i, and as set out above the

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					Plan strategy is not based on every settlement having a housing allocation. In terms of criteria ii. the settlement boundary in Northop has been extended to include a small parcel of land off Church Rd (NOR005). Although a small site, this has the potential to deliver a small windfall development of 5 dwellings and meet some local needs. In terms of criteria iv. there is planning permission (058740) for the erection of 4 dwellings and 2 apartments at the United Reformed Church. Despite not having a housing allocation there is clearly provision for a modest level of the development in the settlement.
674	STR2: The Location of Development	Object	Please find attached a representation in relation to the LDP consultation which relates to Gwernaffield. Policy STR2 sets out a Settlement Hierarchy and identifies Gwernaffield as a Tier 4 'Defined Settlement'. This guides that Tier 4 - housing development will only be permitted within settlement boundaries related to the scale, character and role of the settlement and which delivers local needs affordable housing. Provision will include: i. Windfall market housing (only permitted when essential to delivering affordable housing) ii. Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries It is considered that Gwernffield should be a Tier 3 settlement as it is in a	The above named site needs to be included as an allocated site for the following reasons: - The proposed Candidate Site GFD001 is a logical extension to Gwernaffield providing approximately 3ha developable area for housing which would provide up to 80 dwellings over the plan period. - Gwernaffield is a sustainable settlement which	Not accepted. The settlement hierarchy derives from the settlement audits which informed options for a settlement hierarchy as set out in the earlier Key Messages document. The settlement audits looked at factors such as size, character, role, accessibility and the level of services and facilities and provides a measure of the sustainability of settlements. The methodology used in assessing and categorizing settlements is set out in Appendix 1 to the Key Messages document. Figure 2 identifies bandings of settlements based on the settlement audit assessment work and Gwernaffield was included in the 7th of 10 groupings. Appendix 2 set out the process of refining this work into a series of settlement hierarchy options i.e. different approaches to defining settlements. The feedback from the Key Messages document consultation was used to inform the identification of a preferred settlement hierarchy

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			highly sustainable location and benefits from a number of services and facilities such as an employment site, churches, school and sustainable transport. Therefore, in meeting the plans needs up to 2030, the settlement requires further growth with a housing allocation and not to rely on windfall/ exception sites. No additional land has been identified within the development boundary for Gwernaffield which is available for development, and the only land available consists of curtilages and garden areas – but these are tight and there is little potential for increasing density. The settlement and site was assessed as part of the preparation of the Deposit LDP, however, it is considered that the over-riding strategy is incorrect and additional sites need to be allocated requiring an amendment to the Tier of Gwernaffield to Tier 3 and the site GFD001 needing to be allocated to deliver suitable growth for this highly sustainable settlement and its existing population.	requires an appropriate level of growth to sustain it. - Sites have only been allocated within 9 settlements on large sites of 32-298houses (nine of the total eleven allocated sites are for over 100houses). This is not considered a sustainable approach and more small to medium sized sites should be allocated in other settlements. - - Gwernaffield does require growth and it is considered that the site is the most appropriate candidate site for this purpose.	and this was identified in the Strategic Options consultation document. The Council opted for 'A Refined Five Tier Approach to Settlement Categorisation & Defining Settlement Relationships' involving 5 tiers of settlements. Based on the extensive and robust analysis of settlements and formulation of a sound settlement hierarchy it is not considered that Gwernaffield is of a size, character, or role, nor does it have the services and facilities to warrant it being elevated to a tier 3 sustainable settlement. Gwernaffield has a school, pub and places of worship, but the employment site referred to by the objector is very small and the village does not have a shop. A large proportion of everyday needs are likely to be accessed in the nearby larger settlement of Mold. Although Gwernaffield has a bus service (6/6A), it is only hourly and timings of the first and last service would not easily facilitate journeys to and from work. In this context Gwernaffield is considered to be appropriately designated as a Tier 4 Defined Village, where planned growth is not provided for through allocations. The submission puts forward the argument that because there is a planning consent for a farm shop / convenience store that the settlement should be moved up to a tier 3 Sustainable Settlement. Planning permission for a farm shop was approved on 16/06/17 (056664), removal / variation of conditions approved on 06/10/17 (057296) and reserved matter approved on 14/11/18 (058593). Despite having planning permission for some time, the shop has not

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					been built. It is therefore inappropriate for it to be taken account of in the settlement audit. The site could potentially deliver 90 dwellings, although the allocation seeks a mix of housing and employment. Whatever the mix of development, it represents a large site which is considered to be out of scale with the settlement and the limited range of facilities and services which the settlement offers. Such a scale of development relative the size and character of the settlement is not considered to represent sustainable development. The Employment Land Study has established that there is no need for further employment allocations in the County as there is a sufficient range of employment allocations in terms of type, scale and location and this is supported by a large number of Principal Employment Areas and a flexible suite of policies. However, it is noted that in the present planning application for 80 dwellings (059396) there is no employment provision shown. The objection refers to the proximity of the site to Mold and an improved pedestrian link between Mold and Gwernaffield. However, it is 2.2km from the edge of Gwernaffield to the edge of Mold and a further 1.2km to The Cross in the centre of Mold. This is not 'reasonable walking distance' particularly when much of the section between Mold and Gwernaffield is devoid of street lighting. More specifically, the objection site is 1.9km from the edge of a large housing

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					allocation in the LDP on land between Mold Rd and Denbigh Rd for 246 dwellings in the Tier 1 settlement of Mold. Housing development is also presently being delivered at Maes Gwern by Wates who are in the process of constructing 160 dwellings. In this context it is unclear why there is a need for a further 80 dwellings in a settlement which is three tiers further down the hierarchy. At present there is a well-defined edge to the eastern part of Gwernaffield created by the block of built development on the south side of Gwernaffield Rd and the ribbon of development on the north side of Gwernaffield Rd. By contrast the candidate site would extend built development further eastwards away from the well-defined edge to the settlement. The extension of the settlement boundary to include the site would represent a large extension which would be prominent along the main entrance into the village. Development would harm the character and appearance of the settlement and the open countryside. The allocation of the site would conflict with the Plan's Spatial Strategy and introduce housing developments in less sustainable settlements. There is considered to be no justification for an allocation in Gwernaffield when there is existing and proposed provision in nearby Mold at a much higher level of sustainability. Furthermore, the development of such a large site relative to the size of the settlement would harm the

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					character and appearance of the settlement and open countryside.
588	STR2: The Location of Development	Support	Stewart Milne SUPPORTS Policy STR2 that states that new development will be directed towards allocated sites which includes our client's interests at New Brighton. Stewart Milne also SUPPORTS directing development to the first three tiers of the settlement hierarchy. 2.2 Stewart Milne SUPPORTS the Settlement Hierarchy table on Pages 46 and 47 of the LDP and specifically that New Brighton falls within Tier 3 (Sustainable Settlements).		Support is noted.
608	STR2: The Location of Development	Support	The plan recommends tier 4 status for Pantymwyn i.e. no major development sites or windfall developement unless the latter there is proven local need for affordable houisng. I support thsi proposal based on the following. I want to retain the village's unique character and appearance, Pantymwyn is close to an AOB/country park and has an undulating rural nature. Years ago it was called little Switzerland. It has open land close to its housing and many trees. Some open areas		Support is noted.

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			are nature significant eg Seven Stiles, Cefn Bychan Woods). It has many footpaths. Property generally follows the original roads and is not close together. Housing is diverse in age, appearance and type including a good number of bungalow style properties. There are several small developments off the original roads with "look a like" houses, and one has urban estate density. Properties close to the AOB are generally lower in height with trees and stonewalls adding to their character. There is no mains gas. Hidden in the landscape are a couple of long standing static caravan sites used by "regulars". There is a thriving village hall, a Post Office/shop (part day), Pub and a golf course. People like living here and newcomers tend to stay.There is a natural turnover of properties which because of the housing diversity seems to satisfy demand at a rate the community is able to absorb and welcome. Significant expansion in the larger open areas eg where developers seek to build, would completely change the village's character and appearance. There would be no local means of servicing their needs. These estates I suspect would just be urban commuter		

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			landscapes with little involvement in the village. Large scale development would bring more traffic on narrow roads and also have botanical and wildlife consequences. Allowing development in larger gardens would increase density and reduce greenery and thus change character.		
622	STR2: The Location of Development	Support	Strongly support the classification of Pantymwyn as Tier 4 defined village with its strict control on housing development, including especially no market housing outside the defined settlement boundary. Urge that no changes are made as a result of landowners/developers seeking to re-instate candidate sites seeking new provision for market dwellings in Pantymwyn, or seeking changes to the defined settlement boundary.		Support is noted.
704	STR2: The Location of Development	Object	Policy STR2 sets out a Settlement Hierarchy and identifies Sychdyn as a Tier 3 'Sustainable Settlement'. This guides that Tier 3 - Sustainable Settlements will be the locations for housing development related to the scale, character and role of the settlement. Provision will include: i. Allocations; ii. Windfall market	The above named site needs to be included as an allocated site for the following reasons: - The proposed Candidate Site SYCH007 is a logical extension to Sychdyn	Not accepted. The Plans spatial strategy distributes development based on a 5 tier settlement hierarchy with only the top three tiers receiving planned growth in the form of allocations. The Plan focuses on the most sustainable settlements and sites and does not apportion quantums of development across the board. However, the provision of housing is not just achieved through allocations as development will also be achieved through

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			housing; iii. Affordable housing on sites above an area / units threshold; iv. Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries. However, no allocations have been identified in the settlement and only an existing 'Housing Commitment at Sewage Works, Wats Dyke Way which have already been built and marketed / sold. Therefore, in meeting the plans needs up to 2030, the settlement requires a further allocation and not to purely rely on a previous allocations and consents dating back from the Unitary Development Plan period in 2000.	providing approximately 1.75ha developable area for housing which would provide for approximately 53 units over the plan period. - Sychdyn is a sustainable settlement which requires an appropriate level of growth to sustain it. - Sites have only been allocated within 9 settlements on large sites of 32-298houses (nine of the total eleven allocated sites are for over 100houses). This is not considered a sustainable approach and more small to medium sized sites should be allocated in other settlements. - Sychdyn does require growth and it is considered that the	existing completions, commitments and allowances for small and large site windfalls. In the case of Sychdyn the UDP allocation at the former waste water treatment works is nearing completion. The delivery of the 43 units has occurred during the LDP Plan period i.e. since April 2015. The settlement of Sychdyn has therefore contributed towards meeting the Plans County wide housing need and there is no obligation within the Plan Strategy for a further allocation to be made. The objection site was submitted as an omission site as part of the preparation of the UDP. The UDP Inspector commented ''The site is about 2ha in extent and is agricultural land lying next to the south eastern boundary of the village to the south west of the New Brighton Road close to its junction with Pen-y-Bryn. There is a definite character break between the objection land which rises to the south and the built up area. The site is prominent and forms an integral part of the open countryside which in this location is designated green barrier in order to protect both the rural area from encroachment and the strategic gap between Sychdyn and New Brighton'. The green barrier around and between Mold and the surrounding villages has been retained in the Plan. In the case of Sychdyn and New Brighton there is a narrow gap of 700m between the two settlements and the development of the site would serve to reduce that gap by approximately 115m. Development of the site

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				site is the most appropriate candidate site for this purpose.	would clearly undermine the objectives and function of this particular part of the green barrier. The objection site is in a prominent location alongside the junction of New Brighton Rd and Pen-y-Bryn. The land rises up from the road to the rear of the existing gardens to dwellings on Bryn Teg and Trem-y-Foel. Development would represent a sizeable extension to the settlement and would be visually harmful to the character and appearance of the settlement and open countryside. In the context of the Plans spatial strategy, delivery in Sychdyn during the plan period, provision in New Brighton, and harm to the green barrier and character and appearance of the settlement and open countryside, it would not be appropriate to allocate the site or reduce its level of protection from green barrier to open countryside.
706	STR2: The Location of Development	Support	This Policy sets out the Council's spatial strategy for growth across the County. The Policy is predicated on Spatial Option 5 of the Preferred Strategy published in November 2017, and contains very few changes to the earlier draft Policy. Firstly, we welcome and support the use of a settlement hierarchy to guide new		Support is noted.

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			development in the County; this reflects the overarching aims of PPW10 to deliver sustainable development in the right places. Equally, it is important to ensure that there is not an imbalance to housing delivery; if this was the case, it could result in a number of sub-areas and settlements across the County being overlooked, and with it issues of demand outstripping supply creating issues of affordability. Conversely, there is the risk of people leaving a settlement in search of a new home or job, which in turn could impact of the vitality of settlements. On review of the proposed settlement hierarchy, we have no objection to the proposed settlement tiers, nor the identification of settlements within each tier. They support the role of Ewloe and Holywell. The ranking of each town/settlement is reflective of their sustainability. They also support the Council's approach to allocating land in Tiers 1 to 3, in addition to windfall housing schemes and rural exception sites.		
632	STR2: The Location of Development	Object	Emery Planning is instructed to prepare and submit representations to the Deposit Consultation on the Flintshire	Allocate land adjacent to Maes Celyn, Holywell Road, Northop, CH7 6BA.	See response to id 627 regarding STR2.

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			Local Development Plan (LDP). These representations are submitted on behalf of my client, who have an interest in land adjacent to Maes Celyn, Holywell Road, Northop, CH7 6BA. The site has been promoted as an allocation for residential development to previous consultations on the LDP.		
638	STR2: The Location of Development	Object	To address the conflicts above and ensure that the policy criteria is sound, TW requests that: 1 The Council revisits its evidence base to provide a clear review of the breakdown of development within each Tier. TW considers that the Council reviews Mynydd Isa within its settlement hierarchy and apportions a higher quantum of development towards those more sustainable settlements to meet the upper end of its housing need.	1 Plans for a longer plan period and ensures that the FLDP, when adopted, covers at least a 15-year plan period (ideally 20-years) to ensure longevity and, to provide certainty to the development industry. 2 Increases its housing requirement above the upper end of its objectively assessed housing need (using this upper end figure as a starting point) to deliver aspirational levels of	Not accepted. The Plans spatial strategy distributes development based on a 5 tier settlement hierarchy with only the top three tiers receiving planned growth in the form of allocations. The Plan focuses on the most sustainable settlements and sites and does not apportion quantums of development across the board. However, the provision of housing is not just achieved through allocations as development will also be achieved through existing completions, commitments and allowances for small and large site windfalls. In the case of Mynydd Isa the former allocation at Rose Lane is now progressing through a new developer (a Housing Association) and will deliver its 58 units. The site at Isa Farm, which received consent on appeal is also now progressing through a new developer MacBryde Homes and will deliver its 59 units. These two sites will together deliver 117 units which is considered adequate growth over the Plan period. In this context there is considered to be no further need for an additional allocation.

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				housing and employment to align with national policy. 3 Review commuting patterns to reflect the current position (40%) and to factor this into the housing requirement. Review the evidence base to provide robust evidence for a housing requirement that will support proposed economic growth targets.	The Housing Supply Background Paper is considered to provide a clear breakdown of the growth in each settlement and tier. The objector seeks three changes and these are addressed in turn: 1. It is typical for Plans to be adopted into their respective Plan periods. To alter the Plan period now would require a fundamental reconsideration and rewrite of the Plan and would delay even further its adoption. Welsh Government have made no objections about the Plan period. The objector's failure to engage in the plan process at an earlier stage is not an issue for the Council. 2. The objector simply repeats the points made in objections to STR1 which have been comprehensively dealt with there, including a rebuttal of the separate 'Technical Note' prepared for TW by Lichfields. In essence the only quantification TW give for an increased housing requirement is for the upper range of growth option 6, which adds just 400 more units over the plan period, or just 27 dpa. This is hardly an 'aspirational' approach to use TW term, and is more than accommodated for by the 14.4% flexibility built in, and the over recovery of housing delivery in the early years of the plan. It is of little use to say that the figure should be significantly higher without saying what this figure is or how it is justified and deliverable. This does not therefore challenge the soundness of the plan.

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					3. This point has again been dealt with in comprehensive responses to tW objections to STR1 where the same point was made.
659	STR2: The Location of Development	Object	LEE001 Land adj Queens Farm, Leeswood Policy STR2 sets out a Settlement Hierarchy and identifies Leeswood as a Tier 3 'Sustainable Settlement'. This guides that Tier 3 - Sustainable Settlements will be the locations for housing development related to the scale, character and role of the settlement. Provision will include: i. Allocations; ii. Windfall market housing; iii. Affordable housing on sites above an area / units threshold; iv. Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries. Policy HN1New Housing Development Proposals details where the housing allocations would be and the number of dwellings that these would provide. However, no new allocations have been identified in the settlement and only an existing 'Housing Commitment at Station Yard/Depot identified is on the plan and shown as an existing housing commitment.	The above named site needs to be included as an allocated site for the following reasons: - The proposed Candidate Site LEE001 is a logical extension to Leeswood providing up to 5ha developable area for housing which would provide for up to rely 150 units over the plan period. - Leeswood is a sustainable settlement which requires an appropriate level of growth to sustain it. - Sites have only been allocated within 9 settlements on large sites of 32-298houses	Not accepted. The Plans spatial strategy and approach to allocating land sites for housing is not premised on making allocations in every single settlement within the top three tiers of the settlement hierarchy. Although Leeswood is identified as a sustainable village in Tier 3 it is not considered necessary for it to have a housing allocation. The settlement includes land within the settlement boundary which is suitable in principle for housing. One such example is the former Laura Ashley site, which is a brownfield site and which is the subject of a planning application (058946) for 26 units. In the adjoining settlement of Coedtalon / Pontybodkin is a UDP housing allocation which has planning permission (055798) for 49 dwellings and there is a current planning application (052236) for 6 units on the remaining part of the site. All of these sites are brownfield and the focus within the two settlement over the Plan period should be their delivery and this would not be aided by further greenfield allocations. The objection site LEE001 was previously the subject of a planning application for residential development which was called in by Welsh Government. The Ministers Letter of 14/11/06 states 'The Planning Decision Committee agrees with the Inspector that the development

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				(nine of the total eleven allocated sites are for over 100houses). This is not considered a sustainable approach and more small to medium sized sites should be allocated in other settlements. - Leeswood does require growth and it is considered that the site is the most appropriate candidate site for this purpose.	would cause significant harm to the character of Leeswood village and surrounding countryside'. Planning permission was not granted. Subsequently the site was submitted as an omission site to be considered as part of the preparation of the UDP. The UDP Inspector commented 'At the density of development envisaged for this settlement category the site would accommodate some 162 dwellings resulting in growth of 24%. The growth from this development alone would be well above the indicative band and to my mind excessive. Furthermore, it would extend the settlement into the open countryside and significantly weaken the existing break in development between Leeswood and Pontblyddyn. I do not consider this land should be allocated'. The Inspector recommended no change to the Plan and therefore the site remained outside the settlement boundary in the adopted UDP. Leeswood has a broadly north - south linear character with development along King Street. At the northern end of the village, Dingle Road represents a physical limit to development with the exception of a small block of development on the north side of Dingle Road. This development is bounded by Dingle Road to the south and a minor road to the north, east and west. The narrow width of this road and its hedgerow on the outer edge is considered to represent a distinct change in character between the form and pattern of built development and open countryside beyond. The

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					site extends away from existing built development and would appear as a large extension of built development into countryside that would not be read as a logical urban extension. Development would also weaken the gap between Leeswood and Pontblyddyn, as referenced by the LDP Inspector. Highway Development Management have commented 'Potentially suitable subject to a Transport Assessment; the site is relatively isolated from community facilities (1.2km to school/shop).The width of Dingle Road along the site frontage is generally less than 4.5m; road widening and the provision of footways will be required as part of any development. The section of Dingle Road passing nos. 17-23 and the farm access road, appear unsuitable to cater for any additional traffic, amendments to the road layout will be required to ensure that additional traffic is not generated on this section of road'. It is evident that providing a suitable vehicular access to accommodate potentially 150 dwellings will require road widening and junction improvements that would harm the character and appearance of the area through loss of hedgerows and increase urbanisation. It is unclear whether sufficient control of third party land exists to make such significant improvements or whether the costs involved impact on viability or deliverability. The development of the site has been shown to be unacceptable in the judgement of two separate Planning Inspectors through a called in

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					planning application and through the UDP Inquiry, due to the impact of the site on the character of the village and open countryside and this is something which remains the case with the LDP, as the planning circumstances since those decisions remains unchanged in the context of this site. The site is not considered appropriate to be allocated or included within the settlement boundary.
757	STR2: The Location of Development	Object	STR2 Location of Development Given the constraints around 10 of the sustainable villages, and the absence of any significant brownfield windfall opportunities within the settlement boundaries, it is unclear how this residual need will be met without further site allocations through the LDP; this includes a review of settlement boundaries and the release of land in the Open Countryside and in some instances the Green Barrier. A failure to allocate land around these settlements, and the fact that 20 of the 22 Sustainable Villages are not subject to any allocations, raises concerns over a potential imbalance in housing delivery across the County and the future role of these settlements. 6.24. In addition to the above, our Client considers it would be more appropriate for the Sustainable	it would be more appropriate for the Sustainable Villages to accommodate a minimum of 20% of future housing growth, as documented in the Preferred Strategy as the upper figure. This would equate to 1,390 dwellings of the proposed County-wide requirement, an increase of 417 dwellings overall and an average of 63 dwellings per Sustainable Village.	Not accepted. The Plans Spatial Strategy is not based on having planned growth in every settlement and it is not necessary or appropriate to have a housing allocation in every tier 3 settlement. The provision of housing allocations is only one means of delivering the Plans housing requirement figure. Growth can and is also being delivered through completions during the first four years of the Plan period, through commitments and through allowances for small and large site windfalls. The apportionment of growth to the 5 tiers of the settlement hierarchy in the Preferred Strategy was clearly referenced as being indicative and subject to possible change in the Preferred Strategy. The 14% apportioned to tier 3 sustainable settlements is only just below the 15-20% in the Preferred Strategy. Such a spatial distribution is not considered inappropriate and the spatial strategy has not been objected to by Welsh Government. The objectors approach of seeking a further 417 dwellings in tier 3 or an increase of 63 dwellings

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			Villages to accommodate a minimum of 20% of future housing growth, as documented in the Preferred Strategy as the upper figure. This would equate to 1,390 dwellings of the proposed County-wide requirement, an increase of 417 dwellings overall and an average of 63 dwellings per Sustainable Village. This would be much more reflective of a balanced approach to housing delivery across the County; as drafted, the Deposit Plan does not provide for this, with a clear reluctance on behalf of the Council to adopt a pro-active and positive approach to release and allocate housing sites in the Open Countryside and Green Barrier around the Sustainable Villages. Accordingly, our Client objects to the current proposed spatial distribution breakdown, and specifically the limited amount of growth directed to the Sustainable Villages in view of the policy constraints around a number of them which will equally serve to preclude windfall opportunities.		per sustainable settlement is not considered to offer any greater sustainability benefits than the Plans apportionment. The Council has taken a proactive approach to reviewing settlement boundaries, releasing two sites from green barrier and providing a healthy flexibility allowance. The objector also fails to note that a proportional distribution of growth was considered as an option prior to selecting the Preferred Strategy of the plan and was rejected on the basis of being too mechanistic and not based on sustainability principles. The objector would have been better demonstrating the sustainability of alternative sites being promoted and how these are preferable to the sites allocated in the plan. One of the sites promoted by the objector at Woodside Cottages, Drury already has outline planning permission (app ref 058212) allowed on appeal on 21/12/18 (appeal ref 3209704) for 23 dwellings. It is also noted that a reserved matters application (ref 60855) is presently under consideration. The site will clearly contribute as a commitment to meeting the Plans housing requirement figure and is an example of a windfall site coming forward within settlement boundaries. This site will have the effect of increasing the Plans flexibility, albeit marginally, given the small size of the site.
801	STR2: The Location of Development	Object	The British Land Company PLC object to the current Sustainable Settlement Hierarchy based on its	The British Land Company PLC object to the current	Not accepted. The settlement audit demonstrated that Broughton offers a high level of services and facilities, as a result of the

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			allocation of Broughton as a Local Service Centre, rather than Main Service Centre. Broughton is identified as a 'Local Service Centre – Settlements with a local role in the delivery of services and facilities' in the Deposit Plan. The designation was underpinned by the inclusion of Broughton Shopping Park as a 'Local Centre with 10 or more shops' (Section 3.9). Notwithstanding this, the Deposit Plan clearly indicates the Shopping Park plays a sub-regional role (paragraph 6.20) and forms the biggest retail and leisure offering within the County (paragraph 6.23). It is therefore argued that it would be logical to allocate the settlement as a 'Main Service Centre – Settlements with a strategic role in delivery of services and facilities'. The Deposit Plan makes clear that "The Main Service Centres are the main locations for growth whereas Local Service Centres are where more modest levels of growth are located" (paragraph 5.13). In view of the considerable planned growth in and around Broughton, by virtue of allocations such as STR3B Warren Hall (mixed use development site for employment and housing), it follows that it should be designated as a Main	Sustainable Settlement Hierarchy based on its allocation of Broughton as a Local Service Centre, rather than Main Service Centre. Broughton is identified as a 'Local Service Centre – Settlements with a local role in the delivery of services and facilities' in the Deposit Plan. The designation was underpinned by the inclusion of Broughton Shopping Park as a 'Local Centre with 10 or more shops' (Section 3.9). Notwithstanding this, the Deposit Plan clearly indicates the Shopping Park plays a sub-regional role (paragraph 6.20) and forms the biggest	Broughton Shopping Park, and also is in an accessible location and with significant local employment. However, Broughton does not have the same character or role as the tier 1 Main Service Centres. The other tier 1 settlements are either traditional towns e.g. Flint or market towns e.g. Mold or are settlements which form part of a larger urban area e.g. Queensferry. Broughton does not fit into either of these scenarios as it does not have the character or feel of a town. Typically a town will have a central retail and commercial area which serves an outlying residential area. Broughton has residential areas to the west of an out of town retail park. Furthermore town centres have a wider range of facilities and services than that present in Broughton. Towns typically have a public or civic function such as leisure centres or Council Offices and again this is not the case with Broughton. Having regard to this context it is not considered that it would be appropriate for Broughton to be designated as a Tier 1 Main Service Centre which neither negates or prevents the shopping park from continuing its present role, and also does not challenge the soundness of the plan.

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			Service Centre to be considered to be 'effective' in respect of the Tests of Soundness (Soundness Test 3).	retail and leisure offering within the County (paragraph 6.23). It is therefore argued that it would be logical to allocate the settlement as a 'Main Service Centre – Settlements with a strategic role in delivery of services and facilities'. The Deposit Plan makes clear that "The Main Service Centres are the main locations for growth whereas Local Service Centres are where more modest levels of growth are located" (paragraph 5.13). In view of the considerable planned growth in and around Broughton, by virtue of allocations such as STR3B Warren Hall (mixed use development site	

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				for employment and housing), it follows that it should be designated as a Main Service Centre to be considered to be 'effective' in respect of the Tests of Soundness (Soundness Test 3).	
934	STR2: The Location of Development	Object	It is suggested new (employment) development twill be directed towards Principal employment allocations yet this is not the case and insufficient land has been identified at the PE2 site at Sealand IE.	Policy should be expressed as a minimum.	Not accepted. Policy STR2 explains that new development will be directed to i) allocated sites (which are identified in policy PE1) and ii) Principal Employment Areas which are identified in policy PE2. Unless an employment allocation happens to occur in a PEA, specific provision is not made within PEA's. Rather, PEA's provide a degree of flexibility in delivering new employment development by facilitating new employment development, extensions and expansion within existing defined employment areas. No provision has been made at Chester industrial Estate as an extension to the park (as sought by the objector) would necessitate removing green barrier and would also not meet the justification tests in TAN15 as even less vulnerable employment development cannot take place in flood risk zone C1 if it is greenfield land. The site also involves the loss of grade 2 BMV agricultural land.

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1005	STR2: The Location of Development	Object	It is suggested new (housing) development will be targeted in the settlement hierarchy however, insufficient levels are identified for Mold (Tier 1) , Buckley (Tier 1), Broughton (Tier 2) and the sustainable village of Mancot.	More development within Mold, Buckley, Broughton and Mancot.	Not accepted. The fact that a settlement does not feature in the list of housing allocations in policy HN1 does not mean that these settlements will not experience growth. This may also be achieved by completions during the first 4 years of the Plan, by commitments and by allowances for small and large site windfall developments. Mold is a Tier 1 settlement which has two allocations in the Plan. One of these at Maes Gwern has planning permission for 160 dwellings and is under construction. The site is allocated because planning permission was granted after the Plans base date of April 2018 and could not be included as a commitment. Development is also taking place at Broncoed Industrial Estate via Whitley. In addition to the new allocation on land between Denbigh Rd and Gwernaffield Rd this is considered to be sufficient provision for the town particularly when there is the likelihood of another large windfall site coming forward during the latter half of the Plan period. The Plan Strategy does not prescribe growth limits or target for settlements, as did the UDP. Over the Plan period it is evident that Mold is contributing to the delivery of the identified housing requirement figure. Buckley is a Tier 1 settlement which has a housing allocation carried over from the adopted UDP. The Well St site has recently been sold by Welsh Government to Clwyd Alyn Housing Association who intend to develop a market /

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					affordable development. Despite accepting that the delivery of this site has been very slow, this new information demonstrates that it is an available, viable and deliverable allocation. Buckley has also seen a number of small to medium schemes consented in recent years and these will all contribute to delivering the Plans housing requirement figure. It is not considered that additional provision is required in Buckley. Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period on the site to the south of the Retail Park (Park Jasmine) and also the 'compound site' immediately to the west of the retail park (adjacent to Aldi). This is considered sufficient provision for the Plan period, particularly as the Plan Strategy does not prescribe set amounts or targets to each settlement. Mancot is a Tier 3 Sustainable Settlement. Provision for housing has been by virtue of the Ash lane allocation which abut the settlement boundary of both Mancot and Hawarden (Tier 2 Local Service Centre). Given that allocation is for nearly 300 units there is considered to be no need for further allocations either in Mancot or in Hawarden. The Plan Strategy does not prescribe growth rates or targets in each settlement.

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1119	STR2: The Location of Development	Object	Objection to Settlement Audit. The settlement audits for the LDP are inaccurate. The settlement audit for the village of New Brighton includes services which are outside the settlement boundary. The settlement audit for Mold excludes services outside the settlement boundary	change settlement audit.	Not accepted. The settlement audit for New Brighton includes reference to the Beaufort Park Hotel which is a key facility for the settlement. The objector appears to arguing that it should not be counted as part of the facilities within the settlement. However, the car park to the hotel physically adjoins the settlement boundary and the built form of the hotel is 17m from the settlement boundary. The hotel clearly forms an important facility, both functionally and visually at the crossroads in the middle of the settlement and is quite properly recorded and counted as part of the settlement audit.
1123	STR2: The Location of Development	Object	Objection to allocation at Cae Isa, New Brighton. New Brighton has lost its shop/Post Office and public house, it has no facilities apart from a Church and Community Centre. We do not agree with our classification as a Tier 3 Sustainable Village as we have no services or facilities, it is debatable if we are even a Tier 4 Defined Village, we are not a sustainable location and new development should not be directed to our location.	Removal of allocation at Cae Isa, New Brighton	Not accepted. It is noted that New Brighton has lost its shop / post office and public house. However, it still has a large hotel / bar / conference facility, village hall, place of worship, car sales and service and a nearby petrol filling station and convenience store. The settlement hierarchy is informed not just by the level of services and facilities but also by its character, role and location. In this context New Brighton is on a key communication route between Mold and Deeside and sits close to settlements of Mynydd Isa and Buckley and Sychdyn. Its nucleated development pattern set around the crossroads and with the large hotel, gives it a distinct urban rather rural character and appearance. Despite the unfortunate loss of some facilities, it is still considered to be a Tier 3 Sustainable Settlement.

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1131	STR2: The Location of Development	Object	During the review of growth options in 2016, Pen-y-ffordd was designated as a Sustainable Village! As this aspect is a key consideration in growth under the LDP, it is believed that the village should be re-categorised as a Rural Defined Village for the following reasons. o Public transport has been slashed with the loss of the Mold-Wrexham service and recent loss of the Mold-Chester service through Pen-y-ffordd leaving no punlic bus service running throught the village.. o There is no medical centre. o Junior and local High schools are over subscribed o There is significant shortfall in Adult and Youth Open space provision. o Infrastructure is inadequate with over stretched services. Also concerned about the colour coding from the previous consultation that i really feel did create a window of hope for some speculative applications. Has concerns about how some candidate sites were colour coded as set out in attached document.	Pen y Ffordd to be re-catergorised as a rural defined village	Not accepted. Penyffordd / Penymynydd was designated as a category B settlement in the adopted UDP and as a Tier 3 Sustainable Settlement in the LDP. Penyffordd / Penymynydd is a reasonably large settlement and lies in close proximity to several settlements and employment areas, both in Flintshire and in Wrexham. It has a good range of services and facilities and recently permission was granted for a Coop convenience store which is now under construction. Despite the unfortunate reduction in bus services it is still considered to be appropriately designated as a Tier 3 Sustainable Settlement especially as the settlement has a platform connection to the Wrexham Bidston railway line. Many settlements do not have a medical centre and these facilities exist at both Buckley and Hope where both are newly developed primary health centres. Penyffordd also has a new combined infants and junior school with capacity to expand.
1143	STR2: The Location of Development	Object	Category C Components of Housing Supply – clarification of spatial distribution & housing components by settlement tier & the housing trajectory Background	Housing Land Supply and Delivery contains all the tables required by DMP (Ed.3) namely, Table 4 and	Accepted. Noted. The information contained in the Background Paper and referred to, can be included in the final version of the written statement and can potentially be dealt with as an MAC at the Examination stage.

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			Paper 10: Housing Land Supply and Delivery contains all the tables required by DMP (Ed.3) namely, Table 4 and Appendix 2-5 which collectively set out the spatial distribution of housing provision in the plan, the housing trajectory and the timing and phasing of all the components of supply by settlement tier. They should all be included in the plan as required by the Manual and current consultation on PPW.	Appendix 2-5 which collectively set out the spatial distribution of housing provision in the plan, the housing trajectory and the timing and phasing of all the components of supply by settlement tier. They should all be included in the plan as required by the Manual and current consultation on PPW.	
1151	STR2: The Location of Development	Support	We are happy to accept the revised settlement boundary for Penyffordd and Dobshill, which incorporate all of the recent developments and permissions granted outside of the UDP settlement boundary. We are pleased to see that no further development is proposed in Penyffordd given the significant contribution to housing which has been permitted in the village. Time is needed for the current permissions to be completed and the new residents integrated into the community. there remains a need for critical infrastructure to catch up with housing development.		Support is noted.

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919	STR2: The Location of Development	Object	In light of the representor's land interest at Drury, which is classed as Sustainable Settlement and in third tier of the hierarchy, we welcome the intention that the top three tiers of the hierarchy should be the focus for the majority of new development in the County. The Council state that not every settlement should be expected to grow by having an allocation directed towards it. Clearly, in certain cases this may be appropriate as there are not suitable sites available or there are other policy constraints that would make identifying an allocation difficult. However, this is not the case for Drury. The representor's site at Drury Lane was promoted for residential development through the adopted UDP for a residential allocation. The Inspector, whilst not recommending the site to be allocated as there was no need for a second allocation in Drury at the time, recommended that the site be included within the settlement boundary. The site remains within the settlement boundary and has been promoted for development through the submission of a planning application, which the Council have refused and an appeal is pending. The representor	Allocate a proposed site in Drury	Not accepted. The Plans Spatial Strategy is not premised on the basis of every settlement having to deliver planned growth through a new housing allocation. Instead the Plan seeks to allocate the most sustainable settlements and sites. Drury delivered the highest rate of growth for a settlement in the UDP Plan period. More recently, planning permission has been granted for 23 dwellings at Woodside Cottages, within metres of the site. The Bank lane site remains within the settlement boundary of Drury and its development can be considered in the context of a large windfall site. The objector has been seeking planning permission for the Bank lane site for some time but has yet to submit a scheme which is considered accepted to the Council, most notably as each scheme has sought to include land outside the settlement boundary, within green barrier and utlising Best and Most Versatile agricultural land without justification. In the light of this entrenched position, the Council did not have sufficient confidence that an allocation could be secured within the settlement boundary and the site was not allocated. Equally, if in the context of the site being an existing windfall opportunity, the objector considers there are no "technical, physical, or environmental reasons that would preclude its allocation", then the same must also apply to its ability to come forward now on a windfall basis. If the applicant cannot currently ensure deliverability of the site as a windfall, then it is unclear how can this be done to satisfy the site's allocation.

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			contends that the site remains suitable for residential development and that there are no technical, physical or environmental reasons that would preclude its allocation for residential development. The allocation of land for residential development in a Sustainable Settlement such as Drury would help to ensure that the housing requirement was delivered and that the Council could plan positively for the area rather than having to rely on windfalls coming forward, which by their very nature, cannot be relied on.		
951	STR2: The Location of Development	Object	It is suggested new (housing) development will be targeted in the settlement hierarchy however, insufficient levels are identified for Mold (Tier 1) , Buckley (Tier 1), Broughton (Tier 2) and the sustainable village of Mancot.	It is suggested new (housing) development will be targeted in the settlement hierarchy however, insufficient levels are identified for Mold (Tier 1) , Buckley (Tier 1), Broughton (Tier 2) and the sustainable village of Mancot.	Not accepted. The fact that a settlement does not feature in the list of housing allocations in policy HN1 does not mean that these settlements will not experience growth. This may also be achieved by completions during the first 4 years of the Plan, by commitments and by allowances for small and large site windfall developments. Mold is a Tier 1 settlement which has two allocations in the Plan. One of these at Maes Gwern has planning permission for 160 dwellings and is under construction. The site is allocated because planning permission was granted after the Plans base date of April 2018 and could not be included as a commitment.

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					Development is also taking place at Broncoed Industrial Estate via Whitley. In addition to the new allocation on land between Denbigh Rd and Gwernaffield Rd this is considered to be sufficient provision for the town particularly when there is the likelihood of another large windfall site coming forward during the latter half of the Plan period. The Plan Strategy does not prescribe growth limits or target for settlements, as did the UDP. Over the Plan period it is evident that Mold is contributing to the delivery of the identified housing requirement figure. Buckley is a Tier 1 settlement which has a housing allocation carried over from the adopted UDP. The Well St site has recently been sold by Welsh Government to Clwyd Alyn Housing Association who intend to develop a market / affordable development. Despite accepting that the delivery of this site has been very slow, this new information demonstrates that it is an available, viable and deliverable allocation. Buckley has also seen a number of small to medium schemes consented in recent years and these will all contribute to delivering the Plans housing requirement figure. It is not considered that additional provision is required in Buckley. Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period on the site to the south of the Retail Park (Park Jasmine) and also the 'compound site' immediately to the west of the retail park (adjacent to Aldi). This is considered

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					sufficient provision for the Plan period, particularly as the Plan Strategy does not prescribe set amounts or targets to each settlement. Mancot is a Tier 3 Sustainable Settlement. Provision for housing has been by virtue of the Ash lane allocation which abut the settlement boundary of both Mancot and Hawarden (Tier 2 Local Service Centre). Given that allocation is for nearly 300 units there is considered to be no need for further allocations either in Mancot or in Hawarden. The Plan Strategy does not prescribe growth rates or targets in each settlement.
966	STR2: The Location of Development	Object	It is suggested new (housing) development will be targeted in the settlement hierarchy however, insufficient levels are identified for Mold (Tier 1) , Buckley (Tier 1), Broughton (Tier 2) and the sustainable village of Mancot.	More housing needed to be allocated in areas such as Mold, Buckley, Broughton and Mancot.	Not accepted. The fact that a settlement does not feature in the list of housing allocations in policy HN1 does not mean that these settlements will not experience growth. This may also be achieved by completions during the first 4 years of the Plan, by commitments and by allowances for small and large site windfall developments. Mold is a Tier 1 settlement which has two allocations in the Plan. One of these at Maes Gwern has planning permission for 160 dwellings and is under construction. The site is allocated because planning permission was granted after the Plans base date of April 2018 and could not be included as a commitment. Development is also taking place at Broncoed

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					Industrial Estate via Whitley. In addition to the new allocation on land between Denbigh Rd and Gwernaffield Rd this is considered to be sufficient provision for the town particularly when there is the likelihood of another large windfall site coming forward during the latter half of the Plan period. The Plan Strategy does not prescribe growth limits or target for settlements, as did the UDP. Over the Plan period it is evident that Mold is contributing to the delivery of the identified housing requirement figure. Buckley is a Tier 1 settlement which has a housing allocation carried over from the adopted UDP. The Well St site has recently been sold by Welsh Government to Clwyd Alyn Housing Association who intend to develop a market / affordable development. Despite accepting that the delivery of this site has been very slow, this new information demonstrates that it is an available, viable and deliverable allocation. Buckley has also seen a number of small to medium schemes consented in recent years and these will all contribute to delivering the Plans housing requirement figure. It is not considered that additional provision is required in Buckley. Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period on the site to the south of the Retail Park (Park Jasmine) and also the 'compound site' immediately to the west of the retail park (adjacent to Aldi). This is considered sufficient provision for the Plan period,

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					particularly as the Plan Strategy does not prescribe set amounts or targets to each settlement. Mancot is a Tier 3 Sustainable Settlement. Provision for housing has been by virtue of the Ash lane allocation which abut the settlement boundary of both Mancot and Hawarden (Tier 2 Local Service Centre). Given that allocation os for nearly 300 units there is considered to be no need for further allocations either in Mancot or in Hawarden. The Plan Strategy does not prescribe growth rates or targets in each settlement.
984	STR2: The Location of Development	Object	It is suggested new (housing) development will be targeted in the settlement hierarchy however, insufficient levels are identified for Mold (Tier 1) , Buckley (Tier 1), Broughton (Tier 2) and the sustainable village of Mancot.	More development needed within Mold, Buckley, Broughton and Mancot.	Not accepted. The fact that a settlement does not feature in the list of housing allocations in policy HN1 does not mean that these settlements will not experience growth. This may also be achieved by completions during the first 4 years of the Plan, by commitments and by allowances for small and large site windfall developments. Mold is a Tier 1 settlement which has two allocations in the Plan. One of these at Maes Gwern has planning permission for 160 dwellings and is under construction. The site is allocated because planning permission was granted after the Plans base date of April 2018 and could not be included as a commitment. Development is also taking place at Broncoed Industrial Estate via Whitley. In addition to the new allocation on land between Denbigh Rd and

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					Gwernaffield Rd this is considered to be sufficient provision for the town particularly when there is the likelihood of another large windfall site coming forward during the latter half of the Plan period. The Plan Strategy does not prescribe growth limits or target for settlements, as did the UDP. Over the Plan period it is evident that Mold is contributing to the delivery of the identified housing requirement figure. Buckley is a Tier 1 settlement which has a housing allocation carried over from the adopted UDP. The Well St site has recently been sold by Welsh Government to Clwyd Alyn Housing Association who intend to develop a market / affordable development. Despite accepting that the delivery of this site has been very slow, this new information demonstrates that it is an available, viable and deliverable allocation. Buckley has also seen a number of small to medium schemes consented in recent years and these will all contribute to delivering the Plans housing requirement figure. It is not considered that additional provision is required in Buckley. Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period on the site to the south of the Retail Park (Park Jasmine) and also the 'compound site' immediately to the west of the retail park (adjacent to Aldi). This is considered sufficient provision for the Plan period, particularly as the Plan Strategy does not

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					prescribe set amounts or targets to each settlement. Mancot is a Tier 3 Sustainable Settlement. Provision for housing has been by virtue of the Ash lane allocation which abut the settlement boundary of both Mancot and Hawarden (Tier 2 Local Service Centre). Given that allocation is for nearly 300 units there is considered to be no need for further allocations either in Mancot or in Hawarden. The Plan Strategy does not prescribe growth rates or targets in each settlement.
1059	STR2: The Location of Development	Object	we welcome the requirement that for Tiers 4 and 5 housing development should be related to the scale, character and role of the settlement and that in Tier 5 'development needs to be sensitively conceived and designed…to respect the character and appearance of the site and its surroundings'. We recommend that design related to scale and positive character should apply to all Tiers of development.	We recommend that design related to scale and positive character should apply to all Tiers of development.	Not accepted. Policy STR2 sets out that planned growth, through allocations will only take place in the top three tiers of the settlement hierarchy. These tend to be the most sustainable settlements in terms of their location, size, character, role and level of facilities and services. In Tier 4 Defined Settlements some additional guidance has been provided to guide the type and scale of housing development to ensure that it is related to the scale, character and role of the settlement. In Tier 5 Undefined Settlements there is no settlement boundary and the policy therefore provides additional guidance whereby new development should be sensitive and small scale. This additional guidance should work hand in hand with the policy requirement for new housing to deliver local needs affordable housing. Such additional guidance is not considered appropriate or necessary for the top

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					3 tiers of the settlement hierarchy and it must be stressed that the Plan also needs to be read as a whole whereby all development proposals would need to satisfy policies PC2, 3 and 4.
1146	STR2: The Location of Development	Object	Category C Affordable Housing - general ? Exception Sites – Affordable housing exception sites are permissible under policy STR2: Location of Development and HN4 (criteria f). It is unclear why small scale exception sites are only allowed in Tiers 2-5 and not Tier 1 which are the most sustainable settlements? The approach requires justification and clarification given affordable housing need across Flintshire is significant. ? Affordable Housing Authority Wide Target - The Affordable Housing Background Paper states the affordable housing target for the plan is 1,981 homes. This should be included within a policy in 6 the plan. Policy STR1: Strategic Growth could be amended to state "7,950 homes are provided of which xxx are affordable". The target does not include the contribution from windfall sites (Table 6). It should do. The affordable housing target in the plan should be derived from all components of supply to ensure it is realistic in its aspiration and for monitoring purposes. ? Spatial	The approach requires justification and clarification given affordable housing need across Flintshire is significant. The Affordable Housing Background Paper states the affordable housing target for the plan is 1,981 homes. This should be included within a policy in 6 the plan. Policy STR1: Strategic Growth could be amended to state "7,950 homes are provided of which xxx are affordable" A table setting out anticipated affordable housing contributions by settlement tier and component of supply in line with guidance in the DPM (Ed. 3)	Accepted. The Deposit Plans exclusion of Tier 1 Main Service Centres reflects a carry over from the adopted UDP whereby policy HSG11 applied 'rural' exceptions schemes as was defined in PPW at that time. Therefore adopted policy did not allow small scale exceptions schemes in the larger category A settlements as they were not rural settlements. It is noted that PPW describes such development as 'Affordable Housing Exceptions Schemes' and that reference to 'rural' settlements no longer applies. It is accepted that as Tier 1 settlements are considered to be most sustainable settlements then provision for small scale affordable housing exceptions development would be appropriate in principle. The Council would therefore offer no objection to the Inspector recommending that policy STR2 be amended to allow 'Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries', within criteria a. re Tier 1 Main Service Centres. There is a converse however which is that if small scale incremental schemes were permitted in Tier 1 settlements then this might sterilise future opportunities for larger scale planned growth in a future plan review. The affordable housing information referred to in the background paper can be moved into the

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			Distribution of Affordable Housing Supply – the Affordable Housing Background Paper includes an analysis of affordable housing contributions by housing component. A table setting out anticipated affordable housing contributions by settlement tier and component of supply in line with guidance in the DPM (Ed. 3) would be helpful aiding clarity of the plan and effective monitoring.	would be helpful aiding clarity of the plan and effective monitoring.	written statement in the final version of the Plan and could be agreed as an examination MAC.
1152	STR2: The Location of Development	Object	HN4D. Reference to acceptance the additional of developments of affordable homes adjacent, but outside, settlement boundaries. This is not qualified, either in scale, number of developments or site specific locations considered acceptable for affordable development. 9.2 says that development must be controlled which contradicts this wording and leaves sites open to potential exploitation.	9.2 says that development must be controlled which contradicts this wording and leaves sites open to potential exploitation.	Not accepted. Policy STR2 permits small scale affordable housing exceptions on the edge of tier 2-4 settlements. The policy approach is carried over from the UDP (policy HSG11) and reflects guidance in PPW whereby small scale developments on the edge of settlements can be delivered for affordable housing, as an 'exception' to normal planning policies. Further guidance is provided in the Development Management Policy HN4D. Given the nature of and workings of the policy it is not possible to predict the number or scale of developments. Schemes could arise where there is an identified and evidence housing need to be met, a willing landowner and a housing association or similar body to ensure that the units remain affordable in perpetuity. However, schemes would also need to be acceptable in planning terms in terms of representing a logical extension to the settlement, and acceptable in terms of highways and other considerations. The Plan, when read as a whole contains

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					adequate safeguards to ensure the policy is not mis-used.
1176	STR2: The Location of Development	Support	Policy STR2: The Location of Development This Policy sets out the Council's spatial strategy for growth across the County. The Policy is predicated on Spatial Option 5 of the Preferred Strategy published in November 2017, and contains very few changes to the earlier draft Policy. Firstly, our Client welcomes and supports the use of a settlement hierarchy to guide new development in the County; this reflects the overarching aims of PPW10 to deliver sustainable development in the right places. Equally, it is important to ensure that there is not an imbalance to housing delivery; if this was the case, it could result in a number of sub-areas and settlements across the County being overlooked, and with it issues of demand outstripping supply creating issues of affordability. Conversely, there is the risk of people leaving a settlement in search of a new home or job, which in turn could impact of the vitality of settlements. On review of the proposed settlement hierarchy, our Client has no objection to the proposed settlement tiers, nor the		Support is noted.

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			identification of settlements within each tier. The ranking of each town/settlement is reflective of their sustainability. They also support the Council's approach to allocating land in Tiers 1 to 3, in addition to windfall housing schemes and rural exception sites.		
1178	STR2: The Location of Development	Object	No allowance has been made for completions during the period 2015-2018 given our earlier comments on the LDP period and UDP period shortfall. However, if they were, under the above scenarios the residual dwelling requirements would be adjusted to 49 and 111, and 189 and 251 (applying the 14.4% flexibility factor). In all cases, more housing land is required. Given the constraints around 10 of the sustainable villages, and the absence of any significant brownfield windfall opportunities within the settlement boundaries, it is unclear how this residual need will be met without further site allocations through the LDP; this includes a review of settlement boundaries and the release of land in the Open Countryside and in some instances the Green Barrier. A failure to allocate land around these settlements, and the fact that 20 of the 22 Sustainable	No allowance has been made for completions during the period 2015-2018 given our earlier comments on the LDP period and UDP period shortfall. However, if they were, under the above scenarios the residual dwelling requirements would be adjusted to 49 and 111, and 189 and 251 (applying the 14.4% flexibility factor). In all cases, more housing land is required.	Not accepted. The Plan adopts a sustainable approach to the spatial distribution of growth and it is evidenced that the Tier 1 and Tier 2 settlements are more sustainable that Tier 3 settlements, as this is the basis for the settlement hierarchy. It is therefore right and proper that a significant proportion of the Plans housing provision is directed to the top 2 tiers of the settlement hierarchy. The Plans spatial strategy is not premised on seeking to facilitate planned growth in every settlement and this applies equally to Tier 3 settlements The objection does not portray an accurate position in respect of green barriers and the settlements listed as not all of these settlements are encircled by green barriers whereby any development would be totally constrained. Only two allocations are proposed in Tier 3 settlements because this tier of settlements has seen a number of speculative housing schemes

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			Villages are not subject to any allocations, raises concerns over a potential imbalance in housing delivery across the County and the future role of these settlements. In addition to the above, our Client considers it would be more appropriate for the Sustainable Villages to accommodate a minimum of 20% of future housing growth, as documented in the Preferred Strategy as the upper figure. This would equate to 1,390 dwellings of the proposed County-wide requirement, an increase of 417 dwellings overall and an average of 63 dwellings per Sustainable Village. This would be much more reflective of a balanced approach to housing delivery across the County; as drafted, the Deposit Plan does not provide for this, with a clear reluctance on behalf of the Council to adopt a pro-active and positive approach to release and allocate housing sites in the Open Countryside and Green Barrier around the Sustainable Villages. Accordingly, our Client objects to the current proposed spatial distribution breakdown, and specifically the limited amount of growth directed to the Sustainable Villages in view of the policy constraints around a number of		allowed on appeal and also completions during the first years of the Plan period. Growth is not only achieved through new allocations as it also achieved through completions, commitments and possible windfalls. The objector is proposing an additional allocation in Penyffordd / Penyffordd when there are already three consented housing developments in the settlement. Irrespective of the objectors point about the amount of growth apportioned to Tier 3 settlements it is not necessary or appropriate for further provision to be made in this particular settlement. It is the level of speculative growth approved on appeal in this settlement that was one of the triggers that prompted the Minister's review of TAN1 which has now formally been revoked as not fit for purpose. There is clearly no double counting in respect of the allocation HN1.11 Chester Rd Penymynydd as it appears in the Housing Balance Sheet as an allocation and not as a housing commitment (it is not included in the list of site commitments in Appendix1. There is no requirement in PPW or the draft Development Plans Manual 3 for a separate 10% slippage to the commitments figure. PPW10 requires a flexibility allowance of at least 10% to the overall housing requirement. It is not necessary or appropriate for an allowance to the made for the undelivered

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			them which will equally serve to preclude windfall opportunities. It is noted that the first two tiers of the settlement hierarchy are now expected to deliver 83% of the County's housing requirements, split across 15 towns/settlements. Only 17% of growth is going to be directed to the remaining parts of the County, which in total comprise 22 Sustainable Villages, 17 Defined Villages, and 14 Undefined Villages. Taking the Tier 3 'Sustainable Villages,' this equates to the delivery of 973 dwellings across 22 settlements (of the current proposed County-wide requirement of 6,950 dwellings), at an average of 44 dwellings per settlement. Applying the 14.4% flexibility factor, this increase to 1,113 dwellings. Of these 22 settlements, housing growth will be constrained by the presence of Green Barrier around the following: Ø Bagillt;		housing requirement from the UDP. The housing need for the UDP was calculated at a different point in time, using different projections and assumptions and the adoption of the UDP coincided with a recessionary period. The LDP is seeking to identify a housing requirement figure based on the latest projections and assumptions and the present policy context, for this Plan period, as confirmed by PPW. There is no provision in PPW to account for any historical backlog of housing delivery. The objector should also note that development plans do not deliver housing but rather they make adequate provision to meet the requirement of the plan. It is the industry in combination with market demand that determines delivery rates. It is noteworthy that Welsh Government are broadly comfortable with the level of growth being provided by the Plan and the spatial strategy to distribute that growth.

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			Ø Bretton; Ø Carmel; Ø Drury and Burntwood; Ø Mancot; Ø Northop; ØNorthop Hall; Ø Pentre; Ø Sandycroft; and Ø Sychdyn. As drafted, only two allocations are proposed in the Sustainable Villages; 105 dwellings in New Brighton (Site. Ref. 10), and 186 dwellings in Penymynydd (Site Ref. 11). A further 332 dwellings are already committed (based on the figures contained in Table 4 of Background Paper 10), and 51 units are under construction. It is important to ensure that there is no double-counting in respect of Site Ref. 11 given that this already benefits from planning permission and hence is a commitment.		

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			Accordingly, this leaves a residual requirement of at least 299 dwellings to come forward in the Sustainable Villages against the current housing requirement (439 dwellings when applying the 14.4% flexibility factor), presuming that the allocations and commitments deliver in their entirety. Applying a 10% slippage to the commitments and allocations would increase the residual requirement to 361 dwellings (and 501 dwellings when applying the 14.4% flexibility factor). No allowance has been made for completions during the period 2015-2018 given our earlier comments on the LDP period and UDP period shortfall. However, if they were, under the above scenarios the residual dwelling requirements would be adjusted to 49 and 111, and 189 and 251 (applying the 14.4% flexibility factor). In all cases, more housing land is required. Given the constraints around 10 of the sustainable villages, and the absence of any significant		

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			brownfield windfall opportunities within the settlement boundaries, it is unclear how this residual need will be met without further site allocations through the LDP; this includes a review of settlement boundaries and the release of land in the Open Countryside and in some instances the Green Barrier. A failure to allocate land around these settlements, and the fact that 20 of the 22 Sustainable Villages are not subject to any allocations, raises concerns over a potential imbalance in housing delivery across the County and the future role of these settlements. In addition to the above, our Client considers it would be more appropriate for the Sustainable Villages to accommodate a minimum of 20% of future housing growth, as documented in the Preferred Strategy as the upper figure. This would equate to 1,390 dwellings of the proposed County-wide requirement, an increase of 417 dwellings overall and an average of 63 dwellings per Sustainable Village. This would be much more reflective of a balanced approach to housing delivery across the County; as drafted, the Deposit Plan does not		

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			provide for this, with a clear reluctance on behalf of the Council to adopt a pro-active and positive approach to release and allocate housing sites in the Open Countryside and Green Barrier around the Sustainable Villages. Accordingly, our Client objects to the current proposed spatial distribution breakdown, and specifically the limited amount of growth directed to the Sustainable Villages in view of the policy constraints around a number of them which will equally serve to preclude windfall opportunities.		
1186	STR2: The Location of Development	Object	Category C Affordable Housing - general ? Exception Sites – Affordable housing exception sites are permissible under policy STR2: Location of Development and HN4 (criteria f). It is unclear why small scale exception sites are only allowed in Tiers 2-5 and not Tier 1 which are the most sustainable settlements? The approach requires justification and clarification given affordable housing need across Flintshire is significant.	The approach requires justification and clarification given affordable housing need across Flintshire is significant.	Accepted. The Deposit Plans exclusion of Tier 1 Main Service Centres reflects a carry over from the adopted UDP whereby policy HSG11 applied 'rural' exceptions schemes as was defined in PPW at that time. Therefore adopted policy did not allow small scale exceptions schemes in the larger category A settlements as they were not rural settlements. It is noted that PPW describes such development as 'Affordable Housing Exceptions Schemes' and that reference to 'rural' settlements no longer applies. It is accepted that as Tier 1 settlements are considered to be most sustainable settlements then provision for small scale

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					affordable housing exceptions development would be appropriate in principle. The Council would therefore offer no objection to the Inspector recommending that policy STR2 be amended to allow 'Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries', within criteria a. re Tier 1 Main Service Centres. There is a converse however which is that if small scale incremental schemes were permitted in Tier 1 settlements then this might sterilise future opportunities for larger scale planned growth in a future plan review.
1198	STR2: The Location of Development	Object	I would like to put forward the site of the present India Restaurant on Hawarden Road Hope (The Bombay Sizzler). It could be a site that would fit in with the new Welsh Assembly Self Build Scheme which has funding of £20 million and would be a valuable addition to the LDP housing Policy and would fit in with Policy STR2. It would also be a useful addition to the Housing Allocation in Hope.		Not accepted. Although for a period of time the restaurant ceased trading it is now understood that the restaurant has re-opened. The Indian Restaurant at Hawarden Road Hope is situated within the settlement boundary of HCAC in both the adopted UDP and the Deposit LDP. The development of the site has been previously constrained by its location on the line of the Hope – Caergwrle Bypass, although this road scheme has now been dropped by the Council. Given its location within the settlement boundary it could be developed for a variety of types of housing as set out in STR2. The Plan makes an allowance for small site windfalls and the site could be delivered as part of this. However, the restaurant has recently been trading again and this, along with its small size makes it inappropriate to be allocated in the Plan.

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					Highways: Although there are no highway objection to a small residential development served by a shared private drive from the existing access. There are other constraints to the site that a discussed below. Ecology: Site is predominantly hard standing with leylandii hedgerows and an occasional mature deciduous tree. The building is within 100m of the River Alyn and trees/scrub associated with the adjacent railway and while the building itself is not of high potential, the proximity to suitable feeding habitats gives the building potential. As per BCT Survey guidelines a bat survey would therefore be required and an Impact Assessment with measures to avoid, mitigate, compensate, enhance and manage wildlife features as relevant. Refer to FCC Planning Guidance SPG No 8 Nature Conservation and Planning : http://www.flintshire.gov.uk/en/Resident/Planning/Supplementary-planning-guidance.aspx Additionally, the site is within 100m of Ancient Woodland. The site may affect priority or protected species, as it is agricultural (e.g. breeding birds) or contains existing structures (e.g. bats). The site is a large (>0.4ha) greenfield site. Development here could adversely affect habitat connectivity. It is considered that development here may have an

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					adverse effect on character and result in the loss of important features such as GI. Land contamination: The submitted site is situated on a Secondary A aquifer and with suspected contamination (adjacent to a historic landfill site). As part of any planning application for this site we would advise planning conditions be imposed to ensure that risks associated with any contamination at the site are appropriately managed. This site is immediately adjacent to an actively gassing landfill site and Pollution Control does not support this proposal. An application to develop this site would have to be supported by a detailed land contamination assessment including at least 12 months data and a detailed remediation proposal. It is possible that the site is unsuitable for development where a suitable remediation solution cannot be found. The landfill site is known to be actively gassing and was not engineered to prevent the escape or migration of leachate and landfill gasses away from the site. The extent of the wastes is not known and may extend beyond the boundary of the landfill site as it is today. Wastes are known to be present very close to

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					the surface of the ground as the site is not capped. To conclude, a key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence regarding the above concerns that satisfactory development can be carried out. Therefore, the site is not considered to be necessary or appropriate as an allocation.
1255	STR2: The Location of Development	Object	The distribution of growth is out of kilter with the settlement hierarchy. For example, housing allocations are identified across Tier 1, 2 and 3 settlements yet some larger settlements have no corresponding employment growth. The reverse also applies as some settlements have no housing allocations but are expected to accommodate employment growth. Clearly, this will lead to disjointed housing supply. For example, Tier 1 settlements of Aston & Shotton, Queensferry and Saltney and Tier 2 settlements of Broughton and Greenfield have no housing allocated yet have a significant amount of employment space allocated over the plan period. Yet smaller settlements are identified for comparatively large levels of housing growth	Development must be better dispersed across the Tiers to allow for a proportionate level of growth across Flintshire. This means a broader distribution of housing sites particularly across Tier 1 and 2 settlements (such as Broughton), and particularly when settlements have large employment allocations, yet no housing.	Not accepted. The Plan's spatial strategy and approach to allocating land sites for housing is not premised on making allocations in every single settlement within the top three tiers of the settlement hierarchy. The fact that a settlement does not feature in the list of housing allocations in policy HN1 does not mean that these settlements will not experience growth. This may also be achieved by completions during the first 4 years of the Plan, by commitments and by allowances for small and large site windfall developments. Aston & Shotton and Queensferry are Tier 1 settlements, and although they do not contain any residential allocations, Queensferry does have commitments for 16 dwellings at 1-3 Pierce Street and all are located in close proximity to the Northern Gateway Strategic site which includes 1,325 homes as well as employment uses. The Deeside Plan is also seeking to facilitate improved links between settlements such as these and the Northern Gateway. These settlements are also in close proximity to Connahs Quay and Pentre /

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			Development must be better dispersed across the Tiers to allow for a proportionate level of growth across Flintshire. This means a broader distribution of housing sites particularly across Tier 1 and 2 settlements (such as Broughton), and particularly when settlements have large employment allocations, yet no housing.		Sandycroft where there are large existing industrial areas as reflected in the Principal Employment Areas. In Shotton and Queensferry there are few opportunities for new housing development given the built form of the settlement and constraints such as flooding and ecological designations. However Aston & Shotton have seen the completion of 21 dwellings on the Aston Mead Estate in 2018 and 9 dwellings on the Melrose Centre, Aston in 2019. Saltney is a Tier 1 settlement, and although it does not have a residential allocation it does have a commitment for 71 dwellings at the Allied Bakeries site. As of 1st April 2019 35 of these dwellings were completed with the remaining 36 under construction, due for completion by 1st April 2020. There has also been 54 units completed at 142 High Street by April 2017, 11 of which were completed by the 1st April 2015 which is outside of the plan period, giving a total delivery of 43 units within the plan period. The settlement has clearly delivered housing growth within the first few years of the Plan period. Greenfield is a Tier 2 settlement, and has seen development in the form of 58 units at Glan y Don during the early years of the Plan period. The clear message from these settlements identified by the objector is that housing growth is not only achieved through new allocations but also from commitments and completions.

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					Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period with 189 units completed on the site to the south of the Retail Park in 2017/18, 24 units completed on the 'compound site' immediately to the west of the retail park (adjacent to Aldi) in 2017/18, and 36 units completed on Chester Road (Park Jasmine) also in 2017/18.This is considered sufficient provision for the Plan period, particularly as the Plan Strategy does not prescribe set amounts or targets to each settlement. The Plans spatial strategy distributes development based on a 5 tier settlement hierarchy with only the top three tiers receiving planned growth in the form of allocations. The Plan focuses on the most sustainable settlements and sites and does not apportion quantums of development across the board. Tier 1 and Tier 2 settlements accommodate 83% of the planned growth, whereas Tier 3 will accommodate just 14%, therefore the Council disagree with the objectors comment that "smaller settlements are identified for comparatively large levels of housing growth". In their formal representations on the Plan Welsh Government have no objections to, and have supported in principle the amount of growth and spatial strategy. In terms of the objectors comment that "some larger settlements have no corresponding employment growth" the following summarises the existing employment areas and any new

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					employment allocations within the settlements which include residential allocations; Buckley – has employment allocations and Principal Employment Area's (PEA's) Connah's Quay – has PEAs and is close to the allocated strategic allocation, Northern Gateway Flint – has large PEA's Mold – has employment allocations and PEA's Ewloe – is adjacent to St Davids Park and is close to several PEA's and the allocated strategic site Northern Gateway. Hawarden – close to several PEA's, the allocated strategic site Northern Gateway, and Airbus HCAC – close to Llay Industrial Estate. New Brighton – close to Mold, Buckley and Deeside Penymynydd – close to Broughton and the allocated strategic site Warren Hall. Flintshire has a large number of settlements and traditional employment locations and interrelationships between the two, it is not necessary or appropriate for every settlement to have its own employment as the objector suggests. If this approach was taken, then the

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					objectors proposed site in Broughton would not be suitable as there is no employment allocation in Broughton itself, the nearest is Hawarden Park Industrial Estate and the Strategic allocation Warren Hall.
1275	STR2: The Location of Development	Object	The proposed approach set out within Policy STR2, to direct development towards the more sustainable settlements and employment areas is supported. However, in practice the proposed LPD allocations do not follow the principles of STR2 as a disproportionate amount of development is focussed to less sustainable lower order settlements instead of larger sustainable settlements such as Flint. We address these points later in these representations. The LDP Settlement Hierarchy has 5 Tiers; Main Service Centres (Tier 1), Local Service Centres (Tier 2), Sustainable Villages (Tier 3), Defined Villages (Tier 4) and Undefined Villages (Tier 5) (emerging Policy STR2). However, the distribution of growth is out of kilter with the settlement hierarchy. For example, housing allocations are identified across Tier 1, 2 and 3 settlements yet some larger settlements have no corresponding employment	Does not distribute growth across the settlement hierarchy in a logical or sustainable way in that it places too significant an emphasis on lower order settlements at the expense of more sustainable larger settlements. Additional sites required.	Not accepted. The Plans spatial strategy and approach to allocating land sites for housing is not premised on making allocations in every single settlement within the top three tiers of the settlement hierarchy. The fact that a settlement does not feature in the list of housing allocations in policy HN1 does not mean that these settlements will not experience growth. This may also be achieved by completions during the first 4 years of the Plan, by commitments and by allowances for small and large site windfall developments. Aston & Shotton and Queensferry are Tier 1 settlements, and although they do not contain any residential allocations, Queensferry does have commitments for 16 dwellings at 1-3 Pierce Street and all are located in close proximity to the Northern Gateway Strategic site which includes 1,325 homes as well as employment uses. The Deeside Plan is also seeking to facilitate improved links between settlements such as these and the Northern Gateway. These settlements are also in close proximity to Connahs Quay and Pentre / Sandycroft where there are large existing industrial areas as reflected in the Principal Employment Areas. In Shotton and Queensferry there are few opportunities for new housing development given the built form of the

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			growth. The reverse also applies as some settlements have no housing allocations but are expected to accommodate employment growth. Clearly, this will lead to disjointed housing supply. Furthermore, proposed growth is not distributed across the hierarchy in a logical matter, not least as the distribution does not consider the potential for growth in larger accessible and sustainable settlements (such as Flint). For example, Tier 1 settlements of Aston & Shotton, Queensferry and Saltney, and Tier 2 settlements of Broughton and Greenfield, have no housing allocation yet are expected to support comparatively significant levels of employment growth. Yet smaller settlements are identified for comparatively large levels of housing (emerging Policy HN1, Table 19.1). Therefore, there is a clear uneven distribution of proposed growth across Flintshire, notwithstanding the plan does not allow for enough growth overall.		settlement and constraints such as flooding and ecological designations. However Aston & Shotton have seen the completion of 21 dwellings on the Aston Mead Estate in 2018 and 9 dwellings on the Melrose Centre, Aston in 2019. Saltney is a Tier 1 settlement, and although it does not have a residential allocation it does have a commitment for 71 dwellings at the Allied Bakeries site. As of 1st April 2019 35 of these dwellings were completed with the remaining 36 under construction, due for completion by 1st April 2020. There has also been 54 units completed at 142 High Street by April 2017, 11 of which were completed by the 1st April 2015 which is outside of the plan period, giving a total delivery of 43 units within the plan period. The settlement has clearly delivered housing growth within the first few years of the Plan period. Greenfield is a Tier 2 settlement, and has seen development in the form of 58 units at Glan y Don during the early years of the Plan period. The clear message from these settlements identified by the objector is that housing growth is not only achieved through new allocations but also from commitments and completions. Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period with 189 units completed on the site to the south of the Retail Park in 2017/18, 24 units completed on the ‘compound site’ immediately to the west of the retail park

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					(adjacent to Aldi) in 2017/18, and 36 units completed on Chester Road (Park Jasmine) also in 2017/18.This is considered sufficient provision for the Plan period, particularly as the Plan Strategy does not prescribe set amounts or targets to each settlement. The Plan's spatial strategy distributes development based on a 5 tier settlement hierarchy with only the top three tiers receiving planned growth in the form of allocations. The Plan focuses on the most sustainable settlements and sites and does not apportion quantums of development across the board. Tier 1 and Tier 2 settlements accommodate 83% of the planned growth, whereas Tier 3 will accommodate just 14%, therefore the Council disagree with the objectors comment that "smaller settlements are identified for comparatively large levels of housing growth". In their formal representations on the Plan Welsh Government have no objections to, and have supported in principle the amount of growth and spatial strategy. In terms of the objectors comment that "some larger settlements have no corresponding employment growth" the following summarises the existing employment areas and any new employment allocations within the settlements which include residential allocations; Buckley – has employment allocations and Principal

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					Employment Area's (PEA's) Connah's Quay – has PEAs and is close to the allocated strategic allocation, Northern Gateway Flint – has large PEA's Mold – has employment allocations and PEA's Ewloe – is adjacent to St Davids Park and is close to several PEA's and the allocated strategic site Northern Gateway. Hawarden - close to several PEA's, the allocated strategic site Northern Gateway, and Airbus HCAC – close to Llay Industrial Estate. New Brighton – close to Mold, Buckley and Deeside Penymynydd – close to Broughton and the allocated strategic site Warren Hall Flintshire has a large number of settlements and traditional employment locations and interrelationships between the two, it is not necessary or appropriate for every settlement to have its own employment as the objector suggests. If this approach was taken, then the objectors proposed site in Broughton would not be suitable as there is no employment allocation

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					in Broughton itself, the nearest is Hawarden Park Industrial Estate and the Strategic allocation Warren Hall.

Policy STR3 General

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207	STR3: Strategic Sites	Object	Following a review of the above development plan, the Northern Gateway site has been identified as being crossed or in close proximity to National Grid infrastructure (ZO Route - 400Kv two circuit route from Daines substation in Trafford to Connahs Quay substation in Flintshire). The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.		Not Accepted. However the Northern Gateway site has outline planning permissions on each half of the site. The existence of the overhead line will be taken into account in the consideration of reserved matters planning applications on each phase of development.
541	STR3: Strategic Sites	Object	Objection to Strategic allocation, Warren Hall, Broughton Road Links – Severe congestion within Broughton due to increasing staffing levels at Airbus and Broughton retail park. Main road not designed to take this volume of traffic. Where will the increased traffic from the new development go? This road should have been upgraded before now, and yet you are considering adding to the load with no apparent plans to alleviate the existing pressure. GP Surgeries – Broughton has only one GP surgery. I have approached the Marches Medical	Removal of Warren Hall Strategic Site allocation.	Not Accepted. The Betsi Cadwaldr University Health Board has been a key stakeholder during the preparation of the Plan. During the early engagement stages it was a member of the Key Stakeholder Forum and has been consulted on at each stage in the Plans progression. The Health Board has made no objection to the Plan generally nor this site specifically. The Council is continuing to work with the Health Board in terms of how to accommodate the Plan's proposed growth. It must be stressed that the residential development of this site will not result in one hit given that the Plan's Housing Land Supply Background paper shows the housing

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			Practice, which it tells me has not been consulted in the Planning process, either by Flintshire Planning or Betsi Cadwallder Health Board. I find this quite shocking, as an elderly patient with a number of health issues I rely on my GP and value their service. Three hundred houses could potentially be twelve hundred people, if those houses are four bed dwellings. Again, I have to ask, where will all those new residents go to register with a GP? Schools – Broughton currently has one primary school. At a recent Community Council meeting the Headmistress was quoted as saying that she couldn't deal with any further influx of children. Since the BCUHB had not consulted the Marches Medical practice I wonder whether the LEA has consulted this local school. Where will the additional school children go to school? Drains & Sewers – after speaking to your planning representative at the drop in meeting he advised that additional work is needed to drains and sewers to accommodate this potential new development. I have to ask, when will this work be carried out, before or after the three hundred houses, industrial estate and hotel are built? Broughton is becoming overloaded and unrecognizable without the correct infrastructure in place to support additional people. I cannot understand why additional services such as doctors, schools, roads and drainage are not put		being delivered at a rate of 30 units in 2023/24 and 45 units per year thereafter until 2030. This provides time for the Health Board to put suitable measures in place.

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			in place before building starts. While your representative tells me that no objections have been raised either by the LEA or BCUHB I find it shocking to believe that these organizations are so arrogant to believe that they do not even consult the local grass roots staff for their views.		
633	STR3: Strategic Sites	Object	The Northern Gateway is a site that has been identified as a strategic allocation by the authority dating back to the Flintshire UDP (2000-2015). It is a complex site, with two landowners. One of these landowners, Pochin, recently went into administration. 4.2 The Council's trajectory assumes an extremely high delivery rate of 100 dwellings per annum from the Northern Gateway allocation, despite its acknowledgement in paragraph 5.3.2 of the Preferred Strategy consultation document (2017) that: "The experience of other large sites in Wales suggests they can be difficult to get off the ground and are not delivering development as anticipated. This can have a negative effect on securing and maintaining a 5 year housing land supply from adoption onwards." 4.3 The Council will need to evidence why this build rate has been applied. We would expect the Council to have assessed the local delivery record and explain why it assumes this build rate could be applied to the allocated site. However, no such evidence is	We note that the current reserved matters approval for the first 283 units is one developer only (Countryside). This should be reflected in the delivery forecasts. It is not realistic to assume 100 dwellings from one developer.	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is

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			provided in the published evidence base. We accept that a higher build rate could be achieved on very large sites with multiple developers. However, the Council will need to evidence that there will be more than one developer on site at the same time. In this case the Council will need to demonstrate why it assumes there will be four developers (which would be required to deliver in excess of 100 dwellings per annum) on site at the same time and when this is expected to happen. We note that the current reserved matters approval for the first 283 units is one developer only (Countryside). This should be reflected in the delivery forecasts. It is not realistic to assume 100 dwellings from one developer.		presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is quite normal on a

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					strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The objector's proposed site at Maes Celyn, Northop is predominantly housing based with some other small scale mixed use elements including starter employment units. Rather than focus on the delivery of the Northern Gateway site, the objector's proposed development would actually detract from and compete with it. The objector's proposal would have the effect of jeopardising the delivery of the strategic Northern Gateway site, in favour of pepper potting additional greenfield allocations across the County. Such an approach would have

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					implications for the delivery of regional growth as embodied in the Growth Deal, within which the Northern gateway is a key element.
766	STR3: Strategic Sites	Object			
1149	STR3: Strategic Sites	Object	A key matter for the examination will be whether the plan contains sufficient information in relation to the implementation, delivery and monitoring of the plan. Specifically, whether key elements of the master planning principles, delivery statements, and the infrastructure plan, should be in the plan to ensure good design and comprehensive development for housing and employment sites. ? Masterplan & Delivery Statements have been prepared for both strategic sites. Additional information, where necessary and relevant, along with statements of common ground to support the plan would be advantageous. This also applies to employment sites and key non-strategic housing sites, where relevant. ? Strategic Sites need significant infrastructure which should be articulated in the plan, including specific constraints such as those regarding the nearby airfield i.e. height restrictions which could impact on the developable area. ? The level and rational for the housing flexibility allowance is for the LPA to justify. The DPM (Edition 3)	The trajectory should illustrate the degree of flexibility throughout the plan period.	Accepted. The Council has done a considerable amount of work to provide a robust evidence base to support the policies and proposals in the deposit LDP and to demonstrate the deliverability of the sites in the plan, and its overall soundness. The Council notes and welcomes the Welsh Government's positive support in its formal comments on the Plan for the levels of housing and employment growth and the spatial strategy for distributing and delivering that growth. Whilst the Council acknowledges the need to ensure as far as possible that it can demonstrate the deliverability of the strategic sites in the plan, given the advanced planning status of the Northern Gateway site, which has both outline and now reserved matters permissions across the site, that are enabling the delivery of housing and employment on the ground, the Council is confident that this site is highly sustainable and deliverable, particularly as development interest grows. In relation to the Warren Hall strategic site this is in Welsh Government ownership and a significant amount of background work has and continues to be done to evidence and justify the

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			states 10% is a starting point, with any variation being robustly evidenced. It is not the role of Welsh Government to comment on the merits or the timing of individual sites in the plan. The key point is that the LPA demonstrates that there is sufficient flexibility at key points in the plan period through the trajectory. Statements of Common Ground will assist in clarifying the timing and phasing of all sites. The trajectory should illustrate the degree of flexibility throughout the plan period.		developability and delivery of this site. This is assisted by the site's priority status as part of the North Wales Growth deal where significant funding is available to provide the necessary infrastructure to prime the delivery of development on this site. In addition, the housing element of this site will be fed into the Welsh Government project to accelerate the provision of affordable housing on sites in its ownership working in conjunction with Registered Social Landlords to facilitate this. This provides added certainty of the delivery of the housing element of this mixed use site, and the contribution this makes to the overall housing requirement of the Plan. In terms of flexibility, the Plan includes an allowance that is significantly above the minimum prescribed in DPM3 and the Council considers that this is both reasonable and pragmatic in terms of ensuring the delivery of sufficient housing to meet the housing requirement, consistently throughout the Plan period.
1260	STR3: Strategic Sites	Object	Do not object to the identification of strategic sites and fully recognise the location and potential benefits of such sites. However, the delivery of economic and housing growth objectives is entirely reliant on these two strategic sites, and any delays on these strategic sites is a clear risk. As the council will be aware, strategic sites are complex to deliver and the	the LDP should identify further sites across the plan area in accordance with the settlement hierarchy to safeguard for any further strategic site delays.	Not accepted. It is noted that the objector does not object to the principle of identifying strategic sites and recognises the benefits that they bring. Although the two strategic sites form a key part of the Plans growth strategy, the Plans economic and housing growth is clearly not entirely dependent upon the two sites. There is a range of employment allocations offering choice in terms of location, type and size and also additional flexibility officer by the Principal Employment Areas. The Plans housing

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			expected timescales for development of such sites are often subject to significant slippage. This is particularly apparent with the two LDP strategic sites. Delivery of Northern Gateway (STR3A) is some three years behind expectations and further parcels are likely to be delayed further as a result of the need for further infrastructure works and securing developer interest, for example. Warren Hall (STR3B) is more problematic as the site had an unimplemented Outline consent for employment led development in 2008, and there is no indication the site will come forward during the plan period. As a result, the LDP should identify further sites across the plan area in accordance with the settlement hierarchy to safeguard for any further strategic site delays.		provision is made up of completions, commitments and windfall allowances, in addition to the two strategic sites and other housing sites allocated in the plan. The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, that just building more homes alone cannot match.
1276	STR3: Strategic Sites	Object	Do not object to the identification of strategic sites and fully recognise the location and potential benefits of such sites. However, the delivery of economic and housing growth objectives is entirely reliant on these two strategic sites, and any delays on these strategic sites is a clear risk.	Additional sites required, the LDP should identify further sites across the plan area in accordance with the settlement hierarchy to safeguard for any	Not accepted. It is accepted that the Northern Gateway site has been slow to get off the ground. However, significant investment in flood defence and transport infrastructure has been undertaken by Welsh Government and reserved matters approval given to one phase of housing and a large storage and distribution warehouse. Developer interest is being expressed in other phases of the development. Countryside

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			As the council will be aware, strategic sites are complex to deliver and the expected timescales for development of such sites are often subject to significant slippage. This is particularly apparent with the two LDP strategic sites. Delivery of Northern Gateway (STR3A) is some three years behind expectations and further parcels are likely to be delayed further as a result of the need for further infrastructure works and securing developer interest, for example. As a result, the LDP should identify further sites across the plan area in accordance with the settlement hierarchy to safeguard for any further strategic site delays.	further strategic site delays.	Properties have also commenced construction and use a method of construction which can deliver high annual completion rates. This more positive outlook and the confidence that commencement of development on site can create, confirms the Council's belief that the site can be delivered during the Plan period. It is undoubtedly the case that the employment growth objectives of the Plan rely heavily on the two strategic sites, although there is additional provision in the Plan through other employments allocations and flexibility with the Principal Employment Areas. The Plan is in line with the Growth Deal where both sites form a key part of the economic strategy for the region. However, the housing objectives of the Plan are not solely reliant on the two strategic sites as the Plan makes a number of allocations, in addition to completions, commitments and allowances for small and large site windfalls. The Plan is also on track with the intended housing delivery in the first four years of the Plan. It is not considered that additional housing allocations are required in the Plan. In their formal representations on the Plan, Welsh Government broadly support the level of housing and employment growth and the spatial strategy and consider the Plan to be in general conformity with the draft NDF.
1277	STR3: Strategic Sites	Object	Do not object to the identification of strategic sites and fully recognise the location and potential benefits of such sites. However, the delivery of economic and housing growth objectives is entirely	Additional sites required, the LDP should identify further sites across the plan area in	Not accepted. Although Warren Hall is a strategic site for a mixed use development, the housing element is not strategic, being similar in scale to some LDP housing allocations. The housing element of 300 units is quite capable of

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			reliant on these two strategic sites, and any delays on these strategic sites is a clear risk. As the council will be aware, strategic sites are complex to deliver and the expected timescales for development of such sites are often subject to significant slippage. This is particularly apparent with the two LDP strategic sites. Delivery of Northern Gateway (STR3A) is some three years behind expectations and further parcels are likely to be delayed further as a result of the need for further infrastructure works and securing developer interest, for example. Warren Hall (STR3B) is more problematic as the site had an unimplemented Outline consent for employment led development in 2008, and there is no indication the site will come forward during the plan period. As a result, the LDP should identify further sites across the plan area in accordance with the settlement hierarchy to safeguard for any further strategic site delays.	accordance with the settlement hierarchy to safeguard for any further strategic site delays.	being delivered within the Plan period. It is acknowledged that the Warren hall site has not come forward for development despite being previously allocated in the UDP and having the benefit of outline planning permission (not including the housing element). Nevertheless, the mix of uses has been broadened and the site extended to improve the viability of the site and to improve the mix of development in order to improve sustainability. The need for public sector investment in order to bring forward the site, particularly the employment part, is clearly referenced in the Growth Deal. There is therefore no shortfall in housing from this site. The delivery of 300 units on a strategic site, in a strong housing market area is not unduly onerous or challenging. It is undoubtedly the case that the employment growth objectives of the Plan rely heavily on the two strategic sites, although there is additional provision in the Plan through other employments allocations and flexibility with the Principal Employment Areas. The Plan is in line with the Growth Deal where both sites form a key part of the economic strategy for the region. However, the housing objectives of the Plan are not solely reliant on the two strategic sites as the Plan makes a number of allocations, in addition to completions, commitments and allowances for small and large site windfalls. The Plan is also on track with the intended housing delivery in the first four years of the Plan. It is not considered that additional housing allocations are required in the Plan.

Policy STR3A Northern Gateway and STR3B Warren Hall

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
257	STR3a	Object	STR3A Northern Gateway and STR3B Warren Hall. Both sites have a poor track record of delivery. The housing allocation at Warren Hall fails sustainability tests and the sequential approach to housing land allocation. Please refer to detailed objection in the pdf file attached below. The Plan places significant reliance on the two strategic sites for both employment and housing land requirements. The nature of this objection is that the Plan over-relies on these sites which have a track record of failing to deliver. Paragraphs 3.49 and 3.50 acknowledge that the Plan's job target of 8-10,000 jobs is ambitious and aspirational and justifies its approach due to Flintshire's role as a sub-regional economic hub. However, it does not follow that this will necessarily result an accelerated take up of employment and housing land. These strategic sites account for 24% and 68% of the housing and employment land requirement respectively. It is important to recognise that both these sites have been allocated for development in successive Alyn and Deeside and Flintshire development plans for the last 25 years and yet no meaningful development has taken place. The Northern Gateway site is a complex	With regard to STR3(B) the whole site should be deleted from the Plan and a completion notice served on Welsh Government in accordance with S94 of the Planning Act. At the very least the 300 housing allocation should be deleted. Given the serious shortfall in housing land arising from partial, or total, non-delivery over the Plan period, provision should be made for a suitable high capacity contingency site in a sustainable location. An example would be candidate site FLI008 in Flint.	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			and difficult site to develop. There are abnormally high development costs that have necessitated significant public sector financial assistance. Even with this support the technical and ground condition difficulties and on-site constraints have necessitated the very large housing element as 'enabling development' despite the description of the regeneration project as being 'employment led'. This is misleading as development for employment purposes would not be financially viable and it is dependent on the largest housing allocation in the Plan, albeit wholly within a C1 flood risk area. There is a long history to the development of this Deeside employment area. There have been massive injections of public funding from the EU, UK and successive Welsh Governments following the 'overnight' closure of the former Shotton Steelworks with the loss of 15,000 jobs. That level of support is no longer available for infrastructure and ground preparation. Major land raise works were carried out which included pumping of material from the Dee Estuary. These sources of landfill are no longer available due to the high level of protection which is now rightly given to the estuary. It is also important to acknowledge that the inward investment mobility that Wales experienced at the time has long gone and employment land take up rates have substantially reduced.		development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring

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			These concerns are supported by the Council's own Employment Land Review referred to in paragraph 3.47. This states that the ELR "did not indicate a significant need for new employment land or significant potential for job growth". The Plan tends to dismiss its own evidence by saying that the review "coincided with a significant and prolonged economic recessionary period in the UK/globally" and this did not reflect the "growth ambition" of the County. The reality is that 'ambition' itself will not generate the level of jobs that the Plan seeks. There is no evidence that an upsurge in the take up of employment land will occur. On the contrary, the current uncertainty over investment indicates otherwise which is borne out by the fact that no development has actually taken place other than a sign at the site entrance. The Northern Gateway site was allocated for development as Opportunity Site 1 in the Alyn and Deeside Local Plan 1993 - 2003. This was the preferred site out of 3 Opportunity Sites but was pushed back in priority by the former WDA who favoured the ill-fated Opportunity Site 2 located north of Shotwick Road. None of the sites have been developed apart from the latter as a solar farm despite it being contrary to local and national policies regarding green barrier and the best and most versatile agricultural land. The reality is that this site		about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The objector appears to be objecting to a highly sustainable strategic mixed use development yet the proposed site at Flint has, at its core, a retirement village. This is hardly a sustainable alternative to the Northern gateway site advocated for deletion and as a proposal does virtually nothing to promote economic growth,

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			has been actively proposed for development for over 25 years and still no meaningful development has occurred. Past experience indicates that there is little confidence that it will come forward either partially or completely within the plan period. Little appears to have changed because since permission was granted for the current scheme over 5 years ago, no development has taken place on site. Furthermore, one of the major development partners, Pochin, which went into liquidation earlier in 2019 and it is understood that this may have created difficulties with the other partners involved in the project. This adds to the significant doubt as to whether all, or even part of the site, will be developed within the plan period. There has been relatively little new employment development on the Deeside employment area over the last 10 years which means that the projected take up rate of employment land needs to be treated with great caution. Past experience, together with abnormal site development costs, is evidence that it is highly unlikely that the anticipated rate of housing and employment starts and completions will be realised. The worst case scenario is that none of it will be developed within the first 5 years of the plan period. This severely affects the		

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			deliverability of the required housing land across the county.		
339	STR3a	Object	See attached representation. Unable to complete this box due to word restriction We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment. However due to constraints they have failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning permission and its delivery is in the hands of one landowner. We are also aware that the site has attracted interest from a number of housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. However, we do have greater concerns	See attached representation. Unable to complete this box due to word restriction	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the

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			with regards to the Pochin Goodman part of the Site and its ability to deliver the level of housing envisaged. The very high level masterplan and delivery statement which has been prepared for this part of the Strategic Site provides an indication of the infrastructure which will be required and the anticipated timescales when development is expected to commence. In the case of the Pochin Goodman Northern Gateway element, a package of enabling works is still required to be implemented following reserved matters approval and therefore it is unlikely housing units will begin to be delivered on the site in 2020 as detailed. Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been		development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring

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			provided or is planned to take place." This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of the such large sites. Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date, given the points set out above, we would question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The objector's proposed site at Maes Celyn, Northop is predominantly housing based with some other small scale mixed use elements including starter employment units. Rather than focus on the delivery of the Northern Gateway site, the objector's proposed development would actually detract from and compete with it. The objector's proposal would have the effect of jeopardising the delivery of the strategic Northern Gateway site, in favour of pepper potting additional greenfield allocations across the County. Such an approach would have implications for the delivery of regional growth as embodied in the Growth Deal, within which the Northern gateway is a key element. There is presently no requirement in PPW10 or the Development Plans Manual 3 for LDP's to incorporate contingency sites. The Plan already has a healthy 14.4% flexibility allowance and the allowances for small and large site windfalls is also a conservative estimate, offering further flexibility. It is also unclear when Anwyl are promoting significant alternative sites such as the large predominantly housing only extension to Croes Atti, how they would be in a position to deliver significant housing on a large scale at a rate to meet the requirements of the plan, when multiple developers now with reserved matters consents on the Northern Gateway site would not.

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424	STR3a	Object	Gladman are not convinced that the re-allocation of these sites will necessarily result in delivery as suggested within the plan. The council need a greater level of certainty regarding the delivery of these two sites, which are fundamental element of the FLDP. This concern is even more important if the current consultation to revoke TAN1 goes ahead and 5yr land supply is revoked. The council would then be reliant on monitoring of the housing trajectory through the AMR to ensure the delivery of the necessary scale of housing.	The council need a greater level of certainty regarding the delivery of these two sites, which are fundamental element of the FLDP.	The objection provides little in way of detailed comment on each site other than reference to three studies which look at lead-in times and delivery rates, particularly on large sites. It is acknowledged that the Northern Gateway site has been slow to get off the ground. However, significant investment in flood defence and transport infrastructure has been undertaken by Welsh Government and reserved matters approval given to one phase of housing and a large storage and distribution warehouse. Developer interest is being expressed in other phases of the development. This more positive outlook and the confidence that commencement of development on site can create, confirms the Council's belief that the site can be delivered during the Plan period.
639	STR3a	Object	In order to ensure that the policy is sound, TW recommends that: 1 Strategic allocation STR3A is reviewed in its entirety and the proposed number of dwellings to be delivered by 2030 is reassessed; and, 2 Additional non-strategic sites, which are both available and deliverable within the plan period, are allocated to ensure that the local housing requirements are appropriately met.	Strategic allocation STR3A is reviewed in its entirety and the proposed number of dwellings to be delivered by 2030 is reassessed; and, 2 Additional non-strategic sites, which are both available and deliverable within the plan period, are allocated to ensure that the local housing	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				requirements are appropriately met.	matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is

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					quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The objector's proposed site at Maes Celyn, Northop is predominantly housing based with some other small scale mixed use elements including starter employment units. Rather than focus on the delivery of the Northern Gateway site, the objector's proposed development would actually detract from and compete with it. The objector's proposal would have the effect of jeopardising the delivery of the strategic Northern Gateway site, in favour of pepper potting additional greenfield allocations across the County. Such an approach would have implications for the delivery of regional growth as

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					embodied in the Growth Deal, within which the Northern gateway is a key element. The objector objects to the Northern Gateway Strategic Site and proposes that, in view of delivery concerns, additional non-strategic sites which are available and deliverable within the Plan period are allocated. The objector proposes a large housing site of some 580 dwellings in green barrier on the edge of Mynydd Isa which is more akin to a strategic site than any of the Plan's housing allocations in policy HN1. The objector provides no information on how and when such a large site can be delivered by 2030 and in their representations in relation to the strategy of the plan, are actually seeking an extension to the plan period to assist with delivery of their proposed site.
922	STR3a	Object	The Plan identifies two strategic sites including the Northern Gateway and Warren Hall. The supporting text highlights the problems with strategic sites at paragraph 5.18 stating that they "can be difficult to get off the ground and are not delivering development as anticipated". In light of the Council's strategy of continuing to pursue development at two long standing strategic allocations that have not delivered to date, we question whether this is the correct strategy for the County. Whilst I'm sure the Council believe that these sites will eventually come forward, we remain of the view that an alternative approach that looked at allocating a larger range and number of small, medium and	Over reliance on strategic sites, and that through the allocation of a range of alternative and additional sites, this could be addressed.	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved

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			large sites across the County in the top three tiers of the settlement hierarchy would result in higher and earlier delivery of new housing, as opposed to having to wait for infrastructure heavy strategic development options to come forward. The identification of alternative sites could be in addition to the two strategic sites rather than instead of them, thereby providing flexibility and increasing potential delivery in the short term. Sites such as that at Drury Lane would be ideally placed to come forward in the early part of the Plan. In its current format, we do not consider the Plan sound as it does not meet Test 3 as we do not believe it will deliver the levels of development that are needed, as there is an over reliance on strategic sites, and that through the allocation of a range of alternative and additional sites, this could be addressed.		matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The ethos behind this objection, and others by the same developer, appears to be simply to object to the housing element of this strategic site in order to promote smaller housing elsewhere in the County. Such an approach does not recognise the context of this important mixed use development and the combined package of economic benefits.
952	STR3a	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or	Allocate new deliverable sites	Not accepted. Reserved matters planning consent for both employment and housing development have been granted and Countryside Properties are presently on site. Further reserved matters planning applications are presently under consideration and enquiries from a

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			PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable. Northern Gateway concerns are: • Pochin (in August 2019) collapsed and went into administration which places doubt over the validity of any claims made with respect deliverability. • It is suggested that the Praxis area could deliver 725 units by 2030 and Pochin/Goodman claim to deliver 654 by 2030 out of the approved permission for 770 units; this totals 1,495 units which exceeds the 1,300 draft allocation. • The LDP aims to deliver 994 units across the STR3A area by 2030 and the remainder of the total 1,300 allocation (i.e. 306) in the subsequent plan period. • The whole "Airfields" site is a massively challenging site to bring forward, not least because of its locational position whereupon it does not offer an attractive proposition to build new housing and attract occupiers, but because of significant environmental drainage and highway accessibility / infrastructure investment requirements. • The trajectories provided are not considered to be founded on accurate evidence and will struggle to deliver the rates purported for a variety of reasons.		number of developers relating to other residential plots on the site. In respect of the objectors comments on the Northern Gateway site the Council responds below: • Although Pochin have gone into administration, the Northern Gateway site is within the remit of Pochin Goodman which is a separate development company and is still operational. There is therefore no question mark over the delivery of the Pochin southern part of the site. • The Plans allocation is for 1300 units and this is the figure used in the housing trajectory in Background Paper 10 Housing Land Supply. With two landowners promoting each half of the site, within the context of different sets of planning permissions, this is a complex and rapidly changing site. The Pochin Goodmand Statement which accompanied the Deposit Plan explains that the outline planning permission was for 600 units. In para 2.4 it explains that a subsequent planning permission (054758) granted in March 2018 varied a condition to increase the number of units from 600 to 770 units. Pochin illustrate in Appendix 1 which shows 654 units being completed by the end of the Plan period with the remainder beyond the Plan period. The Praxis delivery statement shows that the 725 units on their part of the site can all be delivered within the Plan period. The position on behalf of the two developers that a total of 1379 units (out of the total of 1495) can be delivered is slightly more optimistic than the Councils position. Policy STR3 identifies the provision of 1325 units on the site and the accompanying trajectory in

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					Background Paper 10 Housing Land Supply shows 994 units being developed within the Plan period and 331 units being beyond the Plan period. In the context of the objectors concerns about non-delivery, it is evident that i) there is now greater overall provision in the Northern Gateway site than shown in the Plan (an additional170 units on the Pochin part) and that ii) the two developers are more optimistic in their estimates having regard to recent progress on the site and recent enquiries and negotiations on subsequent plots and phases. These two factors, indicate that the delivery rates within the LDP trajectory are realistic and if anything an under-estimate of likely delivery. • The site has taken time to come on stream largely because of the need to secure infrastructure investment in the form of flood alleviation works and the provision of a spine road. However, these have been funded by Welsh Government and completed. The site represents a highly sustainable mixed use strategic site at the heart of the growth area advocated in the previous Wales Spatial Plan and now the draft National Development Framework. The site comprises residential, employment, green infrastructure and local community facilities and has a riverside setting alongside the R.Dee and the cycle track. The planning permission and commencement on site by Countryside Properties represents a step change moment and has brought market interest and confidence in the site. As development commences and other developers come on stream, as is the case based on subsequent planning applications and enquiries, the site will create its own housing market.

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					• The objector refers to a variety of reasons as to why projected build rates are not achievable but does not say what they are. For instance, Countryside Properties build in a particular way which enables them to achieve high annual completion rates. Several developers are likely to be on site at the same time and this would increase annual build rates. The objector's comments in respect of Warren Hall will be commented on in relation to Policy ST3B.
967	STR3a	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable. Northern Gateway concerns are: • Pochin (in August 2019) collapsed and went into administration which places doubt over the validity of any claims made with respect deliverability. • It is suggested that the Praxis area could deliver 725 units by 2030 and Pochin/Goodman claim to deliver 654 by 2030 out of the approved permission for 770 units; this totals 1,495 units which exceeds the 1,300 draft allocation. • The LDP aims to deliver 994 units across the STR3A area by 2030 and the	Allocate deliverable sites.	Not accepted. Reserved matters planning consent for both employment and housing development have been granted and Countryside Properties are presently on site. Further reserved matters planning applications are presently under consideration and enquiries from a number of developers relating to other residential plots on the site. In respect of the objectors comments on the Northern Gateway site the Council responds below: • Although Pochin have gone into administration, the Northern Gateway site is within the remit of Pochin Goodman which is a separate development company and is still operational. There is therefore no question mark over the delivery of the Pochin southern part of the site. • The Plans allocation is for 1300 units and this is the figure used in the housing trajectory in Background Paper 10 Housing Land Supply. With two landowners promoting each half of the site, within the context of different sets of planning permissions, this is a complex

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			remainder of the total 1,300 allocation (i.e. 306) in the subsequent plan period. • The whole “Airfields” site is a massively challenging site to bring forward, not least because of its locational position whereupon it does not offer an attractive proposition to build new housing and attract occupiers, but because of significant environmental drainage and highway accessibility / infrastructure investment requirements. • The trajectories provided are not considered to be founded on accurate evidence and will struggle to deliver the rates purported for a variety of reasons.		and rapidly changing site. The Pochin Goodmand Statement which accompanied the Deposit Plan explains that the outline planning permission was for 600 units. In para 2.4 it explains that a subsequent planning permission (054758) granted in March 2018 varied a condition to increase the number of units from 600 to 770 units. Pochin illustrate in Appendix 1 which shows 654 units being completed by the end of the Plan period with the remainder beyond the Plan period. The Praxis delivery statement shows that the 725 units on their part of the site can all be delivered within the Plan period. The position on behalf of the two developers that a total of 1379 units (out of the total of 1495) can be delivered is slightly more optimistic than the Councils position. Policy STR3 identifies the provision of 1325 units on the site and the accompanying trajectory in Background Paper 10 Housing Land Supply shows 994 units being developed within the Plan period and 331 units being beyond the Plan period. In the context of the objectors concerns about non-delivery, it is evident that i) there is now greater overall provision in the Northern Gateway site than shown in the Plan (an additional170 units on the Pochin part) and that ii) the two developers are more optimistic in their estimates having regard to recent progress on the site and recent enquiries and negotiations on subsequent plots and phases. These two factors, indicate that the delivery rates within the LDP trajectory are realistic and if anything an under-estimate of likely delivery. • The site has taken time to come on stream largely because of the need to secure infrastructure investment in the form of flood alleviation works and the provision of a spine road. However, these have been funded by

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					Welsh Government and completed. The site represents a highly sustainable mixed use strategic site at the heart of the growth area advocated in the previous Wales Spatial Plan and now the draft National Development Framework. The site comprises residential, employment, green infrastructure and local community facilities and has a riverside setting alongside the R.Dee and the cycle track. The planning permission and commencement on site by Countryside Properties represents a step change moment and has brought market interest and confidence in the site. As development commences and other developers come on stream, as is the case based on subsequent planning applications and enquiries, the site will create its own housing market. • The objector refers to a variety of reasons as to why projected build rates are not achievable but does not say what they are. For instance, Countryside Properties build in a particular way which enables them to achieve high annual completion rates. Several developers are likely to be on site at the same time and this would increase annual build rates. The objector's comments in respect of Warren Hall will be commented on in relation to Policy ST3B.
985	STR3a	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more	more sequentially sites are available and can be demonstrated to be deliverable	Not accepted. Reserved matters planning consent for both employment and housing development have been granted and Countryside Properties are presently on site. Further reserved matters planning applications are presently under consideration and enquiries from a

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			sequentially sites are available and can be demonstrated to be deliverable. Northern Gateway concerns are: • Pochin (in August 2019) collapsed and went into administration which places doubt over the validity of any claims made with respect deliverability. • It is suggested that the Praxis area could deliver 725 units by 2030 and Pochin/Goodman claim to deliver 654 by 2030 out of the approved permission for 770 units; this totals 1,495 units which exceeds the 1,300 draft allocation. • The LDP aims to deliver 994 units across the STR3A area by 2030 and the remainder of the total 1,300 allocation (i.e. 306) in the subsequent plan period. • The whole “Airfields” site is a massively challenging site to bring forward, not least because of its locational position whereupon it does not offer an attractive proposition to build new housing and attract occupiers, but because of significant environmental drainage and highway accessibility / infrastructure investment requirements. • The trajectories provided are not considered to be founded on accurate evidence and will struggle to deliver the rates purported for a variety of reasons.		number of developers relating to other residential plots on the site. In respect of the objectors comments on the Northern Gateway site the Council responds below: • Although Pochin have gone into administration, the Northern Gateway site is within the remit of Pochin Goodman which is a separate development company and is still operational. There is therefore no question mark over the delivery of the Pochin southern part of the site. • The Plans allocation is for 1300 units and this is the figure used in the housing trajectory in Background Paper 10 Housing Land Supply. With two landowners promoting each half of the site, within the context of different sets of planning permissions, this is a complex and rapidly changing site. The Pochin Goodmand Statement which accompanied the Deposit Plan explains that the outline planning permission was for 600 units. In para 2.4 it explains that a subsequent planning permission (054758) granted in March 2018 varied a condition to increase the number of units from 600 to 770 units. Pochin illustrate in Appendix 1 which shows 654 units being completed by the end of the Plan period with the remainder beyond the Plan period. The Praxis delivery statement shows that the 725 units on their part of the site can all be delivered within the Plan period. The position on behalf of the two developers that a total of 1379 units (out of the total of 1495) can be delivered is slightly more optimistic than the Councils position. Policy STR3 identifies the provision of 1325 units on the site and the accompanying trajectory in

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					Background Paper 10 Housing Land Supply shows 994 units being developed within the Plan period and 331 units being beyond the Plan period. In the context of the objectors concerns about non-delivery, it is evident that i) there is now greater overall provision in the Northern Gateway site than shown in the Plan (an additional170 units on the Pochin part) and that ii) the two developers are more optimistic in their estimates having regard to recent progress on the site and recent enquiries and negotiations on subsequent plots and phases. These two factors, indicate that the delivery rates within the LDP trajectory are realistic and if anything an under-estimate of likely delivery. • The site has taken time to come on stream largely because of the need to secure infrastructure investment in the form of flood alleviation works and the provision of a spine road. However, these have been funded by Welsh Government and completed. The site represents a highly sustainable mixed use strategic site at the heart of the growth area advocated in the previous Wales Spatial Plan and now the draft National Development Framework. The site comprises residential, employment, green infrastructure and local community facilities and has a riverside setting alongside the R.Dee and the cycle track. The planning permission and commencement on site by Countryside Properties represents a step change moment and has brought market interest and confidence in the site. As development commences and other developers come on stream, as is the case based on subsequent planning applications and enquiries, the site will create its own housing market.

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					• The objector refers to a variety of reasons as to why projected build rates are not achievable but does not say what they are. For instance, Countryside Properties build in a particular way which enables them to achieve high annual completion rates. Several developers are likely to be on site at the same time and this would increase annual build rates. The objector's comments in respect of Warren Hall will be commented on in relation to Policy ST3B.
997	STR3a	Object	Paragraph 5.18 – the Council queries whether it is necessary to include a reference to Cheshire West and Chester Council. It may be more appropriate to simply say that there are strategic sites allocated nearby in neighbouring authorities. • Paragraph 5.24 – states that the Northern Gateway site is progressing in line with the permissions, however there is an opportunity for future phases to be developed. It would be helpful to clarify if the area in the policy reflects the whole site, or whether it is the residual left to be developed.	It would be helpful to clarify if the area in the policy reflects the whole site, or whether it is the residual left to be developed.	Not accepted. In para 5.18 the Council is seeking to clarify that there are strategic sites in CWAC, Wrexham and Denbighshire and that the Flintshire LDP does not seek to identify any new strategic sites other than the two sites carried over from the UDP. In para 5,24 the Council is providing an overview and further explanation of the Northern Gateway development. The allocation in the Plan is for the whole site. The whole site has the benefit of two outline planning permissions and further reserved matters and discharge of conditions applications have been approved on both halves of the site. It is not considered that the policy or explanatory text is unclear that it relates to the whole site.
1007	STR3a	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more	more sequentially sites are available and can be demonstrated to be deliverable	Not accepted. Reserved matters planning consent for both employment and housing development have been granted and Countryside Properties are presently on site. Further reserved matters planning applications are presently under consideration and enquiries from a

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			sequentially sites are available and can be demonstrated to be deliverable. Northern Gateway concerns are: • Pochin (in August 2019) collapsed and went into administration which places doubt over the validity of any claims made with respect deliverability. • It is suggested that the Praxis area could deliver 725 units by 2030 and Pochin/Goodman claim to deliver 654 by 2030 out of the approved permission for 770 units; this totals 1,495 units which exceeds the 1,300 draft allocation. • The LDP aims to deliver 994 units across the STR3A area by 2030 and the remainder of the total 1,300 allocation (i.e. 306) in the subsequent plan period. • The whole “Airfields” site is a massively challenging site to bring forward, not least because of its locational position whereupon it does not offer an attractive proposition to build new housing and attract occupiers, but because of significant environmental drainage and highway accessibility / infrastructure investment requirements. • The trajectories provided are not considered to be founded on accurate evidence and will struggle to deliver the rates purported for a variety of reasons.		number of developers relating to other residential plots on the site. In respect of the objectors comments on the Northern Gateway site the Council responds below: • Although Pochin have gone into administration, the Northern Gateway site is within the remit of Pochin Goodman which is a separate development company and is still operational. There is therefore no question mark over the delivery of the Pochin southern part of the site. • The Plans allocation is for 1300 units and this is the figure used in the housing trajectory in Background Paper 10 Housing Land Supply. With two landowners promoting each half of the site, within the context of different sets of planning permissions, this is a complex and rapidly changing site. The Pochin Goodmand Statement which accompanied the Deposit Plan explains that the outline planning permission was for 600 units. In para 2.4 it explains that a subsequent planning permission (054758) granted in March 2018 varied a condition to increase the number of units from 600 to 770 units. Pochin illustrate in Appendix 1 which shows 654 units being completed by the end of the Plan period with the remainder beyond the Plan period. The Praxis delivery statement shows that the 725 units on their part of the site can all be delivered within the Plan period. The position on behalf of the two developers that a total of 1379 units (out of the total of 1495) can be delivered is slightly more optimistic than the Councils position. Policy STR3 identifies the provision of 1325 units on the site and the accompanying trajectory in

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					Background Paper 10 Housing Land Supply shows 994 units being developed within the Plan period and 331 units being beyond the Plan period. In the context of the objectors concerns about non-delivery, it is evident that i) there is now greater overall provision in the Northern Gateway site than shown in the Plan (an additional170 units on the Pochin part) and that ii) the two developers are more optimistic in their estimates having regard to recent progress on the site and recent enquiries and negotiations on subsequent plots and phases. These two factors, indicate that the delivery rates within the LDP trajectory are realistic and if anything an under-estimate of likely delivery. • The site has taken time to come on stream largely because of the need to secure infrastructure investment in the form of flood alleviation works and the provision of a spine road. However, these have been funded by Welsh Government and completed. The site represents a highly sustainable mixed use strategic site at the heart of the growth area advocated in the previous Wales Spatial Plan and now the draft National Development Framework. The site comprises residential, employment, green infrastructure and local community facilities and has a riverside setting alongside the R.Dee and the cycle track. The planning permission and commencement on site by Countryside Properties represents a step change moment and has brought market interest and confidence in the site. As development commences and other developers come on stream, as is the case based on subsequent planning applications and enquiries, the site will create its own housing market.

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					• The objector refers to a variety of reasons as to why projected build rates are not achievable but does not say what they are. For instance, Countryside Properties build in a particular way which enables them to achieve high annual completion rates. Several developers are likely to be on site at the same time and this would increase annual build rates. The objector's comments in respect of Warren Hall will be commented on in relation to Policy ST3B.
1060	STR3a	Object	STR3A - Northern Gateway Mixed Use Development Site You will be aware that there is a long and complex planning history affecting the re-development of this site, and that a number of outline planning applications, which allow for mixed use development, have been granted approval by your Authority since 2013. A complex suite of flood risk mitigation measures are required across the site to manage the consequences of flooding to the development, and users of it, in accordance with TAN15. These are detailed in the various Flood Consequences Assessment (FCA) reports which supported the outline planning applications. Numerous planning conditions were imposed on the planning approvals to ensure that the key flood risk mitigation measures are implemented and delivered over an agreed phasing period. Works to develop the site have already commenced. We note from your	Given the site is intended for allocation further narrative to support viability for the plan period would be beneficial. STR3A and 3B – we would recommend reference is made to provision of a Green Infrastructure network and strategic landscaping and GI network. We suggest that these networks be included in the Proposed Green Infrastructure SPG.	Not accepted. In respect of the Northern Gateway allocation, the site was allocated in the adopted UDP. The site has the benefit of outline planning permissions, consents in respect of discharges of conditions and reserved matters approvals. Housing development is now under construction on the site. Welsh Government has invested in flood defence works involving the strengthening of the embankments along the R. Dee. NRW were a statutory consultee throughout the sites allocation and planning application processes and an appropriate flood management scheme put in place. In respect of both STR3A and B, reference is made as part of the policy wording on each site to 'green infrastructure'. It is not considered further reference is necessary.

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			Authority's Strategic Flood Consequences Assessment (SFCA), and specifically Appendix B (FCC Development Site Assessment) that this site is listed for mixed use development. The Development Site Assessment advises that there should be a presumption against highly vulnerable development on this site, and that your Authority should consider the removal of highly vulnerable development from the plan. Given the site is intended for allocation further narrative to support viability for the plan period would be beneficial. STR3A and 3B – we would recommend reference is made to provision of a Green Infrastructure network and strategic landscaping and GI network. We suggest that these networks be included in the Proposed Green Infrastructure SPG.		
335	STR3a	Object	See attached representation. Unable to complete this box due to word restriction We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites	See attached representation	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently

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			were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment. However due to constraints they have failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning permission and its delivery is in the hands of one landowner. We are also aware that the site has attracted interest from a number of housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. However, we do have greater concerns with regards to the Pochin Goodman part of the Site and its ability to deliver the level of housing envisaged. The very high level masterplan and delivery statement which has been prepared for this part of the Strategic Site provides an indication of the infrastructure which will be required and the anticipated timescales when development is expected to commence. In the case of the Pochin Goodman Northern Gateway element, a package of enabling works is still required to be implemented following reserved matters approval and therefore it is unlikely housing units will begin to be delivered on the site in 2020 as detailed.		on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further

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			Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place." This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of the such large sites. Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date, given		phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The objector's proposed site at Maes Celyn, Northop is predominantly housing based with some other small scale mixed use elements including starter employment units. Rather than focus on the delivery of the Northern Gateway site, the objector's proposed development would actually detract from and compete with it. The objector's proposal would have the effect of jeopardising the delivery of the strategic Northern Gateway site, in favour of pepper potting additional greenfield allocations across the County. Such an approach would have implications for the delivery of regional growth as

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			the points set out above, we would question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		embodied in the Growth Deal, within which the Northern gateway is a key element. There is presently no requirement in PPW10 or the Development Plans Manual 3 for LDP's to incorporate contingency sites. The Plan already has a healthy 14.4% flexibility allowance and the allowances for small and large site windfalls is also a conservative estimate, offering further flexibility. It is also unclear when Anwyl are promoting significant alternative sites such as the large predominantly housing only extension to Croes Atti, how they would be in a position to deliver significant housing on a large scale at a rate to meet the requirements of the plan, when multiple developers now with reserved matters consents on the Northern Gateway site would not.
343	STR3a	Object	See attached representation. Unable to complete this box due to word restriction We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment.	See attached representation. Unable to complete this box due to word restriction	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved

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			However due to constraints they have failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning permission and its delivery is in the hands of one landowner. We are also aware that the site has attracted interest from a number of housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. However, we do have greater concerns with regards to the Pochin Goodman part of the Site and its ability to deliver the level of housing envisaged. The very high level masterplan and delivery statement which has been prepared for this part of the Strategic Site provides an indication of the infrastructure which will be required and the anticipated timescales when development is expected to commence. In the case of the Pochin Goodman Northern Gateway element, a package of enabling works is still required to be implemented following reserved matters approval and therefore it is unlikely housing units will begin to be delivered on the site in 2020 as detailed. Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any		matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is

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			development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place." This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of the such large sites. Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date, given the points set out above, we would question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the		quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The objector's proposed site at Maes Celyn, Northop is predominantly housing based with some other small scale mixed use elements including starter employment units. Rather than focus on the delivery of the Northern Gateway site, the objector's proposed development would actually detract from and compete with it. The objector's proposal would have the effect of jeopardising the delivery of the strategic Northern Gateway site, in favour of pepper potting additional greenfield allocations across the County. Such an approach would have implications for the delivery of regional growth as

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			lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		embodied in the Growth Deal, within which the Northern gateway is a key element. There is presently no requirement in PPW10 or the Development Plans Manual 3 for LDP's to incorporate contingency sites. The Plan already has a healthy 14.4% flexibility allowance and the allowances for small and large site windfalls is also a conservative estimate, offering further flexibility. It is also unclear when Anwyl are promoting significant alternative sites such as the large predominantly housing only extension to Croes Atti, how they would be in a position to deliver significant housing on a large scale at a rate to meet the requirements of the plan, when multiple developers now with reserved matters consents on the Northern Gateway site would not.
369	STR3a	Object	See attached representation. Unable to complete this box due to word restriction We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment.	See attached representation. Unable to complete this box due to word restriction	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved

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388	STR3a	Object	See attached representation. Unable to complete this box due to word restriction We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment.	See attached representation. Unable to complete this box due to word restriction	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved

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758	STR3a	Object	Policy STR3: Strategic Sites 6.26. The Council has identified two Strategic Sites for development during the LDP period 6.27. Our Client has no in-principle objection to these two allocations. 6.28. On review of Appendix 3 of Background Paper 10, it is noted that this sets out proposed delivery rates for both sites during the LDP period. In respect of Warren Hall, this is expected to deliver in its entirety during the LDP period, and specifically during the period 2023-24 to 2029-30. Our Client has no objection to the projected rates of delivery. 6.29. Turning to the Northern Gateway site, it is the Council's expectation that this will deliver 994 dwellings between 2020-21	Our Client would request that the Council publishes firm evidence which supports these ambitious assumptions (i.e. actual housebuilder information on delivery rates as opposed to the Site Promoter's own assumptions);	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved

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			and 2029-30, averaging close to 100 dwellings per annum (and in some years 150 dwellings per annum based on the Site Promoter's own Delivery Statements). To date, it is understood that 280 dwellings benefits from detailed Reserved Matters consent and it is understood that work has commenced on the delivery of associated infrastructure in relation to an access road and flood protection works. There is a need to a clear timetable of when these works will be commenced and completed, alongside evidence that there is no funding gap which could preclude or delay the implementation of any of the required infrastructure works. 6.30. The Council's projected rate of housing delivery on the site is notably ambitious, and will require at least three housebuilder outlets at any one time to achieve them (and in some cases 4 based on the Site Promoter's own Delivery Statements). In calculating these delivery rates, consideration needs to be given to market conditions and competition in respect of the rates of delivery, as build rates will naturally be informed by sales rates and access to mortgages. Our Client would request that the Council publishes firm evidence which supports these ambitious assumptions (i.e. actual housebuilder information on delivery rates as opposed to the Site Promoter's own assumptions); as a leading North Wales housebuilder,		matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is

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			our Client is fully aware of how delivery rates will be affected by market conditions/sales rates, particularly when forecasting over a 10-15 year period.		quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The ethos behind this objection appears to be simply to object to the housing element of this strategic site in order to promote smaller housing elsewhere in the County. Such an approach does not recognise the context of this important mixed use development and the combined package of economic benefits.
921	STR3a	Object	Reliance on Key Strategic Sites Policy STR3 It is accepted that there has been a long term vision and growth proposed for the Northern Gateway area and Warren Hall Development site which are proposed to provide for 1625 homes between them over the plan period. There appears to be	alternative provision should be made available in other highlighted key settlements which are also as sustainable in	Not accepted. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented.

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			a heavy reliance on these sites to deliver almost 25% of new homes required over the plan period. It is considered that there are considerable obstacles that could prohibit or at least slow down the delivery of these sites, in particular flood risk and highways capacity that could significantly hamper the delivery of sites within this timeframe. Neither of these issues have been fully investigated for a full built out scenario. Furthermore, strategic allocations can be slower to be built out as the market becomes saturated and delivery rates can slow in subsequent phases as evidenced on the UDP allocation at Croes Atti, Flint. Therefore, alternative provision should be made available in other highlighted key settlements which are also as sustainable in character in line with Policy STR2. These 2 strategic allocations puts a heavy reliance on these Tier 2 settlements providing a quarter of all new housing for the county over the plan period without the necessary services and infrastructure being in place in these areas to support this growth. This obvious over reliance can put strain on the existing local infrastructure and make it more difficult to achieve the housing figures targeted and moreover required to support a growing population. Furthermore, this approach also fails to provide the market with greater choice of where people want to	character in line with Policy STR2.	The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress in bringing their element of the site forward. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is presently under consideration for 129 homes for Keepmoat Homes (reported to Planning Committee 4th March and secured a Committee resolution to grant planning permission subject to signing of s106). Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development as the development company who have an interest in this site are not affected by the administration. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the

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			live. Other settlements such as Buckley and Aston which are identified in Policy STR2 as Tier 1 Main Service centres are also considered to be sustainable and arguably more sustainable given the existing level of key facilities and transport connections. It is considered that insufficient sites have been allocated in Tier 1 settlements to support the employment led growth forecast that the LDP housing numbers are based upon in STR1. We therefore object to policy STR3.		development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council is aware that the respective owners have had firm enquiries from other developers about further phases of the development on the back of the initial phases of reserved matters permissions having been granted, and development commenced on site. It is quite normal on a strategic site of this size to have several housebuilders on site at the same time. Work associated with the April 2019 Housing Land Monitoring Study has involved feedback from Countryside Properties and it is of note that this developer has commenced construction on site and has a method of construction which can achieve high annual completion rates. It is evident that the site as a whole will be delivered by multiple developers and the housing delivery rates in the Housing Trajectory in the Housing Land Background Paper are realistic and achievable. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory).

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					The ethos behind this objection, and others by the same developer, appears to be simply to object to the housing element of this strategic site in order to promote smaller housing elsewhere in the County. Such an approach does not recognise the context of this important mixed use development and the combined package of economic benefits.
935	STR3a	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable	allocate new site that are deliverable.	Not accepted. The objector, in this submission, provides no explanation or evidence as to why the Northern Gateway won't be developed in the Plan period. Given that this objection is promoting a small extension to a Principal Employment Area on the edge of Chester, it is assumed that the objectors concerns about non-delivery relate to the employment element of the Northern Gateway site. If this is the case it is unclear why the objector's submission is referring to Background Paper 9 Agricultural Land in respect of a proposed housing site in Mold. Reserved matters planning consent for both employment and housing development have been granted and Countryside Properties are presently on site. Further reserved matters planning applications are presently under consideration. Planning permission has been granted in January 2020 as part of a reserved matters approval for a 10,000sqm warehouse development on plot A. Further enquiries have recently made about employment development on other plots and phases.

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					The objectors suggested extension to the Principal Employment Area will be commented on in more detail in relation to policy PE2. The objector's comments in respect of Warren Hall will be commented on in relation to Policy ST3B.
1205	STR3a	Object	Major housing allocations at Northern Gateway and Warren Hall have an obvious track record of non-delivery and insufficient contingency provisions have been allowed for. A further significant consideration is that the Council relies heavily on 2 particular allocations and commitments to meet its target allocation for the Plan period. These are the 1,325 houses on the mixed use Northern Gateway site (STR3A) and the 300 dwellings at Warren Hall (STR3B). There are real concerns regarding the deliverability of these sites notwithstanding that permissions have been granted. The Northern Gateway site, apart from it being located in a C1 flood risk area and comprising of one of the best areas of Grade 2 agricultural land in North Wales, is a complex and difficult site to develop. Indeed, it is because of these difficulties that such a large housing element has been included as development purely for employment purposes would not have been financially viable. There is a long	Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please refer to attached document Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please refer to attached document. The Plan is not consistent in its approach to housing allocations. In particular it allocated 300 dwellings at Warren Hall which is	Not accepted. Progress on the Northern Gateway site has been slow due to the economic recession and the need for infrastructure investment by Welsh Government in terms of flood defence works and spine road. This has now been delivered and progress made on site with Countryside Properties constructing their part of the site and the recent reserved matters approval for a warehouse and distribution centre. Other enquiries are also being received from house builders for other parts of the site. This will bring about a confidence factor which will assist in delivering the bulk of the site within the Plan period. The site is of key importance to the growth agenda for North Wales and represents a strategic and sustainable mixed use development. The Plans housing supply, as set out in the Housing Balance Sheet comprises several elements including completions to date, commitments, windfalls and the detailed housing allocations as well as the contribution from the two strategic sites. It should be noted that the housing balance sheet does not include all of the 1325 units as being delivered within the Plan period. In the totality of the Plans housing supply it is not accepted that it is over-reliant on the two strategic sites, particularly when the Warren Hall allocation is only for 300 units.

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			history to development in this area with massive injections of public funding since the closure of the Shotton Steelworks from the EU, UK and successive Welsh Governments. That level of support is no longer available. Major land raise works were carried out which included pumping of material from the Dee Estuary. These sources of landfill are no longer available due to the high level of protection rightly given to the estuary. Despite permission being granted in 2014 no development has taken place on site. One of the major development partners includes Pochin which went into liquidation in 2019 and it is understood that there may be difficulties between the major partners involved in the project. It should be remembered that Northern Gateway was allocated for development as Opportunity Site 1 in the Alyn and Deeside Local Plan 1993 - 2003. This was the preferred site out of 3 Opportunity Sites but was pushed back in priority by the former WDA who favoured the ill-fated Opportunity Site 2 located north of Shotwick Road. None of the sites have been developed apart from the latter as a solar farm despite it being contrary to green barrier/best and most versatile land local and national policies. The significance is that this site has been actively proposed for development for over	unsustainable and poorly related to settlements. This is subject to separate objection which should be referred to.	The objectors agent should be well aware that the allocation of the Northern Gateway site was based on considerable flood defence studies and approval of (at the time) Environment Agency Wales. The two outline planning applications involved a flood alleviation programme of works which was agreed by NRW and each successive residential phase involves the need to re-consider flood risk considerations. Neverthless, Countryside Properties have been granted planning permission and have commenced construction and a further reserved matters approval for Keepmoat has the benefit of a Committee resolution to grant planning permission. There is no overriding flood risk issue in delivering this site. The Plan has provided for a 14% flexibility allowance and the allowances for small site and large site windfalls are also conservative, having regard to past trends and the findings of the Urban Capacity Study. No further contingency provisions are considered necessary, nor are they required in terms of PPW10 or Development Plans Manual 3.

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			25 years and still no meaningful development has occurred and there is no confidence that it will come forward either partially or completely within the plan period.		
661	STR3a	Support	STR3A Northern Gateway Mixed Use Development Site • This site has planning permission and we have no further comment to make. Welsh Water made representations on this site through planning applications 049320 & 050125.		Support noted.
883	STR3a	Support	Spawforths have been instructed by Pochin Goodman Northern Gateway Ltd (PGNGL) to submit representations to the Flintshire Local Development Plan 2015-2030 Deposit Plan and for their site at Northern Gateway (former Corus Garden City Site), Deeside, referred to in the emerging Plan as STR3A. PGNGL supports the allocation of STR3A, however PGNGL are concerned that there is internal inconsistency within the Local Development Plan which provides uncertainty for landowners, developers and members of the public.		Support is noted. The other matters referred to be the objector are dealt with in separate representations.
215	STR3b	Object	Broughton- The plans here are wholly inappropriate and will put significant strain on local services. When the new housing developments by Broughton Park were proposed it was stated there would be additional GP services and other facilities which never arrived. Residents in this area	Removal of allocation at Warren Hall.	Not accepted. It must be stressed that the site is allocated for a business park and hotel in the UDP and already has outline planning permission for a business park. In the LDP the site area has been extended and the mix of uses broadened to include housing and a commercial local centre.

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			have spoken to me, as a Community Councillor, as they have had difficulty getting their children into school or as their children have been made to attend different schools. The local GP surgery has huge waiting times for appointments as it is. Those in employment, who can not attend the always overprescribed drop in service, regularly have to wait 4-8 weeks for a bookable appointment and then they are not able to see a consistent care provider and have to see whichever doctor is available. This already compromises medical care and there is no logistical way the current doctors surgery could physically expand. This new proposed development would add a huge demand for GP appointments as it would likely mean around 1,000 new residents. Broughton has serious traffic problems and particularly around the proposed Development site. The traffic from the A55 through Broughton is a known problem for Flintshire Council. Prior to the safety improvements on Broughton Hall Road temporary traffic lights were installed for a two week trial to see if this would ease congestion. The lights had to be removed less than 2 hours after they were installed due to the severe disruption they caused. This plan proposes hundreds of properties being built near this junction which means hundreds of extra vehicles adding to the		The Deposit Plan was accompanied by a Masterplan and Delivery Statement document which summaries the wide range of background and technical documents which had been undertaken for the site. One of these was a Transport Assessment which concluded that the local highway network is able to accommodate the development. The Council has for some time pushed for a new access off the A55(T) eastbound to provide a direct route to Airbus and the Retail Park, thereby avoiding Main Road. A sub-regional transport is presently taking place to look at options for improving access into the Broughton / Saltney area and the western edge of Chester. It must be stressed that the Warren Hall housing allocation will not deliver completed houses until 2023-24 and will be developed over a number of years. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is no formal objection from either statutory body to the Plan nor allocation. No objection to the Plan or allocations has been made by the Local Education Authority. The commentary of the Wrexham LDP Inspector referenced in detail above, establishes that it is normal practice for new development to address capacity issues through developer contributions. The new allocations will not deliver completed houses until 2023-24 and will take several years for the development to be completed. The impact on infrastructure will therefore be gradual and will

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			existing traffic issues at a section of road where safety concerns have been raised (and unsuccessfully attempted to be resolved through bollards by the co-op) and this extra congestion means additional pollution and the environmental concerns that go with this. When the planning permission was first considered it was before the Broughton Park expansion and before the Park Jasmine and other new housing developments were in place. Broughton does not have the resources to cope with such a large influx of people. The increased traffic could also be problematic for Airbus if it causes delays for their workers. I can not suggest a more appropriate site. I do not have the necessary data to be able to make such an assessment. I only know that there is no possible way that Broughton has the services and facilities to cope with anywhere near the number of houses suggested.		not be in 'one hit'. This gives the Local Education Authority time to address how the growth in the Plan can be accommodated in terms of school capacity. The Planning Service continues to work with the LEA to secure appropriate mitigation for the delivery of planned LDP sites. No objection to the Plan or allocation has been made by Betsi Cadwaladr University Health Board. Flintshire has a number of relatively new Primary Health Care Centres and the issue is one of lack of sufficient staff including GPs, rather than a lack of facilities as also commented on by the Wrexham LDP Inspector above. As stated in the preceding paragraph in relation to education capacity, there is ample time for the Health Board to plan for how it intends to meet the health care needs of the Plan's growth levels. The Council continues to work with the Health Board in securing the appropriate provision of infrastructure such as health for the delivery of LDP sites.
399	STR3b	Object	1. The site is referred to as Warren Hall all the way through the document. Warren Hall is the name of our house and not correct in the way you use this name through document to describe the site. we would like you to change this on the plan. 2. I'd like to understand if the high and low line electricity lines are new lines going in? Our 7 year old daughter is recovering from cancer and we would like to know what the	Already set out above in the comments box. The wording in the policy wording when describing the site needs to change from 'warren Hall' which is our house to the correct name.	Not accepted. The site has been allocated in the adopted UDP and has outline planning permission and has always been referred to as Warren Hall or Warren Hall Business Park. It is accepted that there is an existing residential property 'Warren Hall' adjoining the site. However, the name Warren Hall in the Plan refers to a geographical piece of land. During the operational phase of the development each internal road and unit /

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			impact would be and how close to our home they will be. 3.The road network around this site is in very poor condition , Lesters Lane is unable to accommodate two way traffic . There are many complaint about this from local villagers and when speaking to FCC representative this appears to be overlooked. There is no footpaths or cycle ways to Kinnerton village from this proposed development . There are also difficulties getting out of Kinnerton Lane onto Mold road at the junction. This feels unsafe especially with young children in the car. There needs to be more thought going into the roads around the development . 4. The Development will be very detrimental to local wildlife, there are many rare Species not mentioned on the plan which isn't accurate.		premises will have a new address and this should enable a differentiation from the objectors dwelling. Welsh Government have commissioned a utilities study for the proposed development and in terms of electricity lines this shows the diversion of a 11kV and a 33kV overhead lines but these do not appear to come any close to existing residential properties. As part of their promotion of the site, Welsh Government have undertaken a Transport assessment which demonstrates that the road network can accommodate the development. Nevertheless it is acknowledged that the condition of Lesters Lane is poor and options exist for it to become one-way or for it to be become a no-through road whilst maintaining access to land holdings and properties from either end. This should prevent Lesters Lane from becoming a rat run. These options were clearly highlighted to the objector at the drop-in session that discussed this site. Active Travel routes are being developed between Mold, Broughton and Broughton and the site can link in with these. Scope also exists for further linkages between these active travel routes and Higher Kinnerton. The principle of development has already been established on the bulk of the site with the allocation in the adopted UDP and the outline planning permission. Nevertheless, Welsh Government has commissioned a wide range of ecological surveys and whilst there are protected species present these can be addressed through avoidance and mitigation measures. No

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					objection has been made to the site by Natural Resources Wales.
666	STR3b	Object	Remove Llys Ben Northop Hall from Green barrier and allocate more housing increase overall housing numbers. The strategic site at Warren Hall (STR3B) near Broughton is isolated and does not have any relationship to facilities. It is therefore not a sustainable option for residential development and the lack of facilities mean that even if residential development comes forward in that location the need for facilities will delay delivery over many years. It is unrealistic to expect that allocation to be brought forward and therefore that represents a further shortfall in housing.	Remove Llys Ben Northop Hall from Green barrier and allocate more housing increase overall housing numbers	Not accepted. The Warren Hall allocation is for a strategic site in the form of a mixed use development. Further to the existing UDP allocation and outline planning permission, the LDP allocation has been extended slightly and the range of uses broadened to include a commercial hub alongside the hotel and to include 300 houses. The concept of mixed use developments is supported in PPW10 in that employment housing and employment provision are provided side by side, alongside a range of other facilities. The site also sits in a gap between Penyffordd / Penymynydd, Broughton and Higher Kinnerton, in a sustainable location where walking and cycling links with those settlements can be developed. It is not in an isolated location. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely manner. There is therefore no shortfall in housing from this site. The delivery of 300 units on a strategic site, in a strong housing market area is not unduly onerous or challenging.

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
765	STR3b	Object	In relation to the FCC's strategic policy for Strategic Sites, the key comments in the context of Warren Hall and the Village Plan thematics and objectives are as follows: • The Community Council and the village community itself recognise the need for new housing in the county and accept that Higher Kinnerton may accommodate some of this growth over the life of the LDP. However, the community feels that development should not come at the cost of a continuing decline in local infrastructure (road, transport, access to health provision, education) and local village amenities (post office, shops, pubs). These vital services have not kept pace with the growth of the community. The recent design of residential developments has also contributed to the growth and reliance of residents' use of their cars as the main means of transport and has added to parking problems within the village. This problem has been recognised nationally in a recent project document (Transport for New Homes 2018). • The community would welcome the opportunity to influence positively the type and form of new development going forward at Warren Hall to maximise the benefits of development while mitigating any negative impacts on the existing community as far as possible. • As the Warren Hall development is included in the LDP, the	The Community Council and the village community itself recognise the need for new housing in the county and accept that Higher Kinnerton may accommodate some of this growth over the life of the LDP. However, the community feels that development should not come at the cost of a continuing decline in local infrastructure (road, transport, access to health provision, education) and local village amenities (post office, shops, pubs). • As the Warren Hall development is included in the LDP, the Community Council consider that the case for further development within the current village boundary is substantially	Noted. The settlement of Higher Kinnerton accommodated growth in the UDP period and in the early years of the LDP period. Unfortunately, recent years have seen a loss of services and facilities, whether private sector or public sector, but this is not specific just to Higher Kinnerton. It is unclear in the example of Higher Kinnerton whether these facilities and services would have been lost irrespective of housing development and the Community Council will be aware that local services are sustained by local patronage from the existing community itself, and if this patronage or demand is not present then that in itself puts a direct strain on the ability of local facilities to survive. It is also unclear from the objection how parking problems in the village have increased if services and facilities have been lost. Given that new developments would have provided on site car parking, and given that these developments are within walking distance of the village centre, it is not explained how or why these parking problems have arisen. The objections made by the objector will influence the broad principles of the allocation, through examination of the Plan. However the objector will have a further opportunity to influence the detail of the scheme through

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			Community Council consider that the case for further development within the current village boundary is substantially weakened and should not be supported. • The residential element of the Warren Hall development should be delivered in such a way that its future residents benefit from a high-quality built environment balanced against not feel isolated from the existing Higher Kinnerton community of which they will become an important new part.	weakened and should not be supported. • The residential element of the Warren Hall development should be delivered in such a way that its future residents benefit from a high-quality built environment balanced against not feel isolated from the existing Higher Kinnerton community of which they will become an important new part.	Pre–Application Consultation (PAC) procedures, ahead of a planning application. Higher Kinnerton is a Tier 3 Sustainable Development which saw development in the UDP Plan period and has seen more recent development in the form of the Elan Homes speculative site on Kinnerton Lane. The Elan Homes development will contribute to the Plan's housing requirement figure through completions in the first few years of the Plan period as a large windfall development. The Plan Strategy is not based on the necessity for housing allocations in every settlement. Given that Higher Kinnerton has contributed to growth in two successive Plan periods it is not considered necessary for further development to be allocated. This is even more so when taking into account the allocation for 300 units at Warren Hall. The indicative Masterplan clearly identifies a Green Infrastructure network which will create a high quality live / work environment with linkages off site to Active Travel routes and to nearby settlements (as referenced in criteria v of STR3B). Residents on the Warren Hall development will benefit from on- site facilities and services but will also benefit from the proximity to facilities and services as well as community events and groups in Higher Kinnerton. The creation of a cohesive community should be capable of being achieved. Further work has been undertaken by Whyte Young Green on behalf of Welsh Government in the form of a Sustainable Development Placemaking Assessment

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					which will assists in ensuring that the allocation can deliver a high quality sustainable place.
1204	STR3b	Object	The Plan is not consistent in its approach to housing allocations. In particular it allocated 300 dwellings at Warren Hall which is unsustainable and poorly related to settlements. This is subject to separate objection which should be referred to. A further significant consideration is that the Council relies heavily on 2 particular allocations and commitments to meet its target allocation for the Plan period. These are the 1,325 houses on the mixed use Northern Gateway site (STR3A) and the 300 dwellings at Warren Hall (STR3B). There are real concerns regarding the deliverability of these sites notwithstanding that permissions have been granted. The Warren Hall site has a similar history of non-development. That was also included in the former Alyn and Deeside Local Plan and no development has occurred, other than works required merely to keep the permission for a business park, hotel and leisure facilities alive. The failure to carry out the development is despite its favourable location (from an investor/developer point of view), on the A55 and close to the Chester/Cheshire border where there is a track record of attracting high quality	Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please refer to attached document Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please refer to attached document Major housing allocations at Northern Gateway and Warren Hall have an obvious track record of non-delivery and insufficient contingency provisions have been allowed for.	Not accepted. The Warren Hall Strategic Site is not considered to be unsustainable nor poorly related to settlements. The site is a mixed use development which has been broadened from the UDP allocation to include housing and a local commercial hub. It therefore represents a high quality mixed use development which sits in close proximity to the two Tier 3 Sustainable Settlements of Penyffordd and Penymynydd and the Tier 2 Local Service Centre of Broughton with its significant retail and employment offer. The Plan is not considered to be over-reliant on the two strategic sites. The Plans housing land supply as set out in the Housing Balance Sheet comprises several elements including completions to date, commitments, windfall allowances and detailed housing allocations in addition to the two strategic sites. The Warren Hall residential element is 300 units which is on a par with the Plan's other housing allocations is quite capable of being delivered in this location. Not all of the 1325 units from the two strategic sites have been shown within the housing trajectory as being deliverable within the Plan period (discounted by 331 units). In this context the Plan is not considered to be over-reliant on the strategic sites. The Warren Hall site is a key part of the Plans Strategy but is also a key part of the North Wales Growth Deal and it is a matter of public record that there is a commitment to funding the infrastructure necessary to deliver the allocation. Welsh Government undertook a

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			business and residential development. The permission at Warren Hall does not include residential development and the likelihood is that the housing allocation is there to try and make it financially more attractive to develop. This is allocation is contrary the location criteria that is applied to new residential development given its isolation from the nearest settlement (Broughton) by green barrier and the busy A55 major strategic highway. Of further concern is the fact that the site is owned by Welsh Government which, through its own policy and LDP guidance, requires development to be allocated only where there is a realistic prospect that it is deliverable. If it was a viable development then it is only reasonable to expect that development would have occurred within the 25 years that a consent has existed.		significant amount of background studies to support the Deposit allocation and have done further work since including a report looking at aeronautical issues and the height of development, a marketing assessment and a sustainable development Placemaking Assessment. Welsh Government is clearly committed to delivering the site given that it forms such an important part of the Growth Deal.
1221	STR3b	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable. Concerns in relation to Warren Hall: • Due to Aeronautical / Levels constraints	more sequentially sites are available and can be demonstrated to be deliverable	Not accepted. Warren Hall is not in an isolated position as it sits between the settlements of Penyffordd / Penymynydd, Higher Kinnerton and Broughton. It therefore sits at the heart of the growth zone between Wrexham and Deeside identified in the draft National Development Framework, being located adjacent to the settlement of Broughton, with its shopping park and major employers. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			just 22% of the site area can be brought forward as two storey development; this increase to 71% – regardless of which figure is accurate this will impose significant commercial constraints upon new employment interests which we cannot believe be office, leisure or residential developers/operators would be keen to take up. • Whilst there may be capacity on the network to handle the volume of traffic that could be generated by the site there is no assessment of sustainable access; and given it comprises an isolated site divorced and physically unconnected with its closest settlements this is a major concern. Indeed, the location of the residential area to the far south of the site is akin to a new settlement not an urban extension. • The site does involve Grade 3 a land; a range of protected species are to be found and no drainage (FCA) SUD's compliant assessment has been undertaken for this greenfield site. • Significant water supply and electrical supplies will be needed to serve the site due to inadequate capacity levels which currently exist. • No trajectory is provided. • It is understood that WG are imposing constraints on delivery partners (zero carbon housing, bungalow development)		Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely manner. There is therefore no shortfall in housing from this site. The Warren Hall allocation is for a strategic mixed use development which will involve a range of uses and facilities, ste within a high quality environment and strong local housing market area. The housing element will help deliver an employment site which is at the heart of the North Wales Growth Deal. The detailed concerns of the objector are addressed in turn: • The Deposit Plan is accompanied by a Masterplan Delivery Statement which represents a summary of the detailed background work that Welsh Government have commission on the site. The masterplan shows the location of the housing, business park and commercial hub and these are not affected by the height constraints associated with the flight path. It is the higher north western part of the site which is most constrained and the Masterplan clearly shows this as being retained as open land. The aeronautical constraint does not prevent the site coming forward for development. The comments by Airbus Operations are addressed separately. Further work has now been undertaken in the form of an

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			that will not make for an attractive commercial proposition.		Instrument Flight Procedure Safeguarding assessment by Cyrrus on behalf of Welsh Government and discussions have taken place with Airbus. The outcome of this work is that development of two or more storeys in height will be acceptable on approximately 54.6ha or 71.2% of the overall site area. These results have been presented to Airbus who consider that further detailed design work at Warren Hall can proceed. • The housing element sits between the settlements of Penyffordd / Penymynnd Higher Kinnerton and Broughton where there is a range of services and facilities within each and major shopping and employment at Broughton and at the scale proposed cannot realistically be considered a 'new settlement' as suggested by the objectors. The Masterplan which accompanied the Deposit Plan for Warren Hall identified the provision of an extensive green infrastructure network across the site to maximise opportunities to promote community cohesion within the site and to enable sustainable linkages with nearby settlements. It clearly shows a network of green infrastructure and walking / cycling routes through the site. The policy requires that the development links in with the Active Travel scheme linking Mold, Buckley and Broughton, which is being developed by the Councils Transport Strategy unit. Consideration will be given to ensuring links between the site and the Active travel route and Higher Kinnerton. Bus services also operate along the A5104 adjacent to the site. It is acknowledged that the site is not an extension to an existing settlement but rather, it forms part of a strategic mixed use site in a

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					highly sustainable location close to several settlements and major employment and shopping at Broughton. • The majority of the site is already allocated in the adopted UDP and has outline planning permission. Although this part of the site has BMV, the principle of development has previously been established. The housing element comprises grade 3b and this is based on an onsite survey and is clearly referenced on the Welsh Government Predictive Agricultural Land Classification Map. In support of the allocation, Welsh Government have undertaken a large number of ecological surveys and whilst there are protected species within the site, they are matters that can be addressed through the detailed design of the scheme in terms of avoidance and / or mitigation measures. The need for SuDS is now a requirement of Welsh Government and this will be developed as part of the detailed design of the scheme. • The need for infrastructure improvements is acknowledged and this is reference in the Growth Deal in terms of the public funding being needed to deliver this. The commitment to fund the necessary infrastructure is a clear demonstration of the importance of the site to the regional growth strategy. • The Deposit LDP is accompanied by Background Paper 10 Housing Land Supply. The summary trajectory in table 3 (as supported by the detailed trajectory in

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					appendix 3) indicates that 75 units will be delivered in years 6-10 (30 in 2023-24, 45 in 2024/25) and 225 will be delivered in years 11-15 (45 per year). In this strong market area a build rate of 45 units per annum is realistic and achievable. • As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site.
1224	STR3b	Object	We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment. However due to constraints they have failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning	In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We	Not accepted. The objector's concerns in relation to the Northern Gateway strategic site have been addressed elsewhere in responding to the same point they made to STR3A. In summary, the recent grant of detailed planning permissions for housing and employment development, and the level of subsequent enquiries from other developers, plus Countryside Properties having commenced construction, confirms that the site is viable and deliverable over the Plan period. A second developer, Keepmoat has reserved matters consent subject to s106) to develop 120 homes on the southern parcel of the site owned by Pochin Goodman, confirming the collective interest in all housing elements of this site. The Council also understands that this interest extends to Anwyl seeking a development parcel on Northern Gateway. In terms of the Warren Hall mixed use development site, the introduction of housing will improve the viability of the overall development. However, it will also improve

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			permission and its delivery is in the hands of one landowner. We are also aware that the site has attracted interest from a number of housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable. In addition, the location of Hawarden Airport which is located approximately 2 km to the north-west of the Warren Hall site will inevitably impact on the height of dwellings which can be brought forward on the site. Whilst bungalows would help to provide an alternative mix of housing on the site, the development density and	do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable.	the overall sustainability of the strategic site by improving the mix of uses. It is a matter of public record that the Warren Hall site is a key part of the Growth Deal and that funding will be secured for infrastructure investment to bring about the delivery of the scheme. Further technical work will be commissioned by Welsh Government to establish further parameters for the height restrictions placed on development within the site. The provision of 300 dwellings at Warren Hall is not 'strategic' in the sense of the level of housing at Northern Gateway and in a strong market area should be capable of being delivered in line with the trajectory in Background paper 10. As stated earlier, the commitment of Welsh Government and National Government to securing funding for infrastructure at Warren Hall through the Growth Deal is a matter of public record. The 300 units proposed at Warren Hall is similar in scale to several of the Plans other housing allocations. Nearby development in Penyffordd / Penymynydd, Broughton and Higher Kinnerton demonstrates that the area is capable of delivering housing development. The Warren Hall site is equally capable of securing 300 units before the end of the Plan period. Welsh Government does not require the identification of contingency sites in the Plan. Instead, it requires that

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			numbers which can be achieved overall is likely to be fewer than envisaged. Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place." This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of the such large sites.		the Plan incorporates a flexibility allowance of at least 10% and the Plan has an allowance of 14.4%. The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, supported by infrastructure funding via the Growth Deal, that just building more homes alone cannot match.

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			Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date, given the points set out above, we would question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		
1226	STR3b	Object	We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment. However due to constraints they have	In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a	Not accepted. The objector's concerns in relation to the Northern Gateway strategic site have been addressed elsewhere in responding to the same point they made to STR3A. In summary, the recent grant of detailed planning permissions for housing and employment development, and the level of subsequent enquiries from other developers, plus Countryside Properties having commenced construction, confirms that the site is viable and deliverable over the Plan period. A second developer, Keepmoat has reserved matters consent subject to s106) to develop 120 homes on the southern parcel of the site owned by Pochin Goodman, confirming the collective interest in all housing elements of this site. The Council also understands that this

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			failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning permission and its delivery is in the hands of one landowner. We are also aware that the site has attracted interest from a number of housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable. In addition, the location of Hawarden Airport which is located approximately 2 km to the north-west of the Warren Hall site will inevitably impact on the height of	wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable.	interest extends to Anwyl seeking a development parcel on Northern Gateway. In terms of the Warren Hall mixed use development site, the introduction of housing will improve the viability of the overall development. However, it will also improve the overall sustainability of the strategic site by improving the mix of uses. It is a matter of public record that the Warren Hall site is a key part of the Growth Deal and that funding will be secured for infrastructure investment to bring about the delivery of the scheme. Further technical work will be commissioned by Welsh Government to establish further parameters for the height restrictions placed on development within the site. The provision of 300 dwellings at Warren Hall is not ‘strategic’ in the sense of the level of housing at Northern Gateway and in a strong market area should be capable of being delivered in line with the trajectory in Background paper 10. As stated earlier, the commitment of Welsh Government and National Government to securing funding for infrastructure at Warren Hall through the Growth Deal is a matter of public record. The 300 units proposed at Warren Hall is similar in scale to several of the Plans other housing allocations. Nearby development in Penyffordd / Penymynydd, Broughton and Higher Kinnerton demonstrates that the area is capable of delivering housing development. The Warren

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			dwellings which can be brought forward on the site. Whilst bungalows would help to provide an alternative mix of housing on the site, the development density and numbers which can be achieved overall is likely to be fewer than envisaged. Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place." This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such		Hall site is equally capable of securing 300 units before the end of the Plan period. Welsh Government does not require the identification of contingency sites in the Plan. Instead, it requires that the Plan incorporates a flexibility allowance of at least 10% and the Plan has an allowance of 14.4%. The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, supported by infrastructure funding via the Growth Deal, that just building more homes alone cannot match.

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			infrastructure is critical to the delivery of the such large sites. Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date, given the points set out above, we would question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		
1228	STR3b	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable. Concerns in relation to Warren Hall: • Due to Aeronautical / Levels constraints	Allocate new deliverable sites	Not accepted. Warren Hall is not in an isolated position as it sits between the settlements of Penyffordd / Penymynydd, Higher Kinnerton and Broughton. It therefore sits at the heart of the growth zone between Wrexham and Deeside identified in the draft National Development Framework, being located adjacent to the settlement of Broughton, with its shopping park and major employers. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the

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			just 22% of the site area can be brought forward as two storey development; this increase to 71% – regardless of which figure is accurate this will impose significant commercial constraints upon new employment interests which we cannot believe be office, leisure or residential developers/operators would be keen to take up. • Whilst there may be capacity on the network to handle the volume of traffic that could be generated by the site there is no assessment of sustainable access; and given it comprises an isolated site divorced and physically unconnected with its closest settlements this is a major concern. Indeed, the location of the residential area to the far south of the site is akin to a new settlement not an urban extension. • The site does involve Grade 3 a land; a range of protected species are to be found and no drainage (FCA) SUD's compliant assessment has been undertaken for this greenfield site. • Significant water supply and electrical supplies will be needed to serve the site due to inadequate capacity levels which currently exist. • No trajectory is provided. • It is understood that WG are imposing constraints on delivery partners (zero carbon housing, bungalow development)		Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely manner. There is therefore no shortfall in housing from this site. The Warren Hall allocation is for a strategic mixed use development which will involve a range of uses and facilities, ste within a high quality environment and strong local housing market area. The housing element will help deliver an employment site which is at the heart of the North Wales Growth Deal. The detailed concerns of the objector are addressed in turn: • The Deposit Plan is accompanied by a Masterplan Delivery Statement which represents a summary of the detailed background work that Welsh Government have commission on the site. The masterplan shows the location of the housing, business park and commercial hub and these are not affected by the height constraints associated with the flight path. It is the higher north western part of the site which is most constrained and the Masterplan clearly shows this as being retained as open land. The aeronautical constraint does not prevent the site coming forward for development. The comments by Airbus Operations are addressed separately. Further work has now been undertaken in the form of an

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			that will not make for an attractive commercial proposition.		Instrument Flight Procedure Safeguarding assessment by Cyrrus on behalf of Welsh Government and discussions have taken place with Airbus. The outcome of this work is that development of two or more storeys in height will be acceptable on approximately 54.6ha or 71.2% of the overall site area. These results have been presented to Airbus who consider that further detailed design work at Warren Hall can proceed. • The housing element sits between the settlements of Penyffordd / Penymynnd Higher Kinnerton and Broughton where there is a range of services and facilities within each and major shopping and employment at Broughton and at the scale proposed cannot realistically be considered a 'new settlement' as suggested by the objectors. The Masterplan which accompanied the Deposit Plan for Warren Hall identified the provision of an extensive green infrastructure network across the site to maximise opportunities to promote community cohesion within the site and to enable sustainable linkages with nearby settlements. It clearly shows a network of green infrastructure and walking / cycling routes through the site. The policy requires that the development links in with the Active Travel scheme linking Mold, Buckley and Broughton, which is being developed by the Councils Transport Strategy unit. Consideration will be given to ensuring links between the site and the Active travel route and Higher Kinnerton. Bus services also operate along the A5104 adjacent to the site. It is acknowledged that the site is not an extension to an existing settlement but rather, it forms part of a strategic mixed use site in a

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					highly sustainable location close to several settlements and major employment and shopping at Broughton. • The majority of the site is already allocated in the adopted UDP and has outline planning permission. Although this part of the site has BMV, the principle of development has previously been established. The housing element comprises grade 3b and this is based on an onsite survey and is clearly referenced on the Welsh Government Predictive Agricultural Land Classification Map. In support of the allocation, Welsh Government have undertaken a large number of ecological surveys and whilst there are protected species within the site, they are matters that can be addressed through the detailed design of the scheme in terms of avoidance and / or mitigation measures. The need for SuDS is now a requirement of Welsh Government and this will be developed as part of the detailed design of the scheme. • The need for infrastructure improvements is acknowledged and this is reference in the Growth Deal in terms of the public funding being needed to deliver this. The commitment to fund the necessary infrastructure is a clear demonstration of the importance of the site to the regional growth strategy. • The Deposit LDP is accompanied by Background Paper 10 Housing Land Supply. The summary trajectory in table 3 (as supported by the detailed trajectory in

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					appendix 3) indicates that 75 units will be delivered in years 6-10 (30 in 2023-24, 45 in 2024/25) and 225 will be delivered in years 11-15 (45 per year). In this strong market area a build rate of 45 units per annum is realistic and achievable. • As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site.
1230	STR3b	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable. Concerns in relation to Warren Hall: • Due to Aeronautical / Levels constraints just 22% of the site area can be brought forward as two storey development; this increase to 71% – regardless of which figure is accurate this will impose significant commercial constraints upon new employment interests which we cannot believe be office, leisure or residential developers/operators would be	Allocate deliverable sites.	Not accepted. Warren Hall is not in an isolated position as it sits between the settlements of Penyffordd / Penymynydd, Higher Kinnerton and Broughton. It therefore sits at the heart of the growth zone between Wrexham and Deeside identified in the draft National Development Framework, being located adjacent to the settlement of Broughton, with its shopping park and major employers. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely

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			keen to take up. • Whilst there may be capacity on the network to handle the volume of traffic that could be generated by the site there is no assessment of sustainable access; and given it comprises an isolated site divorced and physically unconnected with its closest settlements this is a major concern. Indeed, the location of the residential area to the far south of the site is akin to a new settlement not an urban extension. • The site does involve Grade 3 a land; a range of protected species are to be found and no drainage (FCA) SUD's compliant assessment has been undertaken for this greenfield site. • Significant water supply and electrical supplies will be needed to serve the site due to inadequate capacity levels which currently exist. • No trajectory is provided. • It is understood that WG are imposing constraints on delivery partners (zero carbon housing, bungalow development) that will not make for an attractive commercial proposition.		manner. There is therefore no shortfall in housing from this site. The Warren Hall allocation is for a strategic mixed use development which will involve a range of uses and facilities, ste within a high quality environment and strong local housing market area. The housing element will help deliver an employment site which is at the heart of the North Wales Growth Deal. The detailed concerns of the objector are addressed in turn: • The Deposit Plan is accompanied by a Masterplan Delivery Statement which represents a summary of the detailed background work that Welsh Government have commission on the site. The masterplan shows the location of the housing, business park and commercial hub and these are not affected by the height constraints associated with the flight path. It is the higher north western part of the site which is most constrained and the Masterplan clearly shows this as being retained as open land. The aeronautical constraint does not prevent the site coming forward for development. The comments by Airbus Operations are addressed separately. Further work has now been undertaken in the form of an Instrument Flight Procedure Safeguarding assessment by Cyrrus on behalf of Welsh Government and discussions have taken place with Airbus. The outcome of this work is that development of two or more storeys in height will be acceptable on approximately 54.6ha or 71.2% of the overall site area. These results have been

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					presented to Airbus who consider that further detailed design work at Warren Hall can proceed. • The housing element sits between the settlements of Penyffordd / Penymynydd Higher Kinnerton and Broughton where there is a range of services and facilities within each and major shopping and employment at Broughton and at the scale proposed cannot realistically be considered a 'new settlement' as suggested by the objectors. The Masterplan which accompanied the Deposit Plan for Warren Hall identified the provision of an extensive green infrastructure network across the site to maximise opportunities to promote community cohesion within the site and to enable sustainable linkages with nearby settlements. It clearly shows a network of green infrastructure and walking / cycling routes through the site. The policy requires that the development links in with the Active Travel scheme linking Mold, Buckley and Broughton, which is being developed by the Councils Transport Strategy unit. Consideration will be given to ensuring links between the site and the Active travel route and Higher Kinnerton. Bus services also operate along the A5104 adjacent to the site. It is acknowledged that the site is not an extension to an existing settlement but rather, it forms part of a strategic mixed use site in a highly sustainable location close to several settlements and major employment and shopping at Broughton. • The majority of the site is already allocated in the adopted UDP and has outline planning permission. Although this part of the site has BMV, the principle of development has previously been established. The

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					housing element comprises grade 3b and this is based on an onsite survey and is clearly referenced on the Welsh Government Predictive Agricultural Land Classification Map. In support of the allocation, Welsh Government have undertaken a large number of ecological surveys and whilst there are protected species within the site, they are matters that can be addressed through the detailed design of the scheme in terms of avoidance and / or mitigation measures. The need for SuDS is now a requirement of Welsh Government and this will be developed as part of the detailed design of the scheme. • The need for infrastructure improvements is acknowledged and this is reference in the Growth Deal in terms of the public funding being needed to deliver this. The commitment to fund the necessary infrastructure is a clear demonstration of the importance of the site to the regional growth strategy. • The Deposit LDP is accompanied by Background Paper 10 Housing Land Supply. The summary trajectory in table 3 (as supported by the detailed trajectory in appendix 3) indicates that 75 units will be delivered in years 6-10 (30 in 2023-24, 45 in 2024/25) and 225 will be delivered in years 11-15 (45 per year). In this strong market area a build rate of 45 units per annum is realistic and achievable.

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					• As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site.
1232	STR3b	Object	The Plan identifies two strategic sites including the Northern Gateway and Warren Hall. The supporting text highlights the problems with strategic sites at paragraph 5.18 stating that they "can be difficult to get off the ground and are not delivering development as anticipated". In light of the Council's strategy of continuing to pursue development at two long standing strategic allocations that have not delivered to date, we question whether this is the correct strategy for the County. Whilst I'm sure the Council believe that these sites will eventually come forward, we remain of the view that an alternative approach that looked at allocating a larger range and number of small, medium and large sites across the County in the top three tiers of the settlement hierarchy would result in higher and earlier delivery of new housing, as opposed to having to wait for infrastructure heavy strategic development options to come forward. The identification of alternative sites could be in addition to the two strategic sites rather than instead of them, thereby providing flexibility and increasing potential delivery	over reliance on strategic sites, and that through the allocation of a range of alternative and additional sites, this could be addressed.	Not accepted. The objectors concerns in relation to the Northern Gateway strategic site have been addressed elsewhere in response to their same point made to policy STR3A. In summary, the recent grant of detailed planning permissions for housing and employment development, and the level of subsequent enquiries from other developers, plus Countryside Properties having commenced construction, confirms that the site is viable and deliverable over the Plan period. The Warren Hall strategic site comprises 300 units and it is not considered that this is strategic as there are several other housing allocations of a similar size. In combination therefore, it is not considered that the Plan is over-reliant on these two strategic site allocations. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. This provides further certainty to the delivery of the housing element of this site.

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			in the short term. Sites such as that at Drury Lane would be ideally placed to come forward in the early part of the Plan. In its current format, we do not consider the Plan sound as it does not meet Test 3 as we do not believe it will deliver the levels of development that are needed, as there is an over reliance on strategic sites, and that through the allocation of a range of alternative and additional sites, this could be addressed.		The Plan has made a range of other housing allocations, and delivery in the early years of the Plan period are on track in terms of the Plans proposed housing provision. The distribution of housing allocations has been made in the context of the settlement hierarchy and spatial strategy in policy STR2. The site promoted at Drury is commented on separately and given that it already lies within the settlement boundary, can be brought forward as a windfall site over the Plan period.
1236	STR3b	Object	We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment. However due to constraints they have failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning permission and its delivery is in the hands of one landowner. We are also aware that the site has	In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site	Not accepted. The objector's concerns in relation to the Northern Gateway strategic site have been addressed elsewhere in responding to the same point they made to STR3A. In summary, the recent grant of detailed planning permissions for housing and employment development, and the level of subsequent enquiries from other developers, plus Countryside Properties having commenced construction, confirms that the site is viable and deliverable over the Plan period. A second developer, Keepmoat has reserved matters consent subject to s106) to develop 120 homes on the southern parcel of the site owned by Pochin Goodman, confirming the collective interest in all housing elements of this site. The Council also understands that this interest extends to Anwyl seeking a development parcel on Northern Gateway. In terms of the Warren Hall mixed use development site, the introduction of housing will improve the viability of the overall development. However, it will also improve the overall sustainability of the strategic site by improving the mix of uses. It is a matter of public record

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			attracted interest from a number of housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable. In addition, the location of Hawarden Airport which is located approximately 2 km to the north-west of the Warren Hall site will inevitably impact on the height of dwellings which can be brought forward on the site. Whilst bungalows would help to provide an alternative mix of housing on the site, the development density and numbers which can be achieved overall is likely to be fewer than envisaged.	continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable.	that the Warren Hall site is a key part of the Growth Deal and that funding will be secured for infrastructure investment to bring about the delivery of the scheme. Further technical work will be commissioned by Welsh Government to establish further parameters for the height restrictions placed on development within the site. The provision of 300 dwellings at Warren Hall is not 'strategic' in the sense of the level of housing at Northern Gateway and in a strong market area should be capable of being delivered in line with the trajectory in Background paper 10. As stated earlier, the commitment of Welsh Government and National Government to securing funding for infrastructure at Warren Hall through the Growth Deal is a matter of public record. The 300 units proposed at Warren Hall is similar in scale to several of the Plans other housing allocations. Nearby development in Penyffordd / Penymynydd, Broughton and Higher Kinnerton demonstrates that the area is capable of delivering housing development. The Warren Hall site is equally capable of securing 300 units before the end of the Plan period. Welsh Government does not require the identification of contingency sites in the Plan. Instead, it requires that the Plan incorporates a flexibility allowance of at least 10% and the Plan has an allowance of 14.4%.

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			Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place." This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of the such large sites. Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be		The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, supported by infrastructure funding via the Growth Deal, that just building more homes alone cannot match.

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			delivered beyond the Plan end date, given the points set out above, we would question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		
1272	STR3b	Object	We would recommend reference is made to provision of a Green Infrastructure network and strategic landscaping and GI network. We suggest that these networks be included in the Proposed Green Infrastructure SPG.	We would recommend reference is made to provision of a Green Infrastructure network and strategic landscaping and GI network. We suggest that these networks be included in the Proposed Green Infrastructure SPG.	Not accepted. In respect of both STR3A and B, reference is made as part of the policy wording on each site to 'green infrastructure'. It is not considered further reference is necessary.
7	STR3b	Object	Warren Hall Mixed Use Development Site Like most people I welcome any employment opportunity this site would bring to our local area, but the info structure is just not available to support it. Main road is already blocked with traffic at most times of the day and would only		Not accepted. It must be stressed that the site is allocated for a business park and hotel in the UDP and already has outline planning permission for a business park. In the LDP the site area has been extended and the mix of uses broadened to include housing and a commercial local centre.

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			become worse if this went ahead. Traffic from the A55 can exit and join at the roundabouts but anyone wishing to go to Broughton Park will use the main road adding to the local traffic chaos at certain times. A new exit and on junction would be required at Broughton Park. The housing development planned is also not thought out. Local schools and doctors can not cope with the influx of people that it would bring. The local doctors is already at capacity and so are the schools. More planning is required for this plan to go ahead.		The Deposit Plan was accompanied by a Masterplan and Delivery Statement document which summaries the wide range of background and technical documents which had been undertaken for the site. One of these was a Transport Assessment which concluded that the local highway network is able to accommodate the development. The Council has for some time pushed for a new access off the A55(T) eastbound to provide a direct route to Airbus and the Retail Park, thereby avoiding Main Road. A sub-regional transport is presently taking place to look at options for improving access into the Broughton / Saltney area and the western edge of Chester. It must be stressed that the Warren Hall housing allocation will not deliver completed houses until 2023-24 and will be developed over a number of years. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is no formal objection from either statutory body to the Plan nor allocation. No objection to the Plan or allocations has been made by the Local Education Authority. The commentary of the Wrexham LDP Inspector referenced in detail above, establishes that it is normal practice for new development to address capacity issues through developer contributions. The new allocations will not deliver completed houses until 2023-24 and will take several years for the development to be completed. The impact on infrastructure will therefore be gradual and will

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					not be in 'one hit'. This gives the Local Education Authority time to address how the growth in the Plan can be accommodated in terms of school capacity. The Planning Service continues to work with the LEA to secure appropriate mitigation for the delivery of planned LDP sites. No objection to the Plan or allocation has been made by Betsi Cadwaladr University Health Board. Flintshire has a number of relatively new Primary Health Care Centres and the issue is one of lack of sufficient staff including GPs, rather than a lack of facilities as also commented on by the Wrexham LDP Inspector above. As stated in the preceding paragraph in relation to education capacity, there is ample time for the Health Board to plan for how it intends to meet the health care needs of the Plan's growth levels. The Council continues to work with the Health Board in securing the appropriate provision of infrastructure such as health for the delivery of LDP sites.
220	STR3b	Object	STR3 The Warren Hall Masterplan & Delivery Statement, published as a supporting document to the LDP, proposes a complex and aspirational mixed-use development site which, it is considered, would be highly unlikely to be fully delivered within the proposed plan period of 11 years whilst considering the planning history of the site to date. Part of the strategic site was originally granted outline planning permission in 1989 and has not been developed in the last 30 years. It is acknowledged that various	It is considered that the Deposit LDP should consider a number of smaller residential allocations which relate well to existing development boundaries and will ensure that existing services and shops are retained.	Not accepted. The site has outline planning permission for a business park and a hotel. Investment by Welsh Government in the improved grade separated interchange between the A55(T) and the A5119 has been completed. In the LDP the size of the site has been extended and the mix of land uses broadened to include a commercial hub associated with the hotel and 300 houses. It is not considered that the LDP allocation, in comparison with the UDP allocation and planning permission is 'complex and aspirational'. Rather, it is representative of the facilities that would be expected as part of a sustainable mixed use strategic site.

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			subsequent planning consents have been obtained, together with a physical start on site comprising of access works to ensure the planning permission is extant. However, these consents would not relate to the proposed strategic site so it is considered that the proposed strategic site should be assessed on its own merits without having previous consents referenced. It is considered that the Deposit LDP should consider a number of smaller residential allocations which relate well to existing development boundaries and will ensure that existing services and shops are retained. This is the approach which is advocated by Welsh Government policy and one which would ensure that the proposed Deposit LDP meets the Test of Soundness.		The existing consent is clearly relevant as it establishes the principle of development in this location and on this site. It is not considered that the new mix of uses and extent of the site is so different as to warrant ignoring the sites planning history. The relevance of the sites importance to the regional growth agenda is also important. There is a clear commitment in the Growth Deal, through the North Wales Economic Ambition Board, to delivering the Warren Hall site and there is significant financial support to ensure the site can come forward. The site is crucial to delivering economic growth to the region and brings multiple benefits that cannot be delivered by the site being promoted in Higher Kinnerton by the objector. The objector refers to how it has been well documented in recent months that another global recession is soon expected, so the deliverability of this strategic site is questionable. It is simply questioned why such a global recession would affect only the strategic site and not the site being proposed by the objector. The Warren Hall site will be assisted by funding secured through the Growth Deal. The Plan is not over-reliant on the housing element at Warren hall and furthermore, the Plan has made housing allocations in appropriate settlements in line with its Spatial Strategy. PPW fully supports the concept of mixed use development and there is no objection from Welsh Government Planning to the Plan's spatial strategy or to this allocation.

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					The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, that just building more homes alone cannot match.
435	STR3b	Object	I note on the Flintshire Development plan that there is a strategic site on Lesters Lane leading to Higher Kinnerton. This area would fall under our practice boundary. I would like to make it known that we do not have the capacity to take on any new patients in great numbers. We have heard that potentially there could be 300 houses on this site, we certainly could not accommodate the numbers of patients who would reside in them without affecting the care provided to our current patients.	Removal of the Warren Hall Strategic Site	Not accepted. The Betsi Cadwaldr University Health Board has been a key stakeholder during the preparation of the Plan. During the early engagement stages it was a member of the Key Stakeholder Forum and has been consulted on at each stage in the Plans progression. The Health Board has made no objection to the Plan generally nor this site specifically. The Council is continuing to work with the Health Board in terms of how to accommodate the Plans proposed growth. It must be stressed that the residential development of this site will not result in one hit given that the Plans Housing Land Supply Background paper shows the housing being delivered at a rate of 30 units in 2023/24 and 45 units per year thereafter until 2030. This provides time for the Health Board to put suitable measures in place.
580	STR3b	Object	An amendment to the text at Paragraph 5.33 is requested to include specific reference to the B2 element of the Warren Hall allocation. At present the supporting text at paragraph 5.33 states that "The employment element will still comprise B1 development and will need to be of high quality in terms of siting, form, design and materials which respects the setting of the site". It is requested that this is altered to		Not accepted. The Plan quite clearly references in criteria ii of STR3B that the Warren Hall allocation comprises 'B1 and high quality B2 employment land'. In the explanation to the policy paragraph 5.23 (not 5.33) refers only to B1 development. It is accepted that this is an error and that the explanation should also include B2 so that it is in with the policy wording. The Council would have no objection to the Inspector considering an amendment to the Plan accordingly.

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			refer to 'B1/B2 development' to correctly reflect the B1/B2 reference within policy STR3B itself.		
614	STR3b	Object	The Warren Hall Development - STR3B Warren Hall Mixed Use Development Site: Employment and housing I do understand that people need homes and this is a real social problem. Yet, based on what I have seen with all the building taking place in the immediate area, builders are prioritising more lucrative larger properties that are not genuinely affordable to the people in real need. They only put in the absolute minimum of affordable homes in order to secure the land for profitable building. This doesn't solve the housing problem and means large amounts of land must be lost before making any tangible progress delivering the type of housing that is actually needed. The location of the housing planned at Warren Hall is of concern. Higher Kinnerton has already has substantially increased in size over the past few years, and the Elan development is ongoing. The planned location of the new housing, effectively within touching distance of the village, means the nature of what was once a rural community will be badly affected. If the proposed development of the other areas of Warren Hall is permitted, the visual impact will be to effectively connect it up with Broughton and become a suburban sprawl. The entire locality will be significantly and	Remove Warren Hall development.	Not accepted. The Plan will require, through policy HN2 a mix of housing in terms of type and size, and a proportion of affordable housing as set out in policy HN3. The affordable housing requirements in the LDP arise from evidence in the Local Housing Market Assessment (and update) and were informed by a viability assessment undertaken by District Valuation Services. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The housing element at Warren Hall is separated from Higher Kinnerton by a wedge of open countryside and the nearby green barrier has been extended to retain this gap. The business park element of the allocation is already allocated in the adopted UDP and has the benefit of outline planning permission, so the principle of development has been established largely on the extent of the site now re-presented in the LDP. The principle of the use of the land has been established for some time therefore. The edge of Broughton is well defined by the line of the A55(T) and as part of the Warren Hall scheme, extensive strategic landscaping, as part of a green infrastructure strategy will be undertaken, to soften the appearance of the development and ensure

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			detrimentally altered. The greenbelt should not be built over to become 'employment land'. We need to use what we have more carefully, rather than simply removing vast amounts of green space on the assumption it will create employment opportunities. A quick check on RightMove alone to verify what I thought was the case showed there are numerous commercial properties, offices and units available for rental so I question the need to remove such a large area of green space to make way for all this building. The potential size of the Warren Hall development breaches test two of soundness rules given the dramatic impact it would have on the whole nature of the surrounding area.		that a gap exists between the development and Broughton. The Warren Hall site has never been green barrier as it is allocated for development in the existing UDP. The land in question is also not 'green space' as it is presently agricultural land in private ownership. It is the case that at any point in time there will be commercial premises and land available. Indeed, this is why development plans typically ensure that there is an over-provision of employment land to ensure a variety of sites exist in terms of location, type and size to meet the needs of different employers and enterprises. The Plan has two strategic sites whereby Warren Hall seeks to enable a high quality business park and Northern Gateway provides for more general employment development and warehousing and distribution. It is acknowledged that the development of the site will have an impact on the landscape but it must be stressed that the principle of development has already been established in previous development plans and planning permission.
824	STR3b	Object	In summary my clients consider the Deposit Plan is, as drafted unsound. The plan could be made sound by the following actions: 1. Allocating candidate site KH003 for housing. (policy HN1) 2. Deleting the Strategic Mixed Used Development Site at Warren Hall (STR3B) and/or deleting the	Allocating candidate site KH003 for housing. (policy HN1) Deleting the Strategic Mixed Used Development Site at Warren Hall (STR3B) and/or deleting the unsustainable	Not accepted. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			unsustainable Housing Allocation from that.` In summary my clients consider the Deposit Plan is, as drafted unsound. The plan could be made sound by the following actions: 1. Allocating candidate site KH003 for housing. (policy HN1) 2. Deleting the Strategic Mixed Used Development Site at Warren Hall (STR3B) and/or deleting the unsustainable Housing Allocation from that ` The WHDS does not demonstrate that this key Strategic Site meets or has been assessed in accordance with Para 4.2.19 of PPW. That requires for sites which are key to the delivery of the plan's strategy, a site specific viability appraisal must be undertaken through the consideration of more detailed costs, constraints and specific requirements. In the absence of such detailed assessment as part of the evidence base for a key strategic site, the plan is unsound. To base decisions on allocating any Strategic Site without the key evidence of its viability is likely to lead to unsound allocations and the risk that this site (and the other Key Strategic Northern Gateway site) will continue to not be delivered. My client and associated land promotion	Housing Allocation from that `	has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely manner. There is therefore no shortfall in housing from this site and the delivery of the site is considered to be realistic. The concept of mixed use developments is supported in PPW10 in that employment housing and employment provision are provided side by side, alongside a range of other facilities including hotel, leisure and local retail centre. The site also sits in a gap between Penyffordd / Penymynydd, Broughton and Higher Kinnerton where services and facilities are available, in a sustainable location where walking and cycling links with those settlements can be developed. Whilst the site does not adjoin a settlement boundary, it sits in a sustainable location. The housing element of the site is well defined by clear physical boundaries and impacts on the landscape can be mitigated through green infrastructure strategy. The inclusion of the residential development will improve the viability of the overall scheme, but it would also improve the overall sustainability of the site through the creation of a high quality mixed development. Given that the delivery of the overall scheme is clearly publicly referenced as being dependant on public funding as part of the Growth Deal, the objectors concerns in relation to viability are somewhat academic. Detailed matters in relation to the site at Kinnerton Lane (HK003) are addressed separately under policy HN1.

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			partner do not consider the commercial elements of Warren Hall KSS to be viable given its continued constraints, likely development costs and deliverability issues. There is furthermore no evidence of market demand for the uses in the location. The release of housing land at the site is not evidenced anywhere with the LDP as tipping the balance between historic aspiration, past undeliverability and sustainable deliverable place-making for the 21st century. The aspiration for a benchmark “base" Greenfield Land value of £300,000 (para 4.25 Flintshire Viability Study (September 2019) is nowhere evidenced as acting as a cross subsidy for releasing the capital necessary to overcome the significant costs and constraints of delivering the whole of the Warren Hall scheme the WHDS identifies. My client also notes the inclusion of a substantive element of housing allocation within this Strategic Site shown to be accessed directly off Kinnerton Lane. This element of housing would be located less than 200 metres from the North Western boundary of HK003. The Warren Hall Delivery Statement (WHDS) states substantive reporting has been carried out to support the allocation of the site and inter alia to include assessment of the local road network (para 3.3.3). I have, on behalf of my client,		Not accepted. The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, supported by infrastructure funding via the Growth Deal, that just building more homes alone cannot match.

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			requested sight of this reporting and have been advised the Council has only published the Delivery Statement with the Plan. It has not been possible to verify the scope, details or content of any of the reporting underpinning the WHDS. The location of housing at Warren Hall would, it its closest point, be just 200 metres or so from HK003. It follows, assuming the reporting underpinning the WHDS is robust, that Kinnerton Lane must be considered suitable to accommodate residential development in this general location. It contradictory for the LPA to conclude that site HK003 is not suitable to accommodate the same quantum of dwellings when a site just 200 metres away, using the same vehicular, pedestrian and cycling infrastructure, is considered to be suitable in highway terms and suited for allocation. Elan Homes Ltd considers it highly likely that housing at Warren Hall will, due to its location within the Masterplan, access to Kinnerton Lane and proximity to the village of Higher Kinnerton be highly reliant on the village for schooling, community and others services, shopping and day to day requirements. The use of Warren Hall for housing would constitute a major intrusion into open countryside, in a location devoid of existing facilities services which would be		

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			unsustainable development. Housing at Warren Hall should be deleted from the plan. It is unsustainable. If it is the case that Warren Hall is not viable without housing then the entire KSS should be removed from the plan. It follows that that the LDP strategy would be unsound. Consideration should at that point be given to withdrawing the LDP.		
1116	STR3b	Object	Objection to Strategic allocation at Warren hall, Broughton and suggestion of alternative site at Higher Kinnerton. Objection to allocation at Warren Hall for the following reasons: Access Volume of traffic on Lesters Lane, a single track rural lane currently used for agricultural Lorries, tractors, surface water. This will affect our land causing flooding, ribbon development. Higher Kinnerton and Broughton will merge, unable to identify each village producing mass development. Warren Hall planning originally permitted to address planning requirements for 30 years ago. Failed to attract industry and use land for original permission. Should not be used for present day housing. I would like to put forward a field adjacent to the village of Higher Kinnerton to be considered for planning. This field is located within the village and has wide, good access onto a main road, Kinnerton Lane, which has a 30mph speed restriction in place. The field has a pavement adjoining it, a main sewer	Removal of allocation at Warren Hall, Broughton and inclusion of alternative site at Higher Kinnerton	Not accepted. The principal access for the business park will be from the new interchange at the A55 junction. A further access will be provided off Kinnerton Lane for the residential party of the site. The issue of traffic using Lesters Lane can be addressed either through a one way system or a road closure which would be implemented in a way to ensure existing access points along the road. The settlements of Higher Kinnerton and Broughton will not merge as a result of the Warren Hall development. The green barrier along the southern edge of Broughton has been extended to the northern edge of the village and the boundary of the strategic site to ensure a gap is retained. The addition of the residential development is at the southern edge of the land at Warren Hall (which already has planning permission for a business park) will not result in development closing the gap between Broughton and Higher Kinnerton. The suggested site will be commented on separately under HN1.

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			running through the middle with good access to electric, mater and drainage. I have enclosed an Ordnance Survey map with the location of field I wish to be considered.		
1138	STR3b	Object	Warren Hall. Pragmatically, we recognise the thinking behind the re-designation of the Warren Hall site from mixed commercial use to include housing. This clearly stems from a lack of commercial interest in developing the site. However, despite the 'placemaking' assurances, we are questioning the compliance with national policy, specifically in not creating new communities. The location of the development is seemingly adjacent to Broughton but separated by the A55, it is separated from Higher Kinnerton and Pen-y-ffordd. This is likely to leave this community isolated and effectively a new settlement. The site potentially provides for 300 new houses and they would need to be allocated to sites elsewhere, but that is probably preferable in social terms, to a new isolated community.	The site potentially provides for 300 new houses and they would need to be allocated to sites elsewhere, but that is probably preferable in social terms, to a new isolated community.	Not accepted. Welsh Government in PPW10 recognises the sustainability role that mixed use development can play. The site will comprise high quality employment development alongside 300 houses and a commercial hub with hotel, leisure and retail facilities. Residents will not be in an isolated development but will be part of a mixed use development. Furthermore, the site is located on the edge of Broughton which is a shopping and employment centre of sub-regional importance and which has a range of other facilities and services. The site is also close to Higher Kinnerton village which also have a range of services and facilities. Although the site will not have a full range of facilities and services on site it sits in a sustainable location.
1156	STR3b	Object	Warren Hall. Pragmatically, we recognise the thinking behind the re-designation of the Warren Hall site from mixed commercial use to include housing. This clearly stems from a lack of commercial interest in developing the site. However, despite the 'placemaking' assurances, we are questioning the compliance with	remove Warren hall allocation	Not accepted. The strategic site is an important component of the Growth Deal. The inclusion of housing assists in improving viability but the delivery of the site as a whole will require public funding through the Growth Deal. The business park element is already allocated in the adopted UDP and has outline planning permission, so the principle of development is established. In the UDP the site has been extended and

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			national policy, specifically in not creating new communities. The location of the development is seemingly adjacent to Broughton but separated by the A55, it is separated from Higher Kinnerton and Penyffordd. This is likely to leave this community isolated and effectively a new settlement. The site potentially provides for 300 new houses and they would need to be allocated to sites elsewhere, but that is probably preferable in social terms, to a new isolated community.		the mix of uses broadened to include a local centre and housing which will improve its sustainability. Welsh Government supports the principle of mixed use development and has not objected to the Warren Hall development. Although the site is not adjacent to a settlement boundary, it is clearly not in an isolated position being close to Higher Kinnerton and Penyffordd / Penymynydd (both Tier 3 Sustainable Settlements) and Broughton which is a Tier 2 Local Service Centre. Residents on the strategic site will benefit from living in a high quality development with access to on site employment, leisure and retail development as well as being access facilities and services in nearby settlements. It is not considered that residents will feel isolated.
1219	STR3b	Object	STR3A Northern Gateway and STR3B Warren Hall. Both sites have a poor track record of delivery. The housing allocation at Warren Hall fails sustainability tests and the sequential approach to housing land allocation. Please refer to detailed objection in the pdf file attached below.	With regard to STR3(B) the whole site should be deleted from the Plan and a completion notice served on Welsh Government in accordance with S94 of the Planning Act. At the very least the 300 housing allocation should be deleted. Given the serious shortfall in housing land arising from partial, or total, non-delivery over the Plan period, provision	Not accepted. The objector is concerned about the track record of poor delivery on both these sites in terms of housing and employment and how the Plan is over-reliant on them. However, it is worth noting that the Warren Hall has not previously had a housing element. The North Wales Growth Deal clearly identifies the Warren Hall site as forming a key part of the strategy. The initial projects include 'primary infrastructure, to include a new access road and on site access, electricity, drainage and other services at Warren Hall'. This is referenced in the Welsh Government representations on the Deposit LDP wherein Welsh Government support in principle the economic growth strategy in terms of the scale and location of homes and jobs.

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				should be made for a suitable high capacity contingency site in a sustainable location. An example would be candidate site FLI008 in Flint.	Whether the Plan is over reliant on the two sites: It is not considered that the Plan is over reliant on the two strategic sites in terms of housing and employment growth. Turning first to housing, it is worth stressing that the Plan is already delivering, in terms of completions to date, what the Plan seeks to provide as measured against the housing trajectory. If the Council were in the position whereby it had built up a deficit of under-delivery in the first few years of the Plan period, then there might be greater concern about reliance on two strategic sites. Nevertheless, despite Warren Hall being a strategic site, the housing element is not strategic as its 300 dwellings is on a par with the other housing allocations in the Plan. It is not considered that there are any evidenced concerns about the ability of 300 dwellings at Warren Hall to come forward within the Plan period, given that this is the specific focus of the objector. Turning secondly to employment, the two strategic sites serve different market sectors, with Warren Hall aimed at higher quality B1 and B2 development whereas Northern Gateway is aimed also at B8 development. The two sites quite rightly sit prominently at the core of the Plans strategy, particularly given their prominent within the Growth Deal. It is also the case that the Plan has a range of other employment allocations as well as some flexibility provided through land within Principal Employment Areas. Sustainability of location / site: The concept of mixed use developments is supported in PPW10 in that employment housing and employment provision are provided side by side, alongside a range of other facilities including hotel, leisure and local retail centre. The site also sits in a gap between Penyffordd /

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					Penymynydd, Broughton and Higher Kinnerton where services and facilities are available, in a sustainable location where walking and cycling links with those settlements can be developed. Whilst the site does not adjoin a settlement boundary, it sits in a sustainable location. The housing element of the site is well defined by clear physical boundaries and impacts on the landscape can be mitigated through green infrastructure strategy. Failure to develop / viability / land banking: .It is acknowledged that the site has not come forward for development despite being previously allocated in the UDP and having the benefit of outline planning permission (not including the housing element). Nevertheless, the mix of uses has been broadened and the site extended to improve the viability of the site and to improve the mix of development in order to improve sustainability. The need for public sector investment in order to bring forward the site, particularly the employment part, is clearly referenced in the Growth Deal. The site is clearly not been land banked by Welsh Government given the public commitment given to securing its development as a vital part of the growth strategy for the region. Lack of conformity with Development Plans Manual: The site has clearly been reviewed and re-assessed has part of the preparation of the Plan and the site area extended and mix of uses broadened. Welsh Government have commissioned a wide range of background studies which were summarised in the Warren Hall Masterplan Delivery Statement. These demonstrate the site is appropriate to be developed as set out in the Plan.

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					Given that the housing element is for 300 units only it is unclear why this site, by necessity, requires a number of house builders. The Plans trajectory in Background Paper 10 Housing Land Supply shows the site delivering 75 units in years 6-10 and 225 dwellings in years 11-15, at rates of between 30 and 45 units annum, which is entirely achievable for a volume house builder. It is not considered that the allocation is any way non-compliant with the Development Plan Manual. Reliance on windfalls / need for contingency site: The Plan is not reliant on windfalls given that the small site allowance of 50 units per annum and large sites allowance of 50 units per annum, is conservative when comparted with past trends and also having regard to the findings of the Urban Capacity Study. In line with the advice about including a flexibility allowance, in the Development Plan Manual, the Plan incorporates a 14.4% flexibility allowance. There is no requirement from Welsh Government to include within the Plan contingency or reserve sites. Deletion of site / completion notice: Given the strategic context for the site and its role within the Growth Deal it would clearly be inappropriate to delete the site form the Plan. Given that Welsh Government are actively pursuing the development of the site it would be wholly inappropriate to serve a completion notice on a willing development partner. Equally, given the mixed use nature of this site and its respective development types and quantums, the alternative site proposed in Flint is on a wholly different development basis and cannot be sustainably considered to provide a suitable range of alternative and equivalent provision to the Warren Hall

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					strategic site. It clearly therefore fails to represent a more sustainable alternative on any basis. Housing shortfall and need for contingency site: It is unclear from the objector's submission where a 'serious shortfall in housing land' is actually arising from given the size of the housing element at Warren and the emerging picture of delivery at Northern Gateway. There is no need for a further site to be allocated at Flint as there is already the Croes Atti development and the allocation at Northop Road. Furthermore, there is no requirement for the Council to incorporate contingency or reserve sites into the Plan.
1225	STR3b	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable	Allocate new site that are deliverable.	Not accepted. This objection offers no explanation or supporting evidence as to why there is doubt that the Warren Hall site will be delivered in the Plan period other than allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable. Given that the objector has proposed an employment site, it is assumed that this objection is concerned with the non-delivery of the employment part of the Warren Hall site. Warren Hall is not in an isolated position as it sits between the settlements of Penyffordd / Penymynydd, Higher Kinnerton and Broughton. It therefore sits at the heart of the growth zone between Wrexham and Deeside identified in the draft National Development

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					Framework, being located adjacent to the settlement of Broughton, with its shopping park and major employers. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely manner. In the light of such public and high profile commitment to the delivery of this strategic site, it is unclear what the Objectors concerns are. Whilst the site advocated by the objector, on land adjoining the Evans Business Park, Chester (PE2.9), may be on the edge of a large industrial estate, it is not considered that it is sequentially preferable to the Warren Hall site. The objector's site sits within a green barrier, within a C1 flood risk zone and utilises grade 2 BMV agricultural land, none of which apply to the Warren Hall site. Also, it does not perform a strategic function in the way that the Warren Hall site does so it is difficult to envisage how it represents a sustainable and preferable alternative with the support from the Growth Deal that Warren Hall has.
1227	STR3b	Object	We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites	In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the	Not accepted. The objector's concerns in relation to the Northern Gateway strategic site have been addressed elsewhere in responding to the same point they made to STR3A. In summary, the recent grant of detailed planning permissions for housing and employment development, and the level of subsequent enquiries from other developers, plus Countryside Properties having commenced construction, confirms that the site is viable and deliverable over the Plan period. A second developer, Keepmoat has reserved matters consent

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			were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment. However due to constraints they have failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning permission and its delivery is in the hands of one landowner. We are also aware that the site has attracted interest from a number of housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to	Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable.	subject to s106) to develop 120 homes on the southern parcel of the site owned by Pochin Goodman, confirming the collective interest in all housing elements of this site. The Council also understands that this interest extends to Anwyl seeking a development parcel on Northern Gateway. In terms of the Warren Hall mixed use development site, the introduction of housing will improve the viability of the overall development. However, it will also improve the overall sustainability of the strategic site by improving the mix of uses. It is a matter of public record that the Warren Hall site is a key part of the Growth Deal and that funding will be secured for infrastructure investment to bring about the delivery of the scheme. Further technical work will be commissioned by Welsh Government to establish further parameters for the height restrictions placed on development within the site. The provision of 300 dwellings at Warren Hall is not ‘strategic’ in the sense of the level of housing at Northern Gateway and in a strong market area should be capable of being delivered in line with the trajectory in Background paper 10. As stated earlier, the commitment of Welsh Government and National Government to securing funding for infrastructure at Warren Hall through the Growth Deal is a matter of public record.

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			achieve this, therefore delivery within the identified timescales is questionable. In addition, the location of Hawarden Airport which is located approximately 2 km to the north-west of the Warren Hall site will inevitably impact on the height of dwellings which can be brought forward on the site. Whilst bungalows would help to provide an alternative mix of housing on the site, the development density and numbers which can be achieved overall is likely to be fewer than envisaged. Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place." This		The 300 units proposed at Warren Hall is similar in scale to several of the Plans other housing allocations. Nearby development in Penyffordd / Penymynydd, Broughton and Higher Kinnerton demonstrates that the area is capable of delivering housing development. The Warren Hall site is equally capable of securing 300 units before the end of the Plan period. Welsh Government does not require the identification of contingency sites in the Plan. Instead, it requires that the Plan incorporates a flexibility allowance of at least 10% and the Plan has an allowance of 14.4%. The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, supported by infrastructure funding via the Growth Deal, that just building more homes alone cannot match.

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			may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of the such large sites. Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date, given the points set out above, we would question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		
1229	STR3b	Object	Reliance on Key Strategic Sites Policy STR3 It is accepted that there has been a long term vision and growth proposed for the Northern Gateway area and Warren Hall Development site which are proposed to provide for 1625 homes between them	alternative provision should be made available in other highlighted key settlements which are also as	Not accepted. The two strategic sites do form a key part of the Plan strategy but they also perform a key part of the Growth Deal for North Wales in terms of economic growth ambitions for the region.

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			over the plan period. There appears to be a heavy reliance on these sites to deliver almost 25% of new homes required over the plan period. It is considered that there are considerable obstacles that could prohibit or at least slow down the delivery of these sites, in particular flood risk and highways capacity that could significantly hamper the delivery of sites within this timeframe. Neither of these issues have been fully investigated for a full built out scenario. Furthermore, strategic allocations can be slower to be built out as the market becomes saturated and delivery rates can slow in subsequent phases as evidenced on the UDP allocation at Croes Atti, Flint. Therefore, alternative provision should be made available in other highlighted key settlements which are also as sustainable in character in line with Policy STR2. These 2 strategic allocations puts a heavy reliance on these Tier 2 settlements providing a quarter of all new housing for the county over the plan period without the necessary services and infrastructure being in place in these areas to support this growth. This obvious over reliance can put strain on the existing local infrastructure and make it more difficult to achieve the housing figures targeted and moreover required to support a growing population. Furthermore, this approach also fails to provide the market with	sustainable in character in line with Policy STR2.	The Plan is not considered to be over-reliant on the two strategic sites. The Plans housing land supply as set out in the Housing Balance Sheet comprises several elements including completions to date, commitments, windfall allowances and detailed housing allocations in addition to the two strategic sites. The Warren Hall residential element is 300 units which is on a par with the Plans other housing allocations is quite capable of being delivered in this location. Not all of the 1325 units have been shown within the housing trajectory as being deliverable within the Plan period (discounted by 331 units). In this context the Plan is not considered to be over-reliant on the strategic sites. It is accepted that large strategic sites can be slow to deliver but the Warren Hall at 300 units is not considered to be of a size which brings about delivery concerns. It is in a strong housing market area and will form part of a high quality mixed use development comprising employment, hotel, leisure and local commercial hub. The site is also close to the Tier 3 settlements of Higher Kinnerton and Penyffordd / Penymynydd and the Tier Settlement Broughton with its major retail and employment offer. Welsh Government has commissioned considerable background studies for the Warren Hall site and there is a public commitment within the growth deal for funding to deliver the infrastructure associated with its delivery. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			greater choice of where people want to live. Other settlements such as Buckley and Aston which are identified in Policy STR2 as Tier 1 Main Service centres are also considered to be sustainable and arguably more sustainable given the existing level of key facilities and transport connections. It is considered that insufficient sites have been allocated in Tier 1 settlements to support the employment led growth forecast that the LDP housing numbers are based upon in STR1. We therefore object to policy STR3.		housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. Given the RSL status of the objector, it is disappointing that they are neither aware of this project or not more positively engaged in it to use their resources positively to potentially ensure the intention to deliver high levels of affordable housing here is met, given that is the core business of an RSL. The Plan has sought to provide a balanced approach to housing with the two strategic sites being supported by 11 other housing allocations. It must also be noted that growth will have occurred in many settlements as a result of completions and will occur as a result of existing commitments. Not all growth is achieved through new allocations. A housing allocation is made in Buckley and housing allocations in Ewloe and Hawarden are both close to Shotton / Aston. The Plan ensures sufficient market choice. It must be stressed that Welsh Government in their formal representations on the Plan do not object to either the amount, or the spatial distribution of growth.
1237	STR3b	Object	We doubt that these will be delivered in the plan period and no proven deliverability has been demonstrated. Moreover, allocating a greenfield site (STR3B) in an isolated and unsustainable location does not reflect other policies or PPW10; particularly when better more sequentially sites are available and can be demonstrated to be deliverable.	more sequentially sites are available and can be demonstrated to be deliverable	Not accepted. Warren Hall is not in an isolated position as it sits between the settlements of Penyffordd / Penymynydd, Higher Kinnerton and Broughton. It therefore sits at the heart of the growth zone between Wrexham and Deeside identified in the draft National Development Framework, being located adjacent to the settlement of Broughton, with its shopping park and major employers. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential

ID	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Concerns in relation to Warren Hall: • Due to Aeronautical / Levels constraints just 22% of the site area can be brought forward as two storey development; this increase to 71% – regardless of which figure is accurate this will impose significant commercial constraints upon new employment interests which we cannot believe be office, leisure or residential developers/operators would be keen to take up. • Whilst there may be capacity on the network to handle the volume of traffic that could be generated by the site there is no assessment of sustainable access; and given it comprises an isolated site divorced and physically unconnected with its closest settlements this is a major concern. Indeed, the location of the residential area to the far south of the site is akin to a new settlement not an urban extension. • The site does involve Grade 3 a land; a range of protected species are to be found and no drainage (FCA) SUD's compliant assessment has been undertaken for this greenfield site. • Significant water supply and electrical supplies will be needed to serve the site due to inadequate capacity levels which currently exist. • No trajectory is provided. • It is understood that WG are imposing constraints on delivery partners (zero		element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. The site is also central to the North Wales Growth Vision and Growth Deal where UK and Welsh Government funding has been identified to provide the infrastructure required to bring sites like Warren Hall forward in a timely manner. There is therefore no shortfall in housing from this site. The Warren Hall allocation is for a strategic mixed use development which will involve a range of uses and facilities, ste within a high quality environment and strong local housing market area. The housing element will help deliver an employment site which is at the heart of the North Wales Growth Deal. The detailed concerns of the objector are addressed in turn: • The Deposit Plan is accompanied by a Masterplan Delivery Statement which represents a summary of the detailed background work that Welsh Government have commission on the site. The masterplan shows the location of the housing, business park and commercial hub and these are not affected by the height constraints associated with the flight path. It is the higher north western part of the site which is most constrained and the Masterplan clearly shows this as being retained as open land. The aeronautical constraint does not prevent the site coming forward for development. The comments by Airbus Operations are addressed separately.

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			carbon housing, bungalow development) that will not make for an attractive commercial proposition.		Further work has now been undertaken in the form of an Instrument Flight Procedure Safeguarding assessment by Cyrrus on behalf of Welsh Government and discussions have taken place with Airbus. The outcome of this work is that development of two or more storeys in height will be acceptable on approximately 54.6ha or 71.2% of the overall site area. These results have been presented to Airbus who consider that further detailed design work at Warren Hall can proceed. • The housing element sits between the settlements of Penyffordd / Penymynnd Higher Kinnerton and Broughton where there is a range of services and facilities within each and major shopping and employment at Broughton and at the scale proposed cannot realistically be considered a 'new settlement' as suggested by the objectors. The Masterplan which accompanied the Deposit Plan for Warren Hall identified the provision of an extensive green infrastructure network across the site to maximise opportunities to promote community cohesion within the site and to enable sustainable linkages with nearby settlements. It clearly shows a network of green infrastructure and walking / cycling routes through the site. The policy requires that the development links in with the Active Travel scheme linking Mold, Buckley and Broughton, which is being developed by the Councils Transport Strategy unit. Consideration will be given to ensuring links between the site and the Active travel route and Higher Kinnerton. Bus services also operate along the A5104 adjacent to the site. It is acknowledged that the site is not an extension to an existing settlement but rather, it forms part of a strategic mixed use site in a

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					highly sustainable location close to several settlements and major employment and shopping at Broughton. • The majority of the site is already allocated in the adopted UDP and has outline planning permission. Although this part of the site has BMV, the principle of development has previously been established. The housing element comprises grade 3b and this is based on an onsite survey and is clearly referenced on the Welsh Government Predictive Agricultural Land Classification Map. In support of the allocation, Welsh Government have undertaken a large number of ecological surveys and whilst there are protected species within the site, they are matters that can be addressed through the detailed design of the scheme in terms of avoidance and / or mitigation measures. The need for SuDS is now a requirement of Welsh Government and this will be developed as part of the detailed design of the scheme. • The need for infrastructure improvements is acknowledged and this is reference in the Growth Deal in terms of the public funding being needed to deliver this. The commitment to fund the necessary infrastructure is a clear demonstration of the importance of the site to the regional growth strategy. • The Deposit LDP is accompanied by Background Paper 10 Housing Land Supply. The summary trajectory in table 3 (as supported by the detailed trajectory in

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					appendix 3) indicates that 75 units will be delivered in years 6-10 (30 in 2023-24, 45 in 2024/25) and 225 will be delivered in years 11-15 (45 per year). In this strong market area a build rate of 45 units per annum is realistic and achievable. • As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site.
1261	STR3b	Object	Do not object to the identification of strategic sites and fully recognise the location and potential benefits of such sites. However, the delivery of economic and housing growth objectives is entirely reliant on these two strategic sites, and any delays on these strategic sites is a clear risk. As the council will be aware, strategic sites are complex to deliver and the expected timescales for development of such sites are often subject to significant slippage. This is particularly apparent with the two LDP strategic sites. Delivery of Northern Gateway (STR3A) is some three years behind expectations and further parcels are likely to be delayed further as a result of the need for further	The LDP should identify further sites across the plan area in accordance with the settlement hierarchy to safeguard for any further strategic site delays.	Not accepted. It is noted that the objector does not object to the principle of identifying strategic sites and recognises the benefits that they bring. Although the two strategic sites form a key part of the Plans growth strategy, the Plans economic and housing growth is clearly not entirely dependent upon the two sites. There is a range of employment allocations offering choice in terms of location, type and size and also additional flexibility officer by the Principal Employment Areas. The Plans housing provision is made up of completions, commitments and windfall allowances, in addition to the two strategic sites. The Warren Hall site allocates only 300 houses which is on a par with the Plans other housing allocations. It is not considered to be of a size which brings about delivery concerns. It is in a strong housing market area and will form part of a high quality mixed use development comprising employment, hotel, leisure and local commercial hub. The site is also close to the Tier 3

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			infrastructure works and securing developer interest, for example. Warren Hall (STR3B) is more problematic as the site had an unimplemented Outline consent for employment led development in 2008, and there is no indication the site will come forward during the plan period. As a result, the LDP should identify further sites across the plan area in accordance with the settlement hierarchy to safeguard for any further strategic site delays.		settlements of Higher Kinnerton and Penyffordd / Pemnymynydd and the Tier Settlement Broughton with its major retail and employment offer. Welsh Government has commissioned considerable background studies for the Warren Hall site and there is a public commitment within the growth deal for funding to deliver the infrastructure associated with its delivery.
1271	STR3b	Object	Gladman are not convinced that the re-allocation of these sites will necessarily result in delivery as suggested within the plan. The council need a greater level of certainty regarding the delivery of these two sites, which are fundamental element of the FLDP. This concern is even more important if the current consultation to revoke TAN1 goes ahead and 5yr land supply is revoked. The council would then be reliant on monitoring of the housing trajectory through the AMR to ensure the delivery of the necessary scale of housing.	The council need a greater level of certainty regarding the delivery of these two sites, which are fundamental element of the FLDP.	Not accepted. The objection provides little in way of detailed comment on each site other than reference to three studies which look at lead-in times and delivery rates, particularly on large sites. Although Warren Hall is a strategic site for a mixed use development, the housing element is not strategic, being similar in scale to some LDP housing allocations. The housing element of 300 units is quite capable of being delivered within the Plan period.
1273	STR3b	Object	Reliance on Key Strategic Sites Policy STR3 It is accepted that there has been a long term vision and growth proposed for the Northern Gateway area and Warren Hall Development site which are proposed to provide for 1625 homes between them over the plan period. There appears to be	alternative provision should be made available in other highlighted key settlements which are also as sustainable in	Not accepted. The objectors concerns in relation to the Northern Gateway strategic site have been addressed elsewhere in response to the same points made to policy STR3A. In summary, the recent grant of detailed planning permissions for housing and employment development, and the level of subsequent enquiries from other developers, plus Countryside Properties having commenced construction, confirms that the site

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			a heavy reliance on these sites to deliver almost 25% of new homes required over the plan period. It is considered that there are considerable obstacles that could prohibit or at least slow down the delivery of these sites, in particular flood risk and highways capacity that could significantly hamper the delivery of sites within this timeframe. Neither of these issues have been fully investigated for a full built out scenario. Furthermore, strategic allocations can be slower to be built out as the market becomes saturated and delivery rates can slow in subsequent phases as evidenced on the UDP allocation at Croes Atti, Flint. Therefore, alternative provision should be made available in other highlighted key settlements which are also as sustainable in character in line with Policy STR2. These 2 strategic allocations puts a heavy reliance on these Tier 2 settlements providing a quarter of all new housing for the county over the plan period without the necessary services and infrastructure being in place in these areas to support this growth. This obvious over reliance can put strain on the existing local infrastructure and make it more difficult to achieve the housing figures targeted and moreover required to support a growing population. Furthermore, this approach also fails to provide the market with greater choice of where people want to	character in line with Policy STR2.	is viable and deliverable over the Plan period. A second developer, Keepmoat has reserved matters consent subject to s106) to develop 120 homes on the southern parcel of the site owned by Pochin Goodman, confirming the collective interest in all housing elements of this site. The Council also understands that this interest extends to Anwyl seeking a development parcel on Northern Gateway. The Warren Hall strategic site comprises 300 units and it is not considered that this is strategic as there are several other housing allocations of a similar size. In combination therefore, it is not considered that the Plan is over-reliant on these two strategic site allocations. As the Warren Hall site is in Welsh Government ownership, it is the intention to make the residential element of the mixed use site available as part of the Welsh Government's programme of making land available to accelerate the provision of affordable housing, and work is ongoing with the North Wales Registered Social Landlords to advance this site. Given the RSL status of the objector, it is disappointing that they are neither aware of this project or not more positively engaged in it to use their resources positively to potentially ensure the intention to deliver high levels of affordable housing here is met, given that is the core business of an RSL. The Plan has made a range of other housing allocations, and delivery in the early years of the Plan period are on track in terms of the Plans proposed housing provision. The distribution of housing allocations has been made in the context of the settlement hierarchy and spatial strategy in policy STR2 and it is evident that the greatest proportion of housing

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			live. Other settlements such as Buckley and Aston which are identified in Policy STR2 as Tier 1 Main Service centres are also considered to be sustainable and arguably more sustainable given the existing level of key facilities and transport connections. It is considered that insufficient sites have been allocated in Tier 1 settlements to support the employment led growth forecast that the LDP housing numbers are based upon in STR1. We therefore object to policy STR3.		has been apportioned to Tier 1 Main Service Centres, including at Buckley. It is not considered that further allocations are required in Tier 1 settlements.
678	STR3b	Support	STR3B Warren Hall Mixed Use Development Site • Welsh Water does not supply water to this area. • A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). • Potential developers need to be aware that this site is crossed by a sewer and protection measures in the form of an easement width or a diversion of the sewer would be required, which may impact upon the development density achievable on site. • Chester Wastewater Treatment Works (WwTW) can		Noted.

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			accommodate foul flows from the proposed development site.		
1270	STR3b	Support	An amendment to the text at Paragraph 5.33 is requested to include specific reference to the B2 element of the Warren Hall allocation. At present the supporting text at paragraph 5.33 states that ''The employment element will still comprise B1 development and will need to be of high quality in terms of siting, form, design and materials which respects the setting of the site''. It is requested that this is altered to refer to 'B1/B2 development' to correctly reflect the B1/B2 reference within policy STR3B itself.		The support for the allocation from Welsh Government Department of Economy, Skills and Natural Resources is noted and the findings and conclusions of the Marketing Assessment are noted.
351	STR3b	Support	Policy STR3: Strategic Sites allocates Warren Hall for 300 new homes, 22.7 hectares of B1 and high quality B2 employment land, a commercial hub involving hotel, leisure, local centre and retail; plus associated landscaping and transport links. Airbus' comments on the allocation are provided below and are equally applicable to the following policies and documents, insofar as they reference development at Warren Hall: • Policy STR7: Economic Development Enterprise and Employment • PE1: General Employment Land Allocations • HN1: New Housing • Background Document: Warren Hall Masterplan & Delivery Statement (August 2019) Airbus' position is that the future operation of Hawarden Airport will		It is noted that Airbus do not object to the proposed allocation of the site as a strategic allocation in the LDP. It is also noted that Airbus have made representations on the Airport Safeguarding Policy PC8. It is also a fact that the site has had planning permission for employment development for a number of years. Further work has now been undertaken in the form of an Instrument Flight Procedure Safeguarding assessment by Cyrrus on behalf of Welsh Government and discussions have taken place with Airbus. The outcome of this work is that development of two or more storeys in height will be acceptable on approximately 54.6ha or 71.2% of the overall site area. These results have been presented to Airbus who have responded in writing that further detailed design work at Warren Hall can proceed.

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			be protected by the proper application of draft LDP Policy PC8, as amended in accordance with the submitted Airbus objection. Airbus does not object to the Warren Hall allocation, but expresses material concerns / reservations about the sustainability and full deliverability of the strategic allocation, in terms of Airfield Safeguarding and the potential effects on future residential amenity. Warren Hall is situated under the flight path of Runway 04 at Hawarden Airport and within the last section of the approach slope. Under current safeguarding criteria, the ground levels in the area already infringe the approach and take-off slopes and any development in this location may infringe further upon these surfaces. This would erode the safety margins between the safeguarded surfaces and the trajectory that an aircraft has during its instrument approach phase. Airbus comments on potential future, and more stringent, safeguarding rules within its objection to draft LDP Policy PC8. The Warren Hall Masterplan & Delivery Statement specifically recognises the effect of obstacle limitation surfaces on the Warren Hall site and states (paragraph 3.2.2): "We have calculated the difference in the existing ground levels and the obstacle limitation surfaces. Much of the existing ground level of the site infringes the take-off climb surface and approach surface. In		The proposed residential development lies at the southernmost and at the lowest part of the site. It is buffered from the business park element by the substantial woodland corridor which follows Warren Dingle. There is residential development closer to the airport than that proposed at Warren Hall, including the Elan Homes development, allowed on appeal, only 300m to the east of the site.

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			broad terms about 16.8 ha (22.3% of the overall site) would be available for two-storey development". In this context It is the European Aviation Safety Agency's (EASA) rules that specify that no new objects should be permitted above the approach surface. EASA Regulation (EU) No 139/2014) - CS ADR-DSN.J.480 Precision approach runways states (extract): see attachment.		
1235	STR3b	Support	We have significant concerns regarding the overreliance of housing allocations that focus on two strategic sites as set out in policy STR3 (STR3A Northern Gateway and STR3B Warren Hall). Both are allocated for mixed use development with the Northern Gateway expected to deliver approximately 1300 new dwellings and Warren Hall expected to deliver approximately 300 dwellings. Both sites were previous allocations in the UDP with STR3A allocated for a mix of uses including at least 650 dwellings and Warren Hall allocated for employment. However due to constraints they have failed to deliver any housing or employment uses over the UDP period. It is encouraging to note that the Airfields part (Praxis) of the Northern Gateway Strategic Site now benefits from planning permission and its delivery is in the hands of one landowner. We are also aware that the site has attracted interest from a number of	In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a	Not accepted. The objector's concerns in relation to the Northern Gateway strategic site have been addressed elsewhere in responding to the same point they made to STR3A. In summary, the recent grant of detailed planning permissions for housing and employment development, and the level of subsequent enquiries from other developers, plus Countryside Properties having commenced construction, confirms that the site is viable and deliverable over the Plan period. A second developer, Keepmoat has reserved matters consent subject to s106) to develop 120 homes on the southern parcel of the site owned by Pochin Goodman, confirming the collective interest in all housing elements of this site. The Council also understands that this interest extends to Anwyl seeking a development parcel on Northern Gateway. In terms of the Warren Hall mixed use development site, the introduction of housing will improve the viability of the overall development. However, it will also improve the overall sustainability of the strategic site by improving the mix of uses. It is a matter of public record that the Warren Hall site is a key part of the Growth Deal

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			housebuilders who are encouraged by site enabling works taking place and servicing the site for available development. In terms of the Warren Hall allocation, the Masterplan and Delivery Statement details that the LDP Preferred Strategy acknowledges that the delivery of the Warren Hall site has been impeded by both site conditions and wider economic influences, and that a wider mix of uses is required to allow for a deliverable and sustainable allocation. We do not dispute this assertion but consider that the site continues to require a significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable. In addition, the location of Hawarden Airport which is located approximately 2 km to the north-west of the Warren Hall site will inevitably impact on the height of dwellings which can be brought forward on the site. Whilst bungalows would help to provide an alternative mix of housing on the site, the development density and numbers which can be achieved overall is likely to be fewer than envisaged. Whilst we do not object to the Strategic Sites in Policy STR3 being allocated for	significant amount of investment to assist in its delivery. The Delivery Statement does not provide any detail on the funding mechanism to achieve this, therefore delivery within the identified timescales is questionable.	and that funding will be secured for infrastructure investment to bring about the delivery of the scheme. Further technical work will be commissioned by Welsh Government to establish further parameters for the height restrictions placed on development within the site. The provision of 300 dwellings at Warren Hall is not 'strategic' in the sense of the level of housing at Northern Gateway and in a strong market area should be capable of being delivered in line with the trajectory in Background paper 10. As stated earlier, the commitment of Welsh Government and National Government to securing funding for infrastructure at Warren Hall through the Growth Deal is a matter of public record. The 300 units proposed at Warren Hall is similar in scale to several of the Plans other housing allocations. Nearby development in Penyffordd / Penymynydd, Broughton and Higher Kinnerton demonstrates that the area is capable of delivering housing development. The Warren Hall site is equally capable of securing 300 units before the end of the Plan period. Welsh Government does not require the identification of contingency sites in the Plan. Instead, it requires that the Plan incorporates a flexibility allowance of at least 10% and the Plan has an allowance of 14.4%.

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			mixed uses, they will require considerable infrastructure and investment before any development, let alone housing can be delivered and this must be a significant factor when considering whether the Plan provides for a suitable choice of housing sites. The Infrastructure Background Paper 3 which supports the Deposit Draft LDP provides a simple statement in paragraph 4.3 that " Flintshire County Council have adopted a pragmatic approach to show that there are no major 'show stoppers' to the delivery of allocations identified in the plan and/or in the case of the two strategic sites, this has either already been provided or is planned to take place." This may be the case but given the previous lack of delivery during the UDP era, it is questionable whether this is as simple as it sounds. Indeed Appendix 2 of the paper details the requirement for significant energy network provision for both Strategic Sites. The provision of such infrastructure is critical to the delivery of the such large sites. Whilst it is acknowledged within the Housing Balance Sheet on page 90 of the LDP, the Northern Gateway Strategic Allocation figure has been discounted by 331 units as they are more likely to be delivered beyond the Plan end date, given the points set out above, we would		The objector also takes a housing only perspective to development, and in doing so fails to acknowledge the wider purpose and intentions behind promoting mixed use development through sites such as this, and the broader intentions for economic benefits that this can bring, supported by infrastructure funding via the Growth Deal, that just building more homes alone cannot match.

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			question whether the 200 unit discount on the Pochin Goodman part of the site should in fact be greater still. Given the lack of delivery during the UDP period we continue to doubt whether it is realistic to assume that the remaining 995 units on the site and 300 units at Warren Hall will be delivered by the end of the plan period. This adds to the need for a realistic contingency figure to be included in the housing requirement figures or the identification of future contingency sites.		

Policies STR4 to STR9

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
404	STR4: Principles of Sustainable Development, Design and Placemaking	Object	The HBF contend that not all development will be able to meet all of the criteria listed in the policy and the current wording suggests that all development has to meet all of the listed criteria.	The Policy wording should say 'where appropriate' as it does in policy STR5, or make it clear that it may not be possible for all criteria to be met on all developments.	Not accepted. Planning Policy Wales (PPW) places great emphasis on 'sustainable placemaking design principles'. It is therefore vitally important for this strategic policy and the more detailed policies associated with it, to form the basis of all planning decisions and set out how development can achieve positive sustainable, design and placemaking outcomes and minimise any adverse outcomes. Policy STR4 establishes the key planning principles for all development and reflects the aims of PPW. The policy clearly states, 'should' not 'must'. All of the criteria are material planning considerations, some are more relevant than others depending on the type of development, (not all the criteria will be applicable to all developments) the weight to be attached to each issue will be recognised and considered at the planning application stage. Alongside the LDP the Infrastructure Plan has been drawn up which identifies the key infrastructure requirements and helps to understand the viability of each allocated site. This plan is a 'live' document and will be updated as more detailed information comes forward.
546	STR4: Principles of Sustainable	Object	I am writing to object to the Flintshire Local Development Plan. The area I am objecting to is the Ash Lane	Site HWN005- Ash Lane, Hawarden	Not accepted. The Plan has a suite of Strategic Policies and policy STR5 provides strategic guidance on Transport and

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	Development, Design and Placemaking		Development site HWN005. My concern is regarding the traffic problems around Hawarden Village Church School and I write this as a parent at the school and as one of the school Governors. There are serious concerns that road safety is poor around the school. There have been some near misses between cars and parents, children and prams. The school writes in the weekly newsletter that parents walk rather than drive and park on Cross Tree Lane, but it continues to be a problem. There are frequent traffic wardens at the school gates, at the request of school, to reduce unsafe illegal parking but it continues. This causes traffic to build up in both directions blocking most junctions and the "D " at the school entrance. Cars are parked along the whole length of Cross Tree Lane making 2 way traffic flow difficult. The junction at Cross Tree Lane and Ash Lane is very unsafe to cross and there has been a prolonged advert for a new School Crossing Patrol but the post remains unfilled after over one year. An increase in traffic of new residents commuting to work and possibly doing school drop off will be detrimental to this already difficult situation.	Policy STR4 iv: Ensure that the local highway network either has, or can be upgraded, to provide capacity to accommodate sustainable levels of development; Firstly it has been unclear in plan details regarding site access - "Just from Ash Lane" as stated by the Lead Planner or "Ash Lane and Gladstone Way road access without a through access" from a planner at the open evening in Mancot Hall). With 2 access points it would be expected that half of the traffic would be exiting onto Ash Lane, if it was just Ash Lane access then it would be all traffic. Ash Lane	Accessibility and is linked to other detailed policies. The Ash lane site allocation has been informed by a Transport Study and Highways Development Management Officers have no objection to the proposal. Clearly there are pressures around the school and Cross Tree Lane and the Council's Highways Strategy Team (Streetscene) are considering options for traffic management in the area. Scope exists as part of drawing up the detail of the development to address these issues. It must also be stressed that the site is in a sustainable location and within walking distance of two schools.

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				and Cross Tree Lane (where Hawarden Village Church School is situated) have been the subject of repeated traffic monitoring over the last 2-3 years. Local consultations took place this summer because of the current traffic jams and safety issues for the primary school children using these streets at drop off and pick up times (morning, afternoon and 2 at lunchtime time for infant nursery). They held an open session within the school. It was agreed many months ago with the local highway agency that trials of a one-way system could help alleviate this daily congestion - this has not happened yet. More traffic in	

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				this area will impact this congestion further and will make issues of pollution and safety worse. There is access to Ash Lane from the north through Mancot but this also goes past a primary school with school time traffic problems. They are also expecting a one way system trial and this will impact further. The route from Ash Lane to Broughton Shopping Park and Airbus (both major local employers for new residents) going via Sandycroft instead of past the school adds 1.5 miles and 5 min to this 3.2mile 7 min journey and so will be a less preferable route, it is unrealistic to	

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				expect people to use this route. Cross Tree lane is bound in by the cemetery and a wall into the churchyard of St Deniols Church and the local authority offices grounds and a private garden. There is no room for mitigation of increasing the width of this road.	
593	STR4: Principles of Sustainable Development, Design and Placemaking	Object	OBJECTS to Policy STR4. JUSTIFICATION 3.2 Policy STR4 lists 10 criteria in relation to sustainable development which all new developments should achieve. However, not every application will be able to achieve all of the criteria. AMENDMENTS SOUGHT 3.3 Policy STR4 is considered unsound in that it is not appropriate for the area as it sets an unreasonably high bar for applicants and should be reworded to allow some flexibility. It is suggested that it is reworded as follows3: “To achieve this, where appropriate all development should…” 3.4 It is noted that Policy STR5 (amongst others) has the words “where appropriate” in it.	suggested that it is reworded as follows3: “To achieve this, where appropriate all development should…” 3.4 It is noted that Policy STR5 (amongst others) has the words “where appropriate” in it.	Not accepted. Planning Policy Wales (PPW) places great emphasis on 'sustainable placemaking design principles’. This is a strategic policy that seeks to achieve that aspiration by improving the overall quality of design for all new development in the County. It is therefore vitally important for this strategic policy and the more detailed policies associated with it, to form the basis of all planning decisions and set out how development can achieve positive sustainable, design and placemaking outcomes and minimise any adverse outcomes. All of the criteria are material planning considerations, some are more relevant than others depending on the type of development and this is why the policy wording uses the term ‘should’ not ‘must’. Therefore the appropriate

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					weight to be attached to each issue will be recognised and considered at the planning application stage.
740	STR4: Principles of Sustainable Development, Design and Placemaking	Object	UDP Housing Requirement and Historic Rates of Delivery in Flintshire 6.4. Policy STR4 of the now time-expired Flintshire UDP adopted in September 2011 set out the requirement to deliver 7,400 homes during the period 2000 – 2015, an annual delivery rate of 493 dwellings. In comparison, the LDP is proposing a requirement which is 450 dwellings below the previous Plan period requirement at an average delivery rate of 463 dwellings per year. 6.5. The Council's latest Housing Land Monitoring Statement published in April 2018 provides a breakdown of housing completions data in Flintshire since 2007. No information is available for the period 2000-2006 which formed part of the previous UDP period. 6.6. Using the figures set out in Table 1 below, 3,389 dwellings were built between 2007 and 2015 at an average of 376 dwellings per year during the UDP period. This would leave the need for 4,011 dwellings to be built during the UDP period 2000-2006, at a rate of 573 dwellings per year. We would request that the Council provides evidence of delivery rates during this	We would request that the Council provides evidence of delivery rates during this period in order for all parties to establish whether the housing needs during the previous UDP period were met in full or not.	Not accepted. It is accepted that delivery rates during the UDP Plan period did not keep up with what the Plan specified. This is largely down to the economic downturn and its impact on the housebuilding industry. The housing requirement figure for the UDP was calculated in the context of projections and circumstances at the turn of the century. Those circumstances and projections are completely different to those which informed the LDP housing requirement. The relevance of delivery rates between 2000 and 2006 (at a time when the UDP had not been adopted) is not considered relevant to the present debate.

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			period in order for all parties to establish whether the housing needs during the previous UDP period were met in full or not.		
640	STR4: Principles of Sustainable Development, Design and Placemaking	Object	In order to address the conflict detailed above, and ensure that the policy is sound, TW requests that the Council: 1 Review Policy STR4 and the reasoned justification in its entirety and provide explicit measurable targets and criteria based on a robust evidence base. This will assist in determining the impact that the requirements have on the viability of developments and it is not adversely impacted upon.	Review Policy STR4 and the reasoned justification in its entirety and provide explicit measurable targets and criteria based on a robust evidence base. This will assist in determining the impact that the requirements have on the viability of developments and it is not adversely impacted upon.	Not accepted. Planning Policy Wales (PPW) places great emphasis on the sustainable placemaking design principles, it is therefore vitally important for this strategic policy to set out all the material considerations relevant to this issue. Policy STR4 establishes the key planning principles for all development and reflects the aims of PPW. The more detailed policies form the basis of all planning decisions and set out more specifically how development can achieve positive sustainable outcomes and minimise any adverse outcomes. The detailed policies are listed at the end of the Policy context table for STR4. Alongside the LDP the Infrastructure Plan has been drawn up which identifies the key infrastructure requirements and helps to understand the viability of each allocated site. This plan is a 'live' document and will be updated as more detailed information comes forward. The LDP also contains a Monitoring Framework which sets out a number of indicators which form the basis for assessing the plans performance. Many of the indicators include matters relevant to the criteria in STR 4 such as loss of green barrier, open space and green infrastructure, community facilities, amount of walking and cycling, levels of welsh speaking in the county and renewable energy capacity. It is not considered appropriate to include detailed targets to be applied to this

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					strategic policy. The policy will therefore be monitored as part of the overall plan.
854	STR4: Principles of Sustainable Development, Design and Placemaking	Object	Strategic policy 5 Creating sustainable places and communities 5.33 To be welcomed but how can FCC deliver this? Not enforceable by FCC unless legislation is changed and FCC has the resources to make sure developers deliver. New surface water drainage powers to LAs could improve the situation but without the resources FCC will be hard pressed. At the moment we see new developments taking scant regard of green spaces, SuDs, and existing green infrastructure. 'Should be incorporated' is weak wording		Not accepted. Although the objector references policy STR5 it would appear that the objector is actually concerned with policy STR4 as para 5.33 is part of the explanatory text relating to policy STR4. The objection should be considered in the context that this is a newly prepared LDP which has been drafted in the light of the relatively new PPW10. Welsh Government has placed greater emphasis on Placemaking, green infrastructure and sustainable drainage and these are all incorporated into strategic and detailed policies. It is not necessarily the case that such requirements are resource hungry and by way of example Welsh Government indicate that SuDS should be cost – neutral.
924	STR4: Principles of Sustainable Development, Design and Placemaking	Object	STR4: Principles of Sustainable Development, Design and Placemaking We generally support the principles that are set out in the Policy. Specifically, we agree that new development should make the best use of land, materials and resources. Whilst the policy does not specify a specific density that development should achieve, it is common practice for new residential development to achieve a minimum of 35 dwellings per hectare (dph) and that through good design and layout, this can be		Not accepted. The general support for the policy is noted. Policy HN2 Density and Mix of Development specifies that a density of at least 30 dwellings per hectare will be sought, but also recognizes that there will be sites where a lower density may be justified. A Plan wide density target of 30dpha is considered to be realistic for the County given the characteristics of its settlements. This is also emphasized by the requirement for SuDS as part of new developments. It is considered that 35dpha is too high a figure to be generally applied across the County.

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			adequately achieved on sites, resulting in acceptable residential environments incorporating open space and amenity areas. Density is also a function of the type and mix of housing that can be accommodated on a site. A larger proportion of smaller dwellings may mean an increase in density although this may be as a result of these type of dwellings being in need, and therefore, development should not be rejected on density grounds in such circumstances. We also support the objective of incorporating new connections to existing green infrastructure, as a way of promoting biodiversity.		
1137	STR4: Principles of Sustainable Development, Design and Placemaking	Support	Best and Most Versatile Land Flintshire have engaged with the Welsh Government regularly throughout the development of the LDP on land quality information, validation of surveys and Predictive ALC Map information. The plan notes a loss of 52.8ha of BMV land (34.6ha – Housing allocations; 18.2ha Employment allocations). The Council has taken a pragmatic and sensible approach to protecting BMV land and minimising its loss in the plan. Allocations that would represent a loss of BMV have been well evidenced for an overriding need (sequential test) and a balanced judgement has been made. In conclusion, the Welsh Government is of the view that the Council has demonstrated a sensible		Support is noted.

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			and pragmatic approach to considering BMV loss in the context of national planning policy and on that basis no objection is offered.		
1262	STR4: Principles of Sustainable Development, Design and Placemaking	Object	A policy to ensure sustainable development and design is supported in principle. However, the current policy wording is unsound as it places unnecessary and unrealistic burdens on developers. Evidently not all development will be able to meet all policy criteria, particularly where a site in constrained and/or complex where priorities must be balanced. However, failure to comply with individual STR4 criteria does not automatically mean a development is unsustainable. Development should be considered on a site-by-site basis and criteria considered accordingly including the extent to which some elements of sustainability can be achieved. To impose all criteria on all development may impact upon viability and prevent schemes coming forward to the detriment of the economy or the provision of housing. The policy wording should therefore include an element of flexibility and state development should meet the criteria 'where appropriate and relevant'.	The policy wording should therefore include an element of flexibility and state development should meet the criteria 'where appropriate and relevant'.	Not accepted. Planning Policy Wales (PPW) places great emphasis on 'sustainable placemaking design principles'. This is a strategic policy that seeks to achieve that aspiration by improving the overall quality of design for all new development in the County. It is therefore vitally important for this strategic policy and the more detailed policies associated with it, to form the basis of all planning decisions and set out how development can achieve positive sustainable, design and placemaking outcomes and minimise any adverse outcomes. All of the criteria are material planning considerations, some are more relevant than others depending on the type of development and this is why the policy wording uses the term 'should' not 'must'. Therefore the appropriate weight to be attached to each issue will be recognised and considered at the planning application stage.

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1278	STR4: Principles of Sustainable Development, Design and Placemaking	Object	A policy to ensure sustainable development and design is supported in principle. However, the current policy wording is unsound as it places unnecessary and unrealistic burdens on developers. Evidently not all development will be able to meet all policy criteria, particularly where a site in constrained and/or complex where priorities must be balanced. However, failure to comply with individual STR4 criteria does not automatically mean a development is unsustainable. Development should be considered on a site-by-site basis and criteria considered accordingly including the extent to which some elements of sustainability can be achieved. To impose all criteria on all development may impact upon viability and prevent schemes coming forward to the detriment of the economy or the provision of housing. The policy wording should therefore include an element of flexibility and state development should meet the criteria 'where appropriate and relevant'.	The policy wording should include an element of flexibility and state development should meet the criteria 'where appropriate and relevant'	Not accepted. Planning Policy Wales (PPW) places great emphasis on 'sustainable placemaking design principles'. This is a strategic policy that seeks to achieve that aspiration by improving the overall quality of design for all new development in the County. It is therefore vitally important for this strategic policy and the more detailed policies associated with it, to form the basis of all planning decisions and set out how development can achieve positive sustainable, design and placemaking outcomes and minimise any adverse outcomes. All of the criteria are material planning considerations, some are more relevant than others depending on the type of development and this is why the policy wording uses the term 'should' not 'must'. Therefore the appropriate weight to be attached to each issue will be recognised and considered at the planning application stage.
762	STR4: Principles of Sustainable Development, Design and Placemaking	Object	The Higher Kinnerton Village Plan sets out a vision for the future of Higher Kinnerton and its future development from 2018 to 2030 and FCC have confirmed the plan would be a material consideration in progressing the LDP.		Not accepted. The Council has worked pro-actively in assisting Higher Kinnerton Community Council in their preparation of the Village Plan. This is in the context of Welsh Government advice in PPW10 (para 1.28) that 'Place Plans are non-statutory documents.

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			Through consultation with village residents, the steering group identified the following themes to be developed for the plan: ? Protecting our environment and open spaces. ? Promoting community life and social cohesion. ? Community growth through sensitive development. ? Supporting commerce in the community. The Higher Kinnerton Village Plan takes each of these themes in turn, setting out the background and then, based on what we were told by residents in the survey, proposing a set of key objectives which can be delivered.		They may be prepared at the initiation of the local community and are a powerful tool to promote collaborative action to improve well-being and placemaking'. The status of Place Plans has always been somewhat unclear but PPW10 has clarified this with the guidance in para 1.28 of PPW10 'Place Plans should support the delivery of LDP policies and are adopted as supplementary planning guidance'. Further guidance is set out in para 5.7 of the draft development Plans Manual 3 where in para 5.7 Welsh Government state 'Place Plans should be in conformity with the development plan and adopted by the LA as SPG to the plan (chapter 9). They can inform an LDP review, be prepared in parallel with an LDP, or following adoption, providing there is a sufficient 'policy hook' within the plan. They cannot duplicate or introduce new policy, nor can they de-allocate sites identified in the adopted development plan. Place Plans are not part of the statutory development plan; instead they add detail to the adopted plan'. Once the LDP is adopted there is clearly scope to look at how the Place Plan sits with the LDP and for consideration to be given as to how and when it can be adopted as SPG to support the Plan. In the meantime the Place Plan will be treated as a material planning consideration although the weight to be attached to it is not the same as SPG.

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1061	STR4: Principles of Sustainable Development, Design and Placemaking	Object	STR4: Principles of Sustainable Development and Placemaking – we welcome proposals to: ii) respond to local context and character, respect and enhance the natural, built and historic environment and be appropriate in scale, density, mix and layout; v) contribute to the well-being of communities, including safeguarding amenity, the public realm, provision of open space and recreation, landscaping and parking provision in residential contexts; vi) incorporate new and connect to existing Green Infrastructure, promoting biodiversity. However, we would suggest that the multi-functional nature of GI is recognised and the importance of landscape character and local distinctiveness, which applies to all proposals is included. 5.31 – refers to historic settlements and a rural landscape with high quality built environment and to heritage assets including historic parks, gardens and landscapes and that design should reflect this and have regard to local distinctiveness and site context. We advise that reference to landscape character should be included here to ensure all aspects of local distinctiveness are covered.	we would suggest that the multi-functional nature of GI is recognised and the importance of landscape character and local distinctiveness, which applies to all proposals is included. 5.31 – refers to historic settlements and a rural landscape with high quality built environment and to heritage assets including historic parks, gardens and landscapes and that design should reflect this and have regard to local distinctiveness and site context. We advise that reference to landscape character should be included here to ensure all aspects of local	Not accepted. STR4 is a strategic policy which sets out the requirements for sustainable placemaking design principles and highlights the issues through the set of 10 criteria. Policy STR13 Natural and Built Environments, Green Networks and Infrastructure provides strategic guidance on the issue of green infrastructure, as well as the natural and built / historic environment. The issues of green infrastructure and landscape are included in more detail in policies on landscape character and local distinctiveness are found in policies EN2 Green Infrastructure and EN4 landscape Character. In para 5.31 the list of historic assets includes landscapes therefore any development will need to consider landscape character. The plan should be read as a whole.

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				distinctiveness are covered.	
147	STR5: Transport and Accessibility	Object	Site HWN005 - Ash Lane, Hawarden Policy STR4 iv: Ensure that the local highway network either has, or can be upgraded, to provide capacity to accommodate sustainable levels of development; Firstly it has been unclear plan details regarding site access ("Just from Ash Lane" as stated by the Lead Planner or "Ash Lane and Gladstone Way road access without a through access" from a planner at the open evening in Mancot Hall). With 2 access points it would be expected that half of the traffic will be coming out onto Ash Lane, if it was just Ash Lane access then it would be all traffic. Ash Lane and Cross Tree Lane (where Hawarden Village Church School is situated) has been the subject of repeated traffic monitoring and local consultations took place last year because of the current traffic jams and safety issues for the primary school children using these streets for drop off and pick up times (morning, afternoon and 2 at lunchtime times for infant nursery). It has been agreed with the local highway agency that trials of a one-way system will help alleviate this daily congestion - this has not happened yet. More traffic in this area will impact this congestion further and will make issues of pollution and safety	The magnitude of this development exceeds the local road infrastructure currently and so the size of development needs reducing.	Not accepted. The Ash Lane allocation is informed by a Transport Study and there is no objection from the Council's Highways Development Management officers. A response to the other representations on site HWN005 relating to highways matters is made separately.

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			worse. There is access to the Ash Lane entrance from the north through Mancot but this also goes past a primary school with school time traffic problems. Also the route from Ash Lane to Broughton Shopping Park going through Sandycroft adds 1.5miles and 5 min to this 3.2mile 7 min journey and so will be a less preferable route. Cross Tree lane is bound in by the cemetery and a wall into the churchyard of St Deniols Church and the local authority offices grounds and a private garden. There is no room for mitigation of increasing the width of this road.		
292	STR5: Transport and Accessibility	Object	Transport is a key major factor in the Deeside/Wrexham/Chester triangle and this has been identified and reinforced over a considerable period of time. It was a key issue in the Wales Spatial Plan and successive strategies and partnerships have emphasised its importance. The cross-border travel pattern for journeys to work, leisure, shopping is dependent on the coordinated strategies and programmes of the constituent local authorities. A key part of Chester's transport strategy is the Chester Western Relief Road which has been considered and consulted upon. There are two options, both of which involve passing through/upgrading of the highway network in Flintshire. The first	Refer to and set out the degree of cross-border cooperation and agreement (or otherwise) on this key issue.	Not accepted. Nothing in Policy STR5 conflicts with the Chester Western Relief Road proposal which is part of Chester's transport strategy. Reference is included in the supporting explanation to maximizing the benefits of regional transport infrastructure investment (para 5.38) and to cross border working with CWAC and others to deliver improved vehicular access to Chester and Broughton (para.5.41) – this project is still on-going.

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			passes through Saltney, across the river and along Bumper's Lane and on to Sealand Road. The second skirts the west of Saltney, crosses over the river at Ferry Lane and continues on to Sealand Road to the Park and Ride site. The Plan makes no reference to the CWRR either in principle or to the specific route options and how it may impact on the overall cross border transport network. This is a serious shortcoming and casts doubt as to the degree of cross-border cooperation in both planning and transport policy. It is of such importance that reference should be made to it in strategic policy.		
553	STR5: Transport and Accessibility	Object	This representation is made on behalf of a Trust which owns an area of land at Kelsterton Farm, Connah's Quay (Appendix 1). This land covers approximately 40Ha (98.8 acres) and is located south of Chester Road, between Connah's Quay and Flint. Given the site's size and its proximity to two 'Main Service Centre' settlements, we consider that this site provides a future opportunity for a range of land uses including residential, employment and roadside uses. Outlined below is our response to the Flintshire Deposit Plan Consultation which provides comments on the following policies detailed in the draft plan: STR5: Transport and Accessibility (Policy 5) Policy STR5	Allocate site located south of Chester Road, between Connah's Quay and Flint	Not accepted. The support for the general aims of the policy is noted. While the policy does not specifically reference new roadside facilities it does reference 'new development and transport infrastructure' and incorporates criteria against which proposals can be assessed. The Council is also aware of the Welsh Government's aim (para. 5.3.19 of PPW Edition 10) for there to be an increase in freight movement by rail and water rather than by road. Any proposals for roadside facilities can be considered on their merits against the Plans framework of policies and national planning guidance.

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			'Transport and Accessibility' aims to deliver sustainable economic growth and development through the maintenance and enhancement of an integrated, accessible, usable, safe and reliable transport network. Whilst we support the general aims of this policy we object on the basis that it does not provide any support for new road side facilities which are an important component to the transport network. Therefore they should be promoted through this policy. Holyhead Port provides an important trade gateway to North Wales. As Wales' third biggest port it handles approximately 5.2 million tonnes of freight per year (2018), over 95% of which is via roll-on/roll-off or wheeled cargo containers. These figures1, show that despite a minor decrease in 2017 of 15,000 tonnes, there has been a general rise in the amount of freight handled by the port over the past decade, growing from 3.4m tonnes in 2008 (a 53% increase) and averaging a 402,000 tonnes per year increase in the last 5 years. Recent investments in the port reflect this growth with port operators Stena Line agreeing in 2018 to invest more than £4 million in upgrades to infrastructure and choosing the Holyhead to Dublin route as the first		

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			European route to take delivery of its new generation ferries in 2020. Crucially, the new vessel will offer over 3,000 lane meters of freight capacity, a 50% increase on the vessel it will take over from.		
807	STR5: Transport and Accessibility	Support	Our client supports Policy STR5, which recognises that the provision of an integrated, accessible, usable, safe and reliable transport network underpins the Council's economic ambitions. The policy confirms that transport infrastructure should facilitate accessibility to employment opportunities, and also promotes road and rail improvements. The movement of freight by rail is also supported. The supporting text to Policy STR5 recognises the current challenges affecting transport in the Deeside area, which is also the focus for existing and emerging economic initiatives. The plan also notes that high quality transport links and improvements to accessibility are vital to support economic growth. Our client welcomes the acknowledgement of this within the Deposit LDP. The Plan recognises the need for transport improvements within the Deeside area and gives support to the emerging proposals, including improved rail and road links. Our client supports proposed improvements such as Deeside Parkway, which will support economic growth opportunities		Support is noted.

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			within the area. The Tata Shotton works benefits from rail access and road access and must be considered in the context of investments/improvements coming forward under this policy.		
823	STR5: Transport and Accessibility	Support	Policy STR5 (Transport and Accessibility) Policy STR5 of the Deposit Plan states: "…Where appropriate new development and associated transport infrastructure should therefore: Promote the implementation of an integrated transport solution in Flintshire, involving road, rail, bus, park and ride / share and active travel improvements…". Bourne Leisure endorses the Council's approach to the implementation of an integrated transport solution, including active travel improvements, "where appropriate". Draft Policy STR5 is consistent with paragraph 3.35 of PPW which states: "For most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole. Development in these areas should embrace the national sustainable placemaking outcomes and, where		Support is noted.

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			possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys." (Lichfields emphasis).		
1019	STR5: Transport and Accessibility	Object	Paragraph 5.37 – the Council recognises the intention to protect the line of the preferred route (the "red route") within the LDP, but notes that this does not extend into England (and therefore Cheshire West and Chester). • Paragraph 5.41 – the Council welcomes that the Chester Broughton Growth Corridor is referenced, but suggests that the text is amended from "…options to deliver improved vehicular access to Chester and Broughton" to "…options to improve strategic cross border connectivity and accessibility between Chester and Broughton and the wider sub-region".	Paragraph 5.41 – the Council welcomes that the Chester Broughton Growth Corridor is referenced, but suggests that the text is amended from "…options to deliver improved vehicular access to Chester and Broughton" to "…options to improve strategic cross border connectivity and accessibility between Chester and Broughton and the wider sub-region".	Not accepted. It is considered appropriate that the LDP shows protected routes within the LDP area only, though the Council acknowledges that the red route extends beyond the Flintshire County border. If the Inspector considers that the section of the red route defined by policy PC10, beyond the County boundary, should be removed from the proposals maps then the Council would have no objection to amending the proposals maps accordingly.
1002	STR5: Transport and Accessibility	Object	Transport / Highways impacts The Council is currently engaged in ongoing work between the two		Not accepted. It is not considered appropriate to include reference to the Strategic Road or sub regional network under Policy STR5 as

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			authorities, Wrexham Council and Welsh Government to seek to improve the operation of the highway network around Chester and NE Flintshire, to improve accessibility and help support economic development opportunities. The two Councils are also involved in the North Wales and North East Wales Metro project that will support the development of an integrated transport network. It is noted that the two major strategic sites identified in the LDP (Northern Gateway and Warren Hall) are already committed schemes. Cheshire West has previously identified concerns in relation to potential impacts on the A road network especially the A55/ A483 junction (Warren Hall) and the Sealand Road/ A540/ A5117/ A550 and onward routes (Northern Gateway). As such, it may be helpful if the scope of policy STR5 bullet point (iv) was widened to ensure that the highway network outside of Flintshire has (or could provide) sufficient capacity to accommodate levels of development, in addition to the "local highway network" – this could be by reference to the Strategic Road Network, and/or the sub-regional network.		the County as Highway Authority has very limited responsibility for delivery of schemes on these networks. PPW (para. 5.3.29 references Trunk Roads and Motorways as the Strategic Network. The Explanation to Policy STR5 does reference sub regional and regional initiatives (para. 5.3.6). The policy is also supported by a detailed policy PC5.
1063	STR5: Transport and Accessibility	Object	STR5: Transport and Accessibility – we advise including reference to Green Infrastructure networks here, which can include walking and cycling routes and	we advise including reference to Green Infrastructure	Not accepted. Reference is already included in Policy STR5 to Green Infrastructure networks. Bullet point (vi) states 'Provide walking and cycling routes, linking in with active travel

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			significantly enhance the experience and encourage walking and cycling. 5.39 – we recommend linking Active Travel proposals to the Green Infrastructure Strategy SPG. 6.5 – with regards to tourism developments and opportunities arising from the AONB and Flintshire's attractive rural landscape, we suggest reference to Dark Skies.	networks here. 5.39 – we recommend linking Active Travel proposals to the Green Infrastructure Strategy SPG. 6.5 – with regards to tourism developments and opportunities arising from the AONB and Flintshire's attractive rural landscape, we suggest reference to Dark Skies.	networks and green infrastructure networks'. No further wording is necessary in the criteria. Reference is already included in the Plan, in the explanation for Policy EN2 (Para.12.10) as follows: 'Green Infrastructure should be planned so that it integrates with existing rights of way and pedestrian and cycle routes (including Active Travel Routes) as well as other identified nature conservation and green space assets. This Policy will be supported by an SPG on Green Infrastructure'. Para 6.5 is part of a general introductory section leading into the Plan's Economy policies and it is not considered necessary for reference to be made to Dark Skies. The Plan has a detailed policy (EN5) regarding the AONB and policy EN18 addresses light pollution in the policy wording and reference Dark Skies initiative in the explanatory wording. The Plan needs to be read as a whole.
146	STR6: Services, Facilities and Infrastructure	Object	Site: HWN005 - Ash Lane, Hawarden Objection School places for new house owner families and existing local children: Currently the infant and junior school years in Hawarden Village are fully subscribed and similarly in Sandycroft Primary school. This site would be expected to lead to these sites having over-capacity. More children in family houses in the planned allocation for housing plot	Detailed proposals of how to increase local primary school capacity in line with the estimated population growth. Mitigation other than children needing to travel	Not accepted. There is no objection from the Education Authority to the LDP or to this allocation. The Education Authority is assessing how additional school capacity can be established. It must be stressed that this allocation is not scheduled to deliver housing completions until 2023/24 so there is sufficient time to address this.

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			would be in relatively close proximity to Hawarden Village Church School thereby would take up new places there leading to Hawarden and Mancot residents being unable to attend and having to travel out of immediate local area for schooling. This unfair on local families currently setting up for local schooling. It is also again Council policy (local children should have access to local education facilities and not have to travel out of area for education). Hawarden High School (The Highway, Hawarden) has concerns regarding capacity with John Summers School in Queensferry recently closing (July 2017) and many schoolchildren now have to use Hawarden High School increasing intake numbers. Further significant local population increases will make access to the local state High School more difficult for existing residents of Hawarden, Mancot, Ewloe, Pentre, Sandycroft and Queensferry.	farther afield to access education facilities	
145	STR6: Services, Facilities and Infrastructure	Object	HWN005 - Ash Lane, Hawarden Objection. Access To GP surgery: (STR6: Services, Facilities and Infrastructure) - Specifically referencing policy 5.47 There is a lot of local people that state they have difficulties accessing GP (The Stables Medical Centre, 27 Glynne Way, Hawarden) appointments. The evidence for this is available from the Healthcare	The magnitude of such a Local Service Centre development plan must be smaller. Potential of 288 houses is a massive site for such a village with limited	Not accepted. Policy STR6 sets out the types of infrastructure and other developer obligations that can be sought in order to mitigate the impacts of development. Criteria iii) specifies health 'facilities' as the LDP and planning system cannot be required to contribute funding to revenue schemes such as the employment of GP's and other medical staff. This is the remit and responsibility of the

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			Inspectorate Wales Reports from 2017, 2018 and 2019. (www.hiw.org.uk). I have attached excerpts from the last 3 years reports for reference. So despite these reports for 3 years they have been unable to recruit permanent doctors to increase capacity to fit the current local population. Any increase to the local population by such large amounts (250-288 houses would expect a population increase of 500-1000) would further exacerbate strain on access to GP services when clearly they are unable to resolve current access difficulties. The magnitude of this Ash Lane Development plan is not logical or reasonable or balanced (placing such a large new population site with only a single local GP Practice to cope with the change in population). There are no suitable proposals to increase provision to accommodate any additional demand deriving from proposed development.	infrastructure growth.	Health Board. There is no objection to the Plan or this allocation from the Health Board.
191	STR6: Services, Facilities and Infrastructure	Object	The proposal refers to the pre-existing requirement for developers to make a contribution in funds or in kind to the benefit of the community and the prior public consultation to this LDP that set the terms for where future developments will be located. The concept I propose is to have a Community Obligation from developers but this is contributed by them to a County 'pot' that will in its turn be		Not accepted. Where a development would impact upon a community the developer will need to enter into a S106 legal agreement with the Local Authority to provide funds/works to mitigate against the impact of the development. This money can only be spent in accordance with the S106, for example if it is collect for affordable housing purposes it can only be spent on the provision of new affordable housing within that local area, it could not be used to fund other things. If this

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			accessible to bids from across all community areas in Flintshire. A Proposal: There are 3 levels for support: 1. The main providers for public leisure, recreation and sport. 2. Asset Transfers facilitated by FCC. 3. Other small local organisations. Main benefit to the County will be to secure longer futures for community led organisations and enable them to provide additional activities and/or improved facilities for such activities.		money is spent on something other than what the S106 specifies or outside of the agreed area then the developer could legally request the money is repaid by the Local Authority. In April 2010 the Community Infrastructure Levy (CIL) Regulations came into force in Wales. The CIL is a development tax paid by all developers on a £ per square meter basis on developments over 100m2. The contributions are pooled unlike traditional S106 funds and can be used for all types of infrastructure needs within the County. Once the LDP is adopted the Local Authority will explore the viability of producing a CIL for Flintshire. It has not been possible to do this while preparing the LDP due to time and resource issues. Until a CIL is formally adopted the Council will continue to use traditional S106 agreements to mitigate against the impact of development on communities.
413	STR6: Services, Facilities and Infrastructure	Object	objects as nether the policy wording or the supporting text offer advice on how such contributions would be calculated, this creates uncertainty for landowners and developers which in turn could result in development not coming forward. Further uncertainty is created by the potential of CIL being considered but with no indication of timescales or the likely infrastructure requirements, it might cover.	The minimum change required is to cross-reference an SPG in which greater guidance will be provided.	Not accepted. The current policy wording sets out the type of obligations which could be sought and are examples only; the specific obligations will be determined on a case by case basis depending on the nature and location of the proposal at the planning application stage. Details of how the contributions are calculated can be found in the various Supplementary Planning Guidance notes which support the plan. The intention of the policy, it is to provide a framework to seek obligations, in accordance with the tests identified in para 122 of the CIL regulations.

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					The reasoned justification explains that CIL charging system will be assessed once the plan has been adopted.
347	STR6: Services, Facilities and Infrastructure	Object	I have been instructed to write and advise that the Council's observations are that given that there is no additional development designation being made for rural communities: That infrastructure improvement payments made by all developers be collected and held by the Council That rural communities be allowed to bid for grants from there funds for projects to improve their community facilities.	That infrastructure improvement payments made by all developers be collected and held by the Council That rural communities be allowed to bid for grants from there funds for projects to improve their community facilities.	Not accepted. Policy STR 6 clearly states that '' new development will contribute to the provision of a range of key infrastructure, where necessary, to mitigate the impacts of new development comprising:' It is important to understand that requirements for infrastructure needs as listed, will only be sought **where necessary in order to mitigate the impacts of development**. As with any Section 106 Agreement developer contributions will need to meet 3 tests - • Necessary to make the development acceptable • Directly related to the development • Fairly and reasonably related to the scale and kind of development. Section 106 Agreement contributions need to be directly related to the development in order to address a specific impact and a specific

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					project. Section 106 Regulations state that contributions cannot be 'pooled' to be used for sites or projects other than that which the application is directly related. What the representor is suggesting is a Community Infrastructure Levy CIL. The policy explanation sets out that the Local Authority will be examining the viability of developing a CIL Community Infrastructure Levy following adoption of the LDP. The level of the CIL charge will depend on the viability of the development market which varies across the county. The mechanism for determining the infrastructure needs of different communities in the county will also form part of assessing the options for CIL
641	STR6: Services, Facilities and Infrastructure	Object	In order to address the conflict detailed above, and ensure that the policy is sound, TW requests that the Council: 1 Review Policy STR6 and the reasoned justification in its entirety and provide explicit targets based on a robust evidence base for how developments will contribute to infrastructure provision whilst ensuring that viability of developments is not impacted upon. 2 Omit reference to 'public art' from Part x of the Policy.	that the Council: 1 Review Policy STR6 and the reasoned justification in its entirety and provide explicit targets based on a robust evidence base for how developments will contribute to infrastructure provision whilst ensuring that	Not accepted. The Plan contains a Monitoring Framework which sets out a number of indicators which form the basis for assessing the plans performance. Many of the indicators include matters relevant to the criteria in STR 6 such as affordable housing, green infrastructure, community facilities, amount of walking and cycling, wildlife designations and renewable energy capacity. The policy will therefore be monitored as part of the overall plan. The policy sets out to highlight the need for physical and social infrastructure without being too prescriptive.

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				viability of developments is not impacted upon. 2 Omit reference to 'public art' from Part x of the Policy.	TAN 12 Design 2009 recognised the importance of Public Art in the overall design of a scheme or town centre and states in para 5.15.1 'Public art plays an important part in creating or enhancing individuality and distinctiveness, and in raising the profile of our towns, villages, cities and urban and rural landscape'. Para 5.15.4 states 'Public art should be considered early in the design process and be integral to the overall design of a building, public space or place.' Policy STR 6 clearly states that ''new development will contribute to the provision of a range of key infrastructure, where necessary, to mitigate the impacts of new development'' It is important to understand that requirements for infrastructure needs as listed, will only be sought 'where necessary'. As with any Section 106 Agreement developer contributions will need to meet 3 tests - • Necessary to make the development acceptable • Directly related to the development

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					• Fairly and reasonably related to the scale and kind of development. The viability of a development is therefore taken into account. Once CIL is in place, it will replace the Section 106 Agreement system (apart from Affordable housing) negating the chance of double counting.
679	STR6: Services, Facilities and Infrastructure	Support	Policy STR6: Services, Facilities and Infrastructure As a Statutory Water and Sewerage Undertaker Welsh Water aims to ensure that sufficient infrastructure exists for domestic development, and we seek to address deficiencies through capital investment in our 5 year Asset Management Plans (AMP). We put forward a business plan for investment for each AMP cycle and as part of this work we require some certainty in terms of growth areas. An adopted Local Development Plan with allocated sites helps strengthen the case Welsh Water can put forward to our industry regulator, Ofwat, in relation to projects requiring AMP funding. Due to the regulatory, financial and legislative framework that we work within there is potential disparity in the timeframes of our AMP and the LDP. There may be instances where 'lead-in'		Support is noted.

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			times are required to bring an infrastructure project and associated funding to fruition. As such, where specific infrastructure improvements are required to bring a development site forward in advance of any investment through AMP, we support the provision within the policy that improvements can be delivered via private investment.		
936	STR6: Services, Facilities and Infrastructure		This policy is the pre-cursor to the introduction of a CIL tariff which will have to be based upon an adopted Infrastructure Delivery Plan – it immediately raises viability concerns about the realistic delivery of the strategic sites and we also consider it raises doubt over such aspirations for other non-strategic sites.	it immediately raises viability concerns about the realistic delivery of the strategic sites and we also consider it raises doubt over such aspirations for other non-strategic sites.	Not accepted. Policy STR 6 clearly states that '' new development will contribute to the provision of a range of key infrastructure, where necessary, to Council response mitigate the impacts of new development'. It is important to understand that requirements for infrastructure needs as listed, will only be sought where necessary. As with any Section 106 Agreement developer contributions will need to meet 3 tests - • Necessary to make the development acceptable • Directly related to the development • Fairly and reasonably related to the scale and kind of development. Section 106 Agreement Contributions need to be directly related to the development for a

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					specific impact and a specific project. Sect 106 Regulations state that contributions cannot be 'pooled' to be used for sites other than that which the application is directly related. What the representor is suggesting is a Community Infrastructure Levy CIL. The policy explanation sets out that the Local Authority will be examining the viability of developing a CIL Community Infrastructure Levy following adoption of the LDP. The level of the CIL charge will depend on the viability of the development market which varies across the County. The mechanism for determining the infrastructure needs of different communities in the County will also form part of assessing the options for CIL.
1133	STR6: Services, Facilities and Infrastructure	Object	Place Plan and placemaking. There appears to be no reference to developer contributions / settlement needs connecting with communities and referring to Place Plans.	Place Plan and placemaking. There appears to be no reference to developer contributions / settlement needs connecting with communities and referring to Place Plans.	Not accepted. Penyffordd Place Plan will be considered as a material planning consideration on planning applications although it does not have the status of formal SPG. Planning Policy Wales edition 10 is clear that Place Plans should "*support the delivery of LDP policies*" which implies that the Village Plan should align with the LDP. The draft LDP Manual edition 3 also states that "*Place Plans should be in conformity with the development plan*" and also that "*they cannot duplicate or introduce new policy, nor can they de-allocate sites identified in the adopted development plan. Place Plans are not part of the statutory development plan; instead they add detail to the adopted plan*". Place plans can be adopted as Supplementary Planning Guidance once

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					the LDP has been adopted and only if the Place Plan (PP) adheres to the policies in the LDP. Although PP will be material considerations when drawing up LDP's it is important to note that PP's need to reflect the LDP so they cannot be adopted as SPG until the LDP is adopted.
1153	STR6: Services, Facilities and Infrastructure	Object	Place Plan and placemaking. There appears to be no reference to developer contributions /settlement needs connecting with communities and referring to Place Plans.	Place Plan and placemaking. There appears to be no reference to developer contributions / settlement needs connecting with communities and referring to Place Plans.	Not accepted. Place Plans will be considered as a material planning consideration on planning applications, although unless adopted as SPG they will not have the status of formal SPG. Planning Policy Wales edition 10 is clear that Place Plans should "*support the delivery of LDP policies*" which implies that the Village Plan should align with the LDP. The draft LDP Manual edition 3 also states that "*Place Plans should be in conformity with the development plan*" and also that "*they cannot duplicate or introduce new policy, nor can they de-allocate sites identified in the adopted development plan. Place Plans are not part of the statutory development plan; instead they add detail to the adopted plan*". Place plans can be adopted as Supplementary Planning Guidance once the LDP has been adopted and only if the Place Plan (PP) adheres to the policies in the LDP. Although PP's will be a material consideration when drawing up a LDP's it is important to note that PP's need to reflect the LDP so they cannot be adopted as SPG until the LDP is adopted.
770	STR6: Services,	Object	The Higher Kinnerton Village Plan sets out a vision for the future of Higher Kinnerton and its future development		Not accepted. Place Plans will be considered as a material planning consideration on planning applications, although unless

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	Facilities and Infrastructure		from 2018 to 2030 and FCC have confirmed the plan would be a material consideration in progressing the LDP. Through consultation with village residents, the steering group identified the following themes to be developed for the plan: ? Protecting our environment and open spaces. ? Promoting community life and social cohesion. ? Community growth through sensitive development. ? Supporting commerce in the community. The Village Plan takes each of these themes in turn, setting out the background and then, based on what we were told by residents in the survey, proposing a set of key objectives which can be delivered		adopted as SPG they will not have the status of formal SPG. Planning Policy Wales edition 10 is clear that Place Plans should "*support the delivery of LDP policies*" which implies that the Village Plan should align with the LDP. The draft LDP Manual edition 3 also states that "*Place Plans should be in conformity with the development plan*" and also that "*they cannot duplicate or introduce new policy, nor can they de-allocate sites identified in the adopted development plan. Place Plans are not part of the statutory development plan; instead they add detail to the adopted plan*". Place plans can be adopted as Supplementary Planning Guidance once the LDP has been adopted and only if the Place Plan (PP) adheres to the policies in the LDP. Although PP's will be a material consideration when drawing up a LDP's it is important to note that PP's need to reflect the LDP so they cannot be adopted as SPG until the LDP is adopted.
855	STR6: Services, Facilities and Infrastructure	Object	Strategic policy 6 Supporting a prosperous economy LDP objective 10 2. Encourage the development of town and district centres as the focus of regeneration To be welcomed – but 'encourage' is weak or is FCC is relying on market forces? This is an area where the LDP could be stronger. FCC Planning could be leading on this over the next 10		Not accepted. The objector is referring to a Plan objective, not a policy and it is written as such. The Plan has a strategic policy STR9 Retail Centres and Development which is supported by 5 detailed policies, which have been drafted in line with guidance in PPW10. The role of the LDP is to provide a framework of land use policies and it is not a guide or statement of intent regarding the matters sought by the objector. Policy STR9 refers to the changing role of town centres and the need for a degree of flexibility and also references a tailored approach to be taken for each centre having regard to health checks,

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			years: • applying for more grants (such as Townscape Heritage Initiatives) • giving timely guidance to businesses wanting to make changes to their premises such as using upper floors for accommodation and pointing them at potential funding • timely advice for companies wanting to make changes to their buildings in conservation areas • working through planning and enforcement to hold nationals to account when they let their high street premises fall into disrepair 3. Promote a sustainable and safe transport system that reduces reliance on the car The LDP lacks ambition here, there are no new cycle route proposals for Mold apart from Mold to Broughton. We urgently need safe cycle routes from the outskirts of our towns from residential, schools and business / industrial parks into the town centre. Please refer to Mold Town Plan, pages 50 and 51 As bus services are reduced we also need pavements as well as safe cycle		masterplans and action plans. The Council has a regeneration team and these initiatives can all be pursued outside of the LDP. Welsh Government advises in para 3.11 of Development Plan Manual 3 that 'Plans should not be a compendium of policies to cover every eventuality'. • The Council has a track record of securing funding to implement Townscape Heritage Initiatives. However, this is not a matter of the LDP. • The provision of advice about funding for the conversion of upper floors in town centres is not a matter for the LDP • The Council is setting up a pre-application conservation advice service in respect of development proposals involving listed buildings and conservation areas • The Council has legal powers to deal with untidy land and buildings but this is a last resort following attempts to negotiate appropriate action. However, with limited enforcement staff and resources, cases must be priorities. The Transport Strategy Team which is part of the Council's Streetscene & Transportation Service is progressing Active Travel proposals in terms of walking and cycling routes. The Active Travel 'Flintshire Central' Map and the accompanying 'INM Revised Schedule 2'

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			routes from the villages and settlements around towns. Leaving them out of the LDP is a missed opportunity in relation to both town centre vitality, linking communities and reducing carbon emissions		document specifies a series of schemes in and around Mold. As these are being progressed outside of the LDP process it is unclear why the LDP is deficient or lacking ambition. The provision of bus services and pavements is not a matter within the remit of the LDP. The preparation of the Plan, for instance in relation to the assessment of candidate sites has had regard to existing public transport. However, the strategy for and funding of bus services is not a matter for the LDP.
953	STR6: Services, Facilities and Infrastructure	Object	This policy is the pre-cursor to the introduction of a CIL tariff which will have to be based upon an adopted Infrastructure Delivery Plan – it immediately raises viability concerns about the realistic delivery of the strategic sites and we also consider it raises doubt over such aspirations for other non-strategic sites.	viability concerns about the realistic delivery of the strategic sites and we also consider it raises doubt over such aspirations for other non-strategic sites.	Not accepted. Policy STR 6 clearly states that '' new development will contribute to the provision of a range of key infrastructure, where necessary, to mitigate the impacts of new development'. It is important to understand that requirements for infrastructure needs as listed, will only be sought **where necessary**. As with any Section 106 Agreement developer contributions will need to meet 3 tests - • Necessary to make the development acceptable • Directly related to the development • Fairly and reasonably related to the scale and kind of development. Section 106

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					Agreement Contributions need to be directly related to the development for a specific impact and a specific project. Sect 106 Regulations state that contributions cannot be 'pooled' to be used for sites other than that which the application is directly related. What the representor is suggesting is a Community Infrastructure Levy CIL. The policy explanation sets out that the Local Authority will be examining the viability of developing a CIL Community Infrastructure Levy following adoption of the LDP. The level of the CIL charge will depend on the viability of the development market which varies across the county. The mechanism for determining the infrastructure needs of different communities in the county will also form part of assessing the options for CIL
968	STR6: Services, Facilities and Infrastructure	Object	This policy is the pre-cursor to the introduction of a CIL tariff which will have to be based upon an adopted Infrastructure Delivery Plan – it immediately raises viability concerns about the realistic delivery of the strategic sites and we also consider it raises doubt over such aspirations for other non-strategic sites.	immediately raises viability concerns about the realistic delivery of the strategic sites and we also consider it raises doubt over such aspirations for other non-strategic sites.	Not accepted. Policy STR 6 clearly states that '' new development will contribute to the provision of a range of key infrastructure, where necessary, to mitigate the impacts of new development ' It is important to understand that requirements for infrastructure needs as listed, will only be sought **where necessary**. As with any Section 106 Agreement developer contributions will need to meet 3 tests -

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					• Necessary to make the development acceptable • Directly related to the development • Fairly and reasonably related to the scale and kind of development. Section 106 Agreement Contributions need to be directly related to the development for a specific impact and a specific project. Sect 106 Regulations state that contributions cannot be 'pooled' to be used for sites other than that which the application is directly related. What the representor is suggesting is a Community Infrastructure Levy CIL. The policy explanation sets out that the Local Authority will be examining the viability of developing a CIL Community Infrastructure Levy following adoption of the LDP. The level of the CIL charge will depend on the viability of the development market which varies across the county. The mechanism for determining the infrastructure needs of different communities in the county will also form part of assessing the options for CIL
986	STR6: Services, Facilities and Infrastructure	Object	This policy is the pre-cursor to the introduction of a CIL tariff which will have to be based upon an adopted Infrastructure Delivery Plan – it immediately raises viability concerns about the realistic delivery of the strategic sites and we also consider it	viability concerns about the realistic delivery of the strategic sites and we also consider it	Not accepted. Policy STR 6 clearly states that '' new development will contribute to the provision of a range of key infrastructure, where necessary, to mitigate the impacts of new development:' It is important to understand that requirements for infrastructure

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			raises doubt over such aspirations for other non-strategic sites	raises doubt over such aspirations for other non-strategic sites	needs as listed, will only be sought **where necessary**. As with any Section 106 Agreement developer contributions will need to meet 3 tests - • Necessary to make the development acceptable • Directly related to the development • Fairly and reasonably related to the scale and kind of development. Section 106 Agreement Contributions need to be directly related to the development for a specific impact and a specific project. Sect 106 Regulations state that contributions cannot be 'pooled' to be used for sites other than that which the application is directly related. What the representor is suggesting is a Community Infrastructure Levy CIL. The policy explanation sets out that the Local Authority will be examining the viability of developing a CIL Community Infrastructure Levy following adoption of the LDP. The level of the CIL charge will depend on the viability of the development market which varies across the county. The mechanism for determining the infrastructure needs of different communities in the county will also form part of assessing the options for CIL

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1008	STR6: Services, Facilities and Infrastructure	Object	This policy is the pre-cursor to the introduction of a CIL tariff which will have to be based upon an adopted Infrastructure Delivery Plan – it immediately raises viability concerns about the realistic delivery of the strategic sites and we also consider it raises doubt over such aspirations for other non-strategic sites.	doubt over such aspirations for other non-strategic sites.	STR6 sets out the framework for developer contributions and makes it clear that not all the list of infrastructure will be required by all developments. Alongside the LDP an Infrastructure Plan (IP) has been produced which sets out all the Infrastructure requirements for each strategic and allocated sites. The IP is a 'live' document and will be updated as more detailed information comes forward. The reasoned justification for the policy sets out that the Local Authority will be examining the viability of developing a CIL Community Infrastructure Levy following adoption of the LDP. The level of the CIL charge will depend on the viability of the development market which varies across the county. The mechanism for determining the infrastructure needs of different communities in the county will also form part of assessing the options for CIL.
688	STR7: Economic Development, Enterprise, and Employment	Object	We also request the following minor changes be made to policy STR7: Economic Development, Enterprise and Employment – "Supporting the provision of energy related development including new and emerging technologies to assist in the transition to a low carbon Wales." be added to the aims.	We also request the following minor changes be made to policy STR7: Economic Development, Enterprise and Employment – "Supporting the provision of energy related	Not accepted. The representation has been noted however the council disagrees with the proposed change. When the plan is read as a whole policy EN12 and EN13 are specifically for renewable energy and low carbon energy technology and development. Therefore it is considered that the aim is not needed to be added to policy STR7.

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				development including new and emerging technologies to assist in the transition to a low carbon Wales." be added to the aims.	
886	STR7: Economic Development, Enterprise, and Employment	Support	PGNGL supports the aims of STR7 which provides additional policy support for the Northern Gateways strategic role to deliver economic growth. PGNGL support the aims of Policy STR7: Economic Development, Enterprise, and Employment particularly criterion i. which supports the role of the Northern Gateway Site in delivering economic growth for the Region. This is consistent with the Deeside Plan, Wales Spatial Plan 2008, and the emerging National Development Framework. 5.4. PGNGL consider that the policy in its current form is appropriate and consistent internally and with PPW. The policy is not overly prescriptive and therefore provides flexibility. In these circumstances, PGNGL consider the Flintshire Local Development Plan in its current form to be sound. 5.5. No changes to STR 7 are sought.		The representation is noted and the council welcomes the support for policy STR7 Economic Development, Enterprise, and employment.
806	STR7: Economic	Support	STR7: Economic Development, Enterprise and Employment Policy		The representation is noted and the council welcomes the support for policy STR7

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	Development, Enterprise, and Employment		STR7 aims to sustain Flintshire's role as a sub-regional economic hub. Criterion (ii) seeks to enable businesses to invest, innovate, expand and grow, whilst criterion (iii) emphasises Deeside and its area of influence as the economic focus for Flintshire's economic ambition. The recognition of the importance of Deeside, and particularly Deeside Industrial Park, as an area for economic growth is particularly welcomed by our client.		Economic Development, Enterprise, and employment.
826	STR7: Economic Development, Enterprise, and Employment	Support	Policy STR7 (Economic Development, Enterprise and Employment) Policy STR7 of the Deposit Plan states: "In order to sustain Flintshire's role as a sub-regional economic hub, the Plan will support this by: …vii. In rural areas, recognise the continued contribution agriculture makes to the rural economy, whilst also supporting wider rural enterprise, tourism and diversification…". Bourne Leisure endorses the Council's supportive policy position towards tourism in rural areas. Paragraph 5.5.3 of PPW states "in rural areas, tourism-related development is an essential element in providing for a healthy and diverse economy…". Draft Policy STR7 is consistent with national policy and recognises the importance of tourism to the local economy which will help to create an effective Plan.		The representation is noted and the council welcomes the support for policy STR7 Economic Development, Enterprise, and employment.

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911	STR7: Economic Development, Enterprise, and Employment	Object	There is no reference to the economic benefits of mineral extraction. Paragraph 5.4.2 of PPW(v10) states "Minerals…… ……. are also essential to the economy". Minerals provide the foundation and raw materials for the development of housing and infrastructure as well as many other aspects of the economy, including the provision of green energy, and the well-being of society. There is no reference to this in the respective subsections within this policy. "Policy STR16 - Strategic Planning for Minerals", should be referenced in the detailed policy section.	Minerals provide the foundation and raw materials for the development of housing and infrastructure as well as many other aspects of the economy, including the provision of green energy, and the well-being of society. There is no reference to this in the respective subsections within this policy. "Policy STR16 - Strategic Planning for Minerals", should be referenced in the detailed policy section.	Not accepted. The council has noted the representation and believe that the information sought is located within a combination of policies and therefore does not need to be mentioned within policy STR7. Each strategic policy is accompanied by a cross reference to the relevant detailed policies. When the plan is read as a whole STR16 is the specific strategic policy relating to minerals and this policy interlinks with the detailed policies EN23, 24, EN25 and EN26 contributing towards providing the information for minerals. Within these policies it states many of the aspects that minerals provide a foundation for. It is not considered necessary or appropriate for this to be repeated in policy STR7.
917	STR7: Economic Development, Enterprise, and Employment	Object	A private developer is promoting its land to be released from the green barrier designation and for it to be allocated and safeguarded as land to meet specific future development needs that will be required during the development plan period. The masterplan proposals put forward addresses specific identified need which respond to the sustainable	The masterplan provides a unique opportunity to develop an appropriate physical gateway to North Wales. The Council has failed to take	Not accepted. The LDP has allocated sufficient land for development to meet identified needs during the Plan Period and additional allocations are not required. It is considered that the Northern Gateway is a well-established site along with the Warren Hall strategic site which is deliverable and other employment areas allocations as well as flexibility provided by numerous Principal Employment Areas. The focus of the Plan is

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			opportunities which the site itself presents, these are: - • Safeguarding land for the proposed Welsh Government trunk road improvement works; • Lorry Park (10 acres / 4 hectares) • Service Station Facilities (20 acres / 8 hectares) • Data centre (40 acres / 16 hectares) • Hotel / conference facilities (5 acres / 2 hectare) • Residential development (19 acres / 7.5 hectares)	account of the gateway implications of the Red Route and how this traverses across the candidate site and the northern edge of the Deeside Industrial Park. It is clear that the Council's aspirations, as presented under Employment Allocation STR3A 'Norther Gateway Mixed Use Development Site' is more aligned with the connectivity of the 'Blue Route' which is no longer being pursued by the Welsh Government. Compton Group consider that the introduction of the Red Route makes this site a highly	on delivering growth through the development of the two strategic sites as these form a key part of the Growth Deal. The candidate site is located between Deeside Industrial Park and the Flintshire / Cheshire County boundary and it is currently designated as green barrier land. Flintshire's green barrier designations have been reviewed as part of the LDP process and the Sealand – Cheshire Boundary (N River Dee) has been assessed and found to be meeting the purposes of a green barrier as defined in Planning Policy Wales. Development would also result in the loss of a large swathe of grade 2 BMV agricultural land. The submission proposes development on the back of the Welsh Government red route road scheme but there is no evidence yet that this will be delivered within the Plan period. The site is also sited with zone C1 flood risk on NRW's Development Advice Maps and it is not clear how the objector considers that a mixed use development(including residential) can meet the justification tests in TAN15 given that the site is greenfield land. It is considered that the proposal for the inclusion of the site next to the red route located at land North of Shotwick Road, Deeside Industrial Estate is not necessary or appropriate.

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				sustainable location for new employment opportunities, which will have direct links to England and North Wales.	
937	STR7: Economic Development, Enterprise, and Employment	Object	This policy suggests that that focus will be upon the two Strategic Employment sites at Northern Gateway and Warren Hall - yet neither have demonstrated deliverability and there is a mismatch between the jobs target and the amount of employment identified. It recognises the contribution agriculture plays to the local economy but fails to recognise the need to protect BMV land.	This policy suggests that that focus will be upon the two Strategic Employment sites at Northern Gateway and Warren Hall - yet neither have demonstrated deliverability and there is a mismatch between the jobs target and the amount of employment identified. It recognises the contribution agriculture plays to the local economy but fails to recognise the need to protect BMV land.	Not accepted. The policy notes that the strategic sites will provide employment however the policy also states that general employment sites that are part of the LDP will provide employment along with additional flexibility provided by numerous PEAs. The Council has engaged extensively with landowners to ensure that the sites allocated are deliverable and can realistically be brought forward for development over the plan period. It is accepted that the Northern Gateway site has been slow to get off the ground. However, significant investment in flood defence and transport infrastructure has been undertaken by Welsh Government and reserved matters approval given to one phase of housing and a large storage and distribution warehouse on the northern part of the site and one phase of housing on the southern part. Developer interest is being expressed in other phases of the development. This more positive outlook and the confidence that commencement of development on site has created, confirms the Council's assertion that the site can be

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					predominantly delivered during the Plan period. With regards to Warren Hall, the site has outline planning permission for a business park and a hotel. The relevance of the sites importance to the regional growth agenda is also important. There is a clear commitment in the Growth Deal, through the North Wales Economic Ambition Board, to delivering the Warren Hall site. The objector has not explained what is meant by a mismatch between the jobs target and the amount of employment land identified, and the Council are satisfied that from the combination of strategic sites, and the wider employment portfolio, there is more than sufficient context to facilitate the job growth aimed for by the Plan. Given that PPW10 provides a clear context for the protection of Best and Most Versatile agricultural land it is not considered necessary for this to be included in the Plan.
1164	STR7: Economic Development, Enterprise, and Employment	Object	Category C Strategic Policy 7: Economic Development, Enterprise, and Employment – clarity on the strategy for telecommunications Whilst the importance of telecommunications and associated infrastructure is recognised in the plan, the Plan does not set out a strategy for engaging with mobile operators to identify areas of		Accepted. In preparing the LDP the Council has consulted the telecommunications operators and providers and no representations have been made on the Plan. Nevertheless, the Council notes the representation and welcome the guidance on the need for a telecommunications policy. If the Inspector considers that the introduction of a telecommunications policy is necessary then

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			poor or no coverage, or develop criteria based policies to guide mobile infrastructure development or location. A strategy for the development of mobile telecommunications (including mobile broadband) is important to support changing working and personal patterns of movement; technology provides opportunities to travel less both in and out of work with subsequent benefits for sustainability and climate change.		the Council would suggest the following wording: Telecommunications and Digital Technology Infrastructure Proposals for telecommunications and digital technology infrastructure will be assessed in the context of technical and operational requirements and permitted where: i. The development contributes towards the objectives of future proofing development and regeneration proposals or forms part of the planned development of a wider network; ii. The development incorporates all reasonable measures to minimise any significant adverse impact due to the siting and external appearance of the apparatus, and the design minimises impact caused by its visual appearance; iii. There would be no significant adverse effect on natural heritage, the historic environment, or amenity of neighbouring residents; iv. The application is accompanied by evidence of compliance with Government guidelines on health impacts of telecommunications infrastructure. 'Facilitating digital communications is key to Flintshire's plans to accelerate growth in the

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					County in the context of the Growth Deal which recognizes the need to 'Upgrade digital networks and infrastructure access the region to support the functionality, competitiveness and growth of the indigenous business sector..'.. Modern, fast, affordable and secure telecommunications and future proofed digital connectivity infrastructure can stimulate business innovation, enable high-value economic activity and drive-up productivity. For residents, it can transform their communications, home computing, on-line shopping, entertainment facilities, as well as enable effective home working. The potential benefits that telecommunications and digital communications can offer individuals and organisations are recognised, for example in terms of working from home, which can assist in creating a sustainable future by reducing the need to travel. Telecommunication facilities may have special needs and technical considerations, which require them to be installed in particular locations to work effectively. However in sensitive locations the erection of telecommunication towers and antennae can have a significant adverse effect on the quality of the urban and rural environment. Clear guidance with respect to the development of telecoms infrastructure is contained within section 5.2 of PPW10 and TAN19 Telecommunications, which is not repeated in this policy. Applications for telecoms and digital infrastructure developments will

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					therefore be assessed against National Planning Policy and Guidance. In accordance with national planning policy, the Council encourages operators to share telecoms masts. Operators will be required to submit evidence that opportunities for mast sharing and alternative sites have been fully explored. Careful siting, design and disguise, including landscaping and screening, can make developments less obtrusive and enable them to blend in with their surroundings'.
827	STR8: Employment Land Provision	Support	Paragraph 14.17 (Policy STR8 para 6.17) Paragraph 14.7 (6.17)of the Deposit Plan states: "Employment development in rural areas can make rural communities more sustainable by providing jobs closer to where people live, reducing the distance people travel for their work, and stemming the loss of economic activity from rural areas. The locational requirements of businesses may also be very specific but opportunities should exist through the LDP for other forms of employment and economic activity such as tourism, leisure, services and facilities, and agriculture related." Bourne Leisure endorses the Council's recognition at Paragraph 14.17 (6.17) that opportunities that opportunities should exist through the Plan for employment and economic activity related to tourism, leisure, services and facilities. It is vital for tourism development to have in-principle policy support as		The representation is noted and the council welcomes the support for policy STR8, Employment Land Provisions.

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			tourist accommodation, such as Presthaven Holiday Park, require continual investment for maintenance and enhancement so that it can continue to attract the large number of visitors who already help support the local economy through related employment, investment and visitor spending. Paragraph 14.17 of the emerging LDP is consistent with paragraph 5.5.6 of PPW which states that: “Planning authorities should provide a framework for maintaining and developing well-located, well designed and good quality tourism facilities. They should consider the scale and broad distribution of existing and proposed tourist attractions and enable complementary developments such as accommodation…”.		
888	STR8: Employment Land Provision	Object	PGNGL is concerned that Policy STR8 is not clear enough in relation to the allocation STR3. PGNGL supports the aims and objectives of STR8, in particular it supports the commitment to deliver employment at the strategic Allocation STR3. STR3A is identified and an Employment Led Mixed Use Allocation within Policy STR3A. PGNGL is concerned that the mixed use nature of this allocation is not referred to within STR8 and this has the potential to provide uncertainty and lack clarity when applying the provisions of STR8. 6.4. Policy STR8	PGNGL is concerned that Policy STR8 is not clear enough in relation to the allocation STR3.	Not accepted. Northern Gateway is specifically addressed by policy STR3A and is also mentioned in PE1 which lists employment allocations and HN1 which lists housing allocations. Policy STR8 is intended to provide broad strategic guidance on the provision of employment land and is not intended to be site specific. When read as a whole, the Plan is considered to provide appropriate reference to and explanation of the importance of the Northern Gateway site without the need for it to be referenced in policy STR8.

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			criterion iv seeks to safeguard existing employment sites and premises. As indicated earlier, in relation to Policy STR3, PGNGL are concerned that the Proposals Map includes land at John Summers Buildings and Grounds within Principal Employment Area PE2.11. This is not consistent with Allocation STR3A or the extant outline consent (application ref: 050125) and the opportunity for a hotel or community uses at this location. PGNGL maintain that this area of land and buildings should be within STR3A. Further, PGNGL support the need to safeguard employment sites and premises, where they are demonstrated to provide an important role in meeting future economic needs. However, PGNGL are concerned that the explanatory text does not provide sufficient flexibility over the plan period. The explanatory text does not recognise the role of some non B class uses in supporting the overall function of an employment area and its overall sustainability, and as such places unduly onerous requirements through policy PE6, Proposed Change 6.8. To overcome the objection and address soundness matters, the Council should: • PGNGL consider that Criterion iii should be reworded to reference the strategic 'employment led mixed use development at STR3A', in order to provide greater clarity with		The John Summers listed buildings and associated land clearly fall within the boundary of the outline planning permission for the southern half of the Northern Gateway site. Policy STR3A also references in criteria 'x' the need to secure sensitive re-use of the listed buildings and grounds. In this context there is clearly a mapping error on the proposals maps whereby the boundary of the strategic site allocation would have been extended to include the listed buildings and the boundary of the Principal Employment Area to be drawn back to the edge of the railway line. It is requested that the Inspector agrees to this as a mapping change to be addressed in the final version of the proposals maps. The specific guidance in STR3A provides for an appropriate mix of development at Northern Gateway and it is not considered necessary for either STR8 to provide further clarification on other uses within employment sites as this is set out in policy PE6. In response to the objectors requested changes it is considered:

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			regards to the overall nature of the strategic allocation. • The Proposals Map should be amended to include John Summers buildings and grounds within STR3A. • Amend the Explanatory text to explain the circumstances where and what type of alternative uses will be supported.		i) Not necessary for criteria iii to be amended when the strategic sites are referenced elsewhere in the Plan ii) The proposals maps can be amended to show the core boundary of the Northern Gateway strategic site allocation and the Principal Employment Area The protection of employment land and acceptability of other uses is addressed in policy PE6
938	STR8: Employment Land Provision	Object	We consider that the policy must make provision for new employment on sites that are currently outside of the settlement boundary to facilitate expansion of existing enterprises that happen to be located inside the settlement boundary. As it stands the policy only allows development (through re-use of suitable buildings and land) which is a little vague and unclear.	We consider that the policy must make provision for new employment on sites that are currently outside of the settlement boundary to facilitate expansion of existing enterprises that happen to be located inside the settlement boundary. As it stands the policy only allows development (through re-use of suitable buildings and land) which is	Not accepted. The representation is noted and the council does not agree that any change is necessary to the wording. Policy STR8 seeks to provide general strategic advice on the provision of employment and is not intended to cover all eventualities as it is supported by a suite of more detailed Development Management Policies. Policy PE5 provides guidance on the expansion of existing employment enterprises and policy PE3 permits employment development outside settlement boundaries subject to satisfying certain criteria. Clearly, the Plan needs to be read as a whole and it is evident that there is policy to provision to consider the expansion needs of existing businesses.

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				a little vague and unclear.	
999	STR8: Employment Land Provision	Object	Policy STR8 – provides for a strategic and local supply of employment land. Paragraph 6.13 promotes wider regional growth and ambition beyond Employment Land Review estimates and paragraph 6.14 states there is only a need for 28.5 ha based on historic take up. There seems to be a significant oversupply of employment land, but the explanation suggests this is required for regional growth (rather than specific to Flintshire). Is this referring to the North Wales regional growth, or does it include cross boundary Mersey Dee Alliance and the Cheshire West and Chester area?	Clearer policy: There seems to be a significant oversupply of employment land, but the explanation suggests this is required for regional growth (rather than specific to Flintshire). Is this referring to the North Wales regional growth, or does it include cross boundary Mersey Dee Alliance and the Cheshire West and Chester area?	Not accepted. The representation has been noted and it is considered that an appropriate level of employment land has been allocated within the County to identify the Growth needs over the plan period in accordance with the findings contained within the ELR. Typically, development plans in Flintshire have provided an oversupply of employment land to ensure a sufficient choice in terms of location, size and type of site, to meet the need of different commercial operators. The Plan allocates a greater amount of employment land than would be strictly required as a result of previous take up rates. This is to reflect the positive growth strategy within the Plan and its contribution to achieving wider regional growth. It is also in recognition that Flintshire's portfolio of employment land and sites is well established with a choice of development opportunities where the Employment Land Review has not identified suitable alternative uses for these sites and has not recommended deletion of them. This portfolio of employment sites is therefore sufficiently flexible to facilitate the Plans job growth figure without the need for large scale new employment allocations or the expectation that all of the Plans employment will be taken up.

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1170	STR8: Employment Land Provision	Object	Employment Growth Strategy Details on the Council's employment growth strategy are set out in Section 3 of the Deposit Plan. The evidence base to inform the employment strategy is the 2015 Employment Land Review, which has not been updated since. This previous Review has assessed the employment land and premises in Flintshire; in doing so, no sites were considered to warrant de-allocation or allocation for alternative uses such as housing; this is confirmed in paragraph 3.52 of the Deposit Plan. Accordingly, the housing needs of the County need to be met by other sources of land supply. It is noted that two strategic sites are identified for release through the LDP; these comprise the Northern Gateway at Deeside, and Warren Hall in Broughton, both of which will support employment uses. Paragraph 3.51 of the Deposit Plan refers to the fact that the jobs target of 8,000 – 10,000 jobs is ambitious in the context of job projection scenarios which have been prepared on behalf of the Council. Our Client welcomes the jobs targets, which reflects the role that Flintshire has to play as a sub-regional economic hub and a leading contributor to the Welsh economy as a whole. It is however imperative that sufficient employment land and premises are made available during the Plan period to retain and attract investment into the		Not accepted. The representation has been noted and it is considered that sufficient employment land has been allocated within the County to identify the Growth needs over the plan period in accordance with the recommendation contained within the ELR. The Employment Land Review 2015 has analysed employment land and premises demand, supply and need to 2030. ELR's should be updated every five years and therefore the current ELR is in date. This is reinforced by the fact that the ELR has been supplemented by further work from the same specialist consultants, namely the Flintshire Further Employment Growth Scenarios Oct 2015 and the Employment and Housing Advice April 2019. The Plan contains two strategic sites, the employment allocations in PE1 and additional flexibility provided by the principal Employment Areas in PE2 and a flexible policy approach. This should provide for sufficient choice of location, type and size of site to meet the needs of commercial operators. Along with the employment allocations the Plan has sought to make positive provision for housing including a healthy 14% flexibility and this includes numerous housing allocations that are supported by an Infrastructure Plan. With regards to meeting different housing needs, Policy HN2, paragraph 11.6 states "To ensure that mixed and balanced communities are

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			County. This will require a mix of employment sites and premises to meet the commercial needs of developers/operators. At the same time, it will be essential that new infrastructure is provided to support the planned jobs growth. This includes new housing provision around the County, delivering a mix of affordable, family and aspirational housing for workers such that they can access their own home at a price which is within their financial means and affordability bracket.		created the Council will expect developers to provide an appropriate mix of dwelling size and type to meet local housing needs, making reference to the evidence within the latest Local Housing Market Assessment and avoiding residential schemes that are dominated by larger properties with four or more bedrooms" This will ensure developments achieve a good mix of property type and sizes to cater for all needs and demands. Policy HN3 will also seek to ensure affordable housing is provided.
297	STR9: Retail Centres and Development	Object	The "town centres first" policy is very much supported and this objection is more to do with the fact that the policy is not pro-active enough. Having policies which "support the delivery of...." will not bring about the necessary flexibility, drive and commitment which is needed if the county's town centres are to either retain, or achieve, vibrancy and vitality. The policy must be more specific and determined in being committed to master plans and action plans and using planning mechanisms such as its compulsory purchase powers to assemble land which have vacant or underused buildings to bring in a range of compatible new uses to the centres and the fringes recognising that it might not be just about retail.	Need a firm commitment to producing a programme of action plans which will include land assembly using appropriate planning powers to bring about change.	Not accepted. Policy STR9 is a strategic policy which is signposted to other more detailed Development management Policies. It sets out a strategy of seeking to support town, district and local centres through an appropriate set of planning policies. The third para of the policy wording specifically references health checks, masterplans and action plans. These initiatives can be pursued by the Councils Economic Development Team within the policy framework set by the LDP and it is not considered necessary or appropriate for the LDP to try to set out the detailed strategy and programme for each town centre as this will change over time. The Council has given consideration to the use of CPO powers to buy up land and buildings in order to facilitate town centre regeneration projects. It remains a course of action that could be utilized subject to

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					availability of finance. It would be inappropriate for the Plan to commit the Council to such actions, as they are more appropriately considered outside of the Plan making process.
796	STR9: Retail Centres and Development	Object	The British Land Company PLC objects to the failure of the Deposit Plan to suitably allocate land to accommodate identified comparison retail need in Flintshire County Borough. The Flintshire Retail Study identifies a net sales need of 508 sqm over the plan period to 2030 and states: "… the Council should plan for a small amount of comparison retail floorspace in the long term" (para 5.28). The assessment of comparison retail need is considered to be flawed on the basis that it incorporates planning permission ref: 49292, relating to 4,355 sqm gross floorspace (3,520 sqm net) at Saltney Retail Park as "committed floorspace". As confirmed by Flintshire County Council, no submissions have been made in respect of the pre-commencement conditions and as such, the planning permission therefore cannot have been lawfully implemented. As the permission has not been renewed by way of Section 73 application, the permission is understood to have lapsed in December 2018. In view of	The Flintshire Retail Study identifies a net sales need of 508 sqm over the plan period to 2030 and states: "… the Council should plan for a small amount of comparison retail floorspace in the long term" (para 5.28). The assessment of comparison retail need is considered to be flawed on the basis that it incorporates planning permission ref: 49292, relating to 4,355 sqm gross floorspace (3,520	Not accepted. The Retail Study clearly references in para 6.6 (first bullet point) a monitoring and review process including the 'implementation of existing retail commitments' and recognises that 'non-implementation of commitments or the expiry of existing planning permissions will release additional capacity'. The implications of the expiry of the Saltney Retail Park planning permission will increase the overall Plan period requirement from 508sqm (new sales) to 4028sqm (net sales). The UDP made six retail / commercial allocations and only one of these has been implemented. This demonstrates the difficulty in allocating relatively small sites across a large number of centres, which could serve to prevent other sites coming forward. Given the number of centres it is still the Council's belief, even with an increased comparison floorspace need, that a flexible approach which allows the market to bring forward sites or sites to be identified through regeneration activities, is appropriate for the County.

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			the above, the permission can no longer be considered as a "commitment" and therefore should be removed from the calculation of retail need. As a result, the estimated comparison retail need figure in 2022 is considered to increase by 3,520 sqm net sales (£17.16m PCA Turnover). As a result, this takes the comparison net sales need figure from -1,767 sqm to +1,753 sqm in 2022 and from +508 sqm to +4,028 sqm in 2030.	sqm net) at Saltney Retail Park as "committed floorspace". As confirmed by Flintshire County Council, no submissions have been made in respect of the pre-commencement conditions and as such, the planning permission therefore cannot have been lawfully implemented. As the permission has not been renewed by way of Section 73 application, the permission is understood to have lapsed in December 2018. In view of the above, the permission can no longer be considered as a	

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				"commitment" and therefore should be removed from the calculation of retail need.	
1022	STR9: Retail Centres and Development	Support	Town Centre policy It is noted the previous stages of the LDP included the intention to declare Broughton Retail Park a 'town centre' whereby unrestricted retail and leisure development could take place, and in response Cheshire West and Chester was concerned to understand the potential impact on town centres in Cheshire West and in particular, on regeneration proposals in Chester City centre. Therefore, the Council is pleased to see, and supports the approach set out in paragraph 6.23 that Broughton Shopping Park will remain outside of the retail hierarchy.		Support is noted. The Council sought views on the status of Broughton Shopping Park by including it within the retail hierarchy in the Preferred Strategy. However, in the light of the findings of the Retail Study it was reconsidered and left outside the retail hierarchy comprising traditional town, district and local centres, and left as a sub-regional shopping centre.

Policies STR10 to STR16

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
12	STR10: Tourism, Culture, and Leisure	Support	The Greenfield Valley Trust welcomes policy STR10 with its support for sustainable tourism development capitalizing on existing assets such as the Greenfield Valley.		The Council has noted and welcomes the support for Policy STR10 Tourism Culture, and leisure.
349	STR10: Tourism, Culture, and Leisure	Support	We are supportive of the principle of this policy but we consider it to be too focused on the Tourism and Leisure elements with little on Culture. Flintshire is home to Theatr Clywd which is a major producing theatre and an important cultural facility for the surrounding area. We suggest the policy wording is amended to give explicit support to the theatre along with other cultural venues by including culture throughout the policy and supporting text. For example: Supporting new and extended tourism, LEISURE AND CULTURAL development which is appropriate to its location and enhances the existing offer within Flintshire;	Stronger reference and support for cultural venues as described above, in particular Theatr Clywd.	The Council has noted and welcomes the support for Policy STR10 Tourism Culture, and Leisure. The council welcomes the suggested wording alteration. If the Inspector considers that the wording of the policy could be improved to clarify that it seeks to protect from development rather than promote development, the Council would have no objection.
802	STR10: Tourism, Culture, and Leisure	Object	The British Land Company PLC object to the current wording of Policy STR10 on the basis that the policy wording should remain consistent with the policy title and specifically refer to “i. supporting	the policy wording should remain consistent with the policy title and specifically refer to “i. supporting new	The council has noted the representation and welcomes the suggestion. If the Inspector considers that the wording of the policy could be improved to clarify that it seeks to protect from development rather than promote

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			new and extended tourism, culture and leisure development which is appropriate to its location…".	and extended tourism, culture and leisure development which is appropriate to its location…".	development, the Council would have no objection.
830	STR10: Tourism, Culture, and Leisure	Support	Policy STR10 (Tourism, Culture and Leisure) Policy STR10 of the Deposit Plan states: "The intrinsic appeal of Flintshire's natural and built environment makes the County an attractive destination for sustainable tourism development. Development that capitalizes on these assets and creates a year round broad appeal will be supported. Particular emphasis will be placed on: … v. Enabling a range and choice of tourism accommodation to meet a variety of needs from short visit to long stay." Pg 4/14 17958241v6 Bourne Leisure endorses the Council's approach in supporting year round tourism and its flexibility in the development of a range of tourism accommodation to meet varying visitor needs. This emphasis is important to the effective delivery of emerging Objective 14 given the contribution that tourism makes to the local economy and to Flintshire as a whole. Providing Flintshire with an opportunity and support to extend the tourist season will have		The Council has noted and welcomes the support for Policy STR10 Tourism Culture, and Leisure.

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			significant social and economic benefits to the residents of the County. Draft Policy STR 10 is consistent with PPW which states that tourism is "…vital to economic prosperity and job creation in many parts of Wales" (paragraph 5.5.1) and that "the planning system encourages tourism where it contributes to economic development, conservation, rural diversification, urban regeneration and social inclusion, while recognising the needs of visitors and those of local communities…" (paragraph 5.5.2).		
1065	STR10: Tourism, Culture, and Leisure	Object	STR10: Tourism, Culture and Leisure – with regards to promoting accessibility to Flintshire's landscape we advise recognition that this must be done in tandem with sensitive management (noted in 6.28 but could be in STR10).	we advise recognition that this must be done in tandem with sensitive management (noted in 6.28 but could be in STR10).	Noted. The council acknowledges the representation. However, as the Plan is meant to be read as a whole as policies interlink, the Council disagrees with this Representation and believes that the current wording of Policy STR10 (and associated policies) is sufficient. The proposed additional information is noted in 6.28 and within part (iv) which reads: *'Conserving and enhancing Flintshire's natural, built and cultural heritage;'*
25	STR11: Provision of Sustainable Housing Sites	Object	This strategic policy fails to address the knock on impact of the drive for more affordable housing (or any other type of housing) increase on the scale proposed by FCC. The impact is one on the	This strategic policy fails to address the knock on impact of the drive for more affordable housing (or any other type of	Not accepted. The LDP and all site allocations within it are informed by a robust evidence base. Gathering this evidence base involves consultation with statutory consultees including education, health, highways and utility companies to identify if the site would be

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			schools, doctors and infrastructure in the proposed areas of development. the local schools (that any responsible parent would want there child attending) are massively over subscribed with no plan by FCC to build to address this problem. Likewise with local doctors surgeries and the support network which again is over subscribed or push to breaking point. Turning to the local infrastructure - no provision is made for these improvement, FCC seem to adopt the view that this is not an issue, but obviously they have not conducted the appropriate due diligence to understand the impact that new housing on the scale being proposed will have on the local area...	housing) increase on the scale proposed by FCC. The impact is one on the schools, doctors and infrastructure in the proposed areas of development.	suitable and sustainable to develop, and what the impact the development would have on each service/facility. For instance, Betsi Cadwaladr University Health Board are a Member of the Key Stakeholder Forum which met during the earlier engagement phases of the Plans preparation. All of the sites allocated within the plan have been through this rigorous process and statutory consultees have not identified any major constraints that would prevent a site from being developed sustainably. In addition to this, an Integrated Impact Assessment (IIA) has been conducted by an independent specialist to assess the Plan and allocated sites, to ensure they are sustainable. It must be stressed that the Plans new allocations will not deliver completed houses until 2023-24 and will be developed over a number of years. The impact of development will therefore not be felt in ‘one hit’ and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is no formal objection from either statutory body to the Plan nor allocation. No objection to the Plan or allocations has been made by the Local Education Authority. The commentary of the Wrexham LDP Inspector referenced in detail above, establishes that it is normal practice for new development to address capacity issues

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					through developer contributions. The new allocations will not deliver completed houses until 2023-24 and will take several years for the development to be completed. The impact on infrastructure will therefore be gradual and will not be in 'one hit'. This gives the Local Education Authority time to address how the growth in the Plan can be accommodated in terms of school capacity. The Planning Service continues to work with the LEA to secure appropriate mitigation for the delivery of planned LDP sites. No objection to the Plan or allocation has been made by Betsi Cadwaladr University Health Board. Flintshire has a number of relatively new Primary Health Care Centres and the issue is one of lack of sufficient staff including GPs, rather than a lack of facilities as also commented on by the Wrexham LDP Inspector above. As stated in the preceding paragraph in relation to education capacity, there is ample time for the Health Board to plan for how it intends to meet the health care needs of the Plan's growth levels. The Council continues to work with the Health Board in securing the appropriate provision of infrastructure such as health for the delivery of LDP sites.
40	STR11: Provision of Sustainable Housing Sites	Object	Policy STR2.The settlement hierarchy does not allow sufficient flexibility for the even distribution of new development across the County which is primarily being directed to the eastern half. The	The settlement boundary in Trelawnyd should be changed to include part of site TLD001 and policies STR2,	Not accepted. The LDP does not seek to apportion development spatially in an even manner across the County. Rather, it seeks to distribute growth towards the most sustainable settlements and sites in accordance with the settlement hierarchy which is embodied in

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			rigidity of the settlement hierarchy definitions mitigates against a more balanced distribution of housing development. As there are more Tier 3 and 4 settlements in the west there should be more allocations or settlement boundary changes to compensate for this uneven distribution where this would not create harm. STR11.Following from the above the amount of new housing opportunities in Tier 3 and 4 villages will be very limited and especially in the west. It is very likely that criteria vi of this policy will not be met as the opportunities for cross subsidy from windfall sites in small villages with restrictive settlement boundaries will be limited and so small as to make schemes unviable.	STR11 and HN1 amended accordingly to allow more flexibility of housing opportunities in Tier 3 and 4 settlements especially in the west of the County.	policy STR2. This means that every settlement in every tier does not need to accommodate new residential allocations, instead growth is predominantly directed towards the higher tier settlements (main and local service centres and sustainable settlements) where there is greater access to services and facilities. Tier 4 and 5 (Defined Villages and Undefined Villages) will see a smaller proportion of growth due to the size and function of these settlements within the settlement hierarchy. It would be unsustainable to direct a larger proportion of growth into these areas ahead of the Tier 1, 2 and settlements. STR2 still enables residential development within tier 4 and 5 settlements, but on a scale that is appropriate for the character and role of these settlements, and with a focus on delivering local needs housing. Trelawnyd is a Tier 4 Defined village, therefore can accommodate small scale residential development to meet proven local needs, either on windfall sites within the settlement boundary or small scale exception schemes on the edge of a settlement boundary. In the case of windfall sites within the settlement boundaries, market dwellings may be permitted where essential to subsidise the delivery of affordable housing on site. Although it is acknowledged that the new allocations are in the eastern half of the County, it must be stressed that the Plans housing supply comprises more than just new

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					allocations. The Housing Balance Sheet comprises completions that have already taken pace in the first 4 years of the Plan period, housing commitments that have a valid planning permission at present and allowances for small site and large site windfalls. As part of this wider housing supply there will be scope for housing in the western part of the County. The settlement of Trelawnyd has a relatively compact shape with development to the north and south of the A5151 London Rd. The southern part of the settlement features a conservation area and to the west and north of the settlement is the Clwydian Range and Dee Valley AONB. The candidate site promoted by the objector adjoins the western edge of the settlement on the south side of the road and forms part of the designated AONB. This is a statutory landscape of national significance where PPW states 'National Parks and AONBs are of equal status in terms of landscape and scenic beauty, and must both be afforded the highest status of protection from inappropriate developments'. There is a firm and defensible edge to existing built development and the site forms an integral part of the wider agricultural landscape which affords far reaching views across the AONB. Development on the site would harm the character and appearance of the locality. Land on the eastern edge of the settlement on the north side of London Rd offers scope for an affordable housing exceptions scheme where there would be no harm to the AONB.

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					The objector seeks revisions to policy STR11 to allow more scope for housing in tier 3 and 4 settlements in the West of the County, and specifically site TLD001 in Trelawnyd. As set out above TLD001 is not considered appropriate for allocation in policy HN1.
159	STR11: Provision of Sustainable Housing Sites	Object	STR11 The policy indicates that the availability of housing land will be monitored over the plan period to ensure a continuous and adequate supply to enable the delivery of the overall housing requirement. However, the policy contains no mechanism for bringing forward alternative sites should the Plan fail to deliver. The monitoring section (Section 13) indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of deliverable sites for housing. Where this cannot be met	The monitoring section (Section 13) indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. Need to identify contingency sites to be brought forward if the plan fails to deliver.	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply and Welsh Government in their formal comments on the plan have no concerns about the housing growth provided. If TAN1 is revoked then this will have knock on effects for the Plan and particularly the monitoring arrangements. The monitoring indicators have been drafted in the light of guidance in Welsh Government Development Plans Manual 3. At present there is no Welsh Government requirement for the Plan to have

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			there must be a mechanism in place to allow this to be achieved. Simply monitoring and further investigation will not achieve this and will therefore fail to meet soundness Test 2 in that the Plan will not seek to meet assessed needs. The Council's LDP 10 (Background Paper on Housing Land Supply and Delivery) sets out at paragraph 3.0.1 that "the delivery of the housing supply and the maintenance of a 5 year housing land supply throughout the plan period are essential to the achievement of the Plan's aims". As delivery of the 5 year housing land supply is central to the Plan's aims it is crucial that the Plan has a system in place for bringing forward alternative sites should the housing land supply fall short. The identification of contingency sites which could be brought forward in such circumstances would be an appropriate response. However, the current Plan does not identify contingency sites and will therefore lead to planning by appeal should the housing land supply figure fall below 5 years. It is of note that this is exactly what happened in relation to the UDP. Failure to have a mechanism in place within the Plan (such as identification of contingency sites) would lead to		contingency sites. If Welsh Government issue revised guidance then this will be considered in the run up to and at examination.

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			planning by appeal in the latter stages of the Plan (which was precisely the situation which arose as a result of under delivery of the previous UDP). Without such a mechanism the Plan will fail to meet Test 2 set out in Background Paper 2 on Soundness in that it will not provide appropriate mechanisms to seek to meet assessed needs. Neither will it meet Test 3 in that the Plan would not be sufficiently flexible to deliver housing needs.		
250	STR11: Provision of Sustainable Housing Sites	Object	Objection 5: Housing targets in the plan need to be adjusted again to reflect better information from WG about the outlook for future dwellings requirements Recently, the Welsh Government has significantly scaled down the projected number of homes needed by 2038, given the number of completions already made (see p 51 of the Draft National Development Plan). The Draft NDP now states that around 19400 houses are required over 10 years in total in the counties of Conwy, Denbighshire, Flintshire, Gwynedd, Anglesey, Snowdonia and Wrexham. Most of these 19400 houses are already identified and sitting “in the bank” as committed sites awaiting action. This is yet	Revise and lower the housing targets Remove site H1.6 as it is land of last resort for development purposes under PPW and not needed if housing target is made more realistic and less aspirational.	Not accepted. PPW10 states that the latest Welsh Government Local Authority level household projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) form a fundamental part of the evidence base for development plans. These two pieces of evidence have formed the starting point for calculating the housing targets within the LDP, further considerations need to be taken into account including the appropriateness of the projections for the individual local authority area and any other relevant evidence. Population and Household projections are based upon past trends. Therefore the global economic crisis in 2008 has resulted in lower household projections as new households have not been able to afford to move out of their family home etc.

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			another indication that there is currently no overwhelming pressure to develop on greenfield sites and to sacrifice BMV agricultural land. Stats Wales shows that the unrounded figure is 19447, using the Central Estimate Variant. If we remove the data for the last 8 years to 2038 and simply use the first 12 years (to fit in with the Flintshire Deposit LDP period) this gives a figure of 15175 across North Wales. Per annum, this would mean 1265 dwellings across the six counties of North Wales. Flintshire is roughly 22% of North Wales according to Stats Wales data, indicating roughly 278 dwellings for Flintshire based on official WG data. The paper "Indicative Impacts of 2017 projections" has Table 1 comparing nine different scenarios/projections, using WG data; the annual average dwellings requirement calculated for each scenario is 340, 270, 270, 260, 290, 320, 240, 250 and 410. The scenario average is 294. The gap between WG figures and FCC's projections is significant because the Deposit LDP suggests that there is "need" for 500+ p.a. dwellings in Flintshire alone. FCC's figures are not about housing "need" as such, just non-		In April 2014 Welsh Government wrote to all Local Authorities in Wales advising caution when projecting forward low household projections as this would not deliver the growth needed to meet current and future housing needs. In this letter Welsh Government emphasised the importance of not relying solely on Welsh Government projections, highlighting the need to consider all sources of data. The LDP is focused on promoting and enhancing Flintshire's role as an economic hub and is a driver for growth both locally and regionally. Therefore the strategy of the LDP is focused on supporting economic growth and the need to secure continued economic recovery and resilience. This ambitious approach to economic growth and the housing needs identified by the evidence base has directly informed the growth option chosen for the LDP. Welsh Government have not raised any objections to the growth level within the plan. In January 2020 Welsh Government published a series of explanatory notes on the NDF, including a note on housing need. This states that "The national and regional estimates do not reflect the impact of future policies or events and are not a Housing Requirement for Wales or the Regions. However, the estimates do provide part of the evidence and context on which Housing Requirements can be based. While it is expected that there will be a clear alignment between the estimates of housing need and the Housing Requirements set out in LDPs and SDPs, they are not the same and

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			guaranteed jobs. Furthermore, the Welsh Government has recently stated that the 5 year housing supply rule is revoked, so FCC's targets do not need to be set so high. Not compliant with PPW paragraph 1.21.27 Deposit LDP Para 5.9 FCC have chosen to ignore Welsh Govt data and to press on with jobs/housing targets that are too high to be supported within Flintshire given population, migration and demographic trends Para 7.9 & 7.15 the Welsh Govt no longer requires a 5 year supply so putting forward site H1.6 (agricultural land) is comletely inappropriate and unnecessary.		therefore are not expected to match" As stated above The Council need to consider a wider evidence base to determine the housing requirement within the LDP, and it would be contrary to Welsh Government advice to simply revise the LDPs housing requirement in line with the NDF and projections data. That said in their formal comments on the plan Welsh Government state they have no comments regarding the level of homes and jobs proposed and also consider the LDP to be in broad conformity with the NDF.
405	STR11: Provision of Sustainable Housing Sites	Object	The HBF suggests that the final paragraph of the policy is not required as it does not add anything to the policy as it does not provide anything that a developer would need to comply with.	Remove the final paragraph of the policy, which can be included in the supporting text if required, although this is covered by national policy.	Noted. Policy STR11 seeks to set the scene in terms of establishing planning principles to be delivered as part of housing allocations and windfall sites. The last part of the policy wording is merely setting out that the Plan will seek to achieve a 5 year housing land supply and that this will be monitored. If TAN1 is revoked then it may be necessary for this section of the policy as well as the monitoring arrangements to be revisited. However, until guidance is issued by Welsh Government it is not possible to do this.
327	STR11: Provision of Sustainable Housing Sites	Object	One of the key objectives of the Planning System in Wales as descibed in Planning Policy Wales is to identify a supply of land to	A reduction in the reliance on small and windfall site in favour of the allocation of	Not accepted. The Council does not accept that too much reliance is placed on the contribution of large and small windfall sites in the LDP housing land supply. BP10 (section

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			support the delivery of the housing requirement to meet the differing needs of communities across all tenures, this requirement is expressed in mandatory terms. Whilst National policy envisgaes that the use of criteria based policies for the release of site is a possibility the preference is to identify site and allocate those areas of land which are deliverable. In our view the plan places too much emphasis upon the deliverey on small and windfall. We are of the view that the council have failed to identify suffoicient land that is e free, or readily freed, from planning, physical and ownership constraints, and economically viable in order to support the creation of sustainable communities. We are aware of land which has been assessed during the course of the plan perparation process was considered to be suitable (Green) for development as part of the assessment of Candidate Sites. Appendix 1 of the plan should be revised to idenfty land at Halfway Field	sites including the Halfway Field Carmel Site	2.5) explains that an analysis of past trends has been carried out and this is detailed in Section 4.3 of the Flintshire Urban Capacity Study (June 2019) undertaken by Arcadis. This approach accords with the latest National guidance as contained in Development Plans Manual Edition 3: Consultation Draft (June2019). The Draft Manual advises (para. 5.63) that 'an urban capacity study can inform the identification of site allocations and assist to demonstrate delivery of windfall allowance in the Plan'. Both the Arcadis Study and BP10 explain that large and small windfall site contributions used in the Plan are significantly lower than the level of past completions achieved from these sources. It is also the case that the representative body of the development industry, the HBF, agree that the allowances are appropriate. The objector has mis-interpreted the candidate site colour coding where green did not signify suitability for development, but was a more general assessment of potential compliance with the Preferred Strategy. Halfway Field at Carmel (CAR001) has been assessed as a candidate site but was not considered suitable for allocation within the plan for the following reasons: (BP8) Whilst Carmel is identified as a Sustainable Village the site relates poorly to the main built form of the settlement which

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					apart from development on Mertyn Lane is confined between the A5026 along the northern edge and Carmel Road along the southern edge of the settlement. The UDP Inspector considered that the development of the site would 'result in an unacceptable intrusion into the countryside which would be incongruous and poorly related to the built form of the settlement'. The site is better related to the open countryside to the west and beyond Golch Farm to the north. Development of the site would result in urban encroachment extending beyond a well-defined edge and is not considered suitable to be allocated.
360	STR11: Provision of Sustainable Housing Sites	Object	The Plan has no specific policy or proposal to meet the needs of housing for an ageing population and those with dementia. please refer to attached document. Please note that 2 other files are being forwarded separately by email direct to Planning Policy. Paragraph 7.16 refers to the need to provide for more specialist needs housing. It makes particular reference to the ageing population. However, apart from reference to the need for bungalows, other forms of housing suited to meeting the general housing needs of elderly residents, and more specialist forms of accommodation	Have a specific policy and proposal site for housing for the elderly, namely a retirement village on candidate site FLI008.	Not accepted. The Strategic Policies and Development Management Policies within the Meeting Housing Needs sections of the LDP are fully equipped to consider applications for specialist accommodation such as retirement housing for the elderly. Therefore it is not necessary to include a specific policy for this type of housing. Paragraph 11.6 of HN2 specifically recognises the need to provide housing to meet the needs of an ageing population stating “a significant part of this need is driven by the growing older population (65+), therefore the housing needs of older people should be reflected in residential development proposals, which could include the development of bungalows.” The objector also wrongly assumes that the

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			such as sheltered housing, it gives no further direction. The Plan contains no specific development management policy or proposal in the Plan to actually take this forward and meet the aims/outcomes of PPW and Well-being Act. The Plan fails to actively address these issues and has had no regard to the pressing evidence that has been emerging for the last 5 years and more.		sole responsibility and mechanisms to plan for the specialist needs of an aging population and those with dementia is the preserve of the LDP. In doing this the objector ignores other areas of Council policy and strategy related to housing and social care which specifically and successfully target such needs in a Flintshire context. A clear example of this is the Council's programme of extra care facilities. The extra care facility in Flint has a dementia specific element to it which is in a town centre location unlike the objection site.
362	STR11: Provision of Sustainable Housing Sites	Object	The housing requirement for Flintshire over the plan period is met through a mixture of commitments, completions to date, allowances for small sites/windfalls and allocations. Commitments are defined as "Sites where a planning permission exists, usually referred to in the context of housing and employment figures." The number of units included as commitments is 1,771 – more than a quarter of the housing requirement. Delivery of the housing requirement in the Plan is therefore heavily dependent on those sites which already benefit from planning permission. Given that high degree of dependence on commitments, they should be specifically allocated for housing in the Plan. This will		Not accepted. The Plans Housing Balance Sheet which supplements policy STR11 has base date of April 2018 which coincides with the findings of the April 2018 Housing Land Availability. Compared to the Plans requirement of 6,950 and total provision of 7,950 units, a commitments figure of 1,771 units is not considered to be excessive. The HBF has supported the Plans approach to commitments and there is no objection from Welsh Government to the effect that the Plan is over-reliant on commitments. The Plans Housing Balance Sheet represents the position as at April 2018. It would be wholly inappropriate and unnecessary for the Plan to allocate every commitment. The Plans approach is in line with Development Plans Manual 3 and there is no objection from Welsh Government. It is unclear whether the objector is taking a theoretical position or whether it is related to a specific site. The representation does not explain or help the Council to

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			provide certainty that, even if sites are not build out under their current planning permissions, the principle of housing development will still be acceptable and those sites can still contribute towards the supply of new homes later in the Plan period. If a site is suitable for new homes now, it will also be suitable later in the Plan period – the policies in the Plan should reflect this. This will also ensure that the Plan provides certainty for both the public and developers, as is required by PPW. Nowhere in the emerging plan is a distinction drawn between an allocation and a commitment; nowhere in PPW is a distinction drawn (or supported) between an allocation and a commitment. It is unclear why the emerging Plan intends to separate the sites in this way. The plan seemingly classifies sites differently based on whether or not they had planning permission at an arbitrary point in time – when the Plan was being prepared. Whilst it may be appropriate to identify which allocations already benefit from planning permission in order to support the deliverability of those sites, there is no need to treat them differently in policy terms. In		respond fully. If a committed site has planning permission which happens to lapse then it is i) necessary to consider the reasons why it lapsed and ii) determine any fresh planning application in the light of the present national and local planning policy context. It is making a sweeping assumption to adopt a stance that just because a site previously had planning permission that it will, as a matter of course, be granted planning permission again. The Plan is accompanied by a Glossary of Terms which explains what an 'allocation is' and what a 'commitment' is. The only sites recently granted planning permission, that have warranted a settlement boundary change are those speculative sites granted planning permission (either by the Council or on appeal) in the context of TAN1 and the [then] policy of attaching considerable weight to planning proposals which increased housing land supply. Given the context in which these speculative sites were i) submitted and ii) determined, it would be perverse for them not to deliver and expire.

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			fact, the contrary is true – there is every reason to treat allocations and commitments equally in policy terms. The settlement boundary has been amended in many places to accommodate the commitments, however, it is unclear what status these sites will have should the extant permissions expire. They will be within the settlement boundary and therefore Policy 17 will apply, however, they will not be allocated. To ensure that the Plan will effectively achieve its objective of delivering the homes that Flintshire needs, those housing sites which currently benefit from planning permission should be specifically allocated for development in the Plan.		
249	STR11: Provision of Sustainable Housing Sites	Object	The housing targets are based on FCC's ambitions/desires, not on underlying proven need According to Stats Wales, population in Flintshire is set to increase only slightly - 2811 more people in Flintshire up to 2030, then static for the following decade or so. The Welsh Government has produced two sets of data on population for Flintshire. Stats Wales shows that	Revise the targets in line with NDP and latest Welsh government data	Not accepted. PPW10 states that the latest Welsh Government Local Authority level household projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) form a fundamental part of the evidence base for development plans. These two pieces of evidence have formed the starting point for calculating the housing targets within the LDP, further considerations need to be taken into account including the appropriateness of the projections for the

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			the 2011-based calculation of the number of required dwellings in Flintshire gives the figure of 190 (average p.a.) and the equivalent for the WG's 2014-based calculation is 250. Flintshire CC's own "Technical paper: population and household projections with dwelling and employment impacts, November 2017" also predicts modest growth based on WG data (in Table 2.1). The FCC planners however have taken the view that both sets of WG data were "not felt to provide sufficient evidence to change the preferred strategy……. they remain at a very low baseline level for Flintshire and not one that would provide for a positive job growth related plan strategy which the Council has committed to." They then present their own ambitious preferred growth strategy that sets a target of 509 dwellings p.a. However, according to the Housing Land Monitoring Report of 2018, the annual completion rate over the first three years of the Plan period, 2015-2018 was already running well above target at 564, which should take pressure off the need to develop inappropriate sites such as H1.6. There is insufficient reasoned justification offered Not compliant with PPW paragraph		individual local authority area and any other relevant evidence. Population and Household projections are based upon past trends. Therefore the global economic crisis in 2008 has resulted in lower household projections as new households have not been able to afford to move out of their family home etc. In April 2014 Welsh Government wrote to all Local Authorities in Wales advising caution when projecting forward low household projections as this would not deliver the growth needed to meet current and future housing needs. In this letter Welsh Government emphasised the importance of not relying solely on Welsh Government projections, highlighting the need to consider all sources of data. The LDP is focused on promoting and enhancing Flintshire's role as an economic hub and is a driver for growth both locally and regionally. Therefore the strategy of the LDP is focused on supporting economic growth and the need to secure continued economic recovery and resilience. This ambitious approach to economic growth and the housing needs identified by the evidence base has directly informed the growth option chosen for the LDP. Welsh Government have not raised any objections to the growth level within the plan. In January 2020 Welsh Government published a series of explanatory notes on the NDF, including a note on housing need. This states

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			1.11, 1.19 Deposit LDP Para 5.8 Flintshire's aspirations are excessive given all the accumulated evidence showing difficult economic times ahead. Para 5.9 shows that FCC have chosen to ignore Welsh Govt data and to press on with jobs/housing targets that are too high to be supported within Flintshire given population, migration and demographic trends		that "The national and regional estimates do not reflect the impact of future policies or events and are not a Housing Requirement for Wales or the Regions. However, the estimates do provide part of the evidence and context on which Housing Requirements can be based. While it is expected that there will be a clear alignment between the estimates of housing need and the Housing Requirements set out in LDPs and SDPs, they are not the same and therefore are not expected to match" As stated above the Council need to consider a wider evidence base to determine the housing requirement within the LDP, and it would be contrary to Welsh Government advice to simply revise the LDPs housing requirement in line with the NDF and projections data. That said in their formal comments on the plan Welsh Government state they have no comments regarding the level of homes and jobs proposed and also consider the LDP to be in broad conformity with the NDF.
426	STR11: Provision of Sustainable Housing Sites	Support	Note the reference made in paragraph Para 7.9 of the consultation document will need revising prior to examination if the welsh assembly bring forward to proposed changes to revoke TAN1. Policy STR11 notes that housing land will be monitored and maintained over the plan period as part of the annual monitoring report. The monitoring of housing	Para 7.9 of the consultation document will need revising prior to examination if the welsh assembly bring forward to proposed changes to revoke TAN1.	Noted. The Council welcomes support for Policy STR11. Subject to the Welsh Governments findings on the recent consultation on TAN1, the Council would not object to the removal of references to TAN1 if the Inspector considers it relevant. This would also necessitate changes to the Plan's monitoring arrangements but until guidance is issued by Welsh Government it would be inappropriate to amend the Plan.

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			delivery and the trajectory will become of increasing importance if the Welsh Government proposals to revoke TAN1 are brought forward. Gladman believe that the housing trajectory should be considered in detail through the examination process.		
406	STR11: Provision of Sustainable Housing Sites	Object	The HBF contends that it's unreasonable for a policy to 'expect' developments to comply with criteria. Also, the current wording suggests that developments must meet all the criteria this is unlikely to be the case.	The policy wording should be amended to make it clear that development should attempt where possible or appropriate to comply and that it will not always be possible to meet all the criteria.	Not accepted. The aim of policy STR11 is to ensure the sustainable delivery of housing sites across Flintshire. Removing the sentence "The delivery of new housing on these sites will be expected to" would dilute the impact of this policy and limit the sustainability of new residential schemes. It is essential that this sentence remains to ensure applications meet these key sustainability criteria, which will result in the efficient development of land for housing purposes. This strategic policy seeks to set the scene in terms of some key planning principles in respect of ensuring sustainable housing sites. In the light of the objectors stance that the criteria set an 'unreasonably high bar', each of the criteria is considered in turn below: i) Affordable housing – the provision of affordable housing is a key priority of Welsh Government in PPW10. The Plan reflects this and the policy is signposted to a more detailed policy HN3 Affordable Housing. ii) Making most efficient use of land – a key planning principle, whatever the size of

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					development is to make the most efficient use of land through an appropriate density. iii) Securing a mix of housing on a site is also a well established principle. Clearly there will be some developments where this is not possible, but this will be the exception rather than the rule. iv) The requirement to provide for specific housing needs is caveated by term 'where appropriate' recognising this will not be applicable to every site. v) Making provision for infrastructure to mitigate the impacts of development is a well established planning principle and must be related in scale and kind to the development concerned. Making vi) The last criteria is explicitly only applicable to rural areas and not every site. Having looked at each criteria in turn and how they represent well established planning principles and good practice, it is unclear why the objector would not embrace them as part of planning residential developments rather than arguing that they are onerous and unreasonable, which is contrary to the principles of sustainable development.

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412	STR11: Provision of Sustainable Housing Sites	Support	supports the Councils approach to windfall sites and commitments as identified with the Housing Balance sheet and the level of flexibility proposed. also supports the spatial strategy and the mix of both larger and smaller sites proposed.		Noted. The Council welcomes the support of the Home Builders Federation for policy STR11 and in particular the Councils approach in the Housing Balance Sheet regarding windfalls, commitments and the level of flexibility.
591	STR11: Provision of Sustainable Housing Sites	Object	STR11 The policy indicates that the availability of housing land will be monitored over the plan period to ensure a continuous and adequate supply to enable the delivery of the overall housing requirement. However, the policy contains no mechanism for bringing forward alternative sites should the Plan fail to deliver. The monitoring section (Section 13) indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of deliverable sites for housing. Where this cannot be met there must be a mechanism in place to allow this to be achieved.	However, the policy contains no mechanism for bringing forward alternative sites should the Plan fail to deliver. Need to identify contingency sites to be brought forward if the plan fails to deliver.	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites., and there is presently no requirement in PPW10 or the Development Plan Manual to do so A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply and Welsh Government in their formal comments on the plan have no concerns about the housing growth provided. If TAN1 is revoked then this will have knock on effects for the Plan and particularly the monitoring arrangements. The monitoring indicators have been drafted in the light of guidance in Welsh Government Development Plans Manual 3. At present there is no Welsh Government requirement for the Plan to have contingency sites. If Welsh Government issue

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			Simply monitoring and further investigation will not achieve this and will therefore fail to meet soundness Test 2 in that the Plan will not seek to meet assessed needs. The Council's LDP 10 (Background Paper on Housing Land Supply and Delivery) sets out at paragraph 3.0.1 that "the delivery of the housing supply and the maintenance of a 5 year housing land supply throughout the plan period are essential to the achievement of the Plan's aims". As delivery of the 5 year housing land supply is central to the Plan's aims it is crucial that the Plan has a system in place for bringing forward alternative sites should the housing land supply fall short. The identification of contingency sites which could be brought forward in such circumstances would be an appropriate response. However, the current Plan does not identify contingency sites and will therefore lead to planning by appeal should the housing land supply figure fall below 5 years. It is of note that this is exactly what happened in relation to the UDP.		revised guidance then this will be considered in the run up to and at examination.
629	STR11: Provision of Sustainable Housing Sites	Object	We have concerns in relation to the delivery of the Northern Gateway. In our view more realistic delivery assumptions should be	The supply of housing land identified is insufficient to meet the housing requirement.	Not accepted. Work has now commenced on the Northern Gateway site which comprises a number of phases and developers, including a social housing provider. The delivery

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			applied, and a significant reduction in the anticipated quantum of development over the plan period. We also have the following concerns in relation to the housing trajectory provided at Appendices 3 and 4 of LDP10: • The windfall allowance should not apply from 2018/19, as such sites should already be committed. The earliest any windfall allowance should commence from is 3 years after the base date (i.e. 2021/22). • There is insufficient justification for applying build rates of 45dpa to several sites. This raises uncertainty as to whether the following sites will be completed in full during the plan period: Warren Hall, Broughton ? Holywell Rd/Green Lane, Ewloe ? Ash Lane, Hawarden ? Land between Denbigh Rd. & Gwernaffield Rd, Mold Whilst the plan claims to provide a 14.4% flexibility allowance, the reality is that it is necessary to apply a deduction to anticipated future completions to reflect the fact that not all allocated or consented sites will come forward, and this is reflected in the trajectory at Appendix 4 of LDP10. When this is applied the surplus for the whole plan period is only 7 dwellings (0%). We therefore question whether there actually is	Additional flexibility should be provided within the supply of housing land, and alterations should be made to the proposed distribution. We therefore consider that additional flexibility should be provided within the supply, by increasing the proportion of development to be distributed to the rural areas, and specifically the Tier 3 Sustainable Settlements.	assumptions used take account of information provided by landowners and developers. On the issue of windfall allowances, it is considered fully justified to incorporate the small sites allowance, (which averages 60 units per annum) in the housing supply trajectory from 2018/19, as these are units which are not included elsewhere in the supply. It can be seen from the trajectory that the allowance of 60 pa is significantly lower than recent completion rates on small sites, of 87, 102, and 104 units per annum for 2015/16, 2016/17 and 2017/18 respectively. With regard to the large sites windfall allowance, this is not applied from 2018/19 in the trajectory. As referenced in para. 2.5.6 of LDP10 it is acknowledged that 'in practice it is likely that the contribution from large windfall sites will be less in the very early years as they will be sites which did not have planning permission at 1.4.18". For this reason the trajectory does not include any large windfall units in 2018/19 and reduces the contribution in years 2019/20 1nd 20/21 to 20 and 40 units respectively. It should also be noted that sites granted planning permission subject to the signing of a section 106 agreement are not included in the main supply and would therefore be likely to contribute to the windfall supply in these early years (as explained in para 2.4.2 of LDP 10. All allocations have been assessed in terms of deliverability within the plan period. The

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			sufficient flexibility inbuilt within the plan, particularly in light of the issues with the trajectory identified above. We therefore consider that additional flexibility should be provided within the supply, by increasing the proportion of development to be distributed to the rural areas, and specifically the Tier 3 Sustainable Settlements.		allocations at Warren Hall, Ewloe, Hawarden and Mold are in strong market areas, with house builders already in place to develop the Hawarden and Mold sites, and discussions taking place between the Ewloe site promoter and another house builder. The Warren Hall site forms a key part of the regional growth bid and has attracted interest from a number of developers. The Council are satisfied that there is significant developer interest in all of the allocations, and that 45dpa is fully achievable on all of the mentioned sites. Additional flexibility within the rural areas is therefore not needed. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply. Even if the Council were to accept the objector's stance, which it does not, it would not be logical or sustainable to look for more housing in predominantly rural lower tier settlements, in preference to higher tier service centres.
670	STR11: Provision of	Object	There is an overreliance on windfall sites and an overreliance on longstanding commitments	In order to meet the test of Soundness the following changes are	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement,

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	Sustainable Housing Sites		which have failed to be delivered. The Consequence is that the overall housing target figure is too low and the scale and nature of allocations put forward and commitments relied upon will fail even to meet that understated target. In order for the plan to be effective and to deliver it is necessary to substantially increase the overall housing target and to identify far more suitable, available and deliverable sites The Plan proposes a housing target of 7950 units. An analysis of the sites listed in Appendix 1 demonstrates that a number of those sites have had planning permission or have been around for a considerable period of time and have not been delivered. They should be removed from the allocated sites resulting in the need to accommodate another 342 units The strategic site at Warren Hall (STR3B) near Broughton is isolated and does not have any relationship to facilities. It is therefore not a sustainable option for residential development and the lack of facilities mean that even if residential development comes forward in that location the need for facilities will delay delivery over many years. It is unrealistic to expect that allocation to be brought forward and therefore that	required. (i) Increasing the overall level of housing provision to at least 10,500. (ii) Increase in the number of new allocated housing sites by at least 2500. (iii) The removal of Llys Ben site at Northop Hall from the Green Barrier.	which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply. The Council are confident that the committed sites and allocated sites within the LDP will deliver as intended. Significant work has gone into checking the deliverability of the allocated sites that were previously included within the UDP to ensure they will deliver in line with the housing trajectory. Therefore the Council are satisfied that additional sites are not needed to replace these allocated sites. The objector refers to the Plan having an overreliance on windfalls. The Plan makes an allowance for small sites of 60 dwellings per hectare and 50 dwellings per annum on large sites. This is a conservative estimate based on past trends and the Urban Capacity Study demonstrates there is sufficient capacity for the trend to continue. The level of windfalls compared to the Plans overall requirement is not considered excessive or inappropriate and has not been objected to by Welsh Government. The representative body for

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			represents a further shortfall in housing Council's target per annum: 7950 To meet that target it is necessary to: Increase the allocations by 660 to allow for over-reliance on windfall sites. Increase the allowance by 300 to allow for the non-delivery of the Warren Hall site. Increase the allowance by 342 to allow for non-delivery of sites within Appendix 1. Increase the allowance by 16% or 1272 units to reflect under-provision against the past five years delivery pattern. These figures taken together suggest that there should be an overall housing target of 10,500 units which is very significantly more than the number put forward by the Council and is more reflective of the amount of allocations that will be needed to deliver housing and the Council's jobs-led strategy. Sites to accommodate a further 2500 units are needed. Remove Llys Ben Northop Hall from Green barrier and allocate more housing increase overall housing numbers		developers the home builders federation (HBF) also agree the levels are appropriate. Therefore It would be unreasonable to reduce the windfalls figure by 660 units. The objector claims the Plan has an overreliance on longstanding commitments which have failed to deliver. The commitments have been subject to review throughout the Plan process and the Council has not sought to include long standing sites which haven't delivered. Each site that the objector questions are looked at in turn below. But it is clear that the objector has failed to refer to the latest available land supply statement as that clarifies the correct position with the sites referred to as follows;: Whitleys Depot, Buckley – this site is under construction with the 2019 Housing Monitoring Study identifying 11 units under construction. The developer is Whitley, a well known local house builder. Summerhill Farm, Caerwys – this site is under construction with the 2019 Housing Monitoring Study showing 5 units under construction. The developer is Quatrefoil Homes. Station Yard / Depot, Coedtalon / Pontybodkin – Reserved matters approval (055798) was granted on 13/09/19. East of Gronant Hill, Gronant – Full planning consent was granted on 03/08/18. A subsequent application for amended ground

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					levels was approved on 09/09/19. Progress has also been made in discharging pre-commencement conditions and Wates are fully committed to delivering the scheme. Kinnerton Lane – Higher Kinnerton – Elan Homes as at April 2019 had built 31 units and a further 12 were under construction. Bromfield Timber, Mold – the site has an extant planning permission. Although the site has been excluded from the 5 year housing land supply in the 2019 Housing Land Monitoring Statement, this does not mean that the site will not be developed in the Plan period. Sewage Works, Sychdyn – Stewart Milne Homes had at April 2019 built 33 units and 10 were under construction. Altbridge House, Whitford - As part of work on the 2019 Housing Land Monitoring Study it has been established that following a change of ownership that there are no plans for immediate development. Further, the planning permission on the site has expired so the site is not included in the land supply in the 2019 housing land monitoring report Clearly, the objectors analysis of the above sites is inaccurate and it would be entirely unreasonable to delete 342 units from the commitments figure as the sites referred to are all deliverable.

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					The Warren Hall site is in a strong market area and forms a key part of the regional growth bid. The site is not isolated as it sits between Penyffordd / Penymynydd, Broughton and Higher Kinnerton. The site is a mixed use development and in a sustainable location. The objector is unclear as to what facilities are lacking and how this will delay or prevent development coming forward. It would be unreasonable to delete the 300 units from the Housing Balance Sheet. Equally the site at Warren Hall is in closer proximity to a service centre with significant facilities than the site the objector promotes at Llys ben to its nearest service centre. The objector seeks an increase to 'the allowance by 16% or 1272 units to reflect under-provision against the past 5 years delivery pattern'. However, the objector offers no further explanation to this and how the figures have been arrived at. The first four years of the Plan period has seen on average completions ahead of the Plans annualised requirement of 463 units. But directly in line with the average level of plan provision at 530dpa. It is not clear what the under-delivery in the last 5 years is. The objector concludes that taken together these should result in an increase to the overall housing target to 10,500 units. However, the Plans housing requirement is based on a projections / growth led approach which is already in excess of Welsh Government projections. The objectors

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					approach appears to be to delete significant units from the Plans' supply side of the Housing Balance Sheet and then add them to the housing requirement figure. This is not an appropriate way in which to formulate the Plans overall housing requirement. Also at 10,500, the objector provides no evidence to explain how such a proposed requirement of 164 dpa above current delivery rates can be provided for other than by a small site at Llys Benn, what the additional sites are.
759	STR11: Provision of Sustainable Housing Sites	Support	Policy STR11: Provision of Sustainable Housing Sites Our Client agrees with the core principles of this Policy, namely the need to direct new housing development towards sustainably located, economically viable and deliverable sites. There is a clear and urgent need for more affordable housing in Flintshire, and this needs to be reflected through the Council's housing requirement as well; as the site-specific policy requirements. Low density development should be avoided, providing for the efficient use of land. A mix of house types and tenures should be supported informed by an understanding of local needs; this in turn will require up-to-date evidence/information held by the Council as part of its Local Housing Market Assessment. Our Client welcomes		The Council welcome support for policy STR11.

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			the commitment by the Council to continue to monitor the housing land supply position and housing delivery in the County on an annual basis, reported through an Annual Monitoring Report. This will require regular dialogue with the development industry in order to ensure a robust position on housing supply and delivery is established		
763	STR11: Provision of Sustainable Housing Sites	Object	a) The Community Council and the village community recognise the need for new housing in the county and accept that Higher Kinnerton may accommodate some of this growth over the life of the LDP. However, the community feels that development should not come at the cost of a continuing decline in local infrastructure (road, transport, access to health provision, education) and local village amenities (post office, shops, pubs). These vital services have not kept pace with the growth of the community. The recent design of residential developments has also contributed to the growth and reliance of residents' use of their cars as the main means of transport and has added to parking problems within the village. This problem has been recognised nationally in a recent project	Given the situation which arose with the affordable housing units at Babylon Fields in Higher Kinnerton, the criteria for affordable housing needs to ensure affordable housing is genuinely affordable for those in need of housing and whose needs are not met by the open market	Noted. Policy HN2 sets out the criteria for the density and mix of new dwellings, paragraph 11.6 of the reasoned justification states "In order to meet the variety of needs in Flintshire, a range of housing must be provided on sites. The Local Housing Market Assessment identified a particular need for smaller one and two bed units to meet the increasing need from single person households. A significant part of this need is driven by the growing older population (65+), therefore the housing needs of older people should be reflected in residential development proposals, which could include the development of bungalows. To ensure that mixed and balanced communities are created the Council will expect developers to provide an appropriate mix of dwelling size and type to meet local housing needs, making reference to the evidence within the latest Local Housing Market Assessment and avoiding residential schemes that are dominated by larger properties with four or more bedrooms" This

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			document (Transport for New Homes 2018). b) With an aging population nationally and locally, serious consideration needs to be given on how housing should be provided for this section of our community, as well as the provision of affordable housing to encourage younger people to settle in Higher Kinnerton. This to ensure that we have a balanced mix of accommodation types available to provide for the newly enlarged community. c) Given the situation which arose with the affordable housing units at Babylon Fields in Higher Kinnerton, the criteria for affordable housing needs to ensure affordable housing is genuinely affordable for those in need of housing and whose needs are not met by the open market		will ensure developments achieve a good mix of property types and sizes to cater for all housing needs and demands. Affordable Housing will be delivered at 70% market value for low cost home ownership dwellings to eligible applicants from the Tai Teg register. Intermediate rental dwellings will be let at no more than 80% of private rental values. Applicants must meet specific eligibility criteria in terms of their income and any local connection criteria. This will ensure that only applicants who cannot afford to buy or rent on the open market are offered a property, and that they can afford to live in the property.
795	STR11: Provision of Sustainable Housing Sites	Object	Notwithstanding the conclusion in relation Policy STR1 that the housing requirement should be increased, it is also considered that there are significant problems with the assumptions related to the delivery of sites. In the first instance, the approach to the windfall contribution from large sites is questioned on two bases': a. Whilst Background Paper No 10 (BP10) indicates that windfall	Notwithstanding the conclusion in relation Policy STR1 that the housing requirement should be increased, it is also considered that there are significant problems with the assumptions related to the delivery of sites. In the first instance, the approach to the	Not accepted. An analysis of past windfall contributions is contained in Section 4.3 of the Flintshire Urban Capacity Study (June 2019) undertaken by Arcadis. This approach is in line with the latest National guidance as contained in para.5.6.3 of the Development Plans manual, Edition 3, Consultation Draft (June 2019). The Urban Capacity Study sets out (in Table 4.8) the rate of completions on large windfall sites over an 18 year period and shows that

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			contributions over 18 years have been considered and have resulted in an average of 116 pa, this needs to be treated with considerable caution, even with the assumed discount on past rates. The reason for this is that the UDP was not adopted until 2011 and then time expired in 2015, outside of this period it is likely that all sites coming forward were windfalls so the statistics are most unlikely to reflect a normal rate of delivery of such sites alongside an adopted plan. Furthermore, Flintshire has experienced a sub-5 year land supply for a considerable period of time which has resulted in peripheral sites being released, frequently on appeal, which will then also have been treated as windfall sites. Notwithstanding the discount on past rates that has been applied, it is clear that the contribution from large windfall sites that has been assumed is significant and having regard to the above, requires significantly more justification than has been provided to date.	windfall contribution from large sites is questioned. Whilst it is not suggested that none of the above sites will come forward in the Plan period, it is clear that there are significant concerns in relation to a number of the sites and particularly in relation to the assumptions on timing and rates of delivery. These concerns impact on the overall number of allocations that are required, and particularly so in the early years of the Plan period where additional sites that can make an early contribution are considered necessary. For the above reasons, and having regard to our Clients representations in relation to Policy STR1, it is considered that the Housing	these have averaged 116 dwellings per annum. However it is acknowledged (in para. 4.3.19 of the Study) that this past level of completions is unlikely to be achieved throughout the LDP period for a number of reasons including 'the lack of an up to date development plan and the lack of a five year housing land supply, leading to a number of applications and subsequent appeals'. As a consequence the Council has taken a cautious approach and rather than the past average of 116 dwgs per annum, a significantly reduced large sites windfall allowance figure equating to 50 dwgs per annum has been used in the LDP. This is considered to be a conservative and justifiable figure. It is acknowledged that the UDP was not adopted until 2011 and the plan period only extended until 2015. Analysis of actual windfall completions on large sites during this period (Table 4.8 in the UCS) shows that they actually averaged 118 pa, indicating that large windfall completions were not higher during the period when the County did not have an adopted development plan. It is also the case that the representative body of the development industry, the HBF, agree that the windfall allowances are appropriate.

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				Balance Sheet at paragraph 7.11 of the Deposit Plan requires significant amendment to reflect a more robust approach to housing need and delivery. Having regard to the need for additional housing sites, Redrow Homes have proposed two such sites that they consider entirely suitable in relation to Policy HN1.	
584	STR11: Provision of Sustainable Housing Sites	Object	The policy indicates that the availability of housing land will be monitored over the plan period to ensure a continuous and adequate supply to enable the delivery of the overall housing requirement. However, the policy contains no mechanism for bringing forward alternative sites should the Plan fail to deliver. The monitoring section (Section 13) indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the	However, the policy contains no mechanism for bringing forward alternative sites should the Plan fail to deliver. The monitoring section (Section 13) indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply, and Welsh Government in their formal comments on the plan have no concerns about the housing growth provided.

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			5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of deliverable sites for housing. Where this cannot be met there must be a mechanism in place to allow this to be achieved. Simply monitoring and further investigation will not achieve this and will therefore fail to meet soundness Test 2 in that the Plan will not seek to meet assessed needs. The Council's LDP 10 (Background Paper on Housing Land Supply and Delivery) sets out at paragraph 3.0.1 that "the delivery of the housing supply and the maintenance of a 5 year housing land supply throughout the plan period are essential to the achievement of the Plan's aims". As delivery of the 5 year housing land supply is central to the Plan's aims it is crucial that the Plan has a system in place for bringing forward alternative sites should the housing land supply fall short. The identification of contingency sites which could be brought forward in such circumstances would be an appropriate response. However, the current Plan does not identify contingency sites and will therefore lead to planning by appeal should	extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of deliverable sites for housing. Where this cannot be met there must be a mechanism in place to allow this to be achieved. Need to identify contingency sites to be brought forward if the plan fails to deliver.	If TAN1 is revoked then this will have knock on effects for the Plan and particularly the monitoring arrangements. The monitoring indicators have been drafted in the light of guidance in Welsh Government Development Plans Manual 3. At present there is no Welsh Government requirement for the Plan to have contingency sites. If Welsh Government issue revised guidance then this will be considered in the run up to and at examination.

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			the housing land supply figure fall below 5 years. It is of note that this is exactly what happened in relation to the UDP. Failure to have a mechanism in place within the Plan (such as identification of contingency sites) would lead to planning by appeal in the latter stages of the Plan (which was precisely the situation which arose as a result of under delivery of the previous UDP).		
594	STR11: Provision of Sustainable Housing Sites	Object	OBJECTS to Policy STR11. JUSTIFICATION – POLICY TEXT Policy STR11 lists 6 criteria in relation to the provision of sustainable housing sites. The wording of the policy states that new housing on these sites will be "expected" to meet all of the criteria. All criteria are unlikely to be relevant in every case therefore the policy wording and supporting text should be amended. AMENDMENTS SOUGHT – POLICY TEXT Policy STR11 is considered unsound in that it is not appropriate for the area in light of the evidence. Moreover, it does not reflect Development Plans Manual (Edition 3) which states that an LDP should be succinct and clear (see Paragraph 3.11). Policy STR11 is not appropriate for the area as it sets an unreasonably	The wording of the policy states that new housing on these sites will be "expected" to meet all of the criteria. All criteria are unlikely to be relevant in every case therefore the policy wording and supporting text should be amended. AMENDMENTS SOUGHT – POLICY TEXT Policy STR11 is considered unsound in that it is not appropriate for the area in light of the evidence. Moreover, it does not reflect	Not accepted. The aim of policy STR11 is to ensure the sustainable delivery of housing sites across Flintshire. Removing the sentence "The delivery of new housing on these sites will be expected to" would dilute the impact of this policy and limit the sustainability of new residential schemes. It is essential that this sentence remains to ensure applications meet these key sustainability criteria, which will result in the efficient development of land for housing purposes. This strategic policy seeks to set the scene in terms of some key planning principles in respect of ensuring sustainable housing sites. In response to the objectors stance that the criteria set an 'unreasonably high bar', each of the criteria is considered as follows: i) Affordable housing – the provision of affordable housing is a key priority of Welsh Government in PPW10. The Plan reflects this and the policy is signposted to a more detailed

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			high bar for applicants and should be reworded to allow some flexibility. It is suggested that it is reworded as follows (consistent with our submissions in respect of Policy STR 4): Delete the following paragraph: “The delivery of new housing on these sites will be expected to.” And replace it with the following paragraph: “To achieve this, where appropriate all development should…	Development Plans Manual (Edition 3) which states that an LDP should be succinct and clear (see Paragraph 3.11). Policy STR11 is not appropriate for the area as it sets an unreasonably high bar for applicants and should be reworded to allow some flexibility. It is suggested that it is reworded as follows (consistent with our submissions in respect of Policy STR 4): Delete the following paragraph: “The delivery of new housing on these sites will be expected to.”	policy HN3 Affordable Housing. ii) Making most efficient use of land – a key planning principle, whatever the size of development is to make the most efficient use of land through an appropriate density. iii) Securing a mix of housing on a site is also a well established principle. Clearly there will be some developments where this is not possible, but this will be the exception rather than the rule. iv) The requirement to provide for specific housing needs is caveated by the term ‘where appropriate’ recognising this will not be applicable to every site. v) Making provision for infrastructure to mitigate the impacts of development is a well established planning principle and must be related in scale and kind to the development concerned. vi) The last criteria is explicitly only applicable to rural areas and not every site. Having looked at each criteria in turn and how they represent well established planning principles and good practice, it is unclear why the objector would not embrace them as part of planning residential developments rather than arguing that they are onerous and unreasonable.

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954	STR11: Provision of Sustainable Housing Sites	Object	Despite the laudable expectation of this policy almost every (draft) housing allocation sites fails to meet this policy and have failed to demonstrate deliverability. The supporting text suggest the LHMA identifies an n affordable requirement of 228 units per annum; so, over a 15- year plan period this equates to 3,240 dwellings. We would question how this can be delivered; especially by small windfalls and strategic sites. There is a belief that additional sites must be identified and that Reserve/Plan B sites are required in the event allocated sites simply do not deliver. 10% flexibility allowance - As advocated by PPW10 – this should be applied here not later and be up to 15% as advocated also by the FCC Arcadis Urban Capacity Study June 2019 report. Housing Completions (3 years 2015 - 2018) - The level of completions has been good but the reason for this is that UDP allocated sites have failed to deliver and there has been a reliance upon windfalls and the UDP has expired Committed sites with PP (as at 1 April 2018) - Discount by 50% - there is a genuine concern that 50% of the identified sites will not come forward, the evidence to support	Allocate additional sites as contingency.	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply. The Council are confident that the committed sites and allocated sites within the LDP will deliver as intended. Significant work has gone into checking the deliverability of the allocated sites that were previously included within the UDP to ensure they will deliver in line with the housing trajectory. It is the fact that the committed sites are deliverable that has resulted in delivery rates in the early years of the plan matching the average level of provision, and as the trajectory indicates allocated sites will contribute after the plan is adopted. This is logical and sustainable, therefore the Council are satisfied that additional sites are not needed to replace these allocated sites. The objections in respect of the Housing Balance Sheet are addressed in turn:

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			their delivery is non-existent Windfalls - There is an over reliance on both types of windfall sites; larger windfall sites should be realistically allocated and smaller windfalls reduced in number and together they should not represent any more than 10% of the total requirement - i.e. there cannot be a reliance on the delivery of ad hoc development to help quantify housing delivery. The Authority have undertaken an Urban Capacity Study and know what sites are available and should identify those that are deliverable for housing. There is a belief that additional sites must be identified and that Reserve/Plan B sites are required in the event allocated sites simply do not deliver		There is no set requirement in draft Development Plan Manual 3 as to where the flexibility allowance should appear in the Housing balance Sheet. Wherever it appears, the key fact is that the over-allocation by 1000 units representations a 14.4% flexibility allowance.The level of completions is partly due to speculative housing sites (outside settlement boundaries) but it is also due to UDP sites and windfalls within settlement boundaries coming forward. The commitments included in the Plan have been as a result of a review of sites and only includes sites which are capable of coming forward during the Plan period. The objector provides no explanation as to which sites will not come forward or the reasons why and merely resorts to reducing it by an arbitrary 50%. The objector is referenced to the latest land availability statement which explains the development status of all commitments, which does not support the unsubstantiated assumptions made. The Plans housing provision is not over-reliant on windfalls. The Plan makes a conservative allowance of 50 units for large sites and 60 units for small sites when compared with past trends. The role of the Urban Capacity Study was not to identify allocations but to determine whether scope exists to deliver the allowances identified in the Plan. The objectors approach is to remove all large site windfalls from the Housing Balance Sheet which is not

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					appropriate or necessary. There is no objection from Welsh Government to the effect that the Plan is over-reliant on windfalls. The industries representative body HBF agree the allowances made are appropriate. The objector appears to discount all 300 units at Warren Hall Strategic Site. The aeronautical constraint does not apply to the housing part of the site. The site is supported by a Transport Assessment and is not divorced as it sits between 3 settlements and also involves a mixed use development which is a sustainable form of development. The housing part of the site is grade 3b based on an on-site survey. The presence of protected species does not preclude development and comprehensive surveys have been undertaken. The bulk of the site also has a planning permission for the business park. A SuDS compliant scheme will be drawn up for the site, but given the amount of green infrastructure proposed in the masterplan this should be possible. The objector proposes the deletion of 394 units at Northern Gateway . A response on this is provided to the objectors concerns in policy STRA. The objector seeks a reduction of 676 units from the list of 11 housing allocations in HN1. However, the objector does not identify which sites wont deliver either in whole or part and the reasoning why other than a general reference 'We believe that many sites have a

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					variety of significant constraints affecting site deliverability and viability; yet no such work has been done'. Several of the allocations already have planning permission and a number have preferred housebuilders on board. The allocations are in sustainable settlements and strong market areas and can be delivered within the Plan period. The objector concludes that instead of an overprovision of 1000 units there is an under provision of 2611 units, with a need for additional sites. These findings are considered to be vague and lacking in evidence and do not challenge the soundness of the plan.
969	STR11: Provision of Sustainable Housing Sites	Object	Despite the laudable expectation of this policy almost every (draft) housing allocation sites fails to meet this policy and have failed to demonstrate deliverability. The supporting text suggest the LHMA identifies an n affordable requirement of 228 units per annum; so, over a 15-year plan period this equates to 3,240 dwellings. We would question how this can be delivered; especially by small windfalls and strategic sites. 10% flexibility allowance - As advocated by PPW10 – this should be applied here not later and be up	Need to allocate additional sites.	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply.

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			to 15% as advocated also by the FCC Arcadis Urban Capacity Study June 2019 report. Housing Completions (3 years 2015 - 2018) - The level of completions has been good but the reason for this is that UDP allocated sites have failed to deliver and there has been a reliance upon windfalls and the UDP has expired Committed sites with PP (as at 1 April 2018) - Discount by 50% - there is a genuine concern that 50% of the identified sites will not come forward, the evidence to support their delivery is non-existent Windfalls - There is an over reliance on both types of windfall sites; larger windfall sites should be realistically allocated and smaller windfalls reduced in number and together they should not represent any more than 10% of the total requirement - i.e. there cannot be a reliance on the delivery of ad hoc development to help quantify housing delivery. The Authority have undertaken an Urban Capacity Study and know what sites are available and should identify those that are deliverable for housing. There is a belief that additional sites must be identified and that Reserve/Plan B sites are required in the event allocated sites simply do not deliver		The Council are confident that the committed sites and allocated sites within the LDP will deliver as intended. Significant work has gone into checking the deliverability of the allocated sites that were previously included within the UDP to ensure they will deliver in line with the housing trajectory. It is the fact that the committed sites are deliverable that has resulted in delivery rates in the early years of the plan matching the average level of provision, and as the trajectory indicates allocated sites will contribute after the plan is adopted. This is logical and sustainable, therefore the Council are satisfied that additional sites are not needed to replace these allocated sites. The objections in respect of the Housing Balance Sheet are addressed in turn: a) There is no set requirement in draft Development Plan Manual 3 as to where the flexibility allowance should appear in the Housing balance Sheet. Wherever it appears, the key fact is that the over-allocation by 1000 units representations a 14.4% flexibility allowance.The level of completions is partly due to speculative housing sites (outside settlement boundaries) but it is also due to UDP sites and windfalls within settlement boundaries coming forward. b) The commitments included in the Plan have been as a result of a review of sites and only includes sites which are capable of coming

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					forward during the Plan period. The objector provides no explanation as to which sites will not come forward or the reasons why and merely resorts to reducing it by an arbitrary 50%. The objector is referenced to the latest land availability statement which explains the development status of all commitments, which does not support the unsubstantiated assumptions made. c) The Plans housing provision is not over-reliant on windfalls. The Plan makes a conservative allowance of 50 units for large sites and 60 units for small sites when compared with past trends. The role of the Urban Capacity Study was not to identify allocations but to determine whether scope exists to deliver the allowances identified in the Plan. The objectors approach is to remove all large site windfalls from the Housing Balance Sheet which is not appropriate or necessary. There is no objection from Welsh Government to the effect that the Plan is over-reliant on windfalls. The industries representative body HBF agree the allowances made are appropriate. d) The objector appears to discount all 300 units at Warren Hall Strategic Site. The aeronautical constraint does not apply to the housing part of the site. The site is supported by a Transport Assessment and is not divorced as it sits between 3 settlements and also involves a mixed use development which is a sustainable form of development. The housing part of the site is grade 3b based on

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					an on-site survey. The presence of protected species does not preclude development and comprehensive surveys have been undertaken. The bulk of the site also has a planning permission for the business park. A SuDS compliant scheme will be drawn up for the site, but given the amount of green infrastructure proposed in the masterplan this should be possible. e) The objector proposes the deletion of 394 units at Northern Gateway. A response on this is provided to the objectors concerns in policy STRA. f) The objector seeks a reduction of 676 units from the list of 11 housing allocations in HN1. However, the objector does not identify which sites wont deliver either in whole or part and the reasoning why other than a general reference 'We believe that many sites have a variety of significant constraints affecting site deliverability and viability; yet no such work has been done'. Several of the allocations already have planning permission and a number have preferred housebuilders on board. The allocations are in sustainable settlements and strong market areas and can be delivered within the Plan period. The objector concludes that instead of an overprovision of 1000 units there is an under provision of 2611 units, with a need for additional sites. These findings are considered

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					to be vague and lacking in evidence and do not challenge the soundness of the plan.
979	STR11: Provision of Sustainable Housing Sites	Object	OBJECTION is to the'' Over allocation / flexibility 1000 / 14.4%'' element as it is an over flexibility which does not meet the LPA's statement of 'Sustainable Development' permeating through the plan. It gives housing developers a n excuse to get the extra 1000 houses in the plan period. The Earth's resources are scarce so the LPA must not help in that scarcity. The ONS 2018 Population Growth state a Decline in Wales Housing Population will decline by 0.9% by 2043 . But Brexit will increase the decline as already there is a 'Lemming 'exodus from UK by EU Citizens (See further down objections to the LPA's Housing growth data)	Reduce the number of housing allocations within the plan. Reduce the flexibility allowance of 14.4%	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Welsh Government's Development Plans Manual (Edition 3) requires LDPs to include a flexibility allowance of at least 10% with para 5.59 stating 'This means that a flexibility allowance must be embedded into the plan'. Flintshire's LDP includes a flexibility allowance of 14.4% to enable the plan to respond to changes in circumstances that may affect site deliverability. The Council are satisfied that this flexibility allowance is appropriate for the LDP, and have received no objections from Welsh Government regarding the level of 14.4%.
987	STR11: Provision of Sustainable Housing Sites	Object	Despite the laudable expectation of this policy almost every (draft) housing allocation sites fails to meet this policy and have failed to demonstrate deliverability. The supporting text suggest the LHMA identifies an n affordable requirement of 228 units per annum; so, over a 15- year plan period this equates to 3,240	additional allocations required.	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A

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			dwellings. We would question how this can be delivered; especially by small windfalls and strategic sites. There is a belief that additional sites must be identified and that Reserve/Plan B sites are required in the event allocated sites simply do not deliver. 10% flexibility allowance - As advocated by PPW10 – this should be applied here not later and be up to 15% as advocated also by the FCC Arcadis Urban Capacity Study June 2019 report. Housing Completions (3 years 2015 - 2018) - The level of completions has been good but the reason for this is that UDP allocated sites have failed to deliver and there has been a reliance upon windfalls and the UDP has expired Committed sites with PP (as at 1 April 2018) - Discount by 50% - there is a genuine concern that 50% of the identified sites will not come forward, the evidence to support their delivery is non-existent Windfalls - There is an over reliance on both types of windfall sites; larger windfall sites should be realistically allocated and smaller windfalls reduced in number and together they should not represent any more than 10% of the total requirement - i.e. there cannot be a reliance on the		flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply. The Council are confident that the committed sites and allocated sites within the LDP will deliver as intended. Significant work has gone into checking the deliverability of the allocated sites that were previously included within the UDP to ensure they will deliver in line with the housing trajectory. It is the fact that the committed sites are deliverable that has resulted in delivery rates in the early years of the plan matching the average level of provision, and as the trajectory indicates allocated sites will contribute after the plan is adopted. This is logical and sustainable, therefore the Council are satisfied that additional sites are not needed to replace these allocated sites. The objections in respect of the Housing Balance Sheet are addressed in turn: a) There is no set requirement in draft Development Plan Manual 3 as to where the flexibility allowance should appear in the Housing balance Sheet. Wherever it appears, the key fact is that the over-allocation by 1000 units representations a 14.4% flexibility allowance.The level of completions is partly due to speculative housing sites (outside settlement boundaries) but it is also due to

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			delivery of ad hoc development to help quantify housing delivery. The Authority have undertaken an Urban Capacity Study and know what sites are available and should identify those that are deliverable for housing. There is a belief that additional sites must be identified and that Reserve/Plan B sites are required in the event allocated sites simply do not deliver		UDP sites and windfalls within settlement boundaries coming forward. b) The commitments included in the Plan have been as a result of a review of sites and only includes sites which are capable of coming forward during the Plan period. The objector provides no explanation as to which sites will not come forward or the reasons why and merely resorts to reducing it by an arbitrary 50%. The objector is referenced to the latest land availability statement which explains the development status of all commitments, which does not support the unsubstantiated assumptions made. c) The Plans housing provision is not over-reliant on windfalls. The Plan makes a conservative allowance of 50 units for large sites and 60 units for small sites when compared with past trends. The role of the Urban Capacity Study was not to identify allocations but to determine whether scope exists to deliver the allowances identified in the Plan. The objectors approach is to remove all large site windfalls from the Housing Balance Sheet which is not appropriate or necessary. There is no objection from Welsh Government to the effect that the Plan is over-reliant on windfalls. The industries representative body HBF agree the allowances made are appropriate. d) The objector appears to discount all 300 units at Warren Hall Strategic Site. The aeronautical constraint does not apply to the

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					housing part of the site. The site is supported by a Transport Assessment and is not divorced as it sits between 3 settlements and also involves a mixed use development which is a sustainable form of development. The housing part of the site is grade 3b based on an on-site survey. The presence of protected species does not preclude development and comprehensive surveys have been undertaken. The bulk of the site also has a planning permission for the business park. A SuDS compliant scheme will be drawn up for the site, but given the amount of green infrastructure proposed in the masterplan this should be possible. e) The objector proposes the deletion of 394 units at Northern Gateway . A response on this is provided to the objectors concerns in policy STRA. f) The objector seeks a reduction of 676 units from the list of 11 housing allocations in HN1. However, the objector does not identify which sites wont deliver either in whole or part and the reasoning why other than a general reference 'We believe that many sites have a variety of significant constraints affecting site deliverability and viability; yet no such work has been done'. Several of the allocations already have planning permission and a number have preferred housebuilders on board. The allocations are in sustainable settlements and strong market areas and can be delivered

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					within the Plan period. The objector concludes that instead of an overprovision of 1000 units there is an under provision of 2611 units, with a need for additional sites. These findings are considered to be vague and lacking in evidence and do not challenge the soundness of the plan.
1009	STR11: Provision of Sustainable Housing Sites	Object	Despite the laudable expectation of this policy almost every (draft) housing allocation sites fails to meet this policy and have failed to demonstrate deliverability. The supporting text suggest the LHMA identifies an n affordable requirement of 228 units per annum; so, over a 15- year plan period this equates to 3,240 dwellings. We would question how this can be delivered; especially by small windfalls and strategic sites. There is a belief that additional sites must be identified and that Reserve/Plan B sites are required in the event allocated sites simply do not deliver. 10% flexibility allowance - As advocated by PPW10 – this should be applied here not later and be up to 15% as advocated also by the FCC Arcadis Urban Capacity Study June 2019 report. Housing Completions (3 years 2015 - 2018)	Need to allocate additional sites as a contingency. The deliverability of allocated sites is uncertain.	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply. The Council are confident that the committed sites and allocated sites within the LDP will deliver as intended. Significant work has gone into checking the deliverability of the allocated sites that were previously included within the UDP to ensure they will deliver in line with the housing trajectory. It is the fact that the committed sites are deliverable that has

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			- The level of completions has been good but the reason for this is that UDP allocated sites have failed to deliver and there has been a reliance upon windfalls and the UDP has expired Committed sites with PP (as at 1 April 2018) - Discount by 50% - there is a genuine concern that 50% of the identified sites will not come forward, the evidence to support their delivery is non-existent Windfalls - There is an over reliance on both types of windfall sites; larger windfall sites should be realistically allocated and smaller windfalls reduced in number and together they should not represent any more than 10% of the total requirement - i.e. there cannot be a reliance on the delivery of ad hoc development to help quantify housing delivery. The Authority have undertaken an Urban Capacity Study and know what sites are available and should identify those that are deliverable for housing. There is a belief that additional sites must be identified and that Reserve/Plan B sites are required in the event allocated sites simply do not deliver		resulted in delivery rates in the early years of the plan matching the average level of provision, and as the trajectory indicates allocated sites will contribute after the plan is adopted. This is logical and sustainable, therefore the Council are satisfied that additional sites are not needed to replace these allocated sites. The objections in respect of the Housing Balance Sheet are addressed in turn: a) There is no set requirement in draft Development Plan Manual 3 as to where the flexibility allowance should appear in the Housing balance Sheet. Wherever it appears, the key fact is that the over-allocation by 1000 units representations a 14.4% flexibility allowance.The level of completions is partly due to speculative housing sites (outside settlement boundaries) but it is also due to UDP sites and windfalls within settlement boundaries coming forward. b) The commitments included in the Plan have been as a result of a review of sites and only includes sites which are capable of coming forward during the Plan period. The objector provides no explanation as to which sites will not come forward or the reasons why and merely resorts to reducing it by an arbitrary 50%. The objector is referenced to the latest land availability statement which explains the development status of all commitments, which does not support the unsubstantiated assumptions made.

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					c) The Plans housing provision is not over-reliant on windfalls. The Plan makes a conservative allowance of 50 units for large sites and 60 units for small sites when compared with past trends. The role of the Urban Capacity Study was not to identify allocations but to determine whether scope exists to deliver the allowances identified in the Plan. The objectors approach is to remove all large site windfalls from the Housing Balance Sheet which is not appropriate or necessary. There is no objection from Welsh Government to the effect that the Plan is over-reliant on windfalls. The industries representative body HBF agree the allowances made are appropriate. d) The objector appears to discount all 300 units at Warren Hall Strategic Site. The aeronautical constraint does not apply to the housing part of the site. The site is supported by a Transport Assessment and is not divorced as it sits between 3 settlements and also involves a mixed use development which is a sustainable form of development. The housing part of the site is grade 3b based on an on-site survey. The presence of protected species does not preclude development and comprehensive surveys have been undertaken. The bulk of the site also has a planning permission for the business park. A SuDS compliant scheme will be drawn up for the site, but given the amount of green infrastructure proposed in the masterplan this should be possible.

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					e) The objector proposes the deletion of 394 units at Northern Gateway . A response on this is provided to the objectors concerns in policy STRA. f) The objector seeks a reduction of 676 units from the list of 11 housing allocations in HN1. However, the objector does not identify which sites wont deliver either in whole or part and the reasoning why other than a general reference 'We believe that many sites have a variety of significant constraints affecting site deliverability and viability; yet no such work has been done'. Several of the allocations already have planning permission and a number have preferred housebuilders on board. The allocations are in sustainable settlements and strong market areas and can be delivered within the Plan period. The objector concludes that instead of an overprovision of 1000 units there is an under provision of 2611 units, with a need for additional sites. These findings are considered to be vague and lacking in evidence and do not challenge the soundness of the plan.
642	STR11: Provision of Sustainable Housing Sites	Object	Whilst TW supports the inclusion of a policy promoting sustainable housing sites, it is not clear within the policy what the mechanism is	In order to address the conflict above and ensure that the Policy is sound, TW requests	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the

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			for identifying additional housing land in the event that allocated and committed sites do not deliver a five-year housing land supply, as detailed in the supporting trajectory Notwithstanding the above, TW has concerns over the generality of the policy, in particular parts i, ii and iv. Part i requires new housing to facilitate affordable housing relative to local need and viability. Whilst TW welcomes the reference to viability considerations, it is not clear what is required of this policy in regard to affordable housing provision. TW would question whether it is required, as there is a separate affordable housing Policy (Policy HN3) which covers this provision Part ii of the Policy requires housing sites to "make the most efficient use of land through appropriate density of development". As currently worded, the Policy is vague and ineffective and does not provide certainty to developers as to what is required and the range of densities that would be acceptable. Whilst TW supports the Council in allowing flexibility, the Policy needs to quantify what is meant by 'appropriate density In respect of Part iv, whilst TW acknowledges the need to provide housing suitable for all population sectors,	that the Council: 1 Provides clarity regarding the required density on development sites. 2 Gives due consideration to meeting the upper end of the objectively assessed housing needs and the benefits this will bring to the area and to ensure sufficient sites are allocated to meet this need and reduce reliance on windfall sites. 3 Ensure that the need for specific housing is considered as separate to the objectively assessed need, and that the evidence base is amended to consider the financial implications of delivering such units.	plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply. If TAN1 is revoked then this will have knock on effects for the Plan and particularly the monitoring arrangements. The monitoring indicators have been drafted in the light of guidance in Welsh Government Development Plans Manual 3. At present there is no Welsh Government requirement for the Plan to have contingency sites. If Welsh Government issue revised guidance then this will be considered in the run up to and at examination. The Council does not accept that too much reliance is placed upon windfall sites within the LDP. An analysis of past windfall contributions is contained in Section 4.3 of the Flintshire Urban Capacity Study (June 2019) undertaken by Arcadis. This approach is in line with the latest National guidance as contained in para.5.6.3 of the Development Plans manual, Edition 3, Consultation Draft (June 2019). The Urban Capacity Study sets out (in Table 4.8) the rate of completions on large windfall

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			the identified needs must be based on robust and sound evidence. It is not clear from the Council's Local Housing Strategy that the requirement for specific housing has been considered separately to the objectively assessed housing need. It is important that these housing requirements are considered separately, given that the needs of the future occupiers are different. Furthermore, it does not appear that the cost of delivering specialist housing has been considered within the Viability Report, it is important that the cost to deliver these requirements are based on robust evidence so as not to impact the viability of development proposals. TW supports the provisions of Part iii of the policy which states the need for balanced developments requiring a mix of housing units.		sites over an 18 year period and shows that these have averaged 116 dwellings per annum. However it is acknowledged (in para. 4.3.19 of the Study) that this past level of completions is unlikely to be achieved throughout the LDP period for a number of reasons including 'the lack of an up to date development plan and the lack of a five year housing land supply, leading to a number of applications and subsequent appeals'. As a consequence the Council has taken a cautious approach and rather than the past average of 116 dwgs per annum, a significantly reduced large sites windfall allowance figure equating to 50 dwgs per annum has been used in the LDP. This is considered to be a conservative and justifiable figure. With regards to the criteria i), ii) and iv) of Policy STR11 it must be stressed that this is a strategic policy which sets the scene in terms of establishing principles to be embodied in housing sites, and where in relation to the well-established principle of reading the plan as a whole, there are data led policies related to STR2 that provide the clarity sought to illustrate this; i.) This criteria is merely flagging up that the provision of affordable housing is an important consideration as explained in PPW10. Further specific guidance is set out in the signposted policy HN3 which sets out the affordable housing requirements.

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					ii.) This criteria seeks to make the best use of land which is a well established planning principle. It is signposted to Policy HN2 which sets out a minimum density of 30dph with flexibility within the policy to address site specific constraints. The actual density to be achieved on a particular site is based on the specifics of the site, the development proposed and its surroundings.. iv). The aim of this criteria is to encourage a range of dwelling types in order to cater for different housing needs "where appropriate". It is not intended that specialist housing will apply to every housing allocation or windfall site, although the provision of house types that meets the needs of an ageing population is something that developments should be mindful of. Each application will be assessed on its merits and the evidence of specialist housing need within that area at that time. Where such needs are evidenced and are included within the proposed development, bespoke viability testing would need to be carried out to account for potential additional costs.
1177	STR11: Provision of Sustainable Housing Sites	Support	Policy STR11: Provision of Sustainable Housing Sites Our Client agrees with the core principles of this Policy, namely the need to direct new housing development towards sustainably		The Council welcomes support for policy STR11.

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			located, economically viable and deliverable sites. There is a clear and urgent need for more affordable housing in Flintshire, and this needs to be reflected through the Council's housing requirement as well; as the site-specific policy requirements. Low density development should be avoided, providing for the efficient use of land. A mix of house types and tenures should be supported informed by an understanding of local needs; this in turn will require up-to-date evidence/information held by the Council as part of its Local Housing Market Assessment. Our Client welcomes the commitment by the Council to continue to monitor the housing land supply position and housing delivery in the County on an annual basis, reported through an Annual Monitoring Report. This will require regular dialogue with the development industry in order to ensure a robust position on housing supply and delivery is established.		
705	STR11: Provision of Sustainable Housing Sites	Support	Policy STR11: Provision of Sustainable Housing Sites We agree with the core principles of this Policy, namely the need to direct new housing development towards sustainably located,		The Council welcomes support for policy STR11

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			economically viable and deliverable sites. There is a clear and urgent need for more affordable housing in Flintshire, and this needs to be reflected through the Council's housing requirement as well; as the site-specific policy requirements. Low density development should be avoided, providing for the efficient use of land. A mix of house types and tenures should be supported informed by an understanding of local needs; this in turn will require up-to-date evidence/information held by the Council as part of its Local Housing Market Assessment. We welcome the commitment by the Council to continue to monitor the housing land supply position and housing delivery in the County on an annual basis, reported through an Annual Monitoring Report. This will require regular dialogue with the development industry in order to ensure a robust position on housing supply and delivery is established.		
743	STR11: Provision of Sustainable Housing Sites		To ensure that the Plan will effectively achieve its objective of delivering the homes that Flintshire needs, those housing sites which currently benefit from planning permission should be specifically		Not accepted. The Deposit LDP has a Housing Balance Sheet accompanying policy STR11. The Balance Sheet clearly explains in the notes accompanying the commitments that it is calculated as at the Housing Land Monitoring Study date of 01/04/18. It is not

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			allocated for development in the Plan. We trust that the above comments are useful and will be given due consideration. Please do not hesitate to get in contact should you wish to discuss any of our comments further.		possible for the Deposit LDP going out to consultation in September 2019 to have been based on the findings of the 01/04/19 Study given short timescale. It is clearly not possible for the Plan to be completely up to date in terms of every planning permission. In the event that during the Examination an updated Housing Balance Sheet is necessary, then planning permissions will be picked up as part of the Pans supply.
925	STR11: Provision of Sustainable Housing Sites	Object	We welcome the intention of the policy in that new housing will be directed to sustainably located, economically viable and deliverable sites. We have no objection to what is expected to be delivered on such sites, including affordable housing, whilst making efficient use of the site. Whilst the policy is acceptable in principle, it is not considered a suitable alternative for allocating sites instead. By allocating sites for housing, the Council can devise site specific requirements for individual sites that will ensure that the various expectations set out in STR11 can be met. An allocation or allocations would provide greater certainty that these can be met and delivered rather than waiting for individual sites to come along ad hoc. The provision of sustainable housing sites by allocating land for development	Allocate more sites: The land to the rear of 81 Drury Lane, Drury, is located within the settlement boundary and in our view would be a suitable site for a housing allocation. However, the Council have decided that it is not worthy of an allocation and instead have opted to rely on windfall developments coming forward to meet its needs instead. We do not consider this a sound approach as there is a risk that the objectives of the Plan will not be delivered and therefore, it does not	Not accepted. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply. Policy STR11 is a strategic policy which seeks to set the scene in terms of the provision of sustainable housing sites, whether they are allocations or windfalls. It needs to be read in conjunction with policy STR3 and HN1-3. It is established practice to include an allowance for windfalls and the Plan splits this

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			may help the Council redress its previous poor performance on housing delivery. It cannot currently demonstrate a five year supply of housing and the gap between what is needed and what is being constructed is getting wider. Positive planning through the allocation of sites, in our view, will help ensure that the Council will be able demonstrate a five year supply of housing upon adoption of the Plan and will enable it to prevent ad hoc applications that do not necessarily accord with the spatial development strategy. The Housing Balance Sheet set out following paragraph 7.11 includes an allowance of 600 dwellings for large site windfalls i.e. sites larger than 10 dwellings. We contend that a more appropriate approach would be to allocate sites instead rather than waiting for windfalls of this size to come along. The supporting text at paragraph 7.13 refers to site search sequence when identifying new allocations, which includes previously developed land and/or under utilised sites located within existing settlements in the first instance. The land to the rear of 81 Drury Lane, Drury, is located within the settlement boundary and in our	meet Test 3 as it is not effective.	into a small sites allowance of 60 units per annum and a large sites allowance of 50 units per annum. The allowances are conservative based on past trends and considered realistic going forward, based on the findings of the Urban Capacity Study. The HBF have agreed that these levels are appropriate. The Council accepts that the objection site at bank lane is located within the settlement boundary of Drury. In principle, the site is acceptable for housing development as a 'large site' windfall provided that it meets other planning policies. That said the site was identified as having windfall potential by its inclusion within the settlement boundary of the UDP, and given the objectors view that it is sustainable enough to allocate, then by definition it must also be equally sustainable to develop as a windfall. However, the objector has repeatedly submitted planning applications for a housing development which goes beyond the settlement boundary and into green barrier land and also land which is BMV agricultural land. Bank lane is considered to represent a firm and defensible boundary to the settlement and to the green barrier. In view of the considerable uncertainty that the objector is willing to pursue an acceptable development within the settlement boundary, it would be entirely inappropriate to allocate the site in the Plan. Given that there is if fact no certainty of the sites deliverability.

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			view would be a suitable site for a housing allocation. However, the Council have decided that it is not worthy of an allocation and instead have opted to rely on windfall developments coming forward to meet its needs instead. We do not consider this a sound approach as there is a risk that the objectives of the Plan will not be delivered and therefore, it does not meet Test 3 as it is not effective.		
27	STR12: Provision for Gypsies and Travellers	Object	By proposing an increase in pitches for travelers you will be failing to deliver on your objective to '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' You again fail to consider the impact on the local community. Ewole green school continues to grow class sizes at the detriment of the individual pupils.	By proposing an increase in pitches for travelers you will be failing to deliver on your objective to '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'	Not accepted. Welsh Government has placed a statutory duty through the Housing (Wales) Act 2014 on local authorities to make provision for sites for Gypsies and Travellers where a needs assessment identifies need. This is translated into national planning guidance by para 4.2.35 of Planning Policy Wales which states 'Local authorities are required to assess the accommodation needs of Gypsy and Traveller families and to allocate sites to meet the identified need'. The para goes on to say 'Where a Gypsy and Traveller Accommodation Assessment (GTAA) identifies an unmet need, a planning authority should allocate sufficient sites in their development plan to ensure that the identified pitch requirements for residential and/or transit use can be met. Planning authorities will need to demonstrate that sites are suitable for development and deliverable in the identified timescales'.

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					In preparing a development plan it is necessary to consider the housing needs of all members of society and this includes the needs of Gypsies and Travellers. The Plan has identified a need through its Gypsy Traveller Accommodation Assessment (GTAA). The role of the LDP is to safeguard land in the development plan through a land use allocation to meet that need. Following an assessment of Council owned land the Plan has sought to meet the identified need by seeking the extension of existing authorised sites where existing families have expressed to the Council a need to meet their extended family's needs. The objector's reference to objective 1 under 'Enhancing Community Life' in para 3.41 refers to 'communities' in its widest sense and there is a legitimate need to ensure that Gypsies and Travellers, as well as the 'settled' residents, have access to services and facilities such as education and health. In the absence of an objection to the site by the Local Education Authority, the additional educational needs arising from the increase in pitches should be able to be met.
13	STR13: Natural and Built Environment, Green Networks and Infrastructure	Support	The Greenfield Valley Trust supports policy STR13 in respect of the protection it affords to the historic assets and green environment of the Greenfield Valley and surrounding area.		The representation is noted and the council welcomes the support for policy STR13

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66	STR13: Natural and Built Environment, Green Networks and Infrastructure	Support	CPAT welcomes the intent of this policy to take account of historic environment features		The representation is noted and the council welcomes the support for policy STR13
408	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	The HBF suggests that not all development will be able to meet all of the criteria listed in the policy and the current wording suggests that all development has to meet all of the listed criteria. The HBF also question how it would be possible to comply with criteria x unless the site included such features within the site boundary. The protection of playing fields and open space is also covered by policy EN1	The policy wording should be amended to make it clear that development should attempt where possible or appropriate to comply and that it will not always be possible to meet all the criteria. Delete criteria x or amend wording.	Not accepted. This is a strategic policy that sets out high level principles which seek to protect and enhancing the County's environmental and historic assets. An aspiration that is set out in national planning policy and one which the Council fully advocates and supports as is reflected in the policy wording of the accompanying detailed policies such as EN1. Not all development will affect all the criteria listed on this policy but it is important to hi light all the issues to ensure that all developments have considered them.
213	STR13: Natural and Built Environment, Green Networks and Infrastructure	Support	support		Support is noted.
418	STR13: Natural and Built Environment, Green Networks and Infrastructure	Support	Support		Support is noted.
682	STR13: Natural and Built	Object	The site at Llys Ben is roughly rectangular in shape and is	propose site at Northop Hall, Llys Ben	Not accepted. The existing UDP green barriers have been reviewed in line with PPW10. Each

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	Environment, Green Networks and Infrastructure		bounded to the east and the south by existing residential development comprising predominately large detached properties. To the west of the site is the Northop Hall Pavilion with carparking, formal play area and football pitches. The site is only open on its northern boundary beyond which is agricultural farmland. It therefore is contained with the existing urban form of Northop Hall. Outside of its Green Barrier designation the site does not have any particular landscape importance attached to it and is identified by Carl Taylor BA (Hons) Dip LA/CMLI as having "a poor-quality landscape".		has been reviewed against the criteria in PPW10 alongside whether there is persistent development pressure. The presence or otherwise of 'landscape quality' considerations is not a factor to be taken into account in the designation of a green barrier as the key consideration is 'openness'. The site was submitted as an omission site in the UDP and was considered by the UDP Inspector who did not recommend the inclusion of the site. The Inspector commented in respect of the green barrier 'In this case because I find the site relates well to the countryside and other open land such as the playing fields to the west, it forms part, albeit a small part, of the green barrier and allocation of/development on it would undermine the objectives of the designation'. The findings of the UDP Inspector are still considered relevant in the context of the LDP.
773	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	In relation to the FCC's strategic policy for Natural and Built Environment, Green Networks and Infrastructure the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LPD process are as follows: a) The Deposit LDP has designated the former candidate sites HK10 &	The Deposit LDP has designated the former candidate sites HK10 & HK13 as falling within a Green Barrier. It is proposed that the former candidate site HK03 and the land to the south & east of the property known as The Mount, Lesters	Not accepted. The purpose of the Policy EN11 Green Barrier is to ensure the protection of the openness of key areas and locations between and around settlements. Background Paper No1 Green Barrier Review shows the results of the LDP review of green barriers and states about the green barrier around Higher Kinnerton EN11. 14. ''This large (464 ha) green barrier forms a strategic gap between Broughton/Bretton and Saltney and the Cheshire border. It comprises open and flat

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			HK13 as falling within a Green Barrier. It is proposed that the former candidate site HK03 and the land to the south & east of the property known as The Mount, Lesters Lane should also be designated as a Green Barrier. The community wish to conserve and protect the rural setting of the village which has already been compromised by the Kinnerton Meadows development which was granted permission on appeal. By extending the proposed Green Barrier as proposed, this would ensure that both the existing village and the new proposed Warren Hall development, whilst forming part of the same community, maintain their own identities and rural settings which residents indicated that they value so much through the Village Plan Survey. The extension would also protect the two Grade II Listed buildings on the edges of HK03 as well as the footpath into the village which would provide an important rural link between the existing and new community. b) Higher Kinnerton Community Council has adopted the aims and ambitions set out in the Wellbeing of Future Generations Act, Flintshire County Council's "A Wales of Cohesive	Lane should also be designated as a Green Barrier. The community wish to conserve and protect the rural setting of the village which has already been compromised by the Kinnerton Meadows development which was granted permission on appeal.	land where development would harm its open character and appearance. The A55 provides a firm and defensible boundary to any expansion southwards of Broughton. However, the location of the extended Warren Hall strategic site on the south side of the A55 (and the need to consider a further extension southwards) would result in a narrow gap between Warren Hall and Higher Kinnerton. This is emphasised by the recent Elan Homes planning permission which extended Higher Kinnerton north westwards, towards Warren Hall. It is therefore considered necessary and appropriate to retain this green barrier and extend it south westwards to include land at the junction of Kinnerton Lane and Lesters Lane and extending along the north side of Main Road to the County boundary.'' The green barrier boundary should follow a defensible physical feature on the ground and Kinnerton Lane is the most suitable boundary in that location. Green barrier should : -not be designated where normal open countryside policies would be sufficient • not be drawn wider than necessary to achieve their purpose • be drawn where there is significant and sustained development pressure • not unnecessarily duplicate other policy

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			Communities" and a "Healthier Wales".		designations • not need to possess any intrinsic inherent landscape, nature conservation or other quality. It is considered appropriate to use the Kinnerton Lane as the boundary in this location which will create an adequate barrier between Higher Kinnerton and the Warren Hall development without creating a barrier wider than necessary. As such it is not considered necessary to designate the Candidate site HK003 as green barrier.
835	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	Policy STR13 (Natural and Built Environment) Policy STR13 of the Deposit Plan states: "Development will identify, respect, protect, enhance and connect Flintshire's environmental assets, to create a multifunctional network of natural and historic resources. To achieve this all development will: …" Bourne Leisure endorses the Council's commitment to protecting and enhancing Flintshire's environmental assets. However, as drafted, Policy STR13 is not consistent with national policy as it is more onerous than PPW, which states that planning authorities should "…enable complementary [tourist] development such as accommodation and access to be	Policy STR13 should be amended as follows: "Development will identify, respect, protect and, where possible, enhance and connect Flintshire's environmental assets to create a multifunctional network of natural and historic resources. To achieve this all development will, where appropriate: …"	Not accepted. This is a strategic policy that sets out high level principles which seek to protect and enhancing the County's environmental and historic assets. An aspiration that is set out in national planning policy and one which the Council fully advocates and supports as is reflected in the policy wording of the accompanying detailed policies such as EN1. Not all development will affect all the criteria listed on this policy but it is important to highlight all the issues to ensure that all developments have considered them.

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			provided in ways which limit negative environmental impacts and consider the opportunities to enhance biodiversity." (paragraph 5.5.6). Paragraph 6.4.21 also states that enhancements should be achieved wherever possible. Each proposal should be considered on its own merits. Draft Policy STR13 therefore fails the first test of soundness (Does the plan fit?). In order to be consistent with national policy and therefore sound, draft Policy STR13 should be amended as follows: "Development will identify, respect, protect and, where possible, enhance and connect Flintshire's environmental assets to create a multifunctional network of natural and historic resources. To achieve this all development will, where appropriate: …" (proposed amendments underlined). Without the amendment to ensure the emerging Plan is sound, the draft policy risks creating unreasonable requirements which may not be achievable in every circumstance which in turn would risk making the plan undeliverable.		
940	STR13: Natural and Built Environment, Green Networks	Object	Para 16.13 states that Policy STR13 does not mention BMV because it is covered in PPW10 yet, this is considered	Para 16.13 states that Policy STR13 does not mention BMV because it is covered	Not accepted. Welsh Government advice is very clear on this issue and states that PPW policies should not be repeated in LDP's. LDP Manual Edition 3 states in paragraph 3.11 '' A

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	and Infrastructure		unacceptable given that PPW10 states that BMV must be protected.	in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	LDP should be focussed, succinct and relevant to the key issues it is seeking to address. It should not repeat national policy.''
1048	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	Habitats Regulations Assessment We have significant concerns regarding the suitability of the Habitat Regulations Assessment (HRA). This is due to the screening decisions reached in the HRA. We believe that policies PE2, PE13 and PE14 have been screened out to early in the process. Policy PE2 defines areas where certain types of employment development 'will be permitted'. As such, these areas must be assessed through the HRA process. Policies PE13 and PE14 give assurance that features of 'nature conservation' must be given appropriate consideration in any future application. However, the areas defined by these policies lie within and immediately adjacent to protected sites, and as such, we consider that they cannot be screened out from the HRA at such an early stage.		Partly accepted. Policy PE13 is a policy which seeks to carefully manage static caravan and chalet development and it identifies an area in the coastal strip between Talacre, Gronant and Gwespyr where new static caravan development is not permitted. This is because of the cumulative impact of historic static caravan development in this area on the flat, open coastal landscape and the fact that the area is sensitive in terms of international nature conservation designations and flood risk. The policy approach is carried over from the UDP and it is considered that the NRW have misinterpreted the policy wording, particularly as the explanatory text provides a clear explanation as to what the policy is seeking to achieve. Nevertheless, the Council considers that should the Inspector at examination be of the opinion that the policy could be amended to make clearer the intention of the policy then the Council would not oppose this. Policy PE14 is a policy which seeks to carefully manage development in the Greenfield Valley. The Greenfield Valley is designated in the Plan on account of its diverse natural and man made assets and character. The policy approach is carried over

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			Before a plan can be postponed to a lower tier or to project level assessment, there are clear requirements in order to ascertain that there would be no adverse effect on the integrity of a European site (Appropriate Assessment). Flintshire CC as LPA may only rely on mitigation measures in a lower tier plan, or at project level (i.e. to postpone) if the following three criteria are all met: i. The higher-level plan assessment cannot reasonably predict effects on a European site in a meaningful way; whereas ii. The lower tier plan or project level, which will identify more precisely the nature, timing, duration, scale or location of development, and thus its potential effects, will have the necessary flexibility over the exact nature, timing, duration, scale and location of the proposal to enable an adverse effect on site integrity to be avoided; and iii. The HRA of the lower tier plan or project is required as a matter of law or Government policy. We would welcome further		from the UDP. In respect of new development proposals, the policy may use the words 'will be permitted' but this is qualified by the remainder of the policy which states 'where they do not detract from the tourism potential of the valley or harm areas or features of landscape, nature conservation or historic value. The Council does not consider that the policy actively promotes development which would potentially be harmful to areas of flood risk, historic assets or international nature conservation designations. Nevertheless, it considers that should the Inspector at examination be of the opinion that the policy could be amended to make clearer the intention of the policy then the Council would not oppose this. Policy PE2 identifies Principal Employment Areas which recognise existing defined area of employment development. The policy allows for 'in effect' new employment development to come forward as 'windfall' development. The policy wording is clear that proposals would only be permitted where it 'is of an appropriate type and scale for both the site and its surroundings'. Development proposals would also need to satisfy other policies in the Plan (as the Plan needs to be read as a whole) and therefore be assessed against policies relating to flood risk. Nature conservation and built heritage. Nevertheless, NRW interpret the policy as being akin to 'allocating' land for employment development. As with the other two policies the Council would not object to the

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			discussion with the Policy team regarding this matter.		Inspector identifying an amended policy wording. Although to varying degrees it is considered that NRW has misinterpreted the three named policies, it is considered NRW have raised concerns about whether the HRA has fully complied with law and legislation. It is therefore proposed that, the Council's specialist consultants be asked to undertake a supplementary addendum to the HRA to specifically appraise these policies'.
1066	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	Policy STR13: Natural and Built Environment, Green Networks and Infrastructure – NRW would welcome reference in this section to Geodiversity.	NRW would welcome reference in this section to Geodiversity.	Not accepted. Criterion iii of the policy states ''Conserve, protect and enhance the quality and diversity of Flintshire's natural environment including …. . The use of the word 'including' means that the list is not exhaustive and so the policy can relate to geodiversity. Geodiversity is also mentioned in the explanation paragraph 8.10. It is not considered necessary for the policy to be amended.
760	STR13: Natural and Built Environment, Green Networks and Infrastructure	Support	Policy STR13: Natural and Built Environment, Green Networks and Infrastructure 6.35. Our Client recognises the importance of maintaining a balance between new development and the protection of the natural and built environment. To this end, our Client supports the general themes of this Policy, many of which resonate with them as a leading housebuilder in North Wales		The representation is noted and the council welcomes the support for policy STR13

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			across a range of sites. The provision of open space, landscaping, and net gains in biodiversity are matters with which our Client is familiar through the development management process. The delivery of such provision needs to be supplemented by longer-term management measures which should be put in place at an early stage of the development process.		
955	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	Para 16.13 states that Policy STR13 does not mention BMV because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	Para 16.13 states that Policy STR13 does not mention BMV because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	Not accepted. Welsh Government advice is very clear on this issue and states that PPW policies should not be repeated in LDP's. LDP Manual Edition 3 states in paragraph 3.11 '' A LDP should be focussed, succinct and relevant to the key issues it is seeking to address. It should not repeat national policy.''
970	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	Para 16.13 states that Policy STR13 does not mention BMV because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	Para 16.13 states that Policy STR13 does not mention BMV because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	Not accepted. Welsh Government advice is very clear on this issue and states that PPW policies should not be repeated in LDP's. LDP Manual Edition 3 states in paragraph 3.11 '' A LDP should be focussed, succinct and relevant to the key issues it is seeking to address. It should not repeat national policy.''
988	STR13: Natural and Built	Object	Para 16.13 states that Policy STR13 does not mention BMV	Para 16.13 states that Policy STR13 does	Not accepted. Welsh Government advice is very clear on this issue and states that PPW

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	Environment, Green Networks and Infrastructure		because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	not mention BMV because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	policies should not be repeated in LDP's. LDP Manual Edition 3 states in paragraph 3.11 '' A LDP should be focussed, succinct and relevant to the key issues it is seeking to address. It should not repeat national policy.''
1010	STR13: Natural and Built Environment, Green Networks and Infrastructure	Object	Para 16.13 states that Policy STR13 does not mention BMV because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	Para 16.13 states that Policy STR13 does not mention BMV because it is covered in PPW10 yet, this is considered unacceptable given that PPW10 states that BMV must be protected.	Not accepted. Welsh Government advice is very clear on this issue and states that PPW policies should not be repeated in LDP's. LDP Manual Edition 3 states in paragraph 3.11 '' A LDP should be focussed, succinct and relevant to the key issues it is seeking to address. It should not repeat national policy.''
419	STR14: Climate Change and Environmental Protection	Support	support policy.		Support is noted.
680	STR14: Climate Change and Environmental Protection	Support	Policy STR14: Climate Change and Environmental Protection We support the requirement within this policy for a sustainable approach to water resource management including supply, surface water run-off and waste water treatment. The tackling of surface water at source is a vital component of sustainable development and mitigates against overloading sewers which can ultimately lead		The representation is noted and the council welcomes the support for policy STR14

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			to flooding. The Flood and Water Management Act 2010 reinforces the obligations for developers to incorporate sustainable drainage systems into their developments.		
690	STR14: Climate Change and Environmental Protection	Object	We request that the following minor changes be made to other policies STR14: Climate Change and Environmental Protection – "Supporting the development of infrastructure necessary for the transition to a low carbon Wales, on suitable sites, such as those designated under Policy ENxx." be added to the aims.	We request that the following minor changes be made to other policies STR14: Climate Change and Environmental Protection – "Supporting the development of infrastructure necessary for the transition to a low carbon Wales, on suitable sites, such as those designated under Policy ENxx." be added to the aims.	Not accepted. Policy EN13 Renewable Energy and Low Carbon Energy Development permits proposals for renewable and low energy carbon subject to certain criteria. The Council have carried out a Renewable Energy Assessment which has identified the Indicative Local Search Areas in order to focus this type of development in the most appropriate locations. It is considered unnecessary therefore to have an addition policy setting out allocations for energy storage infrastructure.
856	STR14: Climate Change and Environmental Protection	Object	STR14 1V flood risk sites – Mold Flood Alleviation Scheme stage 2 has been shelved and there is no reference in the LDP as to how this will now be delivered in Mold apart from HN1 6 land between Gwernaffield Road and Denbigh Road. The water is from the hills around Mold including Gwernymynydd and Gwernaffield and the scheme will have to be	Remove Mold Site - Flood Risk concern	Not accepted. Housing Allocation HN1 (6) does not fall within an area of C1 or C2 flood risk as defined on the Development Advice Maps produced by NRW. A pocket of surface water floodrisk exists to the north west of Alwyn Close which can be addressed as part of developing a SuDs scheme for the development. The north western part of the candidate site sits within a C2 flood risk area within the DAM and accordingly the site boundary has been drawn back to exclude this

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			more than one new estate and any potential changes to Factory Pool Lane 8.20 'Encourages' is not enough for the next 10 years and the climate change emergency that WG has announced – new developments 'must' include energy efficiency measures – solar PV and HW on houses, district heating schemes for developments of scale, farm-scale AD to power lighting on new developments close by – this would be ideal for the dairy farm at Rhual and the new Gwernaffield Road and Denbigh Road, Mold proposals (eg the AD at Holt)		flood risk area. The brief design guidance for this site in the written statement in policy HN1 stipulates that development, with the exception of the new access road onto Denbigh Rd, will not take place on the land between Pool House lane and Denbigh Rd in order to provide a landscape buffer and to incorporate a suds lagoon or attenuation pond. NRW have been consulted on the Deposit Plan and they have no statutory objection to the site. In this context the Plan, and the specific allocation are compliant with PPW and therefore do not fail the tests of soundness. The Mold Flood Alleviation Scheme which secured planning permission will not be delivered in its approved form, largely due to budgetary pressures. A revised scheme is presently being looked at. Therefore, it is necessary for the allocated site to be designed in such a way that it can work effectively with any future flood alleviation scheme. In terms of energy efficiency, new development will have to adhere to all new Building Regulations that come into force over the plan period. The purpose of this policy is to set a strategic framework to reflect the Well Being Act and PPW support the authority in its aim to help tackle climate change. Policy EN12 seeks to ensure that larger housing and commercial schemes seek to maximize the use of renewable energy measures as an integral part of the development. The Council

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					cannot insist though that all new development incorporates renewable energy. In a broader context the Welsh Government has consulted on tougher requirements for new housing development but this is unlikely to be implemented in full until 2025. The decision as to whether existing farms or businesses incorporate renewable energy technology into their operations is entirely a matter for them to decide upon. The Plan provides appropriate guidance in policy EN13.
644	STR14: Climate Change and Environmental Protection	Object	In order to address the conflicts above and ensure that Policy STR14 is sound, it is requested that the Council: 1 Considers whether the policy is necessary and justified; and, 2 On the findings above, amend Parts iii, v and vii of the Policy and the justification to provide a clear strategy as to how developers are to demonstrate sustainable, energy efficient design and how the Council will implement it and at what point during the application process	1 Considers whether the policy is necessary and justified; and, 2 On the findings above, amend Parts iii, v and vii of the Policy and the justification to provide a clear strategy as to how developers are to demonstrate sustainable, energy efficient design and how the Council will implement it and at what point during the application process	Not accepted. Planning Policy Wales (PPW) and the Well Being Act, place great emphasis on the sustainable development of land and the need to be able to adapt to climate change. This is a strategic policy that seeks to achieve that aspiration by hi lighting the main factors which influence climate change and show how planning can play a role in dealing with this important issue. It is therefore vitally important for this strategic policy and the more detailed policies associated with it, to form the basis of all planning decisions and set out how development can achieve positive sustainable places. All of the criteria are material planning considerations, some are more relevant than others depending on the type of development, therefore the weight to be attached to each issue will be recognised and considered at the planning application stage. In terms of Criterion iii the Sustainable Drainage Systems associated with all new developments is

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					covered in more detail in Policy EN15 Water Resources and PC3 Design. SUD's regulations since January 7th 2019, state that all new developments of more than 1 house or where the construction area is of 100m2 or more will require sustainable drainage to manage on-site surface water. For Criterion v. in terms of energy efficiency, new development will have to adhere to all new Building Regulations that come into force over the plan period. For Criterion vii detailed policies PC4 and EN 14 are relevant.
1067	STR14: Climate Change and Environmental Protection	Support	we welcome reference (vi) to the protection of the environment from light pollution.		The representation is noted and the council welcomes the support for policy STR14
836	STR15: Waste Management	Object	i Maximising the use of secondary and recycled aggregate." Whilst Bourne Leisure recognises the importance of ensuring that the County has sufficient waste management facilities and mineral resources, the amenity of any nearby sensitive receptors, including holiday accommodation, should be protected from any adverse impacts associated with waste management, resource recovery activities and minerals extraction, such as noise, odour and visual impacts. Failing to protect amenity is likely to result in operators not being able to attract new and repeat visitors to the local	following addition to Policy STR16: "Whilst meeting the needs of mineral resource management, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed mineral extraction/processing facilities."	Not accepted. Policy STR16 is a strategic policy which sets out the general approach that has been taken in the plan with respect to facilitating sustainable management of mineral resources in Flintshire. Point iv of the policy states that we will ensure that new mineral extraction is located so as to minimise impacts on communities and the environment. Strategic Policy STR14 sets out the general approach in point vi that new development will have regard to the protection of the environment in terms or air, noise and light pollution Also, Policies PC2, EN18, and EN27 provides detailed criteria against which planning

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			area with direct and indirect consequences for the local economy, including retaining jobs. This in turn would undermine delivery of the emerging Plan. As such, Bourne Leisure proposes the following addition to Policy STR15: "Whilst meeting the needs of waste management facilities, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities." (proposed additions underlined) The Company also proposes the following addition to Policy STR16: "Whilst meeting the needs of mineral resource management, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed mineral extraction/processing facilities." (proposed additions underlined) The proposed amendments will align Policy STR15 and Policy STR16 with PPW which states that, "The planning system has an important role to play in facilitating sustainable waste management by providing a framework for decision making which recognises the social, economic and environmental benefits that can be realised from the management of		applications (including minerals applications) will be assessed. Policy PC2 sets out the general requirements for development which includes a number of criterion including point a. which would ensure development harmonises with the surrounding area, point b. "where all development should, where appropriate not have a significant adverse impact on the safety and living conditions of nearby residents, other users or nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard or the adverse effects of pollution." Policy EN18 will also provide safeguards to ensure that new development would not create an increased risk of noise, vibration, odour, dust, light or other pollution or hazards. Policy EN27, specific to secondary and recycled aggregate applications will ensure that they development would not have an adverse impact on residential amenity through noise or dust. It is considered that, when the Plan is read as a whole, there are detailed criteria based policies within the Plan that will safeguard the amenity of residents and other land users from any potential mineral development that may be proposed and assessed by the LDP. Therefore there would be no need to change Policy STR16 as suggested as this would repeat policy already contained within the LDP.

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			waste as a resource to meet the needs of society and businesses, whilst at the same time: protecting the amenity of residents, of other land users and users affected by existing or proposed waste management facilities." (paragraph 5.13.1). The proposed amendments would also align Policy STR16 with paragraph 5.14.42 of PPW which states that "minerals workings should not cause unacceptable adverse environmental or amenity impact…". The proposed amendments to Policy STR15 and STR16 would mean that these elements of the Plan would satisfy the test of soundness.		
181	STR16: Strategic Planning for Minerals	Support	The Coal Authority supports this policy which identifies that mineral sterilisation will be a consideration when development proposals are being considered.		Noted
299	STR16: Strategic Planning for Minerals	Object	Policy STR16: Strategic Planning for Minerals While the Town Council wish to support the importance of minerals in the area, it has concern regarding the details given for Caerwys quarries. It is felt that we wish to object and express concern to the proposals for an extension at Ddol Uchaf for the following reasons. In Test 2 it	The area should be protected for the natural environment along with sensitive considerations for residents living close and within the 100m buffer.	Not accepted. STR16 provides the Strategic Policy which sets out the general approach that has been taken with respect of sustainably managing mineral resources in Flintshire, and the wider region. Policy EN25 provides details of the allocations set out in the plan to demonstrate how a sustainable supply of minerals can be provided for. Policy EN26 provides the criteria to which minerals

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			states that allocation should be logical, reasonable and balanced, together with being clear and focused. The proposals state that the extension would be increased from 5.2 ha to 10 ha. This would be doubling the site, is this reasonable and balanced? We object. The plan allocation is inappropriate for the area in light of evidence that would be required, is this clear and focused? We object and express concern. The area should be protected for the natural environment along with sensitive considerations for residents living close and within the 100m buffer. We object and express concern. The transport infrastructure would be a concern due to the vertical and horizontal alignment of the A5122 into and through Caerwys and on to the A55. Express concern. Other objections include affecting Footpath 27; effects on the ecology in a SSSI ; will affect archaeology and visual impact on the AONB. Thank you for your time and understanding for this small town of Caerwys. The Town Council would be happy to discuss this further if required		development will be assessed at the planning application stage. The extension in Ddol Uchaf has been proposed by the developer as an extension to the area adjacent to their existing consented area at the site (which currently lies dormant). It is logical to propose an extension to an existing quarry site where there are known mineral resources as the necessary infrastructure will be located on site associated with their current consent, once it recommences operations at this site. Furthermore, it is reasonable to propose an extension, as opposed to the allocation a new site to meet the aggregate needs of the county, and wider region given that the tonnages required by the emerging RTS second review (at least 3.543 million tonnes) would not support the creation of a new quarry site. The allocation is clear and focused as the site is clearly defined in the proposals map. The emerging RTS second review has indicated that Flintshire needs to find an additional 3.543 million tonnes (at least) which this allocation would contribute towards as it is anticipated it would yield 1.4 million tonnes. Therefore it is considered to be reasonable and balanced. Concerns raised by the Town Council would be addressed at the planning application stage in terms of highways. As stated within the Minerals Background Paper, planning permission was granted in 1989 for an access

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					into the quarry directly off the A541 and therefore the B52122 would not be required to be used to access any extension. The planning application could address vehicle routing to avoid travel through the village of Caerwys, a temporary or permanent diversion of the public footpath would be required should the allocation be developed. However, this would be undertaken under different legislation. The effects of mineral working in this site would be assessed through the environmental statement that would accompany the planning application which would assess amongst other things, the effects on ecology, archaeology, the visual impact from the AONB and also residential amenity. The Minerals Background Paper also addresses these issues to provide evidence that the application is likely to be acceptable in planning terms. The working area would be refined in the planning application to ensure that there would be no residential properties within the 100m buffer zone.
908	STR16: Strategic Planning for Minerals		Strategic Policy STR16 – Strategic Planning for Minerals We would express our surprise as to why the strategic minerals policy is contained within a chapter entitled "Valuing the Environment". This approach emphasises the fundamental disconnect between society's understanding and its need for minerals. The policy would be better located within Section 6 of the Preferred	The policy would be better located within Section 6 of the Preferred Strategy, "Supporting a Prosperous Economy".	Not accepted. The Plan should be read as a whole document and therefore, the particular section that the minerals policies are located is not significant. Equally, minerals development does have an impact on the environment which is why the minerals policies are located where they are. This does not affect the soundness of the plan.

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			Strategy, “Supporting a Prosperous Economy”. Minerals supply is fundamental to economic growth We support the principle of seeking to avoid the sterilisation of mineral resources from inappropriate development, however, it would be helpful for the Council to indicate which minerals resources it intended to safeguard from sterilisation. We would suggest that this approach should be extended to cover minerals infrastructure. At point iii, the proposed policy states that the Council will contribute “towards the regional supply of mineral through the allocation of 1.4 million tonnes of sand and gravel and 3.84 million tonnes of crushed rock through the extension to existing quarries, in collaboration with Wrexham County Borough Council”. This is not a true reflection of the Regional Technical Statement (first review) which requires new allocations totalling at least 1.4 million tonnes of sand & gravel and at least 3.84 million tonnes of crushed rock (our underlining). It is appreciated that the RTS is scheduled for review, however, the policy as worded does not accord with current RTS requirement. Further, we believe that the wording which states “through the extension to existing		The Minerals Background Paper provides the evidence base in which the Minerals Policies have been developed. The Minerals Background Paper (in section 5) provides justification why surface coal and clay are not safeguarded through the LDP. All limestone, including industrial limestone (non-aggregate limestone) is safeguarded through the mineral safeguarding areas shown on the constraints plan, and through Policy EN23. There is also a Mineral Buffer Zone (as defined in Policy EN24) applied to the operational quarry Cefn Mawr that supplies industrial limestone to Padeswood Cement works. The Minerals Background Paper also provides evidence how non mineral Candidates Sites within the Buffer Zone of Cefn Mawr quarry have been assessed. Policy EN26 (and other policies in the plan) provides the criteria in which proposals for non-aggregate minerals would be assessed. The Minerals Background Paper provides details relating to Cefn Mawr Quarry in relation to the life of planning permission to 2042 which is beyond the plan period. Therefore, it is not necessary to plan for additional need for industrial limestone during this LDP.

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			quarries" may prove overly restrictive and may limit potential sites being brought forward for allocation. Such wording does not accord with PPW which states that "such a policy should not rule out the possibility of new workings where these may be environmentally more acceptable". The important consideration is to ensure a continuing and adequate supply of minerals to accord with PPW. It is not clear how the Council will address non-aggregate minerals within the plan. We would suggest the Council needs to address this. Further, we note Policy STR4, ii) states "Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;"		Furthermore, the LDP is not supposed to repeat national policy contained within PPW10. Page numbers will be checked with a final draft as page numbering will change in the final draft. STR16 provides the Strategic Policy which sets out the general approach that has been taken with respect of sustainably managing mineral resources in Flintshire, and the wider region. Policy EN23 provides a detailed policy which states which minerals would be safeguarded. This policy also includes point e) which includes essential infrastructure. To provide certainty, the Council would not object to Mostyn Docks (which could be used for the landing of minerals such as sand) and Padeswood Cement Works railway sidings being shown on the Proposals Map should the Inspector consider that this annotation would improve the Plan. The comments in relation to point i are noted and the Council would not object to the change of wording as drafted below, should the Inspector consider that the change of wording would improve the Plan. "i. Protecting minerals from unnecessary sterilisation by directing new development away from areas underlain by mineral of economic importance or where this is not possible through the requirement for prior

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					extraction in accordance with the criteria set out in Policy EN23." STR16 provides the Strategic Policy which sets out the general approach that has been taken with respect of sustainably managing mineral resources in Flintshire, and the wider region. Policy EN24 provides the detail of how Mineral Buffer Zones would be applied. The comments are noted and, the Council would not object to the change of wording as drafted below, should the Inspector consider that the change of wording would improve the Plan. "ii. Reducing the conflict between minerals development and sensitive development through the use of buffer zones as identified on the Proposals Map and applied through Policy EN24." With regards to point iii. of Policy STR16, the comments are noted and the Council would have no objection to the Inspector considering the suggested change to the policy wording which retains the intention of the policy as originally drafted. Suggested change of policy wording: iii. Flintshire will contribute to the regional supply of minerals in collaboration with Denbighshire and Wrexham County Borough Councils to accord with the apportionment

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					figures contained in the published Regional Technical Statement" It is suggested that the Council would have no objection to include the reference to the Appendix A (North Wales) of the RTS in the RJ within para 8.27, if the Inspector considers that this would improve the Plan. Flintshire has no specific building stone quarries. There is limited resource available in the County and no demonstrable need for this type of mineral. The LPA served prohibition orders on a number of quarries that supplied the building industry for historic buildings as there was no demonstrable need. However, should one ever arise in the future it is considered that there is sufficient flexibility in Policy EN26 for this to be considered. Furthermore, this issue can be reconsidered at future LDP reviews. The comments are noted. The Policies and RJ was drafted prior to the second review of the RTS being published for consultation. Therefore, at the time of the Plan going on deposit, the first review of the RTS was the evidence base in which the Council used in the drafting of the policy and the RJ and therefore the figures quoted are from the first review of the RTS as the second review was not available at the time of publication.

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					Policy EN26 provides a criteria based policy which allows for non-allocated sites to come forward. The Council feel that this policy provides flexibility for other sites to come forward to meet future demand. However, should the Inspector feel that the Plan could be improved by amending the wording of this paragraph, the Council would not object to the following wording to Paragraph 8.27 of the RJ. "The RTS and accompanying appendix for North Wales identifies the level of need for mineral at the regional level, and then apportions this to individual local authorities. A need for additional sand and gravel has been identified in Flintshire as well as crushed rock. It is proposed to meet the need through the extension of existing quarries. Detailed allocations are identified on the Plan and on the Proposals Map. In addition to this, new site development may also be required to meet future demand in addition to the extensions proposed as allocations. Further allocations may be proposed on subsequent reviews of the LDP to meet the identified need of the RTS." The Minerals Background Paper provides the evidence base for the minerals policy. It is inherent within PPW10 as the representor states that minerals are essential to the economy. It is considered not necessary to repeat national policy.

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					Noted, should the Inspector feel that the Plan could be improved by amending the documents listed within the 'key evidence', the Council would not object to the following to be added to the table providing the Policy Context: - North Wales Regional Aggregate Working Party Report, - RTS second review (consultation draft) - Minerals Technical Advice Note 1 (MTAN1) Noted, should the Inspector feel that the Plan could be improved by amending the documents listed within the 'monitoring', the Council would not object to the following to be added to the table providing the Policy Context: - North Wales Regional Aggregate Working Party Report,
1029	STR16: Strategic Planning for Minerals	Object	Minerals and Waste The Council notes that the LDP proposes to meet future minerals requirements by allocating extensions to existing sites and that proposals for the management of waste, will generally be allowed on employment sites, which should meet Flintshire's waste	To improve clarity, or help answer questions about the policy meaning and how it will be assessed, the Council would make the following	Not accepted. The explanatory text and the Minerals Background Paper refer to collaborative working and provide further explanation with regards to the nature of collaboration. The Flintshire LDP deposit draft, and the figures contained in strategic policy STR16 was published prior to the consultation draft

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			requirements. To improve clarity, or help answer questions about the policy meaning and how it will be assessed, the Council would make the following observations: • STR16 (iii) – it is not clear whether the text 'in collaboration with Wrexham County Borough Council' relates to sand and gravel and crushed rock only, or just crushed rock. What does 'in collaboration with Wrexham County Borough Council' mean? How has the contribution been split between the individual authorities? • STR16 (v) – does it explain anywhere what is meant by 'appropriate restoration' or 'specific environmental and community benefits'?	observations: • STR16 (iii) – it is not clear whether the text 'in collaboration with Wrexham County Borough Council' relates to sand and gravel and crushed rock only, or just crushed rock. What does 'in collaboration with Wrexham County Borough Council' mean? How has the contribution been split between the individual authorities? • STR16 (v) – does it explain anywhere what is meant by 'appropriate restoration' or 'specific environmental and community benefits'?	RTS second review. In reality more sand and gravel, and crushed rock is required to be identified through the LDP; at least 3.543 million tonnes and 35.9 million tonnes respectively. Flintshire will work in collaboration with Wrexham County Borough Council, and Denbighshire County Council to provide for the minerals needs of the region for both the provision of sand and gravel and crushed rock. With respects to Wrexham and crushed rock, Flintshire had already committed to provide for Wrexham's crushed rock requirements through a statement of Common Ground published through Wrexham's LDP process. The RTS second review now recognises that Wrexham is so heavily constrained due to the location of crushed rock in relation to the AONB, it is not reasonable to require Wrexham to provide crushed rock and as a result is not required to make any provision within their plan. Therefore it is inherent that Flintshire will work collaboration with Wrexham with respects to Crushed Rock. As Denbighshire has a large landbank of crushed rock due to a number of mothballed sites in the County, Flintshire will produce a sub-regional Statement of Collaboration with Denbighshire to assist with the required apportionment identified for Flintshire. Furthermore, Flintshire will need to work in collaboration with Wrexham to meet its

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					apportionment figure with respects to Sand and Gravel. Yes: It is suggested that the Council would have no objection to change the wording of point iii to reflect the new figures in the RTS second review to: iii. Flintshire will contribute to the regional supply of minerals in collaboration with Denbighshire and Wrexham County Borough Councils to accord with the apportionment figures contained in the published Regional Technical Statement." Each quarry site will have specific restoration requirements which will be derived from the type of mineral that has been excavated, and the way in which mineral has been excavated. Therefore it would be difficult to present a prescriptive policy to define what is meant by appropriate restoration, as this will vary from site to site. STR16 is the strategic policy, which this requirement for restoration is then continued and presented in Policy EN26 which prescribes the criteria for minerals development. Policy EN26 provides a criteria based policy for which minerals development will be assessed. Criteria iv and v have been included within the policy to ensure that proposals for mineral development include restoration and aftercare provision which would be assessed at the planning application stage. Each

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					proposal would be considered on a case by case basis, and on its own merits. All minerals development would have characteristics specific to the individual site and restoration for sand and gravel quarries may be different to a hard rock quarry. Therefore, it would be difficult to prescribe in the policy what specifically it should include. Each planning application will be required to provide details of restoration, which will be assessed at the application stage. Therefore, there is no need to prescribe details within this policy.

Policies PC1 to PC12

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276	PC1: The Relationship of Development to Settlement Boundaries		Dear Sir, Flintshire LDP Consultation Document and LDP08 Candidate Alternative Sites I have reviewed the above documents and in principal support your plan, however I wish to make the following comments. 1. There appears to be no commitment to Education or Healthcare Services! With the perceived increase in housing there must be an increase in families and therefore children requiring education, where are the new schools? With the increase in our aging population there will inevitably be an increase in the need for healthcare services, apart from your commitment to increase social services for home care/visits I see no future infrastructure in your plan. 2. As a resident of Higher Kinnerton the proposed Strategic site of Warren Hall including approximately 300 new homes, all to be located within the existing Parish boundary of Higher Kinnerton, there will undoubtedly be significant impact on the village amenities ie school, church, village hall, scout hut etc. This should eliminate future housing development here not only in this LDP but beyond! 3. Viewing document LDP08 I note ALL Candidate Sites pertaining to		Noted. The Deposit Plan has not allocated nor included within the settlement boundary the candidate site HK008. The objector appears to be supporting the Deposit LDP in this context. In terms of the other points made: 1. No objection has been made to the Plan by statutory service providers such as the Local Education Authority and the Betsi Cadwaladr University Health Board. The Plan's new housing allocations will not see housing completions until 2023/24 and will be developed over a number of years. There will not be one 'big hit' by development and there is time for infrastructure capacity to be put in place. The LPA continues to work with the LEA and BCUHB towards achieving this. 2. The Warren Hall site sits between the settlements of Penyffordd / Penymynydd, Broughton and Higher Kinnerton where new residential development can access services and facilities in each settlement. It is unclear why the objector considers that additional patronage for a church, village hall and scout hut in Higher Kinnerton is a negative. It is also the case that the Warren Hall mixed use allocation seeks to provide on-site facilities with hotel / leisure and a commercial hub providing for instance local shopping facilities. 3. It should be noted that HK011 is a slightly different site boundary to HK008, but is essentially the same parcel of land. It is also accepted that the recommendation is worded slightly differently. However, with the exception of the opening sentence on the response to HK011 the assessment commentary is identical. The key point here is that the site has not been allocated in the Plan nor included in the settlement boundary because of the level of growth experienced in Higher Kinnerton and the provision of 300 dwellings at nearby Warren Hall Strategic Site. However, both the UDP Inspector and the present site assessment recognises that in planning terms the site would represent a sensible rounding off of the settlement form. 4. The Council does not consider the commentary needs to be revisited. The site has been submitted by a developer in the form of an objection to the Plan and the Council will oppose that objection.

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			Higher Kinnerton HK003 to HK013 have been recommended as “not suitable for development” apart from HK008 which “has not been allocated”. This site is identical to HK011 which has been allocated as “not suitable for development”! I urge you to re-evaluate HK008 to “not suitable for development”. 4. Our Village Plan noted “the rural approach to the village” was highlighted as “very important” to the residents. There were also “concerns at the level of development” taking place which would “transform the village into another dysfunctional mass of commuter housing”. Again I urge you to re-evaluate HK008. Your humble servant		
15	PC1: The Relationship of Development to Settlement Boundaries	Object	We have objected, not because we disagree with the policy in principle, just its specific limits in this case. The limit was drawn incorrectly previously and remains nonsensical, in our view. It was discussed in the UDP Inquiry and we have now proved that the site can properly be included in the settlement. We have a topographical survey and ecological surveys to prove this if required. Include, Gwernymynydd is a settlement which stretches along the A494 for over a mile with the application site located towards the middle of it. This site is the only part of that frontage which is outside the boundary. Underused land on the opposite side of the road is		Not accepted. This site (Lys Newydd, A494, Gwernymynydd) is also the subject of a separate objection (id 223), from the same agent, seeking the allocation of the site under policy HN1. An outline planning application on the site for 28 dwellings (060696) has been submitted in February 2020 which is under consideration. The settlement boundary for Gwernymynydd in the vicinity of the site has not been previously incorrectly drawn. At the time of the UDP public inquiry there was sufficient land within the settlement boundary to deliver housing development and the Inspector did not recommend that the site be included in the settlement boundary. It must be borne in mind that in the UDP Gwernymynydd was a category B settlement and that the spatial strategy allowed for planned growth through allocations in category A, B and C settlements. The Inspector did not recommend the inclusion of the site within the settlement boundary. The settlement boundary in the Deposit Plan is considered to be firm and defensible in excluding a large tract of greenfield land located prominently along the A494(T)

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			within the settlement and would appear eligible for development. Development of this site would appear to be wholly in character with the community. Development would provide a modest increase in the size of the community to assist in maintenance of the school, community facility and pub. This site is visibly within the settlement boundary (albeit not on the plan) The Inspector is urged to read the previous UDP inspector's report and agree with what we believe was clearly the conclusion that subject to a satisfactory access the site should be included within the settlement.		In its response on the objection to HN1 the council concluded that provision for growth exists within the settlement boundary of Gwernymynydd and in nearby Mold. It is not considered necessary or appropriate for the settlement boundary to be amended, particularly to include a site where there are concerns about its impact on the form and character of the settlement and in the light of concerns over ecology and topography and uncertainty over access. Despite acknowledging that the present planning application may address some of these concerns, the site is not considered to be appropriate to be included within the settlement boundary.
43	PC1: The Relationship of Development to Settlement Boundaries	Object	Objection to Candidate Sites: PYF001/PYF002/PYF003/PYF004/PYF006 for the following reasons: Penyffordd has been afforded more than its fair share of development. Llinegar Hill is the main access into Penyffordd and the surrounding villages, the Hill has no footpaths, it is single carriageway and has a very bad blind bend, the hill is dangerous. I object to any more development in the Penyffordd area that involves using 'open countryside' I object to any more development in the Penyffordd area on the grounds that enough of the countryside surrounding Penyffordd has already		Noted. Each of the sites referenced by the objector have been responded to below: PYF001 has not been allocated in the LDP and remains outside of the settlement boundary. PYF002, land north of Coed Mor has been included within the settlement boundary of Pen y ffordd as the site has been granted planning permission for 23 dwellings (055398). PYF003 includes the area of land submitted under PYF002. Only the land shown in PYF002 has been included within the settlement boundary, the remaining land submitted under PYF003 has not been allocated within the LDP for development and remains outside of the settlement boundary. PYF004 has not been allocated for development within the LDP and remains outside of the settlement boundary.

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			been taken for development and Penyffordd has been allowed to expand quite considerably, without any improvement to the infrastructure. I object to any form of development being granted to any site unless provisions are taken to improve the safety of Llinegar hill.		PYF006 has not been allocated for development within the LDP and remains outside of the settlement boundary. There are no allocations for development in Pen y ffordd within the LDP, there are however three committed sites with planning permission which will provide growth for the village over the plan period. These include; 27 dwellings at Llys Dewi (057971) where 6 units were complete as of the 1st April 2019 with 21 units under construction 23 dwellings on land off Coed Mor which is also candidate site PYF002, as of the 1st April 2019 these units had not been started. 8 dwellings off Rhewl Fawr Road (053603) which also had not been started as of 1st April 2019. In considering each planning application, the comments of the Highways Development Management Officer would have been taken into consideration and these have not raised the need for road improvements to Llinegr Hill.
154	PC1: The Relationship of Development to Settlement Boundaries	Object	HWN005 - Ash Lane, Hawarden This green barrier land will cause coalescence of Mancot and the Upperdale area of Hawarden, The character of these 2 areas is quite significant with the size and style of houses being of a large house and grounds and spacing in Hawarden compared with Mancot. As such merging these 2 areas removes their distinct village identity.	Specific avoidance of village coalescence.	Not accepted. See response to ID 150 EN11 Green Barrier. The UDP Inspector did not consider that the drawing back of the green barrier as part of recommending the allocation of the site for housing, would harm the function of the green barrier. Although the site allocated in the LDP is slightly larger than that recommended by the UDP Inspector, the green barrier review Background Paper demonstrates that it will not harm the function of the green barrier. The settlement boundary of Hawarden and Mancot already adjoin each other in the adopted UDP to reflect that there is already coalescence between the two settlements. The LDP seeks to retain the southern and higher land as green barrier on either site of the Gladstone Way. This will ensure that the green barrier around the historic part of Hawarden remains intact.

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					The purpose of policy PC1 is to set out the significance of settlement boundaries in the Plan in terms of the different approaches to considering development proposals within and outside settlement boundaries. The overriding objective when delineating settlement boundaries is to ensure that they follow clear physical features on the ground in order that they create firm and defensible boundaries to settlements. Settlements have been reviewed as part of the Plan preparation and amended to take account of planning permissions, cartographic errors and new development allocations. In the case of the Ash Lane housing allocation it is considered that the new settlement boundary is firm and defensible in that it follows a clearly identifiable hedgerow and seeks to protect the higher and visually more prominent southern part of the site. The settlement boundary and the green barrier work together to ensure that the gap between the historic part of Hawarden and the site is retained. The settlements of Hawarden and Mancot are already joined as reflected in the adopted UDP. The settlement boundary for Hawarden includes the main (or historic core of the village) and the part of the village between the railway line and Gladstone Way. It also includes the development on the east side of Gladstone Way including Park Avenue and Kennedy Drive. The settlement boundary between Hawarden and Mancot runs from the west of Paddock Way, the northern end of Park Avenue and the rear gardens of properties on Brookleigh Avenue to join Cottage Lane. The two settlements are already coalesced and have been for several decades. The amendment of the settlement boundary and the allocation of the site at Ash Lane will infill this wedge shaped gap between existing development (on three sides) in the form of a logical and well defined urban extension. This is complemented by the retention of a green barrier on the prominent and sensitive rising land between the site and Gladstone Way and therefore retains a green barrier around both Hawarden and Mancot.

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194	PC1: The Relationship of Development to Settlement Boundaries	Object	The settlement boundary for Buckley should be adjusted to encompass land at Megs Lane SUMMARY OF REASONS • The site is well placed in relation to Buckley, a main service centre, and a principal location for new housing development which reinforces and contributes to sustainable settlements. • The site is genuinely capable of being delivered and could be brought forward rapidly subject to planning approval. • The site is capable of fulfilling the various other development criteria set out in the Deposit Local Plan. • The site does not materially harm or undermine the Green Barrier. • Even if the site is not to be treated as a formally allocated site, the Deposit Plan nevertheless requires a supply of large windfall sites in order to fulfil its housing requirement over the plan period. This is an appropriate site from which to achieve such a contribution. • The Deposit Plan acknowledges there is a lack of suitable and appropriate brownfield land in the County (para 11.2). Greenfield sites are therefore required to fulfil future housing requirements. By virtue of the extent of the Green Barrier surrounding Buckley, some release of Green Barrier land will be required.	Adjustment to settlement boundary on the Proposals Maps	Not accepted. The settlement boundary along the southern edge of Buckley is considered to be well defined and logical. It follows the rear gardens of the ribbon of residential properties along the south side of Megs Lane and is firm and defensible. In respect of the objection which seeks the allocation of the site for housing in policy HN1 (id193) it is considered that the site is not necessary or appropriate to be allocated for housing, particularly in respect of the impact on the green barrier. For the same reasons it is not considered necessary or appropriate for the site to be included in the settlement boundary.
258	PC1: The Relationship of	Object	Objection 7: Mold may be a Tier 1 settlement but it is a special case that must be recognised in planning	Revise the settlement strategy and the unique	Not accepted. The objector has made objections to a raft of policies throughout the Plan as part of an objection to the allocated site HN1.6,

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Development to Settlement Boundaries		decisions As a Tier 1 Settlement, Mold is an anomaly: it is an attractive location as a small town with reasonable services but it also has three significant factors that require deeper analysis and a more nuanced approach to development. Firstly there is no rail connection. Secondly, Mold is one of the few (relative) bastions of Welsh-speaking in Flintshire. Thirdly, its road connections are amongst the most congested for commuters. All of these factors should lead to Mold being treated as a special case but I can find no such analysis of such significant factors, taken together. Not compliant with PPW paragraph 2.19, 4.1.4 to 6, 4.1.36, 5.4.13 Deposit LDP Para 5.13 allows for some nuancing of the settlement strategy but does not choose to do so for Mold which has unique features to be considered Para 5.30 & 5.31 Despite the stated commitment to local distinctiveness, historic assets and unprotected assets, this plan does not actually apply this when assessing settlements and sites Para 5.35 & 5.39 An integrated planning and transport strategy would not put such large development in Mold which has no railway station and links up with congested routes, and will not benefit directly from Growth Track 360. Mold not a sustainable location and no key transport	characteristics of Mold as a Tier 1 settlement	including policy PC1. This objection overlaps with the objection to PC1 (id256). As part of the Key Message consultation document published for comment during the early pre-deposit engagement stages of plan preparation, some 81 settlements were the subject of settlement 'audits' which sought to establish the sustainability of settlements but considering location, scale, character, role and level of services and facilities. When grouping the initial results, Mold featured in the 1st grouping (Fig 2 on p35 in the key Messages document, https://www.flintshire.gov.uk/en/PDFFiles/Planning/Revised-Key-Messages-LDP.pdf). This clearly translated into Mold being a Tier 1 settlement, along with Aston & Shotton, Connahs Quay, Holywell, Queensferry, Buckley, Flint and Saltney. The County does not have particularly 'large' towns in the sense that none of the settlements are even approaching the size of say Wrexham. Instead it has a number of modest sized towns, each with their own history, character and role. Mold is not the only Tier 1 settlement to not have a railway station as Saltney, Connah's Quay, Queensferry and Holywell do not. In successive development plans, Mold has been included in the upper tier of the settlement hierarchy and this includes the Clwyd Structure Plan, the Delyn Local Plan and the adopted UDP. The purpose of the settlement hierarchy in each development plan has been to form the basis the making decisions about how development is to be distributed spatially across the County. The preparation of each Plan provides the opportunity to take into account the issues and considerations raised by the objector such as transport, landscape, historic assets and welsh language. Mold is a vibrant town which is the administrative centre for the County and sits well in terms of the growth triangle concept of Wrexham Chester and Deeside in the former Wales Spatial Plan and the principle of Wrexham and Deeside as a focus for growth in the draft NDF. It is not

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			proposals line up to benefit it directly. Para 5.47 states development will only be permitted where there is adequate infrastructure or suitable proposals to accommodate additional demand/problems deriving from proposed development and to address deficiencies. The Plan ignores issues of transport, community cohesion, crime, habitat, Welsh Language, and unexplored issues regarding Physical Environment Deprivation score under WIMD in Mold West Ward and Site H1.6		considered that the settlement hierarchy and spatial strategy in respect of Mold is contrary to PPW10 or the NDF. Mold has always been in the highest tier of settlements from the Clwyd Structure Plan through to the Delyn Local Plan and the UDP. The LDP adopts a consistent approach as the settlement audit and settlement hierarchy work in the Key Messages document clearly shows that Mold meets the criteria for being classed in the upper tier of the settlement hierarchy and site comfortably along the other settlements identified within Tier 1. Despite Mold having a number of particular attributes, such arguments could be advocated in respect of other settlements and it is not considered that Mold is a 'special case'. Rather, the attributes identified by the objector are material planning considerations to be had regard to in making planning decisions.
312	PC1: The Relationship of Development to Settlement Boundaries	Object	Objection 24: Mold's unique combination of environment and of culture is being undermined by the pressure of being treated as an undifferentiated Tier 1 settlement Mold's success as a thriving town (according to Mold Town Council) must surely be because it is different history to other Flintshire towns. It has a prettier, more countrified, and more green setting, has a mixed economy of mixed arable/dairy farming, a livestock market, a street market, a farmers' market, light industry, tourism, Mold Food & Drink Festival, Mold Blues & Soul Festival, and a high level of cultural assets in Theatr Clwyd, St Mary's Church and Bailey Hill Castle Park in the centre of town. It has a quirky mix not found elsewhere in the county and could so easily be unbalanced by unsuitable	Reconsider Mold as a special case of Tier 1 settlement due to its status in preserving the Welsh Language, its lack of a railway station, the importance of agriculture and the livestock market, its richness of history in the close vicinity and its attraction as a visitor destination.	Not accepted. The objector has made objections to a raft of policies throughout the Plan as part of an objection to the allocated site HN1.6, including policy PC1. This objection overlaps with the objection to PC1 (id256, 258 and 262). It is accepted that the attributes of Mold are many and varied and is what attracts many people to live, work and visit Mold. However, it is not accepted that additional residential development in the form of a well-defined urban extension alongside existing estate type development is harmful to the historic, retail and cultural character and role of the town. Despite commenting on the various attributes of Mold compared to other towns in Flintshire, the objector does not identify specific evidence as to why a housing allocation is inappropriate within the town, nor why the allocated site would cause demonstrable harm to the town. The other matters raised in the objection have been responded to in other objections.

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			developments that are too ambitious and fast growing for a modest-sized town and its services to support. Failure to support the continuation of agriculture and to protect land that is actively farmed would lead to a fundamentally different Mold, a less distinctive Mold, and a diminished asset for Flintshire in marketing itself as a good county in which to live and work. Agriculture and farming are known to be very important contributors to Mold's mixed economy and its rural North Wales hinterland. A recent survey cited in the Mold Town Plan revealed that around two-thirds of town centre users confirmed that the Livestock Market was an important factor in bringing visitors into the town. (See Livestock Market Survey Report, August 2015). All of this keeps Mold going as a busy town. Displace agriculture and you displace the retail offering and the success of the town. Not compliant with PPW paragraph 2.19 Deposit LDP Para 6.27 pays lip service to the importance of tourism to the historic town of Mold. Also nods to importance of cultural identity as expressed through the significant Welsh Language in Mold. But the Plan proposes no special language plan to protect these important issues In section 12, EN8 refers to the need to protect listed buildings and their settings. Development on site H1.6		

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			creates adverse effects on listed buildings in the vicinity.		
256	PC1: The Relationship of Development to Settlement Boundaries	Object	Objection 6: The Plan's settlement strategy needs to be more nuanced in response to the UDP Inspector's advice and WG advice The UDP to Settlement Inspector criticised the UDP for being backward-looking in its approach to the designation of settlement boundaries and relying on historic settlement patterns to justify the avoidance of coalescence. The Inspector at that time expressed the view that a "settlement boundary on a plan does not define identity or cohesion of a community" (S3.5.37): identity is formed by the community itself, and its cultural interests, not by the local authority and its boundary line drawn on a plan. There is some limited discussion of this point in the new LDP but no real evidence of a rethink nor any concession to the idea that - in some strictly controlled cases - coalescence might make more sense 4.1.4 to 6, 4.1.36, 5.4.13 Deposit LDP Para 5.13 allows for some nuancing of the settlement strategy but does not choose to do so for Mold which has unique features to be considered Para 5.30 & 5.31 Despite the stated commitment to local distinctiveness, historic assets and unprotected assets, this plan does not actually apply this when assessing settlements and sites Para 5.35 & 5.39 An integrated planning	Reconsider UDP Inspector' advice on settlement strategy	Not accepted. The objector has made objections to a raft of policies throughout the Plan as part of an objection to the allocated site HN1.6, including policy PC1. The settlement strategy in the adopted UDP has been reviewed comprehensively as part of the preparation of the LDP. The much earlier Key Messages consultation document set out options for a revised settlement hierarchy based on a comprehensive series of settlement audits to establish a sustainability evidence base on every settlement. The Strategic Options consultation document set out the preferred settlement hierarchy and set out a number of options in terms of how to distribute growth spatially across the County. The chosen means of spatially distributing growth was set out in policy STR2. In the Key Messages document section 4 of Appendix 2 references the comments of the UDP Inspector and presented 6 options for comment. This included an option of combining settlements into urban areas. The outcome of the consultation was that a refinement of the 3 tier settlement hierarchy into a 5 tier settlement hierarchy based on existing settlement boundaries was the most appropriate option for the County rather than seeking to define urban areas. It must be stressed that whilst there is only a brief reference to this in the Deposit Plan written statement, it is comprehensively addressed as part of earlier stages in the Plan's preparation and specifically the preparation of the Preferred Strategy where during the public consultation the objector had an opportunity to comment. This is still available on the Council's website as part of the timeline of the Plan's preparation. It is not necessary or appropriate for every detailed issue or previous document to be referenced in the Deposit Plan. The UDP Inspector's comments were more specifically aimed at areas where settlements had merged such as Buckley, Drury, Mynydd Isa and the Deeside settlements. The Council considered a number of approaches to defining settlements, including the use of 'urban areas' but favoured a

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			and transport strategy would not put such large development in Mold which has no railway station and links up with congested routes, and will not benefit directly from Growth Track 360. Mold not a sustainable location and no key transport proposals line up to benefit it directly. Para 5.47 states development will only be permitted where there is adequate infrastructure or suitable proposals to accommodate additional demand/problems deriving from proposed development and to address deficiencies. The Plan ignores issues of transport, community cohesion, crime, habitat, Welsh Language, and unexplored issues regarding Physical Environment Deprivation score under WIMD in Mold West Ward and Site H1.6		new 5 tier settlement hierarchy as set out in the Strategic Options document. It is of note that the objector is concerned about a housing allocation in Mold. In the UDP Mold was a category A settlement and in the LDP is a Tier 1 Main Service Centre, i.e. in the highest tier of settlements and where in both circumstances is categorized in this way to reflect the Town's level of sustainability. Mold is a free standing settlement and not one where it would be reasonable to consider an alternative approach of defining the settlement. There is no objection from Welsh Government to the Plan's spatial strategy and it is not accepted that the Plan is contrary to PPW10. The other matters raised in the objection have been responded to in other objections.
262	PC1: The Relationship of Development to Settlement Boundaries	Object	Objection 10: The Plan does not recognise that some locations are spatially more important for their contribution to local identity and to character than for housing Topic Paper 7 notes the importance of the Clwydian Range AONB; the urbanised and industrialised character of Deeside and Wrexham; the need in Flintshire for a high-quality year-round tourism offer; and the need for areas of restraint on development on green wedges. Clearly, building a large housing development on a highly visible and attractive countryside route into (and area of) Mold puts the	Remove site H1/6/MOL044/MOL 045 in order to retain the surrounding landscape value and to prevent what the UDP Inspector called (in regard to this site) "significant incursion into countryside"	Not accepted. The objector has made objections to a raft of policies throughout the Plan as part of an objection to the allocated site HN1.6, including policy PC1. This objection overlaps with the objection to PC1 (id256 and 258). The spatial strategy of the Plan as set out in STR2 sets out to apportion development across the first three tiers of the settlement hierarchy with proportionately a greater amount of development being directed to Tier 1 Main Service Centres. The identification of a housing allocation in Mold is entirely consistent with the Plan's spatial strategy. The town of Mold is constrained by the line of the A494(T) by pass to the south, by the River Alyn floodplain to the east and north and by the narrow gap between Mold and Gwernymynydd to the south west. The north western part of the town provides the only logical direction for growth. The allocated site has no landscape or ecological designation or protection

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			Spatial Strategy in conflict with the Deposit LDP. Development on such a site severely undermines the location-specific landscape character of Mold. This town is not simply the urban "Tier 1 settlement" of the planner's jargon. It is a small, quirky rural town and its north-west edge is comprised of rolling hills, trees, sheep, green fields, cows, cowpats, crops, mud, birds, bats, moles, hedgerows, a few houses, some cars and a few tractors. Furthermore, the MOL045/H1.6 site, Gwernaffield Road/Denbigh Road with its wide views across the rolling hills of Gwernymynydd, Gwernaffield, Moel Fammau, the historic Rhual and Gwysaney estates, does not feel like "urban edge" – it feels like countryside. Ironically, photographs of this green countryside on either side of Gwernaffield Road have often featured in publicity material for Mold Town Council, highlighting the essential green nature of the small market town of Mold and its sense of place. There is no point in producing a spatial review if it does not inform planning decisions, and crucially, shape the underlying discussions that precede the decisions to release sites. All of this somewhat undermines the FCC claim in the Housing Land Monitoring Report Para 3.5 that "the LDP will ensure that sites can be identified based on a rigorous and transparent assessment and against an agreed spatial strategy		attributed to it. Whilst it represents undulating farmland this is the same in parts of the County and on the edge of many settlements. The site is well contained by Pool House Lane and does not create a precedent for further westward expansion between Gwernaffield Road and Denbigh Road. This part of Mold does not have a particularly sensitive built edge as it comprises for the most part of 1970's /80's estate type development of bungalows, dormer bungalows. The Council consider the allocation of the site at Denbigh Road, Mold to be appropriate and sustainable for this Tier 1 settlement, and the extension of the settlement boundary to incorporate this allocated site is logical.

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			rather than on an ad hoc basis." Not compliant with PPW paragraph: 1.19, 2.19, 3.40, 6.0.2 Deposit LDP and Spatial Strategy paper in conflict.		
587	PC1: The Relationship of Development to Settlement Boundaries	Object	Comments in Relation to Site PEN037 The policy seeks to locate development within defined settlement boundaries as defined on the Proposals Maps. It is important therefore that the settlement boundaries are drawn to realistically reflect the character of the settlement and to follow long term defensible boundaries. If settlement boundaries do not follow firm and defensible physical boundaries on the ground, it is likely to lead to developments being approved outside of settlement boundaries during the plan period (particularly if housing delivery falls short). This would weaken the ability of the policies in the Plan to perform towards the end of the plan period. Our specific concerns in relation to this policy relate to the settlement boundary drawn around the village of Penyffordd (and in particular site PEN037). It is of note that, in granting planning permission on appeal for the adjoining field under appeal reference APP/A6835/A/17/3182034 the Inspector assessed the visual containment of the site. He confirmed that in visual terms the site has well defined visual envelope. He noted that Penyffordd already touches the A550 bypass over considerable	Add additional sites in Penyffordd	Not accepted. This response should be read in conjunction with the response to the objection seeking allocation of the site in HN1 (id586). The process of defining settlement boundaries is to firstly, follow existing urban form and patterns of development, utilising firm and defensible boundaries, but secondly, it is to define where development may take place within the Plan period. There is no requirement for, nor is it reasonable to drawn settlement boundaries in a manner so as to enable longer term development opportunities or for example through the provision of 'contingency sites' which are not part of national planning guidance. The longer term options for development are more appropriately considered as part of a future Plan review. In the Council's response on HN1 (id586) it is considered that it is not necessary or appropriate for the site to be allocated for housing, and for the same reasons it is not considered necessary or appropriate for the site to be included in the settlement boundary'

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			lengths and the proposed development would not significantly affect views of the countryside from that road or further afield. The Inspector's conclusion was that the loss of the field would not materially affect the rural character and appearance of the wider area and that, "the A550 would provide a defensible boundary". That assessment can be applied equally to the adjoining site (PEN037). The A550 would provide a long term defensible boundary for both sites (as it does for the remainder of Penyffordd).		
619	PC1: The Relationship of Development to Settlement Boundaries	Object	The settlement boundary at Newlands, Drury should be amended to include this land and the land should be allocated as an additional site for residential development. The property known as Newlands is currently located outside of the settlement boundary in the adopted UDP, within the Green Barrier, and the LDP Deposit Draft proposes to continue these designations. We consider that due to the specific characteristics of the property and its relationship to the village of Drury, the property should be included within the settlement boundary for Buckley. The site is located off Drury New Road, Drury. A site location plan is enclosed. The site comprises the	The settlement boundary should be amended to include this land and the land should be allocated as an additional site for residential development.	Not accepted. The objector proposes that the site would be suitable for one or two dwellings. This site is therefore too small to be allocated within the plan. The objector states that the proposed site at Newlands should be included within the settlement boundary as it does not appear divorced from the settlement. The intervening land between the commercial units and the dwelling (Benbradagh) adjacent to Newlands comprises greenfield land, clearly defining the divorced nature of the distinct gap and character break between the settlement and Newlands. The inclusion of DRU006 within the settlement boundary would result in a ribbon of development into the open countryside and the green barrier between Drury and Buckley, which would not be a logical extension of the settlement boundary. The objective of the green barrier designation is to retain the open nature of the countryside around the settlement and to protect the open countryside between Drury and Buckley from further encroachment. Built

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			garden of the dwelling. The garden is very large for a house the size of Newlands. Consequently, the surplus land represents a potential development opportunity for 1 or 2 dwellings. A planning application for the erection of one dwelling (reference: 038321) was refused in December 2004. The site is located within the Green Barrier; albeit it comprises the garden of a dwelling which is located on the edge of the village. Our client has therefore sought a change to the settlement boundaries through the emerging LDP and has submitted representations at various stages of the process, including representations to the Candidate Site Submission process. It is strongly disputed that the two dwellings (Newlands and the property known as Benbradagh to the north) are divorced from the settlement. They directly adjoin the curtilage of commercial units associated with the adjacent garden centre / farm shop to the north.		development in this location would undermine the function and openness of the green barrier. During the UDP plan period from 2000 to 2015 Drury/Burntwood, saw a 26.7% level of growth, which as a Category B settlement with a growth band of between 10% and 15 %, is a very significant level of growth. In terms of the LDP period a recent application (ref 058212) for the demolition of 1 and 2 Woodside Cottages and erection of 23 new dwellings, adjoining this site was allowed on appeal. The site cannot be included as a housing commitment as planning permission was granted after the base date of 01/04/18 for the Plan's housing balance sheet. The site therefore represents a windfall site and will form part of the Plans overall housing land supply for the Plan period. Also, another adjoining site at Bank Lane has been subject to various applications in recent years (058489 – outline 66 dwellings refused, 090160 – outline 66 dwellings refused). At present a full planning application (060587) for the demolition of 81 Drury Lane and construction of up to 56 dwellings has been refused and an appeal is ongoing at the present time (May 2020). Rather than devise a housing scheme which functions within the settlement boundary, as recommended by the UDP Inspector, the applicant has sought to extend the application site boundary beyond the settlement boundary in order to increase on-site housing density by siting open space to the east of the settlement boundary. Given that there are concerns about the manner in which the site was being proposed for development in the planning applications it was not considered appropriate for the site to be allocated in the Plan. Both these examples demonstrate that there are development opportunities within the settlement boundary of Drury/ Burntwood as windfall sites, provided that appropriate development schemes are put forward. It is anticipated that these will provide for an adequate level of growth for Drury/ Burntwood over the Plan period.
769	PC1: The Relationship of Development	Object	Policy PC1: The Relationship of Development to Settlement Boundaries 7.13. For the reasons set out earlier in this Representation,	There is a lack of non-greenfield land on which to build within settlement	Not accepted. The Council set out in its Preferred Strategy document a broad apportionment (accompanying policy STR2) of development between the different tiers of settlement hierarchy. The apportionment set out in the Deposit Plan is broadly consistent with that. There is no

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	to Settlement Boundaries		there is a need to review the settlement boundaries around the Tier 3: Sustainable Villages to accommodate additional housing growth. There is a lack of non-greenfield land on which to build within settlement boundaries and that is one of the exceptional circumstances for the release of greenfield sites through the LDP. In view of our Client's land interests, this includes the settlement boundaries of Northop Hall, Drury and Carmel	boundaries and that is one of the exceptional circumstances for the release of greenfield sites through the LDP. In view of our Client's land interests, this includes the settlement boundaries of Northop Hall, Drury and Carmel , there is a need to review the settlement boundaries around the Tier 3: Sustainable Villages to accommodate additional housing growth.	objection from the Welsh Government in their formal representations on the Plan, indeed they have supported in principle the amount of growth and spatial strategy. The objector considers that the review of settlement boundaries has not produced sufficient opportunities for development in Tier 3 sustainable settlements. The objector considers that this is the case in Northop Hall, Drury and Carmel where a site is promoted. Northop Hall has clearly seen development both within the UDP Plan period and the early part of the LDP Plan period with the allocation at Cae Eithin and a subsequent extension to that site. It is not considered that an additional allocation is necessary or appropriate in the settlement. The specifics of the site promoted at Wellfield Farm will be commented on separately in terms of HN1 under rep 1267. Drury saw a high level of growth in the UDP Plan period and land is still available within the settlement boundary for further development. In this context the objectors assertion that insufficient land exists in the settlement boundary is puzzling as the site they promote at Woodhouse Cottage is already within the settlement boundary of Drury in the UDP and the LDP. Furthermore, planning permission has been granted (appeal ref 3209704) on the site for 23 dwellings. The site will become part of the Plans housing supply as part of an update to the Housing Balance Sheet from April 2018 to 2019. Carmel has seen only limited development in recent years but the site promoted by the objector at Holway Rd was firmly resisted by the UDP Inspector. With the exception of the housing on Mertyn Lane and the sporadic dwellings north of the A5026, development in Carmel is to the south of the main road. This long straight road marks a strong physical demarcation between the built up area and the countryside. Extending the settlement boundary to enable development on the site would result in urban encroachment extending beyond a well-defined edge. The specifics of the site promoted will be commented on separately in terms of the rep 783 to policy HN1.

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					In conclusion the site at Drury is already within the settlement boundary and it is not appropriate or necessary for the sites at Carmel and Northop Hall to be allocated or included in the settlement boundary.
956	PC1: The Relationship of Development to Settlement Boundaries	Object	This policy is vague and does not enable existing facilities to expand beyond the settlement boundaries.		Not accepted. The purpose of policy PC1 is to set out the significance of settlement boundaries in the Plan in terms of the different approaches to considering development proposals within and outside settlement boundaries. It is not considered to be vague. The Plan must be read as a whole and this policy clearly references policies elsewhere in the Plan whereby guidance is provided on certain types of development which may be permitted outside settlement boundaries. The objector refers to the policy not enabling existing 'facilities' to expand beyond settlement boundaries. In the context of the objection seeking the extension of the Mancot settlement to allocate land it is not clear what 'facilities' means. In the absence of any suggested changes to the Plan it is not clear what the objector is seeking with regard to policy PC1. The objector's promotion of the site for housing in HN1 is responded to in representation id959. It is concluded that it is not necessary or appropriate for the site to be allocated and the same applies to the settlement boundary.
971	PC1: The Relationship of Development to Settlement Boundaries	Object	This policy is vague and does not enable existing facilities to expand beyond the settlement boundaries.		Not accepted. The purpose of policy PC1 is to set out the significance of settlement boundaries in the Plan in terms of the different approaches to considering development proposals within and outside settlement boundaries. It is not considered to be vague. The Plan must be read as a whole and this policy clearly references policies elsewhere in the Plan whereby guidance is provided on certain types of development which may be permitted outside settlement boundaries. The objector refers to the policy not enabling existing 'facilities' to expand beyond settlement boundaries. In the context of the objection seeking the extension of the Broughton settlement to allocate land it is not clear what 'facilities' means. In the absence of any suggested

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					changes to the Plan it is not clear what the objector is seeking with regard to policy PC1. The objector's promotion of the site for housing in HN1 is responded to in representation id974. It is concluded that it is not necessary or appropriate for the site to be allocated and the same applies to the settlement boundary.
989	PC1: The Relationship of Development to Settlement Boundaries	Object	This policy is vague and does not enable existing facilities to expand beyond the settlement boundaries.	This policy is vague and does not enable existing facilities to expand beyond the settlement boundaries.	Not accepted. The purpose of policy PC1 is to set out the significance of settlement boundaries in the Plan in terms of the different approaches to considering development proposals within and outside settlement boundaries. It is not considered to be vague. The Plan must be read as a whole and this policy clearly references policies elsewhere in the Plan whereby guidance is provided on certain types of development which may be permitted outside settlement boundaries. The objector refers to the policy not enabling existing 'facilities' to expand beyond settlement boundaries. In the context of the objection seeking the extension of the Mold settlement to allocate land it is not clear what 'facilities' means. In the absence of any suggested changes to the Plan it is not clear what the objector is seeking with regard to policy PC1. The objector's promotion of the site for housing in HN1 is responded to in representation id991. It is concluded that it is not necessary or appropriate for the site to be allocated, particularly given the impact on the green barrier, and the same applies to the settlement boundary.
774	PC1: The Relationship of Development to Settlement Boundaries	Object	In relation to the FCC's Development Management Policy for the Relationship of Development to Settlement Boundaries and Infrastructure the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LDP process are as follows: a) There is concern		Not accepted. The Warren Hall strategic site does not fall within the settlement boundary of Higher Kinnerton. The settlement boundary of Higher Kinnerton follows the well-defined physical feature which is the public right of way which forms the edge of the Elan Homes development. The objector's comments in respect of the proposed housing at Warren Hall has been commented on separately in a series of representations on other policies.

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			that with a major development at Warren Hall with up to 300 new homes being constructed on part of the site that falls within the settlement boundary of Higher Kinnerton, this presents a serious challenge to maintaining social cohesion for the expanded community. Going forward, plans need to be developed to ensure Warren Hall can be integrated in a way that promotes cohesion and mitigates the potential for any negative impacts of such a large single development includes the impact on the community, the environment and the open countryside.		
1011	PC1: The Relationship of Development to Settlement Boundaries	Object	This policy is vague and does not enable existing facilities to expand beyond the settlement boundaries.		Not accepted. The purpose of policy PC1 is to set out the significance of settlement boundaries in the Plan in terms of the different approaches to considering development proposals within and outside settlement boundaries. It is not considered to be vague. The Plan must be read as a whole and this policy clearly references policies elsewhere in the Plan whereby guidance is provided on certain types of development which may be permitted outside settlement boundaries. The objector refers to the policy not enabling existing 'facilities' to expand beyond settlement boundaries. In the context of the objection seeking the extension of the Buckley settlement to allocate land at Bryn Awelon it is not clear what 'facilities' means. In the absence of any suggested changes to the Plan it is not clear what the objector is seeking with regard to policy PC1. The objector's promotion of the site for housing in HN1 is responded to in representation id1013. It is concluded that it is not necessary or appropriate for the site to be allocated and the same applies to the settlement boundary.

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820	PC1: The Relationship of Development to Settlement Boundaries	Object	HCAC005 With reference to the site not being within the settlement boundary. I am only requesting one, what would be discreet dwelling very close to the existing settlement boundary of Hope. Over the years small dwellings have been tastefully enlarged into larger dwellings out with the settlement boundary without any impact on the countryside and I would ask you to please reconsider my application as I would be more than willing to work with the planning department to achieve a satisfactory outcome of any development. With reference to the large garden at Primrose Cottage being added to sporadic development. I am not sure this would be the case as the land to the south of Primrose Cottage is made up land which used to be a pond and ditch shown on old plans of the site. With regard to the access off Pigeon House Lane. As the site is on the outside of the bend on Pigeon House Lane, I have visibility to Well House in one direction and beyond the crossroads with Stryt Isa in the other direction making it safe to access the road. I would be prepared to recess my access to enable any visiting vehicle making deliveries etc., to be off the road. I would also ensure a turning area within the property to ensure no reversing of vehicles out onto the road. With reference to paragraph 4 regarding footpaths I am unable to see how the occupancy of	Inclusion of candidate site HCAC005	Not accepted. Primrose Cottage lies on the northern side of Pigeon House Lane and on the eastern side of Stryt Isa. The site adjoins the eastern boundary of Primrose Cottage and forms a long thin site with hedgerows and trees along its boundaries. The settlement boundary for Hope already follows a ribbon of development along Stryt Isa, with Primrose cottage and the proposed site located outside of the settlement boundary at the junction of Stryt Isa and Pigeon House Lane. The junction of these two roads is clearly part of the open countryside, featuring wide grass verges and hedges. Although there are existing dwellings Primrose Cottage and Ffordd Las just outside of the settlement boundary, they appear as sporadic dwellings in an open countryside setting rather than as part of the physical form and pattern of built development of Hope. The inclusion of the proposed site within the settlement boundary would necessitate the inclusion of the large garden at Primrose Cottage, increasing pressure for built development and extending the ribbon of development, which would be harmful to the open countryside. The proposed site and Primrose Cottage relate better to the open countryside than the built form of Hope, therefore they have not been included within the settlement boundary of Hope.

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			one dwelling would require this as a condition.		
1206	PC1: The Relationship of Development to Settlement Boundaries	Object	Land at Bryn Y Baal Candidate site MYN006 regarding extension to settlement boundary and roll back green barrier EN11(10). Please refer to attached document The green barrier in this location is relatively narrow but part of the rationale for extent of green barrier designation is that they should not be excessive both in number and extent. Paragraph 4.13 of the existing UDP explains. A review was undertaken as part of the preparation of the LDP. Each green barrier was subject to an assessment that had regard to the need to make provision for development allocations where sites conformed with the Plan spatial strategy and detailed site assessment process. Such allocations should not harm the openness of the green barrier nor the purposes for designating the green barrier. This is somewhat pointless as Inspectors at appeal would consider virtually anything to affect its open character. In considering this candidate site the key factor is whether or extending the settlement boundary would be materially harmful to green barrier purposes.		Not accepted. The objector's representation in respect of the green barrier has been responded to under policy EN11, Rep 92. The objector's representation seeking its allocation as a residential gypsy and traveller site under HN8 is considered in id91. The proposed extension of the settlement boundary, and the removal of this site from the green barrier is small, however it would appear illogical to the current pattern of built form of Mynydd Isa and result in harm to the function of the green barrier and open countryside. As stated by the objector the site was subject to an appeal (Appeal Ref: APP/A6835/A/17/3175048) in August 2017, for the refusal of outline planning permission for 5 dwellings (056672). The inspector dismissed the appeal stating; "The site lies within the Mold – Mynydd Isa/Sychdyn/New Brighton green barrier which was designated for the purpose of safeguarding the open countryside around these settlements and preventing the settlements from merging into one another. The development would comprise the construction of some 4 dwellings and associated works on a site that would protrude out into the rural gap between Mynydd Isa and New Brighton. As such it would be harmful to the rural character and appearance of the area and to the openness of the green barrier, and it would erode the gap between the 2 settlements, contrary to UDP Policies GEN3 (in respect of development in the open countryside) and GEN4 (in respect of development in the green barrier). The site was considered as a potential development site at the UDP preparation stage but the UDP Inspector rejected it as it was considered to have more in common with the countryside than the settlement and to make a contribution towards the green barrier, "albeit it in a small way". That situation has not changed. Although a relatively small site which is only a small part of the green barrier, the harm due to its development for

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			The planning authority acknowledges that the site's contribution to the green barrier is small and seeks justification for this view by referring to 2 appeal decisions. The first appeal was in relation to an enforcement notice where the main issue related to the lawfulness of the use as a builder's yard over a period of time. This failed on the basis that there was insufficient evidence on the balance of probability that it had existed for 10 years although it was acknowledged that this only fell short by a matter of 2 months. The second appeal was in respect of the refusal of application reference 056672 for residential development where the Inspector concluded that harm to the green barrier designation outweighed the merits of residential development put forward at the appeal. It should be noted however that he also stated, "If the site was not located in a green barrier, these arguments would be finely balanced". The critical issue here is that the Inspector's decision was based on the policy that existed at the time. The difference now is that the green barrier is being reviewed as part of the development plan process and Inspectors' comments should therefore be considered in this context. In declining to make a small change to the settlement boundary the planning authority consider that the		housing would warrant considerable weight (in accordance with PPW advice). The green barrier has been reviewed as part of the LDP process, this review has resulted in the retention of the green barrier between Mynydd Isa and New Brighton, particularly the swathe of land to the east and west of Bryn Y Baal Road which plays a vital role in preventing the coalescence of the two settlements. The green barrier has already been reduced to the north of this site along the A494(T) at New Brighton, a further reduction would be harmful to the function of this green barrier. The objector states that the extension of the settlement boundary would appear to be a logical rounding off of Mynydd Isa. The extension would in fact result in the settlement boundary protruding in a ribbon style of development and not result in a rounding off of the settlement at all. The objector argues that the Council have removed land at Ewloe from the green barrier for residential development, however the allocated site at Ewloe is over 950m south from the settlement boundary of Connah's Quay at the nearest point, there is over 750m of green barrier between this allocation and Connah's Quay and over 1100m of green barrier from the settlement boundary of Shotton to the North East of the site. The green barrier between the objector's proposed site and New Brighton would be reduced to 120m at the narrowest point as an area of land at New Brighton, to the north east of the A494 has already been removed from the green barrier, leaving a total distance of 280m from the settlement boundary of New Brighton. The removal of the allocated site at Ewloe is not comparable to the objector's site at Mynydd Isa, where the green barrier is significantly smaller. Although the A494 separates Mynydd Isa from New Brighton, this is still an important green barrier which is already very small, therefore it would be detrimental to extend the settlement boundary and reduce it any further.

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			site does not relate well to the form and pattern of nearby development. This is not the case and view of the physical form of the existing built settlement clearly shows that this is a logical extension and rounding off and fits with the principals that the authority has adopted in other new allocations adjacent to settlement boundaries. These include the much larger sites including the housing commitment at Mynydd Isa and new allocations at Abermorddu, Penyffordd, Ewloe Green, Mancot, Mold, New Brighton. All of these have substantially greater impact in terms of scale and character. The planning authority also state that the site has “greater association in character and appearance with the open land between the two settlements”. This is simply not true. The site is a triangular enclosed area with the well-defined former hard surfaced former highway between the site and the established hedgerow. The land beyond consists of open fields in agricultural production. Not only is it significantly different in character but it has no realistic beneficial use for agricultural purposes. The site is hard surfaced and, without substantial security fencing, is liable to incidents of fly tipping and other unauthorised activity.		

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			It is a matter of fact that extending the settlement boundary would narrow the gap which separates the Bryn Y Baal from New Brighton. This measures some 350m with the A494 Mold by-pass passing through the centre of this gap. The reduction in the gap if the settlement boundary were redrawn would be some 50m, i.e. 15%. This would not be visually significant and the perception of the green barrier and its role would not be damaging due to the existence of the strong defensible boundary. All development, by definition, has an effect but in this case that effect is not so damaging as to outweigh a very modest development in a highly sustainable location. The site's current status as green barrier should not be an impediment at this stage to development of the site. When producing a new plan it is incumbent on the authority to review the green barrier and make adjustments in the context of development need and sustainability. It has already done so at Ewloe where a large 10 ha site within the green barrier has been allocated to provide up to 300 dwellings. This is a major incursion into the green barrier with a substantially greater impact on landscape character than this small site at Bryn Y Baal which is well related to the existing settlement pattern. 3.8 Ysgol Mynydd Isa Primary		

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			School is within 0.4km and the Argoed High School is 0.7km away. It is 0.8km to the local clinic, library and convenience store in Mercia Drive. The nearest public open space is only 250m to the east at Bryn Road with the Argoed Sports and Social Club within 800m. Access to public transport is excellent with a bus stop 50m away on the main road. In sustainability terms it is far superior to housing land allocations that the planning authority has proposed. This is merely a statement of fact rather than any argument that this site should in any way substitute for those allocations. The proposal to redraw the settlement boundary to allow for a very modest development of two dwellings constitutes a very sustainable form of development. This modest contribution to housing land supply would not result in any material harm to the character of the area and, in the context given above, would not prejudice or weaken the green barrier in terms of actual effect and the policy overall.		
941	PC1: The Relationship of Development to Settlement Boundaries	Object	This policy is vague and does not enable existing facilities to expand beyond the settlement boundaries.		Not accepted. Policy PC1 which sets out the relevance of settlement boundaries is not considered to be vague. It clearly identifies that development within settlement boundaries is acceptable in principle and sets out circumstances where development may be acceptable outside settlement boundaries in a number of criteria. Criteria b. clearly refers to

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					'the specific forms of employment development as set out in the employment chapter'. It is also unclear why the objector is criticizing policy PC1 in respect of settlement boundaries, when the objector is seeking the inclusion of land with a Principal Employment Area, The small part of the industrial estate which lies within the Flintshire boundary is identified by a Principal Employment Area and not a settlement boundary. One of the employment policies in the Policy PE 3 Employment Development Outside Allocated sites and Principal Employment Areas does allow for new industrial office and warehousing development under certain conditions. However, in the context of the objection relating to the expansion of existing facilities, this is specifically covered in policy PE5. It is not considered necessary or appropriate for PC1 to make provision for expansion of existing development when this is addressed by policies elsewhere in the Plan. The specific site promoted by the objector on the edge of Chester will be commented on under separate policies.
972	PC1: The Relationship of Development to Settlement Boundaries	Object	It is difficult to see how the (draft) strategic housing/employment sites (especially Warren Hall) and (draft) housing allocation sites will manage to meet and comply with this policy.		Not accepted. As part of preparing the Plan, settlement boundaries have been reviewed. In the case of housing allocations in HN1 the settlement boundaries have been revised accordingly. The objector appears to be arguing that housing allocations should be within the existing UDP boundaries yet puts forward many sites for housing development which would warrant settlement boundary changes. The objector offers no explanation as to what the objection is saying or seeking. It is the case that the Warren Hall and Northern Gateway allocations do not have a settlement boundary. The sites were allocated in the adopted UDP and did not have a settlement boundary. Both are mixed use allocations in a strategic and sustainable location. The mere fact they do not have settlement boundaries does not question their appropriateness to be allocated in the Plan.

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1101	PC1: The Relationship of Development to Settlement Boundaries	Object	I am writing to inform you that the original forms handed in in May 2014. That the land to the rear of Rosemount was then classed as Agricultural land. Since then I have been granted a Lawful Certificate of use dated 18th Sept 2018 (code No 058731). On this basis I would like the inspectors appointed to include the Candidate Site within the settlement boundary. It is my belief that it is now in the residential curtilage of Rosemount and not land located in the open countryside. I do believe the plan fits the tests of soundness as it is appropriate for the area. The site does not over shadow any other aspect and runs in line with existing housing developments to the east namely Bryn Eithin. As I have now obtained the Lawful Certificate of use I would like the line to now moved around my property and not through it.	Include Candidate site GYM002 Land to the rear of Rosemount Gwernymynydd within the settlement boundary.	Not accepted. The settlement boundary in the vicinity of the objection site includes the frontage development on the A494 as well as the estate type development at Llys Enfys and Bryn Eithin, which lies to the east. The settlement boundary then includes the frontage land to the north of the objection site, comprising the existing dwelling 'Rosemount' and the adjacent plot which has planning permission for a single dwelling. The settlement boundary then runs westwards along the A494(T). The delineation of the settlement is considered to represent a firm and defensible edge to built development. The objection site forms part of Clwydian Range and Dee Valley AONB which is a statutory landscape designation. The boundary of the AONB follows the edge of the built development at Bryn Eithin. That built development is well screened from the AONB by the steep wooded bank which runs along the edge of Bryn Eithin. The site forms a linear belt of open meadow land which sits between the belt of woodland to the east and the belt of woodland to the west which slopes down to Ffordd Maeshafn to the west. The objection site sits at the northern end of the swathe of land and forms a small paddock area. The objection site was the subject of a lawful development certificate application for use as domestic garden in connection with Rosemount. A certificate was issued on 18/09/18. However, the fact that the site is part of the garden area to Rosemount does not mean that it should be automatically included in the settlement boundary. In preparing the Plan, settlement boundaries have been drawn in a manner so as to clearly define the extent of built development. The implication of including land within a settlement boundary is that development proposals will be acceptable in principle. The site measures 0.21ha and could accommodate some 5-6 dwellings. This would relate poorly to the built form and pattern of development in the settlement and would create a precedent further releases of land to the south. Development on the site would not meet the test of either conserving or enhancing the natural beauty of the AONB.

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					Although the objector promotes a maximum of 3 dwellings (one of which could be an affordable unit), the site is capable of accommodating some 6 dwellings. It would result in a pressure for development which would appear as an 'island' of development and not form a logical extension to the settlement. The extant planning permission is considered to form the logical extent of built development in the settlement. Further extensions of built development on the site and beyond would be harmful to the character and appearance of open countryside and the AONB. Highways Officers consider the site to be unsuitable as there is no suitable access to the adopted highway. The objector has submitted an outline planning application (ref 061007) for the construction of two affordable dwellings and one private dwelling which is under consideration.
1182	PC1: The Relationship of Development to Settlement Boundaries	Object	For the reasons set out earlier in this Representation, there is a need to review the settlement boundaries around the Tier 3: Sustainable Villages to accommodate additional housing growth. There is a lack of non-greenfield land on which to build within settlement boundaries and that is one of the exceptional circumstances for the release of greenfield sites through the LDP. In view of our Client's land interests, this includes the settlement boundary of Penyffordd.	There is a lack of non-greenfield land on which to build within settlement boundaries and that is one of the exceptional circumstances for the release of greenfield sites through the LDP. In view of our Client's land interests, this includes the settlement boundary of Penyffordd.	Not accepted. This response should be read in conjunction with the response to the objection seeking allocation of the site in HN1 (id1179). The Council set out in its Preferred Strategy document a broad apportionment (accompanying policy STR2) of development between the different tiers of settlement hierarchy. The apportionment set out in the Deposit Plan is consistent with that. There is no objection from the Welsh Government in their formal representations on the Plan, indeed they have supported in principle the amount of growth and spatial strategy. The objector considers that the review of settlement boundaries has not produced sufficient opportunities for development in Tier 3 sustainable settlements. The objector considers that this is the case in Penyffordd / Penymynydd where a site is promoted. However, it is patently the case there is more than sufficient land within the settlement boundary of Penyffordd / Penymynydd given the three appeal decisions at Rhos Rd (North), Hawarden Rd and Chester Rd and a more recent appeal decision at Rhos Rd (South). The settlement has seen a large scale of development and a rapid pace of development at the end of the UDP period and beginning of LDP period and it is not considered necessary or appropriate for further sites to be provided in the Plan period. The settlement boundary for Penyffordd / Penymynydd has already been

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					amended to take account of the first three appeal decisions and will need to be further amended to take account of the recent appeal decision. In the Council's response on the HN1 objection it is considered that it is not necessary or appropriate to allocate the objection site and it is also not necessary or appropriate therefore to be included within the settlement boundary.
316	PC1: The Relationship of Development to Settlement Boundaries	Support	I wish to confirm my support for the LDP as it stands. In particular the plans for the boundary envelope presently described for Pantymwyn, namely plans numbered Pant001, 002, 003, 004, and 005. It is noted that other than one that is residential, they are all either agricultural or greenfield sites, and therefore excluded from development.		Support noted.
319	PC1: The Relationship of Development to Settlement Boundaries	Support	Supports settlement boundary as shown in LDP and objecting to a new development by Tan Y Felin, Greenfield for the following reasons Access to new estate, either via Tan Y Felin, Ffordd Dwyfor or School lane are already busy and added traffic would make it dangerous and have an impact on local residents. More traffic on Greenfield Road which in turn would cause bottle necks at the top of the well hill and onto the coast road. It will be dangerous for our children and elderly to cross the busy roads, there have been quite a few accidents on this road. The road leading all the way up Tan Y Felin and Ffordd Dwyfor is already a busy road, with cars parked on road sides as the houses		Support for the settlement boundary excluding land at Tan y Felin Greenfield is noted.

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			developed here at least 25yrs ago have inadequate drive ways, bringing more people to the area will make the matter worse! During winter months, November to April, the top of Tan-y-Felin becomes isolated. Even the slightest hint of icy conditions make the roads impassable, Tan y Felin extends for approximately 800 metres and the ground rises nearly 50 metres from its conception at the B5121 to the present highest point at Tros Yr Aber. Extra housing could only compound the present situation, more families could be cut off from their daily routine, daily income could be lost and children could miss school time. If there was ever a serious accident that required immediate assistance from the services, fire, police, ambulance, then property and lives could be at risk. Present estate roads would be hard pushed to cope with extra traffic. Greenfield is made up of green fields and part of those would be lost, plus protected animals and species, owls, bats and badgers would be lost. Schools are almost full, who would provide the funds for a bigger school and teachers. Has any survey taken place to ensure that nationally protected species, such as great crested newts, are not also resident? Doctors and Dentists, we have none in Greenfield and currently have to go to our nearest town Holywell and getting appointments is hard enough now and it would be		

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			even harder if we have a larger population. Putting even more pressure on our services.		
356	PC1: The Relationship of Development to Settlement Boundaries	Support	Amendment is sought to the existing settlement boundary of Drury and Burntwood. Amendment 1 relates to the northern part of the settlement boundary. It is requested that the existing settlement boundary is adjusted eastwards to align with the ward boundary. This will provide a common boundary for both the settlement boundary and the ward boundary on the line of the former Hollins lane. A plan is attached denoted as appendix 1.This will enable the existing properties and curtilages to be included within the settlement boundary and not left isolated outside the settlement boundary. Amendment 2 relates to the southern part of the settlement boundary. It is requested that the existing settlement boundary is adjusted to Include the existing built properties and curtilages on Drury New Road. No future development is requested outside the existing curtilages of the existing properties. Adjusting the settlement boundary modestly will provide a sense of belonging to the Drury and Burntwood Settlement without eroding the green barrier outside of the existing curtilages. A plan is attached as appendix 2.	Amendment to the existing settlement boundary of the Drury & Burntwood settlement shown on the proposals maps.	Not accepted. Each suggested amendment to the settlement boundary of Drury will be addressed in turn: Amendment 1 - The amendment is not small scale in that it seeks to extend the settlement boundary by including some 2.7ha of intervening land. The inclusion of this land within the settlement boundary would bring with it an acceptance in principle of new development. Given the site area this could accommodate anything up to 81 dwellings. The suggested amendment includes a small woodland and pasture land wrapping around a number of randomly located dwellings. The present settlement boundary is presently well defined by the rear of residential properties on Dinghouse Wood and by Bank Lane. Given that there is already unannotated land within the settlement boundary on the south side of Bank lane, it is unclear why the objector seeks to include another large area of white land. Settlement boundaries are not drawn in order they replicate administrative ward boundaries but to i) mark the edge of existing built form and ii) define areas where development is deemed acceptable in principle, or not as the case might be. The proposed amendment to the settlement boundary would necessitate an equivalent drawing back of the green barrier. The incremental drawing back of the green barrier would unnecessary and unacceptable as to begin the process of incrementally eroding the green barrier reduces its role and purpose, and its integrity as per the comprehensive review undertaken as part of the Plan process. The northern part of the land was previously put forward as candidate sites (DRU005) and was not accepted by the Council on account of the harm to the openness and the role of the green barrier in protecting the edge of built development. The inclusion of additional land to the south of DRU005 would have an even greater impact.

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					Amendment 2 - The settlement boundary in this part of Drury is unchanged from the adopted UDP. On the western side of Drury New Road it follows the well-defined edge of development at Mornington Crescent. On the eastern side of Drury New Road the settlement boundary includes Drury Farm and Broad Oak and includes the substantial areas of hardstandings associated with the farm shop. The settlement boundary then follows the well-defined edge of built development along Newton Drive. It would be inappropriate to include the farm buildings and greenhouses associated with Lesters Farm Shop, within the settlement boundary as these are facilities that typically exist in open countryside and therefore have a relevance and logic to be located there, and do not need to be included with a settlement boundary in order to continue functioning as a farm shop or to better relate them to the settlement. It would be too easy to see such an argument or request repeated in multiple similar contexts where farms exist near to settlements which would be counter to the purpose of what a settlement boundary is for. The suggested settlement boundary would include the farm buildings, land to the south of Broad Oak and the dwellings of Benbradagh and Newlands both of which sit in large plots. The total area proposed for inclusion is 0.95ha and therefore does not represent a small settlement boundary change. From the edge of built development at Mornington Crescent, the settlement boundary would extend a further 118m and from the existing settlement boundary on the eastern side of Drury New Rd, the settlement boundary would extend a further 151m into open countryside. Settlement boundaries are delineated so as to differentiate between built development and open countryside, and do not either contribute to or take away from the separate identification of community identify and cohesion. They are simply a planning tool. It must therefore be borne in mind that inclusion of land within a settlement boundary implies that development will be acceptable in principle. In looking at this particular settlement boundary it is considered that the land and its use relates more closely to open countryside than it does to the built form and pattern of development in the settlement. The inclusion of the land within the settlement could result in scope for some 25 to 30 new dwellings. The proposed settlement boundary would not result in a logical delineation as it would result in a

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					finger of land extending along Drury New Road. Despite claims that this would not result in pressure for development, two candidate sites were submitted in the vicinity of Newlands seeking housing development. Both of these candidate site requests have not been accepted and as such there is no need to amend the settlement boundary. The objection not only has implications for the settlement boundary but also for the green barrier. The green barrier review concluded the need to prevent the coalescence (or threat of coalescence) between Buckley and Drury by retaining the green barrier. The extension of the settlement boundary and consequent drawing back of the green barrier would create pressure for further releases from the green barrier along the eastern side of Drury new Road.
832	PC1: The Relationship of Development to Settlement Boundaries	Support	Policy PC1 (The Relationship of Development to Settlement Boundaries) Policy PC1 of the Deposit Plan states: “Outside settlement boundaries new development will be permitted for: … c. development related to agriculture, minerals extraction, rural diversification, tourism, leisure and recreation, and existing educational and institutional establishments, provided there is no unacceptable impact on the social, natural and built environment and subject to complying with other Plan policies…”. Bourne Leisure endorses the Council’s positive approach to development related to tourism and recreation outside of settlement boundaries. The emerging Policy is appropriate in the light of the evidence for tourism and will help to deliver Objective 14. Further, draft Policy PC1 is consistent with PPW which states: “Whilst the		Support is noted

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			protection of the open countryside should be maintained wherever possible, the expansion of existing businesses located in the open countryside should be supported provided that there are no unacceptable impacts." (paragraph 5.6.4).		
927	PC1: The Relationship of Development to Settlement Boundaries	Support	PC1: The Relationship of Development to Settlement Boundaries We support the policy and agree that development proposed within settlement boundaries as defined on the Proposals Map will generally be supported. We note that the land at Drury Lane, Drury, is wholly within the settlement boundary and as such, is considered suitable for residential development.		Support Noted.
645	PC2: General Requirements for Development	Object	Policy PC2 provides general requirement for new developments. Consideration of Policy 9.2 TW considers that the policy, as written is vague and ineffective. The principles of design are covered within Strategic Policies, as well as supporting Policies PC3 and PC4. TW considers that Policy PC2 is, therefore not required. Neither the policy or supporting text provides justification for its inclusion and it does not provide parameters by which developers could measure where they accord with the Policy. Tests of Soundness 9.3 TW considers that the Council fails to meet the following tests of soundness: 1 Soundness Test	TW considers that Policy PC2 is, therefore not required. Neither the policy or supporting text provides justification for its inclusion and it does not provide parameters by which developers could measure where they accord with the Policy. Tests of Soundness The policy as currently worded is vague and	Not accepted. The purpose of policy PC 2 is to set out generic criteria to be used to assess all development proposals. The use of the words 'should, where appropriate' ensures that the criteria are expressed as policy requirements where they are most relevant and it is recognised that the listed criteria may not be relevant to all developments. It is made clear in the explanation that the plan should be read as a whole and that this policy is a single reference point for commonly use criteria to ensure all development considers the most important issues that are likely to have an impact. In response to concerns regarding duplication of policy criteria, matters listed under Policy PC2 may be referred to in other policies, however these policies are area/topic-specific or specific to certain types of development, whereas the generic policy criteria of PC2 are intended to apply to all types of development, where relevant.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			3: The policy as currently worded is vague and ineffective and not required. Recommended Change 9.4 TW would recommend that the Council omit this Policy from the FLDP.	ineffective and not required. Recommended Change 9.4 TW would recommend that the Council omit this Policy from the FLDP.	
779	PC2: General Requirements for Development	Object	In relation to the FCC's Development Management Policy for General Requirements for Development the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LDP process are as follows: a) Whilst Higher Kinnerton Community Council has adopted the aims and ambitions set out in the Wellbeing of Future Generations Act and Flintshire County Council's "A Wales of Cohesive Communities" and a "Healthier Wales", there is concern that with a major development of 300 new homes within the boundary of Higher Kinnerton creates a serious risk of a significant adverse impact on the safety and living conditions on nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard, or the adverse effects of pollution. Going forward, any planning permission should ensure the development of Warren		Noted. The purpose of policy PC 2 is to set out generic criteria to be used to assess all development proposals. The use of the words 'should, where appropriate' ensures that the criteria are expressed as policy requirements where they are most relevant and it is recognised that the listed criteria may not be relevant to all developments. It is made clear in the explanation that the plan should be read as a whole and that this policy is a single reference point for commonly use criteria to ensure all development considers the most important issues that are likely to have an impact. In response to concerns regarding the Strategic Site at Warren Hall, this policy will help to mitigate against any adverse impacts which may result from this development on the surrounding area. Conditions will be attached to a planning permission and the issue of developer contributions will also be addressed at the full planning application stage.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Hall is controlled in such a way that mitigates the negative impacts of such a large single development via appropriate planning conditions, planning obligations or CIL charges (as appropriate).		
837	PC2: General Requirements for Development	Object	Policy PC2b (General Requirements for Development) Part b. of draft Policy PC2 states: "All development should, where appropriate: not have a significant adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard or the adverse effects of pollution." Bourne Leisure considers that it is essential for the amenity of those staying in holiday accommodation to be protected so that operators can continue to attract the large number of visitors who support the local economy through jobs, investment and visitor spending. As drafted, part b of Policy PC2 fails the first test of soundness as it does not align with national policy which seeks to prevent adverse effects upon amenity. For example, in relation to air and noise pollution, PPW states "Proposed development should be designed wherever possible to prevent adverse effects to amenity…" (paragraph 6.714). Bourne Leisure therefore proposes the following amendments to part b of Policy PC2:	Bourne Leisure therefore proposes the following amendments to part b of Policy PC2: "All development should, where appropriate: not have a significant unacceptable adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard or the adverse effects of pollution." (proposed amendments underlined and with strikethrough). The proposed amendments to Policy PC2 part b would mean that	Not accepted. The purpose of policy PC 2 is to set out generic criteria to be used to assess all development proposals. The use of the words 'should, where appropriate' ensures that the criteria are expressed as policy requirements where they are most relevant and it is recognised that the listed criteria may not be relevant to all developments. It is made clear in the explanation that the plan should be read as a whole and that this policy is a single reference point for commonly use criteria to ensure all development. It is considered that the use of the words ''significant adverse impact'' does mean 'unacceptable'. If something is 'significantly adverse' then it is by its very nature unacceptable. A|so the use of the term 'other users of nearby land/property' would relate to the amenity of people using holiday accommodation in the county. It is therefore considered unnecessary to add the word ''unacceptable''.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			““All development should, where appropriate: not have an significant unacceptable adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard or the adverse effects of pollution.” (proposed amendments underlined and with strikethrough). The proposed amendments to Policy PC2 part b would mean that this element of the Plan would satisfy the tests of soundness.	this element of the Plan would satisfy the tests of soundness.	
942	PC2: General Requirements for Development	Object	It is difficult to see how the (draft) strategic housing/employment sites (especially Warren Hall) and (draft) housing allocation sites will manage to meet and comply with this policy.		Not accepted. The purpose of policy PC 2 is to set out generic criteria to be used to assess all development proposals. The use of the words ‘should, where appropriate’ ensures that the criteria are expressed as policy requirements where they are most relevant and it is recognised that the listed criteria may not be relevant to all developments. It is made clear in the explanation that the plan should be read as a whole and that this policy is a single reference point for commonly use criteria to ensure all development considers the most important issues that are likely to have an impact.
1068	PC2: General Requirements for Development	Object	PC2: General Requirements for Development – a) we recommend including that development should contribute to Green Infrastructure.	a) we recommend including that development should contribute to Green Infrastructure.	Not accepted. The plan should be read as whole. Policies EN2, STR4, STR6 and STR13 all include reference to provision of or protection of Green Infrastructure. It is not considered necessary to include it in PC2.
957	PC2: General Requirements for Development	Object	It is difficult to see how the (draft) strategic housing/employment sites (especially Warren Hall) and (draft) housing allocation sites will manage to meet and comply with this policy.		Not accepted. The plan should be read as whole. Policies EN2, STR4, STR6 and STR13 all include reference to provision of or protection of Green Infrastructure. It is not considered necessary to include it in PC2.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
990	PC2: General Requirements for Development	Object	It is difficult to see how the (draft) strategic housing/employment sites (especially Warren Hall) and (draft) housing allocation sites will manage to meet and comply with this policy.		Not accepted. The purpose of policy PC 2 is to set out generic criteria to be used to assess all development proposals. The use of the words 'should, where appropriate' ensures that the criteria are expressed as policy requirements where they are most relevant and it is recognised that the listed criteria may not be relevant to all developments. It is made clear in the explanation that the plan should be read as a whole and that this policy is a single reference point for commonly use criteria to ensure all development considers the most important issues that are likely to have an impact. In response to concerns regarding the Strategic Site at Warren Hall, this policy will help to mitigate against any adverse impacts which may result from this development on the surrounding area. Conditions will be attached to a planning permission and the issue of developer contributions will also be addressed at the full planning application stage.
1012	PC2: General Requirements for Development	Object	It is difficult to see how the (draft) strategic housing/employment sites (especially Warren Hall) and (draft) housing allocation sites will manage to meet and comply with this policy.		Not accepted. The purpose of policy PC 2 is to set out generic criteria to be used to assess all development proposals. The use of the words 'should, where appropriate' ensures that the criteria are expressed as policy requirements where they are most relevant and it is recognised that the listed criteria may not be relevant to all developments. It is made clear in the explanation that the plan should be read as a whole and that this policy is a single reference point for commonly use criteria to ensure all development considers the most important issues that are likely to have an impact.
182	PC2: General Requirements for Development	Support	The Coal Authority are pleased to see that land instability is identified within the policy criteria as an issue which should be addressed as part of development proposals.		Support is noted
681	PC2: General Requirements for Development	Support	Policy PC2: General Requirements for Development We support the inclusion of this policy and the requirement that all development should, where appropriate, not result in or be susceptible to problems related to foul and surface water drainage.		Support is noted.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
771	PC2: General Requirements for Development	Support	Policy PC2: General Requirements for Development supports 7.14. Our Client has no objection to the requirements of this Policy. The themes set out within the Policy are largely consistent with national guidance contained in PPW10 and relevant Technical Advice Notes and typically reflect what would be expected of good design and good practice.		Support is noted.
646	PC3: Design	Object	Policy PC3 seeks a high standard of design in new developments and sets out general design parameters for new developments. Consideration of Policy 10.2 TW acknowledges the importance of ensuring that new developments are of a high quality and that they respect the local vernacular and character of the surrounding area. In this respect TW broadly supports the principles of Policy PC3, however it objects to the Policy in its current wording as it is too general and not implementable. 10.3 For example, part e requires 'suitable provision of space about dwellings…' however it is not clear within either the policy or supporting text what the space standards are. Similarly, Part g requires all new development to 'incorporate Sustainable Urban Drainage Schemes', however the policy does not reference the potential viability implications or site constraints that may require alternative design solutions. 10.4 It is not clear to TW	Recommended Change 10.6 In order to address the conflicts above and ensure that Policy PC3 is sound, it is requested that the Council: 1 Considers whether the policy is necessary and justified; and, 2 On the findings above, amend Policy and the justification to provide a clear strategy as to how developers are to demonstrate how they will implement the design requirements	Not accepted. The purpose of this policy is to improve the overall quality of design for all new development in the County, an aspiration that is set out in national planning policy and one which the Council fully supports through the policy wording and accompanying SPG. In terms of the policy wording being too general, a specific Supplementary Planning Guidance Note No2 Space about Dwelling is available which give developers full details of the expected standards. Alongside the SPG information there is guidance on the SUDS systems available on the Councils Website. The Council firmly believes that if developers engaged fully with the pre application planning process and follow the existing guidance available around the appraisal of site context and design (TAN12) and with the use of SPG's that will aid their understanding of the design requirements for each site. The SPG Notes will be reviewed and adopted once the LDP has been adopted.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			that the Policy is required above applicable nationally described standards set out in PPW and TAN12. Tests of Soundness 10.5 TW considers that Policy PC3 fails to meet the following tests of soundness: 1 Soundness Test 2: The policy is not specific or supported by robust evidence. 2 Soundness Test 3: As worded Policy PC3 is vague and ineffective. The Policy fails to provide thresholds for achieving these requirements listed in Parts a to g. Recommended Change 10.6 In order to address the conflicts above and ensure that Policy PC3 is sound, it is requested that the Council: 1 Considers whether the policy is necessary and justified; and, 2 On the findings above, amend Policy and the justification to provide a clear strategy as to how developers are to demonstrate how they will implement the design requirements		
1070	PC3: Design	Object	PC3: Design – a) we recommend including use of colour and use of lighting here and e) refers to amenity space, landscaping and planting – this should all be included as part of a comprehensive landscape scheme. Unclear what 'landscaping' refers to. SPG Space Around Dwellings is referenced. We recommend comprehensive design guidance SPG including spaces, buildings, scale, form, materials, colour, lighting as a holistic guide to buildings and	we recommend including use of colour and use of lighting here and e) refers to amenity space, landscaping and planting – this should all be included as part of a comprehensive landscape scheme. Unclear what 'landscaping' refers	Not accepted. It is not considered necessary for criteria a) to refer to lighting when lighting is specifically mentioned in criteria e. Criteria a refers to 'design' and 'materials' and these terms are quite capable of considering 'colour' and other issues such as 'texture' without specific reference in the policy wording. The policy has sought to include the key terms. In criteria e) reference is made to landscaping and uncertainty as to what this means. In a common sense meaning, the dictionary definition of 'landscaping' is 'the process of making a garden or other piece of land more attractive by altering the existing design, adding ornamental features, and planting trees and shrubs'. As part of looking at the design of a development it is good practice to consider the role that landscaping can play in the scheme.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			landscape. NRW would welcome reference in this section to including opportunities to enhance and interpret geodiversity when designing schemes.	to. SPG Space Around Dwellings is referenced. We recommend comprehensive design guidance SPG including spaces, buildings, scale, form, materials, colour, lighting as a holistic guide to buildings and landscape. NRW would welcome reference in this section to including opportunities to enhance and interpret geodiversity when designing schemes	The Council has a series of adopted SPG's and appendix 2 of the written statement identifies those SPG's which the Council intend to review and adopt. Given the design guidance in TAN12 Design and the increased emphasis on Placemaking in PPW10 that a comprehensive design guide for the County is either necessary or appropriate. The Plan needs to be read as a whole and the objector has submitted a separate objection to policy EN6 seeking reference to geodiversity.
889	PC3: Design	Object	Policy PC3 establishes a checklist to ensure that new development embrace the objectives of good design. PGNGL support the aims and objectives of policy PC3, and further support the acknowledgement within paragraph 9.8 of the explanatory text that the criteria will not be applicable to all types of development, such as utilitarian buildings. 7.4. PGNGL consider that it is important to retain the sentiment of paragraph 9.8 and considers that the explanatory text should be expanded and amended in relation to key employment areas	To overcome the objection and address soundness matters, the Council should: • Provide greater flexibility in the explanatory text paragraph 9.8, in relation to scale on strategic employment locations such as STR3	Not accepted. The purpose of this policy is to improve the overall quality of design for all new development in the County, an aspiration that is set out in national planning policy and one which the Council fully supports through the policy wording and accompanying SPG. That the policy wording should address the need of employment areas, the policy clearly states ''should, where appropriate'' which allows for the flexibility as suggested by the representor. The Council firmly believes that if developers engaged fully with the pre application planning process and follow the existing guidance available around the appraisal of site context and design (TAN12) and with the use of SPG's that will aid their understanding of the design requirements for each site. In this way developers will be fully aware of requirements early on the development process.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			where the current scale of buildings may not reflect the scale of buildings required for modern manufacturing processes and that may still be acceptable given the nature of the existing uses surrounding. PGNGL consider that these amendments are required in order that the plan is sufficiently flexible and does not unnecessarily constrain economic growth. 7.5. PGNGL consider that the requirements as explained in the explanatory text are not sufficiently effective and do not provide an appropriate strategy. PGNGL consider that the Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy. In these circumstances, we do not consider the Flintshire Local Development Plan, in its current form, to be sound. 7.7. However, PGNGL consider that with increased flexibility within the Explanatory Text the Local Development Plan can be found sound. PGNGL will continue to work with the Council to develop appropriate modifications to the Local Development Plan. Proposed Change 7.8. To overcome the objection and address soundness matters, the Council should: • Provide greater flexibility in the explanatory text paragraph 9.8, in relation to scale on strategic employment locations such as STR3.		The SPG Notes will be reviewed and adopted once the LDP has been adopted.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
214	PC3: Design	Support			Support is noted.
833	PC3: Design	Support	PC 3 Design. Bourne Leisure endorses the Council's approach for development to, where appropriate, respect and enhance the site and its surroundings; retain existing landscape and nature conservation features and incorporate opportunities to enhance biodiversity; and to protect and enhance the historic environment. The emerging policy takes a proportionate and pragmatic approach to delivering development, recognising that the criteria may not be applicable to every project. Under the heading "Tourism", PPW states that planning authorities should "…enable complementary development such as accommodation and access to be provided in ways which limit negative environmental impacts and consider the opportunities to enhance biodiversity." (paragraph 5.5.6). Paragraph 6.4.21 of PPW also states that enhancements should be achieved wherever possible. Therefore, draft Policy PC3 is consistent with national policy and once adopted will help to deliver the Objectives of the Plan.		Support is noted.
717	PC3: Design	Support	Policy PC3: Design We support the need for "good design." This includes the use of quality materials, landscaping and open space, and sustainable urban drainage systems all of which form key components of		Support is noted

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			sustainable development for current and future generations. We also support inclusive accessibility standards and adaptation to climate change, all of which contribute to the creation of a sense of place, quality of life and well-being.		
772	PC3: Design	Support	Policy PC3: Design 7.15. As a leading housebuilder in North Wales, our Client has a full and comprehensive understanding of what entails “good design.” This is reflected through their housing developments, all of which are built to a high standard. This includes the use of quality materials, landscaping and open space, and sustainable urban drainage systems all of which form key components of sustainable development for current and future generations. Our Client is also familiar and compliant with inclusive accessibility standards and adaptation to climate change, all of which contribute to the creation of a sense of place, quality of life and well-being.		Support is noted.
1174	PC3: Design	Support	Policy PC3: Design Our Client supports the need for “good design.” This includes the use of quality materials, landscaping and open space, and sustainable urban drainage systems all of which form key components of sustainable development for current and future generations. Our Client also supports inclusive accessibility standards and adaptation to climate change, all of		Support is noted.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			which contribute to the creation of a sense of place, quality of life and well-being.		
1157	PC4: Sustainability and Resilience of New Development	Object	PC4 must be enforced. Wales cannot reach its carbon target of 2030 if any new houses are built not using sustainable energy sources.		The comments are noted but it is stressed that the issue of energy efficiency / generation measures have been incorporated into Building Regulations. Welsh Government has recently consulted on proposals, in the context of its declared climate change emergency, for tougher new standards for new housing in terms of energy, to be implemented in full by 2025. At present there is no requirement in PPW10 for every new house to incorporate renewable energy. Nevertheless, Policy EN12 seeks to ensure that new larger scale development maximizes the potential for renewable energy.
1071	PC4: Sustainability and Resilience of New Development	Object	PC4: Sustainability and Resilience of New Development – c) we welcome the inclusion of 'incorporating planting, landscaping and design features which mitigate the effects of climate change' but advise that these elements all form part of a comprehensive landscape scheme and recommend that reference is made to Sustainable Management of Natural Resources (SMNR). Similarly, 9.11 and 9.13 should reference SMNR and comprehensive, integrated landscape scheme for the development.	we welcome the inclusion of 'incorporating planting, landscaping and design features which mitigate the effects of climate change' but advise that these elements all form part of a comprehensive landscape scheme and recommend that reference is made to Sustainable Management of Natural Resources (SMNR). Similarly, 9.11 and 9.13 should reference SMNR and comprehensive, integrated	Partly accepted. The aim of the policy is to ensure that the main principles of sustainable development are taken into account and incorporated at an early stage in the design process. Support for the c) of the policy is welcomed. The terminology 'Sustainable Management of Natural Resources' is clearly referenced in PPW10 and it is not clear why it is essential for this to be repeated in the explanation to the policy. However, if the Inspector considers that reference to SMNR would improve the understanding and implementation of the policy then the Council would have no objection to this.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				landscape scheme for the development.	
1142	PC4: Sustainability and Resilience of New Development	Object	PC4 must be enforced. Wales cannot reach its carbon target of 2030 if any new houses are built not using sustainable energy sources.		The comments are noted but it is stressed that the issue of energy efficiency / generation measures have been incorporated into Building Regulations. Welsh Government has recently consulted on proposals, in the context of its declared climate change emergency, for tougher new standards for new housing in terms of energy, to be implemented in full by 2025. At present there is no requirement in PPW10 for every new house to incorporate renewable energy. Nevertheless, Policy EN12 seeks to ensure that new larger scale development maximizes the potential for renewable energy.
662	PC4: Sustainability and Resilience of New Development	Support	Policy PC4: Sustainability and Resilience of New Development We support the inclusion of this policy and its requirement that development should utilise sustainable construction techniques to maximise water conservation		Support is noted.
928	PC4: Sustainability and Resilience of New Development	Support	PC4: Sustainability and Resilience of New Development We do not object in principle to the objectives of the policy. However, we do object to point e) which refers to incorporating renewable energy technology. In our view, energy reduction and efficiency is covered by building regulations and we see this as dual control. As such, it is not necessary as it is adequately addressed outside of the planning system.		Noted. The aim of the policy is to ensure that the main principles of sustainable development are taken into account and incorporated at an early stage in the design process. Support for the objectives of the policy is welcomed. The Council recognises the need to strike the correct balance between promoting change and the better quality of life that sustainable housing creates on the one hand and inhibiting development by placing onerous requirements on developers, on the other hand. LDPs should not duplicate or contradict national planning policy or legislation such as building regulations. The Council is aware that Welsh Government, in view of its climate change emergency declaration, has recently consulted on proposals to introduce tougher requirements on housing development in terms of energy with a view to this being implemented fully by 2025. In this broader context of the increased importance in PPW10 on energy, it is considered reasonable and appropriate for the Plan to reference the need to consider renewable energy. The wording of criteria e is qualified by the term 'where appropriate' and must be read in conjunction with EN12.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
778	PC4: Sustainability and Resilience of New Development	Support	Policy PC4: Sustainability and Resilience of New Development 7.16. Our Client has no objection to the requirements of this Policy. The themes set out within the Policy are largely consistent with national guidance contained in PPW10 and relevant Technical Advice Notes and typically reflect what would be expected of sustainable development which is capable of enduring		Support is noted.
414	PC5: Transport and Accessibility	Object	object to criteria d (a requirement for 10% of spaces to have electric charging points) as this is not currently supported by national legislation. This is a subject which should be dealt with at National policy level to ensure consistency across Wales and to ensure it is in line with Building Regulation requirements.	Criteria should be removed.	Not accepted. Criterion d. clearly states that it only applies to 'non-residential' development. This is in accordance with para 4.1.39 of PPW10. In the context of recent Government announcements about phasing out of fossil fuel powered vehicles, the policy approach is quite appropriate and in line with PPW10.
691	PC5: Transport and Accessibility	Object	No actual sites are mentioned in detail, consequently no land protected. There is not a procedure for a planning application to be tested. Consequently an application would be approved to the detriment of railway transport. In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment.	No actual sites are mentioned in detail, consequently no land protected.	Not accepted. The Deposit plan recognizes (para. 9.21) that it is not able to directly influence existing public transport facilities and services, and (para.9.22) that the Policy must be read and implemented in the context of budgetary pressure on public transport services. The Policy therefore lists criteria against which new development proposals can be assessed. The Council acknowledges that no specific sites are referenced in the Deposit plan. PPW 10 (para.5.3.3) advises that 'Blight should be kept to a minimum by including in development plans only schemes which are likely to commence within the Plan period.' In the context of this policy it is unclear what 'railway enforcement' means. Also the objector does not identify any specific sites or schemes that need to be safeguarded for the types of facilities listed. It must be stressed that many of these can be progressed without land being safeguarded in the Plan.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
784	PC5: Transport and Accessibility	Object	In relation to the FCC's Development Management Policy for the Protection of Disused Railway Lines the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LDP process are as follows: a) To develop and enhance green infrastructure, the community and external agencies should be engaged with to develop a 'walkable' wildlife corridor along the old railway line embankment running between Bennett's Lane and Main Road including working with FCC to support the development of the Active Travel network and with local land owners to gain access to unused and currently unavailable parts of the old railway line to create new public rights of way wherever possible. b) A planning obligation should be a prerequisite to any development so secure a financial contribution from the developer via a S106 agreement to promote the development of the Active Travel Network including routes along disused railway lines.		Not accepted. The aspirations of the Community Council in relation to the future use of the disused railway line in Kinnerton are in no way hindered by the Policy. The suggestion that a planning obligation should be a prerequisite to any development to secure a financial contribution from the developer via a S106 agreement to promote the development of the Active Travel Network is not accepted. An agreement can only be included if it meets the statutory tests, ie it is necessary to make the development acceptable in planning terms, it is directly related to the development, and it is fairly and reasonably related in scale and kind'.
1072	PC5: Transport and Accessibility	Object	PC5: Transport and Accessibility and PC6: Active Travel – we advise that these policies should make reference to Green Infrastructure and the importance of walking and cycling along green routes.	we advise that these policies should make reference to Green Infrastructure and the importance of walking and cycling along green routes.	Not accepted. The Plan needs to be read as a whole and advice in respect of green infrastructure is set out in EN2.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
720	PC5: Transport and Accessibility	Support	We support the need for new development to be sustainably located; this goes hand in hand with the sustainability objectives expressed in national guidance. We actively promotes walking and cycling within our development schemes through the provision of dedicated pedestrian and cycle linkages where possible. This will continue to be the case. The impacts of new development should continue to be assessed as part of the development management process, particularly in relation to network capacity and road safety. The flexibility towards parking standards expressed in paragraph 4.1.53 of PPW10 should feed down into the development management process, and it is noted that there is recognition to this effect in paragraph 9.17 of the Deposit Plan. This will allow for much greater flexibility in respect of car parking provision on a site by site basis, and particularly given that some sites will be more sustainably located than others (particularly in relation to access to public transport services).		Support is noted.
780	PC5: Transport and Accessibility	Support	Policy PC5: Transport and Accessibility 7.17. Our Client supports the need for new development to be sustainably located; this goes hand in hand with the sustainability objectives expressed in national guidance. Our Client actively promotes walking and cycling within their development		Note that representation 720 supports the need for new development to be sustainably located. Re Rep. 780, Para. 9.17 requires developments to provide appropriate levels of parking in accordance with the maximum parking standards approach embodied in para 4.1.53 of PPW10 and does recognise that this para. ‘stresses that Parking standards should be applied flexibly and allow for the provision of lower levels of parking…’

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			schemes through the provision of dedicated pedestrian and cycle linkages where possible. This will continue to be the case. The impacts of new development should continue to be assessed as part of the development management process, particularly in relation to network capacity and road safety. The flexibility towards parking standards expressed in paragraph 4.1.53 of PPW10 should feed down into the development management process, and it is noted that there is recognition to this effect in paragraph 9.17 of the Deposit Plan. This will allow for much greater flexibility in respect of car parking provision on a site-by-site basis, and particularly given that some sites will be more sustainably located than others (particularly in relation to access to public transport services).		
1175	PC5: Transport and Accessibility	Support	Policy PC5: Transport and Accessibility Our Client supports the need for new development to be sustainably located; this goes hand in hand with the sustainability objectives expressed in national guidance. The impacts of new development should continue to be assessed as part of the development management process, particularly in relation to network capacity and road safety. The flexibility towards parking standards expressed in paragraph 4.1.53 of PPW10 should feed down into the		Support is noted.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			development management process, and it is noted that there is recognition to this effect in paragraph 9.17 of the Deposit Plan. This will allow for much greater flexibility in respect of car parking provision on a site-by-site basis, and particularly given that some sites will be more sustainably located than others (particularly in relation to access to public transport services).		
595	PC6: Active Travel	Object	OBJECTS to Policy PC6. JUSTIFICATION 5.2 The policy states that: “New development proposals should ensure that people have access to employment, education, healthcare and other essential services and facilities as a result of:” 5.3 Six criteria are then set out. 5.4 It is simply not realistic that all sites will meet this statement. For example Part (f) of the policy states “the incorporation of existing public rights of way as an integral part of the design and layout of the development”. 5.5 Again, whilst this may be desirable, it is not always achievable and sometimes public rights of way need to be diverted to allow for development. AMENDMENTS SOUGHT 5.6 Policy PC6 is considered unsound in that it is not appropriate for the area as it sets an unreasonably high bar for applicants and should be reworded to allow some flexibility. This could be achieved by the first paragraph of the	5.6 Policy PC6 is considered unsound in that it is not appropriate for the area as it sets an unreasonably high bar for applicants and should be reworded to allow some flexibility. This could be achieved by the first paragraph of the policy being reworded as follows: “The Council will promote active travel, in appropriate schemes, through”:	Partly accepted. It is accepted that the criteria within the policy may not apply to every development, particularly smaller scale development in rural areas. If the Inspector considers that the policy would be improved by adding after ‘should’ the words ‘wherever possible’ then the Council would have no objection to this.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			policy being reworded as follows: "The Council will promote active travel, in appropriate schemes, through":		
694	PC6: Active Travel	Object	No actual sites are mentioned in detail, consequently no land protected. There is not a procedure for a planning application to be tested. Consequently an application would be approved to the detriment of railway transport. In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment.	In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment	Not accepted. The Deposit plan recognizes (para. 9.21 that it is not able to directly influence existing public transport facilities and services, and (para.9.22 that the Policy must be read and implemented in the context of budgetary pressure on public transport services'. The Policy therefore lists criteria against which new development proposals can be assessed. The Council acknowledges that no specific sites are referenced in the Deposit plan. PPW 10 (para.5.3.3) advises that 'Blight should be kept to a minimum by including in development plans only schemes which are likely to commence within the Plan period.'
775	PC6: Active Travel	Object	In relation to the FCC's Development Management Policy for Active Travel the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LPD process are as follows: b) The proposed Warren Hall outline plan shows many footpaths and cycleways running through the development. The development should provide a well thought out network of footpaths and cycleways that not only connect to Flintshire County Council's active travel routes but also provided connectivity to the existing village with the aim being to link both parts of the community with a new integrated walking and cycle network. Any development should promote and enhance the value the		Noted. The masterplan clearly shows a network of green infrastructure and walking / cycling routes through the site. The policy requires that the development links in with the Active Travel scheme linking Mold, Buckley and Broughton, which is being developed by the Councils Transport Strategy unit. Consideration will be given to ensuring links between the site and the Active travel route and Higher Kinnerton.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			environment with more green spaces, footpaths and cycleways, as recommended by the Transport for New Homes Study, and provide facilities for a growing environmentally friendly transport system.		
958	PC6: Active Travel	Object	We do not believe that STR3B can meet this policy.		Not accepted. The Warren Hall site lies close to two potential Active Travel routes. The first route is a strategic route between Mold, Buckley and Broughton and on to Deeside which runs along the A5104 which runs along the site frontage. Funding is being applied for to deliver this route. A longer term variation of the same route is to cross over the A55(T) from Dobshill to enter Broughton via Old Warren. Policy STR3 clearly references the need for sustainable transport links with the route and nearby settlements. The Council's Transport Strategy team are also looking at achieving links between this Active Travel route and the village of Higher Kinnerton, with a potential route along either Kinnerton lane or Lesters lane. It is considered that the site can achieve sustainable transport links either by walking, cycling or the bus services which passes the site.
973	PC6: Active Travel	Object	We do not believe that STR3B can meet this policy.		Not accepted. The Warren Hall site lies close to two potential Active Travel routes. The first route is a strategic route between Mold, Buckley and Broughton and on to Deeside which runs along the A5104 which runs along the site frontage. Funding is being applied for to deliver this route. A longer term variation of the same route is to cross over the A55(T) from Dobshill to enter Broughton via Old Warren. Policy STR3 clearly references the need for sustainable transport links with the route and nearby settlements. The Council's Transport Strategy team are also looking at achieving links between this Active Travel route and the village of Higher Kinnerton, with a potential route along either Kinnerton lane or Lesters lane. It is considered that the site can achieve sustainable transport links either by walking, cycling or the bus services which passes the site.
1021	PC6: Active Travel	Object	Paragraph 5.43 – the Council supports the reference to active travel, and suggests that extra text is included to draw out the role of local	suggests that extra text is included to draw out the role of local bus services,	Support for Policy PC6 is noted. Policy PC7 deals with the issue of passenger transport and provides clear support for bus services linking communities with each other and with facilities, services and employment

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			bus services, particularly opportunities to strengthen cross-border networks linking to the proposed new and existing residential and employment sites. • Policy PC5 and PC6 – the Council supports the references regarding transport and active travel.	particularly opportunities to strengthen cross-border networks linking to the proposed new and existing residential and employment sites.	areas. It is not considered that adding specific reference to cross border bus services is necessary as the policy applies to bus services generally.
838	PC6: Active Travel	Object	Policy PC6 (Active Travel) Policy PC6 of the Deposit Plan states that: "New development proposals should ensure that people have access to employment, education, healthcare and other essential services and facilities as a result of: a the provision of walking and cycling routes being an integral part of the scheme and connecting the development with key destinations; …" As drafted, Policy PC6 fails the first test of soundness as it is not consistent with national policy. PPW states "…development in these [rural] areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys" (paragraph 3.35) In order to be consistent with national policy, the following amendment to Policy PC6 should be made: " "New development proposals should, where possible, ensure that people have access to employment, education, healthcare and other essential services and	Policy PC6 of the Deposit Plan states that: "New development proposals should ensure that people have access to employment, education, healthcare and other essential services and facilities as a result of: a the provision of walking and cycling routes being an integral part of the scheme and connecting the development with key destinations; …" As drafted, Policy PC6 fails the first test of soundness as it is not consistent with national policy.	Partly accepted. It is accepted that the criteria within the policy may not apply to every development, particularly smaller scale development in rural areas. If the Inspector considers that the policy would be improved by adding after 'should' the words 'wherever possible' then the Council would have no objection to this.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			facilities as a result of: a the provision of walking and cycling routes being an integral part of the scheme and connecting the development with key destinations; …" The proposed amendment to draft Policy PC6 would mean that this element of the Plan would satisfy the tests of soundness. Without the amendment the policy risks undermining the ability for the Council to deliver the Plan as it does not recognise the rural context of the much of the County.	PPW states "…development in these [rural] areas should embrace the national sustainable placemaking outcomes and, where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys" (paragraph 3.35) In order to be consistent with national policy, the following amendment to Policy PC6 should be made: " "New development proposals should, where possible, ensure that people have access to employment, education, healthcare and other essential services and facilities as a result of: a the provision of walking and cycling routes being an integral part of the	

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				scheme and connecting the development with key destinations; …" The proposed amendment to draft Policy PC6 would mean that this element of the Plan would satisfy the tests of soundness. Without the amendment the policy risks undermining the ability for the Council to deliver the Plan as it does not recognise the rural context of the much of the County.	
943	PC6: Active Travel	Object	We do not believe that STR3B can meet this policy.		Not accepted. The Warren Hall site lies close to two potential Active Travel routes. The first route is a strategic route between Mold, Buckley and Broughton and on to Deeside which runs along the A5104 which runs along the site frontage. Funding is being applied for to deliver this route. A longer term variation of the same route is to cross over the A55(T) from Dobshill to enter Broughton via Old Warren. Policy STR3 clearly references the need for sustainable transport links with the route and nearby settlements. The Council's Transport Strategy team are also looking at achieving links between this Active Travel route and the village of Higher Kinnerton, with a potential route along either Kinnerton lane or Lesters lane. It is considered that the site can achieve sustainable transport links either by walking, cycling or the bus services which passes the site.

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695	PC7: Passenger Transport	Object	No actual sites are mentioned in detail, consequently no land protected. There is not a procedure for a planning application to be tested. Consequently an application would be approved to the detriment of railway transport. In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment.	In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment.	Not accepted. The Deposit plan recognizes (para. 9.21 that it is not able to directly influence existing public transport facilities and services, and (para.9.22 that the Policy must be read and implemented in the context of budgetary pressure on public transport services'. The Policy therefore lists criteria against which new development proposals can be assessed. The Council acknowledges that no specific sites are referenced in the Deposit plan. PPW 10 (para.5.3.3) advises that 'Blight should be kept to a minimum by including in development plans only schemes which are likely to commence within the Plan period.' In the context of this policy it is unclear what 'railway enforcement' means. Also the objector does not identify any specific sites or schemes that need to be safeguarded for the types of facilities listed. It must be stressed that many of these can be progressed without land being safeguarded in the Plan.
209	PC7: Passenger Transport	Support	Support		Support is noted.
348	PC8: Airport Safeguarding Zone	Object	Paragraph 9.24 is the only explanatory text within the draft LDP which relates to Policy PC8: Airport Safeguarding Zone. The paragraph is not consistent with national policy and both the paragraph and LDP, as a consequence, fail to properly and clearly explain the implications of the Policy and its application. As such, it fails to properly address a key issue. The aerodrome safeguarding process is included in UK legislation / guidance as an integral part of the planning system. The relevant national policy is set out in Circular 01/2003 Safeguarding of Aerodromes, Technical Sites and Military Explosive Storage Areas; and The Town and Country Planning (Safeguarded	Paragraph 9.24 should be amended as follows and supplemented with further paragraphs as set out below. 9.24 Airbus currently owns the airport and is the main user. However, other uses include Police, Air Ambulance and Military helicopters, Military Training Jets and Private Business Jets, as well as flight training. Alongside	Accepted. The Council would be agreeable to an amendment to the wording of the final sentence of Para 9.24 to read 'Consultation will be carried out with the Airport operator and the Civil Aviation Authority' if the Inspector considers that this would improve the implementation of the policy.

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			aerodromes, Technical Sites and Military Storage Areas) Direction 2002 (updated December 2016). The Direction identifies, contrary to the current wording of paragraph 9.24, that the consultation process operates between Flintshire County Council, as the Local Planning Authority (LPA), and the 'consultee' defined as the owner or operator of the aerodrome (in this case Airbus). Further, the Civil Aviation Authority (CAA) is only consulted, by the LPA, in circumstances where it proposes to grant permission subject to conditions, contrary to the advice of the consultee. As above, the LDP also needs to better explain safeguarding in order that the requirements are fully transparent to future applicants for planning permission. Airbus would also note, for the Authority's information, that airfield safeguarding is not a 'fixed' regime and may well change over the LDP period. In brief: • The ICAO (International Civil Aviation Organization) is reviewing the current OLS (Obstacle Limitations Surfaces) which determine the safeguarding criteria for aerodromes at present. The new surfaces are going to be approved in 2021 and become effective from 2024; • The CAA and DfT are currently reviewing the status of Public Safety Zones (PSZ) in the UK. Although a PSZ is not yet established at Hawarden Airport, there is a possibility that in the	Airbus other companies based at Hawarden include Aerocare, Raytheon UK and NWMAS all of whom provide aircraft maintenance facilities on site. Aviation Park Group offer a range of services including Aircraft handling, overnight parking, hangarage and passenger services. 9.25 The safeguarding zone for Hawarden Airport is defined on a safeguarding map issued by the Civil Aviation Authority. This defines certain types of development that, by reason of their height, attraction to birds or inclusion of or effect upon aviation activity, require prior consultation with the Airport owner or operator. Government advice in OPDM Circular 1/2003 'Advice to Local Planning	

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			next few years such an area could be established and this will bring further constraints to this area, as no new developments would be allowed. This would negate any high-density developments. (as referenced in DfT Circular 1 / 2010 Control of Development in Airport Public Safety Zones)	Authorities on Safeguarding Aerodromes and Military Explosives Storage Areas' sets out the detailed guidance on how safe and efficient operations can be secured. 9.26 In accordance with this Circular, the owner or operator of Hawarden Airport is a statutory consultee for certain planning applications for developments that require safeguarding to protect the safety of the airport's operation. 9.27 The owner or operator of Hawarden Airport will assess planning applications and consider their potential impact on whether the development causes: an obstacle; an attraction to birds; any light or reflection that might	

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				be confused with or interfere with aerodrome lighting or present a visual hazard; interference with communication systems including radar systems and ground to air communication and whether its construction will present any hazard to flight safety.	
59	PC9: Protection of Disused Railway Lines	Object	However any reuse of disused railway line should take account of the historic environment implications that this reuse might encounter.		Noted. Support for the policy is noted. Under the Policy any planning applications for development on or affecting a disused railway line should be accompanied by an assessment (para 9.25 of Deposit Plan). As part of this assessment the historic and environmental issues would need to be considered.) The Plan also needs to be read as a whole and there are strategic and detailed policies relating to the historic environment.
696	PC9: Protection of Disused Railway Lines	Object	No actual sites are mentioned in detail, consequently no land protected. There is not a procedure for a planning application to be tested. Consequently an application would be approved to the detriment of railway transport. In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment.	In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment.	Not accepted. The Deposit plan recognizes (para. 9.21 that it is not able to directly influence existing public transport facilities and services, and (para.9.22 that the Policy must be read and implemented in the context of budgetary pressure on public transport services'. The Policy therefore lists criteria against which new development proposals can be assessed. The Council acknowledges that no specific sites are referenced in the Deposit plan. PPW 10 (para.5.3.3) advises that 'Blight should be kept to a minimum by including in development plans only schemes which are likely to commence within the Plan period.' In the context of this policy it is unclear what 'railway enforcement' means. Also the objector does not identify any specific sites or schemes that need to be safeguarded for the types of facilities listed. It must be stressed that many of these can be progressed without land being safeguarded in the Plan.

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782	PC9: Protection of Disused Railway Lines	Object	Through consultation with village residents, the steering group identified the following themes to be developed for the plan: ? Protecting our environment and open spaces. ? Promoting community life and social cohesion. ? Community growth through sensitive development. ? Supporting commerce in the community. The Village Plan takes each of these themes in turn, setting out the background and then, based on what we were told by residents in the survey, proposing a set of key objectives which can be delivered. As with many rural communities, the industrial revolution brought many changes, not least to the railway and Kinnerton's own station. The railway was dismantled in the 1960s but still provides a focal point as a popular footpath and public open space. In relation to the FCC's Development Management Policy for the Protection of Disused Railway Lines the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LDP process are as follows: a) To develop and enhance green infrastructure, the community and external agencies should be engaged with to develop a 'walkable' wildlife corridor along the old railway line embankment running between Bennett's Lane and Main Road including working with FCC to support		Not accepted. The aspirations of the Community Council in relation to the future use of the disused railway line in Kinnerton are in no way hindered by the Policy. The suggestion that a planning obligation should be a prerequisite to any development to secure a financial contribution from the developer via a S106 agreement to promote the development of the Active Travel Network is not accepted. An agreement can only be included if it meets the statutory tests, ie it is necessary to make the development acceptable in planning terms, it is directly related to the development, and it is fairly and reasonably related in scale and kind'. Developing a walkable wildlife corridor is something that can be developed outside of the LDP. It would be inappropriate for the Plan to safeguard further sections of the former railway line as an active travel or other route in the absence of firm evidence that the project is viable and deliverable.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the development of the Active Travel network and with local land owners to gain access to unused and currently unavailable parts of the old railway line to create new public rights of way wherever possible. b) A planning obligation should be a prerequisite to any development so secure a financial contribution from the developer via a S106 agreement to promote the development of the Active Travel Network including routes along disused railway lines.		
133	PC10: New Transport Schemes	Object	Plough Lane Link Road, Shotton.	Remove Plough Lane Link Road, Shotton.	Not accepted. The Plough Lane Link Road scheme would remove traffic from the B5129 through Shotton and has Preferred Route status. While the previous planning permission has lapsed the scheme is currently included in the Council's Highways Capital Programme. The scheme will be considered further as part of a number of other studies including the Chester Broughton Growth Corridor Study and the Flintshire Integrated Transport Proposals. The safeguarding of the route under Policy PC 10 reflects the above, but it is acknowledged in the Plan (para. 9.29) that the route 'has fallback potential as a sustainable transport corridor such as a walking/cycling route'.
170	PC10: New Transport Schemes	Object	I am writing with SHOTTON TOWN COUNCILS comments on the 'Deposit Flintshire Local Development Plan (LDP) Consultation 30th September – 11th November 2019. Shotton Town Council OBJECT to the Plough Lane Link Road in the Local Development Plan as it would be Detrimental to Peoples enjoyment of this area which has been Designated an area of Peace and Tranquillity with Wepre Park. It would also be Detrimental to Protected Species in the area.	OBJECT to the Plough Lane Link Road in the Local Development Plan as it would be Detrimental to Peoples enjoyment of this area which has been Designated an area of Peace and Tranquillity with Wepre Park.	Not accepted. The Plough Lane Link Road scheme would remove traffic from the B5129 through Shotton and has Preferred Route status. While the previous planning permission has lapsed the scheme is currently included in the Council's Highways Capital Programme. The scheme will be considered further as part of a number of other studies including the Chester Broughton Growth Corridor Study and the Flintshire Integrated Transport Proposals. The safeguarding of the route under Policy PC 10 reflects the above, but it is acknowledged in the Plan (para. 9.29) that the route 'has fallback potential as a sustainable transport corridor such as a walking/cycling route'. The route seeks to provide improved access between Aston Park Road (and the A55) adjacent to the Deeside Community Hospital and. It runs along Aston park Road with spurs to north and south along Shotton Lane.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					Passing under the railway line the route follows Killins Lane for 100m before turning north to run along the western edge of the railway line to meet Chester Road East at Shotton. The Councils constraints maps indicate that there is only one historic asset along the route which is an archaeological feature relating to the former Shotton brickworks within the linear strip of open land to the west of the railway line. There are no landscape or natural environment designations along the route. The boundary of the SSSI and SAC lies 210m to the west of the route. The Council has created the Taliesin Nature Area on land between the Well House primary School and Killins Lane but this is not directly impinged on by the route. Clearly as detailed design work for the route is progressed it will be necessary to have regard to any indirect effects on the SSSI / SAC. There is no objection to the route from NRW.
697	PC10: New Transport Schemes	Object	No actual sites are mentioned in detail, consequently no land protected. There is not a procedure for a planning application to be tested. Consequently an application would be approved to the detriment of railway transport. In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment.	In addition to railway enforcement land needs to be protected for: Bus access and turning Cycle storage Park and ride According to the actual site and the catchment	Not accepted. This representation does not relate to any of the schemes referenced under policy PC10. In the absence of comments on specific safeguarded road schemes it is not possible to this general representation which has been made to several Plan policies.
981	PC10: New Transport Schemes	Object	OBJECT to the inclusion of the Plough Link Road land safe- guarding in the plan, reasons being: 1. That it has been in the precious plans for 30 yrs,(advised) and there has been no plan to date of the actual road envisaged to be built, nor funding	EW.EU request Plough Ling Road land safe- guarding be deleted and the corridor become an Active Safe Travel	Not accepted. The Plough Lane Link Road scheme would remove traffic from the B5129 through Shotton and has Preferred Route status. While the previous planning permission has lapsed the scheme is currently included in the Council's Highways Capital Programme. The scheme will be considered further as part of a number of other studies including the Chester Broughton Growth Corridor Study and the Flintshire Integrated Transport Proposals. The safeguarding of the route under Policy PC 10

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			requested from the Welsh Government to provide the funding. EW.EU request it be deleted and the corridor become an Active Safe Travel Route for walking and cycling	Route for walking and cycling	reflects the above, but it is acknowledged in the Plan (para. 9.29) that the route 'has fallback potential as a sustainable transport corridor such as a walking/cycling route'.
1074	PC10: New Transport Schemes	Object	PC10: New Transport Schemes – we advise that this policy should refer to landscape and other environmental considerations, mitigation and potential enhancements. PC11: Mostyn Docks, by contrast, refers to environmental effects in relation to the Dee Estuary.	we advise that this policy should refer to landscape and other environmental considerations, mitigation and potential enhancements. PC11: Mostyn Docks, by contrast, refers to environmental effects in relation to the Dee Estuary.	Not accepted. The Plan needs to be read as a whole and advice in respect of landscape and other environmental considerations is contained in other policies in the Plan, eg PC3, PC4, EN4 & EN7. The specific reference to environmental considerations in PC 11 reflects the sites location in the Dee Estuary which is a European Marine site comprising a number of designations including SSI, a Ramsar site and a Special Area of Conservation.
1188	PC10: New Transport Schemes	Object	The LDP has not considered the impact of climate change on Holywell and Flintshire, with the ambition of the UK to be carbon neutral by 2030, a target date within the lifespan of this LDP. The case for a railway station to be reopened at Greenfield has been well made, and a must if we are to embrace the green agenda with land available for green industrial expansion to match for example the Kingspan development which is now carbon neutral. The need for walking, cycling, public transport, local employment and housing is urgently needed and was clearly illustrated in the County Council's recently successful funding application to	The LDP has not considered the impact of climate change on Holywell and Flintshire, with the ambition of the UK to be carbon neutral by 2030, a target date within the lifespan of this LDP. The case for a railway station to be reopened at Greenfield has been well made, and a must if we are to embrace the green agenda with land	Not accepted. Policy PC10 safeguards transport schemes which are being progressed by either Welsh Government or the County Council. These schemes are either those which feature in the Welsh Government National Transport Finance Plan and the Regional Transport Plan for North Wales or the Council's Capital Programme. There is no known scheme that has been agreed with landowners, and key stakeholders or funding secured to deliver a new or re-opened railway station at greenfield. Schemes should only be safeguarded or protected in the Plan. The site comprises part of an existing scrapyard adjacent to the railway line. The candidate site submission form previously submitted to seek the designation of the site for a station assumed that the land was Council owned which it is not. The land is either owned by the scrapyard or by Network Rail and the Council is unaware of any agreement reached in terms the land being available to accommodate a new station.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Welsh Government's Local Transport Fund (LTF), for developing the active travel routes through Greenfield Valley. This grant application did refer to a large scale housing development at Pen Y Maes which now appears to have been discarded from the LDP.	available for green industrial expansion to match for example the Kingspan development which is now carbon neutral. The need for walking, cycling, public transport, local employment and housing is urgently needed and was clearly illustrated in the County Council's recently successful funding application to Welsh Government's Local Transport Fund (LTF), for developing the active travel routes through Greenfield Valley. This grant application did refer to a large scale housing development at Pen Y Maes which now appears to have been discarded from the LDP.	The land is accessed off Station Road on its western boundary whilst to the north is vegetation alongside the railway. The site is dissected by a railway bridge which carries Dock Road. The site is used as a scrapyard and there is no indication that it is either available or suitable for a railway station. There is also no evidence that a railway station at Greenfield is necessary or feasible in terms of funding, customer numbers, impact on journey times / speeds etc. Highways Officers consider that the land is potentially suitable subject to a Transport Assessment. Access is available from Station Road however capacity on Station Road is limited. Appropriate car / bus / cycle parking / waiting / turning facilities would need to be provided. No such Transport Assessment has been provided. In the absence of evidence, justification and established proposals for a new station, it would be inappropriate to make an allocation in the Plan. Only sites which are realistic and likely to be delivered within the Plan period should be allocated in a development plan. Welsh Government confirm in para 7.18 of the draft Development Plan Manual 'While an LPA should ensure that adequate provision is made for development and infrastructure when preparing its LDP, it is important that proposals are realistic and likely to be implemented over the plan period'. Proposals for a new station could be considered against national planning policies in PPW10 and local planning policies, either in the adopted UDP or the LDP when adopted. The lack of an allocation or designation in the UDP will not prevent proposals being progressed by the Town Council and other parties, including the Council.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
554	PC10: New Transport Schemes	Support	This representation is made on behalf of a Trust which owns an area of land at Kelsterton Farm, Connah's Quay (Appendix 1). This land covers approximately 40Ha (98.8 acres) and is located south of Chester Road, between Connah's Quay and Flint. Given the site's size and its proximity to two 'Main Service Centre' settlements, we consider that this site provides a future opportunity for a range of land uses including residential, employment and roadside uses. We note that Policy PC10 outlines five new transport schemes that are safeguarded on the proposals map (Appendix 3). This policy is significant to the site because the A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement (Point 1) proposed 'red route' cuts through the north western edge of the site, with the site of the remodelled Kelsterton junction falling on their land. We support this policy and its objective to take pressure off the existing A494/A55 and make more efficient use of the existing transport infrastructure.		The support for Policy PC10 is noted.
60	PC11: Mostyn Docks	Support	CPAT welcomes the intent of this policy to control the potential adverse effects of development on historic environment features		Support is noted.
776	PC12: Community Facilities	Object	In relation to the FCC's Development Management Policy for Community Facilities the key comments in the context of the Village Plan thematics		Noted. The aim of the policy is to ensure that community facilities are retained wherever possible and to encourage the development of new social and community facilities in sustainable locations.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			and objectives and from the Community Council's perspective as a key stakeholder in the LDP process are as follows: a) Through the Village Plan survey the continuing importance of our shop, public houses, village hall and scout headquarters were regularly hi-lighted and their usage needs to be sustained and encouraged. b) Part of Flintshire's Health, Community, Wellbeing and Cohesion document states "The role of the LDP or the key objectives will enable all local residents the opportunity to have access to quality housing, services, shops and leisure, recreational and sports facilities". The community of Higher Kinnerton has experienced over many years the decline of local services and the loss of a permanent post office creates an unnecessary problem for those in the community who are unable to travel freely out of the village or those who want the convenience of a traditional post office for basic services.		
237	PC12: Community Facilities	Support	Policy PC12- Community Facilities: The intention to minimise the loss of essential community facilities serving rural and other communities has the full support of the Joint Committee.		Support is noted.

Policy PE1

ID	Title	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
84	PE1: General Employment Land Allocations		Support	However the employment allocation at PE1.2 contains a number of historic assets and these will require assessment prior to development		The Council has noted and welcomes the support for Policy PE1 employment Allocations and noted the presence of historic assets. As this is an allocation and the Council are unable to predict exactly what use will be proposed for the site, or how this is laid out, it is difficult to assess any impact until a proposal is submitted as a planning application. The issue of impact on heritage assets and the potential for any mitigation can be incorporated as part of considering an application.
115	PE1: General Employment Land Allocations		Object	Connahs Quay Power Station: The representation specifically relates to the northern site within Connahs Quay Power Station. this land should be proposed as employment use to help meet the strategic employment land requirements within the plan period. the deposit plan does not take into consideration the unique qualitative benefits that the northern site has. The non-allocation of the site puts at risk the potential for national and regionally significant infrastructure project.	The northern site within Connahs Quay Power Station should be allocated as employment use.	Not accepted. The representation has been noted regarding land to the north of the Connah's Quay Power Station (CON89). However the council disagree with the objector. It is considered that sufficient land has been allocated for employment development within the County to identify the Growth needs over the plan period in accordance with the recommendation contained within the Employment Land Review, 2015. Specifically, policy EN13 within the LDP provides advice on renewable energy developments. It is unclear from the representation whether the site is being promoted for renewable energy development, non-renewable energy development or more general employment development. The site was not allocated for employment in the adopted UDP nor was it included in a Principal Employment Area. The submission contains no sustainability appraisal of either the site or the proposed uses which is of concern given the potential constraints present. With regards to the site, the land sits within Zone C1 flood risk and abuts the boundaries of the Dee Estuary SAC and SSSI and it is considered that the site better relates

ID	Title	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
						to the open countryside and performs an important role in providing a buffering between the power station and the nature conservation designations. The representation is unclear in that it contains two maps showing the boundary of the Northern Site, of which Fig 1 includes a western portion of land (containing lagoons) which is part of the SSSI/SAC/SPA. Therefore it is not considered appropriate to allocate the site for an employment or energy generation use without having knowledge of what the proposal is. However the LDP contains guidance on renewable and low carbon energy development proposals in policy EN13 and also policy PE5 provides guidance on the expansion of existing employment uses, which may be applicable. Despite the words of support from the Welsh Government Department for Economy and Transport (North wales Regional Team), there is not considered to be sufficient detail or justification within the submission to warrant allocating such a sensitive site. The focus of the Plan is to deliver the two existing strategic sites of Northern Gateway and Warren Hall as these are key to the North Wales Growth Deal. It is not considered that the delivery of these sites would be assisted by identifying further large scale employment allocations, particularly in the absence of exactly what the need is for development on such a site.
117	PE1: General Employment Land Allocations		Object	The representation relates specifically to the Southern site within Connahs Quay Power Station. Uniper propose that the southern site is re-allocated for	To allocate the land to the south of Connah's Quay Power Station as an employment site under Policy PE1.	Not accepted. The representation has been noted regarding land to the south of Connah's Quay Power Station (CON090). However the council considers that sufficient land has been allocated for employment within the County to identify the Growth needs over the plan

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				employment use to help meet Flintshire Strategic employment land requirements. Deposit Draft Policy PE1 does not allocate the subject site for general employment uses, which is inconsistent with the adopted UDP and the evidence base for the Deposit Draft Plan. Suggested amended is to allocate the site as an employment site and employment area under Policy PE1.		period in accordance with the recommendation contained within the Employment Land Review, 2015. The candidate site was allocated in the UDP as EM1(7) - Former Power Station, Connah's Quay however the site was not listed as an allocation in the LDP. The 2015 Employment Land Review concluded that the site should be excluded from the realistic employment land supply because it was a site held for the expansion of an individual firm i.e. E.ON UK. The site cannot be developed separately from the power station and is assumed will be retained for associated uses. Additionally, the site has no obvious vehicular access and appeared to be dependent on the adjacent site / energy development for access. It contains buildings and structures associated with the former gas fired power station and will need reclamation and de-contamination measures. The land is situated within Zone C1 flood risk and is in close proximity to the Dee Estuary SAC, SPA and SSSI and it is considered that these represent constraints which the objector has not addressed. Previous planning applications for a converter station on the site were refused. The objector has now provided an updated position with the effect that the site is not now being held by the adjacent operator as expansion land, has been recently marketed, can be accessed from the local highway network and is now available for general employment development. However, the objection was lacking in detail in terms of provision of a vehicular access, suggested layout, and timescales. It is unclear whether the site is to be promoted in its present condition or whether it is to be reclaimed, and redeveloped as serviced industrial plots.

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						Given the sensitive location of the site in terms of constraints it is of concern that background and technical evidence has not been put forward as part of the submission. It is accepted now that the site is available for development and that it is a brownfield site which has previously been allocated for employment development in the UDP. However, given the lack of certainty in terms of necessary technical evidence to demonstrate that constraints can be overcome, It is not considered that there is sufficient confidence with which to allocate the land at present. Similarly, it is not considered that the site and the existing adjacent power station could reasonably be included within a new Principal Employment Area boundary as part of policy PE2. In conclusion given the site constraints and the lack of technical evidence to overcome them, the site is not considered appropriate at this point in time to be allocated for employment under policy PE1 nor is it considered suitable to be included, along with the adjacent power station, in a new Principal Employment Area within policy PE2. However, if the objector can provide the necessary technical evidence then this could be reviewed at examination.
663	PE1: General Employment Land Allocations			The following provisions are applicable to all proposed employment allocations in the LDP: • Water mains required for any potential development can be acquired through the water		The council welcomes the comments and has noted the representation. All provisions will be taken into consideration at planning application stage.

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				requisition provisions of the Water Industry Act 1991 (as amended). • Any proposed site which requires the provision of non-potable water for process use will need further examination to understand how this requirement could be delivered. • Sewerage required for any potential development site can be acquired through the sewer requisition provisions of the Water Industry Act 1991 (as amended). • Should potential end users of these sites require the discharge of new or amended trade effluent then the written consent of DCWW is required. • Under no circumstances would we allow surface water runoff from the proposed development to be discharged into the foul or combined public sewerage system. • The proposed employment allocations represent a substantial area of land for development for which the potential demands are unknown at		

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				present. It is essential that we understand these demands in order to allow us to assess the impact on our assets. It may be necessary for water and sewerage modelling assessments to be undertaken to establish how we would provide the water supply and where the proposed development could connect to the public sewerage system. At this moment in time our response is based on domestic demands only. 1. Chester Aerospace Park, Broughton 2. Manor Lane/Hawarden Park Extension, Broughton 3. Drury New Road, Buckley 4. Greenfield Business Park Phase 2 5. Greenfield Business Park Phase 3 6. Broncoed Industrial Estate, Mold 7. Mold Business Park 8. Adjacent Mostyn Docks 9. Chester Road East, Queensferry 10. Antelope Industrial Estate, Rhydymwyn 11. River Lane, Saltney 12. Rowley's Drive, Shotton		

ID	Title	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
890	PE1: General Employment Land Allocations		Support	support the allocation of STR3A, however are concerned that the Proposals Map does not include the John Summers building within the allocation. XXX support the allocation of STR3A for Employment, to deliver 72.4 ha of employment land alongside the wider allocation which includes Housing, and commercial and community facilities. The Allocation is consistent with the Deeside Plan which considers that the Northern Gateway site is crucial to the economic growth ambitions of the region. It is consistent with the Wales Spatial Plan (2008) which identifies Deeside as a primary key settlement, a key regeneration area, key business sector and hub. Further, the emerging National Development Framework which identifies Wrexham and Deeside as a National Growth Area that are nationally significant. The NDF promotes their	To overcome the objection and address soundness matters, the Council should: Amend the Proposals Map to include the John Summers buildings and grounds within allocation STR3A • Ensure flexibility of uses for the John Summers Buildings consistent with the outline permission and allocation STR3A. • Amend policy or explanatory text to ensure that the Plan is sufficiently flexible to support non B1, B2, B8 uses that are suitable for location on General Employment areas and can contribute to the overall function of the employment area.	The representation is noted and the council welcomes the support of PE1. With regards to the John Summers listed building and associated land clearly fall within the boundary of the outline planning permission for the southern half of the Northern Gateway site. Policy STR3A also references in criteria 'x' to the need to secure sensitive re-use of the listed buildings and grounds. In this context there is clearly a mapping error on the proposals maps whereby the boundary of the strategic site allocation would have been extended to include the listed buildings and the boundary of the Principal Employment Area to be drawn back to the edge of the railway line. It is requested that the Inspector agrees to this as a mapping change to be addressed in the final version of the proposals maps.

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				continued Growth and regeneration and the focus for large scale employment opportunities and housing growth. 8.4. The uses identified are broadly consistent with the extant outline consent Application Ref 050125 "Outline application for employment-led mixed use development, incorporating logistics and technology park (B1, B2, B8) with residential (C3), local retail centre (A1), hotel (C3), Training and skills centre (C2, D1), new parkland, conversion of buildings, demolition of barns; associated infrastructure comprising construction of accesses, roads, footpaths/Cycle paths, earthworks and flood mitigation/drainage works" Approved on 14/05/2014, and the subsequently approved S73 application , ref: 056540 approved on 1/3/2018, which revised the quantum of residential development from 600 to 770 dwellings.		

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				8.5. XXX is however concerned that the allocation is not consistent with the designations shown on the Proposals Map. Allocation STR3 explicitly includes the John Summers Listed Buildings and grounds stating under criterion x 'sensitive reuse of John Summers Listed Buildings and Grounds'. The inclusion of these buildings is consistent with the outline planning permission ref 050125. The Proposals Map, however excludes the existing John Summers buildings from allocation STR3A. XXX consider that the Proposals Map should be revised to ensure that the John Summers buildings are included.		
944	PE1: General Employment Land Allocations		Object	We do not believe that sufficient employment land is identified and that a host of these sites will not come forward during the plan period.	Allocate more land for employment purposes.	Not accepted. The representation has been noted, however the council disagree with the objector. It is considered that sufficient land has been allocated within the County to identify the Growth needs over the plan period in accordance with the recommendation contained within the Employment Land Review, 2015. Furthermore, there is further flexibility inherent within the boundaries of the 30 Principle Employment Areas in terms of facilitating employment development through the re-use or re-

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						purposing of existing sites and buildings within existing employment areas.
1052	PE1: General Employment Land Allocations		Object	Policy PE1: General Employment Land Allocations We have concerns regarding a number of the sites allocated under this policy as they are in flood risk areas but have not been appropriately assessed for deliverability by way of a Flood Consequence Assessment (FCA). This includes PE1.1, PE1.2, PE1.4, PE1.5, PE1.6, PE1.8, PE1.9, PE1.10, PE1.12. Full Details in appendix 1	We have concerns regarding a number of the sites allocated under this policy as they are in flood risk areas but have not been appropriately assessed for deliverability by way of a Flood Consequence Assessment (FCA). This includes PE1.1, PE1.2, PE1.4, PE1.5, PE1.6, PE1.8, PE1.9, PE1.10, PE1.12. Full Details in appendix 1	Not accepted. The representation has been noted and the Council, as agreed with the objector, have commissioned further work as part of the SFCA to assess the flood risk of the employment areas that are all existing sites reviewed and carried forward from the existing development plan, and not new sites. Where an employment site may be affected by flood risk, which is classed as 'less vulnerable development' in TAN15, at the planning application stage a developer will be required to submit an FCA as a supplementary document to illustrate how the consequences of flooding have been assessed, and what appropriate flood risk mitigation can be put in place. This is difficult to assess for an allocation as there is no definitive proposed use for the site at the development plan allocation stage, but the general SFCA work will indicate the developable areas of the employment sites.
879	PE1: General Employment Land Allocations		Object	The land is identified within the settlement boundary of Buckley, which is supported, however, the site of the former Dimplex factory is included in the Principal Employment Land designation - PE2.7 (Little Mountain Industrial Estate, Buckley) and part is allocated for future employment expansion	Remove the site of the former Dimplex factory, Drury New Road from the Principal Employment area PE2.7 and from the future employment expansion area under policy PE1.3	Not accepted. The proposed land was allocated as employment within the UDP in 2000 and has been allocated as employment again within the LDP. Proposals for the use to be changed to residential is considered inappropriate due to the site is not situated wholly within the settlement boundary additionally, the site is located in close proximity to the wildlife designation. Any submission of a planning application for housing would need to be considered against the site allocation and long-established use the site for employment purposes, and housing allocations already allocated as part of the LDP.

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				under Policy PE1.3 (Drury New Road, Buckley), as defined on the Proposals Map. This objection is raised to the land being included in the designation and part allocated, on account of the fact that the land does not best serve for employment purposes, either currently or for future consideration, and would better serve for an alternative land use, e.g. residential allocation. Justification for the exclusion of the land from the principal employment area designation is provided within the accompanying Commercial Viability Assessment Report, which concludes as follows: The subject site is situated on the eastern fringe of the urban settlement of Buckley and sits within the development boundary. The site comprises a vacant, detached manufacturing unit and an area of allocated employment land and a further area of land		The site was originally allocated in the UDP for employment purposes and has been re-allocated under Policy PE1 (PE1.3) of the Flintshire Local Development plan as part of Principle Employment area PE2.7. It is also allocated for future employment expansion. There is no intention to de-allocate the employment allocation in the LDP from this site.

ID	Title	allocated site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				which is not available for development for ecological reasons. XXX have been marketing the manufacturing building since the former tenant took the decision to vacate in May 2018. During this period, they have not received a single offer for the building.		
1249	PE1: General Employment Land Allocations		Object	There is also PEN 015 that I would like to include as formal business use, I withdrew my request for PEN 016 on your recommendation, but feel around the station does need to be taken more advantage of for employment or business opportunities.	There is also PEN 015 that I would like to include as formal business use, as land around the station does need to be taken more advantage of for employment or business opportunities.	Not accepted. The site comprises a narrow rectangular block of land at the north end of the railway station car park, on the eastern edge of the railway line. It has been used as a contractor's storage compound but is presently empty and contains no buildings or structures other than security fencing. Highways Officers consider the site to be unsuitable for the following reasoning 'Limited width access road, poor junction alignment and lack of junction visibility make this unsuitable to cater with any additional traffic, but accept that the site has had previous uses'. The Employment Land Review has identified that there is sufficient employment land to provide flexibility in terms of location, size and type of employment development. There is no need for further employment allocations in the Plan. In this context, and in view of the access constraint, it is not appropriate to allocate the site, particularly as it sits within open countryside. If a development proposal does come forward for specific employment development on the site then it can be assessed against Policy PE3 of the LDP.

Policy PE2

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
242	Policy PE2: Principal Employment Areas	Object	Stoney Beach Quarry & Pinfold Lane Quarry, Alltami 1. Principal Employment Area Table 18.3 Deposit Plan September 2019 Ref Number PE2.2 refers to Flintshire Council's Alltami Depot, Alltami as an Employment Area. 2. The Council is requested to include the adjacent land as a Principal Employment Area as shown outlined red on the attached plan also including the blue land within third party ownership. Within the red outline are existing significant Employment including the door manufacturing factory, also including an adjacent Welsh Water Maintenance Depot occupied by their appointed contractor, also including a horticultural contracting depot, also including a vehicle haulage depot, the latter two Employment uses / land areas are accessible from the rear access road from the Council's own highways depot (PE2.2) which access road is in shared use by all the Employment uses / tenants occupying our adjacent land as described. 3. In addition there is the third party blue land (shown within the land outlined red) which is also within existing Employment uses. 4. Our submission is for all the land within the red line to be allocated for Employment uses. The areas within the red line shown hatched	Our submission is for all the land within the red line to be allocated for Employment uses. The areas within the red line shown hatched have recycling waste management uses within existing quarries known as Stoney Beach Quarry and Pinfold Lane Quarry and these recycling waste management uses can / should also be designated for Employment uses.	Not accepted. In the vicinity of the objection site there are two Principal Employment Areas. To the west of the objection site and on the north side of the A494 is Alltami Depot which comprises the Council Depot and a range of other industrial units and uses to the rear. To the south of the objection site is Ewloe Barns Wood which is an industrial Estate comprising a range of waste management and industrial uses. The objection site has planning permission for and is used as an Integrated Waste Management Facility comprising a mixed waste treatment facility, a construction waste materials recycling facility, and a contaminated soils treatment facility. Planning Permission was granted on 14/07/2003 at what is known as 'Pinfold Lane Quarry' which is north of the access road for the reclamation of materials (basically inert waste recycling) this is consented until 21 February 2042 and has a condition (no 15) which requires a scheme to be submitted for 'final treatment' of the permitted area, access road and structures. The reason states in the interest of restoration to avoid dereliction from abandoned infrastructure and structures. The present use will take place until 21 Feb 2042, as this is the operation life. The submission of a scheme 'of final treatment' in

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			have recycling waste management uses within existing quarries known as Stoney Beach Quarry and Pinfold Lane Quarry and these recycling waste management uses can / should also be designated for Employment uses.		the interests of restoration and then the implementation of that scheme would be beyond the end of the Plan period. The area to the south is known as 'Stoney Beach Quarry' and this has a consent for an 'Integrated waste management facility comprising a mixed waste treatment facility, a construction waste materials recycling facility, and a contaminated soils treatment facility. This consent is not for a temporary period so has no end date and no requirement for restoration. The planning permission was granted on 23.01.2018 subject to a legal agreement to revoke the minerals consent on the site. However this has not been implemented. Both Stoney Beach Quarry and Pinfold Lane quarry are identified in Policy EN21 as a location of waste management. The minerals background paper at para 8.1.6 states that as there is adequate provision of employment land, this site has not been included as an allocation in the LDP and it is also inappropriate to be included within the Principal Employment Area.
132	Policy PE2: Principal Employment Areas	Object	The Deposit Draft Policy PE2 does not identify the Power Station as a Principle employment Area. The Connahs Quay Power Station is one of the most substantial and longstanding employment sites in Flintshire. The	Uniper suggest that the site is allocated as a principle employment area under Policy PE2. The proposed	Not accepted. PE2 seeks to identify on the proposals map the areas where employment development is in principle likely to take place. The principal employment areas comprise a mixture of, existing employment land and buildings, land or buildings with planning

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			deposit Plan does not take into consideration the unique benefits that the Connahs Quay site provides, which differentiate it from other employment areas within the county and indeed regionally/nationally. Uniper suggest that the site is allocated as a principle employment area under Policy PE2. The proposed amendment will ensure the Deposit Plan is sound.	amendment will ensure the Deposit Plan is sound.	permission (commitments), undeveloped employment allocations and other undeveloped unannotated land. In responding to the objectors representation regarding the Power Station Southern Site (PE1-id117) the Council considers that there are a number of constraints regarding the former coal fired power station and a lack of technical evidence to demonstrate that constraints could be overcome. The Council considers that it is inappropriate for the site to be allocated or included as part of a new Principal Employment Area. In respect of the northern power station site (PE1- id115) the Council considered that in the light of constraints, particularly the proximity / overlapping with ecological designations, and the open undeveloped nature of the site, that it would be inappropriate to be allocated or included in a Principal Employment Area. The existing power station site is different to the other Principal Employment Areas in that it does not have the same diversity of uses and mix of development. This is consistent with other free standing employment developments which are not identified as Principal Employment Areas such as Padeswood Cement Works and the Oakenholt Paper Mill. It is not appropriate for the existing power station to be designated as a new Principal Employment Area.

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684	Policy PE2: Principal Employment Areas	Object	The Flintshire LDP Proposals Map 2 Draft identifies the Site as part of a much larger Principal Employment Area designated under Policy PE2 for B1, B2 and B8 uses. Other economic uses of the site, such as energy uses not falling within B-class definitions, are not explicitly recognised, although the Site appears to be in proximity to a Possible Waste Site designated under Policy EN21, which permits waste management uses subject to detailed criteria in Policy EN22. Boundaries are not shown for this designation. Clarity is requested as to whether the DPL landholding is subject to the designation, and/or whether the designation refers to the Energy Recovery Facility currently being built to the east and anticipated to complete next month.	Clarity is requested as to whether the DPL landholding is subject to the designation, and/or whether the designation refers to the Energy Recovery Facility currently being built to the east and anticipated to complete next month.	Not accepted. PE2 seeks to identify on the proposals map the areas where employment development is likely in principle to take place. The Principal Employment areas comprise a mixture of existing employment land and buildings, land and buildings with planning permission, undeveloped employment allocations and other undeveloped/unannotated land. The policy is not considered too restrictive as the policy purpose is to help control development therefore the policy cannot allow too much flexibility. It is better to treat each proposal on their own merits. With regards to waste management, Policy EN21 directs waste management development to existing or allocated employment sites for B2 uses. The policy provides an 'in principle' acceptance that proposals for waste management would be acceptable on the sites listed within the policy subject to the criteria detailed in Policy EN22. The policy does not provide allocations for waste management. It is an 'area of search' type policy which directs developers to certain areas in the County. In the case of PE2.11, this is a large area which includes the former Deeside Power Station site. The site is not specifically allocated for waste management uses, the Policy provides an 'in principle' acceptance of waste management uses in the general area, subject to compliance with EN22 and other policies within the plan.

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880	Policy PE2: Principal Employment Areas	Object	The land is identified within the settlement boundary of Buckley, which is supported, however, the site of the former Dimplex factory is included in the Principal Employment Land designation - PE2.7 (Little Mountain Industrial Estate, Buckley) and part is allocated for future employment expansion under Policy PE1.3 (Drury New Road, Buckley), as defined on the Proposals Map. This objection is raised to the land being included in the designation and part allocated, on account of the fact that the land does not best serve for employment purposes, either currently or for future consideration, and would better serve for an alternative land use, e.g. residential allocation. Consideration of the overall site (former Dimplex factory and associated vacant land), extending to 3.4 ha, for a residential allocation (under Policy 43 – HN1).	Consideration of the overall site (former Dimplex factory and associated vacant land), extending to 3.4 ha, for a residential allocation (under Policy 43 – HN1).	Not accepted. The proposed land was allocated as employment within the UDP in 2000 and has been allocated as employment again within the LDP as well as being included in the Principal Employment Area. Proposals for the use to be changed to residential is considered inappropriate due to the site is not situated wholly within the settlement boundary additionally, the site is located in close proximity to the wildlife designation. Any submission of a planning application for housing would need to be considered against the site allocation and long-established use the site for employment purposes, and housing allocations already allocated as part of the LDP. The site was originally allocated in the UDP for employment purposes and has been re-allocated under Policy PE1 (PE1.3) of the Flintshire Local Development plan as part of Principle Employment area PE2.7. It is also allocated for future employment expansion. There is no intention to de-allocate the employment allocation in the LDP from this site.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
808	Policy PE2: Principal Employment Areas	Object	Deeside Industrial Park, which includes land owned by Tata, is designated as a Principal Employment Area (PE2.11 Deeside Industrial Park and DARA). Policy PE2 provides support for employment development (specifically Class B1, B2 and B8), subject to it being of an appropriate type and scale for the site and surroundings. Paragraphs 10.2 and 10.3 of the Deposit LDP confirm that the Principal Employment Areas are where most employment development is likely to take place, and within these areas employment development will generally be acceptable. Our client welcomes the designation of the Deeside Industrial Park as a Principal Employment Area and the support for employment related proposals within this area. The policy recognises the importance (and potential) of Deeside Industrial Park as a significant local employment area, where economic growth should be focussed. As the Council is aware, land at Tata's Shotton works is currently one of 18 sites which have been shortlisted (from a long list of 65) as a potential location to provide one of four logistics hubs to support the expansion of Heathrow Airport. If selected, the site would be used as an offsite construction centre. The exact nature of how each site would be used	Whilst the range of uses permitted within Policy PE2 (B1, B2 and B8) is generally supported by our client, the policy should be amended to allow greater flexibility for non B-class uses and ancillary uses. The current wording does not provide any flexibility for other appropriate uses. The policy should be amended to allow for a wider range of uses (where suitable, appropriate and/or of a scale ancillary to the nature to the main employment function of the PEA). Examples (not exhaustive) of such uses could include those relating to education or visitor centres.	Not accepted. The general support for the inclusion of the Tata site within the Principal Employment Area is noted. However, it is not considered that either the general wording of the policy nor this specific PEA should be amended to include reference to 'other' uses. The primary objective of the policy is to facilitate employment development within such areas, subject to satisfying other Plan criteria. It is recognized that there may be other uses that might be acceptable within PEA's but these should be considered on their merits against PE2 and other Plan policies in terms of whether they would complement or have prejudicial implications for the main purpose of the designation. To broaden the scope of the policy would have the effect of weakening the primary purpose of the policy.

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			is yet to be established. The shortlisting of the site demonstrates the appropriateness of the site for major employment development, particularly due to its high quality connectivity links (including road and rail) with the potential for improvement. If successful, the proposed Heathrow Hub would be an appropriate form of development within the Principal Employment Area, in compliance with Policy PE7. The proposal would also support the wider economic growth of Flintshire, in accordance with Policy STR7, bringing wide ranging benefits to the local area. Whilst the range of uses permitted within Policy PE2 (B1, B2 and B8) is generally supported by our client, the policy should be amended to allow greater flexibility for non B-class uses and ancillary uses. The current wording does not provide any flexibility for other appropriate uses. The policy should be amended to allow for a wider range of uses (where suitable, appropriate and/or of a scale ancillary to the nature to the main employment function of the PEA). Examples (not exhaustive) of such uses could include those relating to education or visitor centres.		
893	Policy PE2: Principal Employment Areas	Support	Supports the identification of Principal Employment Areas however is concerned that the boundaries for Site PE2.11 include the John Summers Buildings and Grounds .. is concerned	To overcome the objection and address soundness matters, the Council should:	Accepted. The representation is noted and the council welcomes the support of PE2. With regards to the John Summers listed building and associated land clearly fall within the boundary of the outline planning permission

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			that Principal Employment Area PE2.11 includes the John Summers buildings and land previously part of the historic Northern Gateway allocation. The inclusion with PE2.11 is not consistent with allocation STR3A in this Plan. It is not consistent with the extant outline consent, reference 050125 and the subsequently approved S73 application, ref: 056540. The inclusion of the John Summers Buildings and grounds within PE2.11 means that any application for alternative use, even those consistent with the outline consent, will subject to the provisions of PE6. This would be unduly onerous given the relevant planning history and could prevent a viable use for the Listed Buildings coming forward and ensuring their long term protection.	• Remove the John Summers Buildings and Grounds from PE2.11 as illustrated on the Proposals Map.	for the southern half of the Northern Gateway site. Policy STR3A also references in criteria 'x' the need to secure sensitive re-use of the listed buildings and grounds. In this context there is clearly a mapping error on the proposals maps whereby the boundary of the strategic site allocation would have been extended to include the listed buildings and the boundary of the Principal Employment Area to be drawn back to the edge of the railway line. It is requested that the Inspector agrees to this as a mapping change to be addressed in the final version of the proposals maps.
945	Policy PE2: Principal Employment Areas	Object	'Within principal employment areas, as defined on the proposals map and listed below, the following types of employment development will be permitted: a. B1 business use; b. B2 general industry; c. B8 storage and distribution provided that the proposal is of an appropriate type and scale for both the site and its surroundings.' This provides no room for expansion of existing employment facilities outside of the defined PEA's. The Evans Business Centre, Cheshire West (PE2.9) we assume is the one located off Minerva Avenue, Sealand IE. We consider that	The Evans Business Centre, Cheshire West (PE2.9) we assume is the one located off Minerva Avenue, Sealand IE. We consider that additional land should be allocated beyond the defined PEA here given its highly sustainable location.	Not accepted. It is unclear why the objector refers to 'assuming' that the Evans Business Centre is off Minerva Avenue. The Principal Employment Area is clearly marked on the proposals maps as PE2.9 and is cross referenced to the written statement on p132 in the table which follows policy PE2. From the objection it is unclear whether the extension to the PEA is a general extension to facilitate non specified employment development or whether it is to facilitate the expansion of a particular firm operating on the existing industrial estate. In terms of the former it is not considered appropriate or

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			additional land should be allocated beyond the defined PEA here given its highly sustainable location.		necessary for the PEA to be extended into a green barrier, into an area of C1 flood risk (where TAN1 would not support the development of a green field site) and grade 2 BMV agricultural land. In terms of the latter there is no detail given as to what the need is for the expansion, the size, the nature and scale of development, in order that a judgement could be made. Although policy PE5 permits the expansion of existing employment uses it is not considered that the policy, in conjunction with other Plan policies and national guidance, would support built development where there are such constraints. In conclusion it is not considered necessary or appropriate to extend the boundary of the Principal Employment Area.
1053	Policy PE2: Principal Employment Areas	Object	This policy defines" areas", specifying that employment development types B1, B2 and B3 will be permitted. However, these areas do not appear to have been adequately assessed in relation to Flood Risk. We are not clear if these are plan "allocations" to which TAN15 Section 10 would need to apply. By way of example Para 10.2 of PE2 refers to "undeveloped employment allocations" and "other undeveloped / unannotated land" which suggests the LDP is allocating land. We also note that while the policy has been assessed, the mapped areas have not been assessed in the IIA. It maybe that PE2 is intended to protect/safeguard	Based on the current information we are concerned with the inclusion of Policy PE2: Principal Employment Areas as the following allocations within the LDP as they lie partially/ wholly within DAM Zone C and have not been demonstrated as suitable or deliverable	Partly accepted. The representation has been noted and the Council, as agreed with the objector, have commissioned further work as part of the SFCA to assess the flood risk of the employment areas that are all existing areas reviewed and carried forward from the existing development plan, and not new sites. Where an employment area may be affected by flood risk, which is classed as 'less vulnerable development' in TAN15, at the planning application stage a developer will be required to submit an FCA as a supplementary document to illustrate how the consequences of flooding have been assessed, and what appropriate flood risk mitigation can be put in place. This is difficult to assess for a Principal

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			existing sites rather that allocate land in which case the Policy should be clearer and specifically should be a criteria-based policy which include reference to site flood risk and the need to demonstrate flood consequence acceptability. We do appreciate that most of the PEAs are concentrated on heavily developed areas, but the Policy would still support new development and potentially large extensions within these areas, without considering flood risk as a constraint. Based on our experience of working in areas constrained by flood risk (particularly the River Dee corridor), we know that it can be difficult to manage flood risk to an acceptable level for new development and substantial extensions. This flood risk is also likely to be increased when considering the impact of climate change. Based on the current information we are concerned with the inclusion of Policy PE2: Principal Employment Areas as the following allocations within the LDP as they lie partially/ wholly within DAM Zone C and have not been demonstrated as suitable or deliverable allocations: PE2.24; PE2.30; PE2.23; PE2.29; PE2.13; PE2.14; PE2.28; PE2.3; PE2.22; PE2.21; PE2.27; PE2.18; PE2.26; PE2.10; PE2.17; PE2.16; PE2.4; PE2.15; PE2.19; PE2.20; PE2.9; PE2.11; PE8	allocations: PE2.24; PE2.30; PE2.23; PE2.29; PE2.13; PE2.14; PE2.28; PE2.3; PE2.22; PE2.21; PE2.27; PE2.18; PE2.26; PE2.10; PE2.17; PE2.16; PE2.4; PE2.15; PE2.19; PE2.20; PE2.9; PE2.11; PE8	Employment Area as there is no definitive development proposals for the site at the development plan preparation stage, but the general SFCA work will indicate the developable areas of the Principal Employment Areas.

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1075	Policy PE2: Principal Employment Areas	Object	PE2.17, PE2.18, PE2.19 - We would welcome inclusion in the policy wording/reasoned justification to draw the following to the attention of future developers e.g.: For major sites that lie within the visual setting of the AONB/ face open countryside, attention to boundary planting; use of recessive colours and non-reflective finishes to roofs and building elevations; and the limited use of lighting (designed to dark sky standards) will be important planning considerations. In regard to supporting the delivery of place making development, Environmental Colour Assessment may be required to develop an appropriate colour palette in addition to building design that reflects what is locally characteristic and distinctive.	Add to policy wording : - For major sites that lie within the visual setting of the AONB/ face open countryside, attention to boundary planting; use of recessive colours and non-reflective finishes to roofs and building elevations; and the limited use of lighting (designed to dark sky standards) will be important planning considerations. In regard to supporting the delivery of place making development, Environmental Colour Assessment may be required to develop an appropriate colour palette in addition to building design that reflects what is locally characteristic and distinctive.	Not accepted. The three Principal Employment Areas referenced (Broncoed Industrial Estate, Mold Business Park and Mold Industrial Estate) lie in excess of 1.5km from the AONB designation. They sit within the well-defined physical boundary formed by the A494(T) bypass and form an integral part of the town of Mold. The Plan contains policies PC2 and PC3 which provide design guidance and policy EN5 protects the setting of the AONB. Furthermore, guidance on light pollution is contained in policy EN18. It is not considered necessary or appropriate for such detailed guidance to be attached to the PEA policy for specific PEA's as this could create a precedent for the same to be requested on other specific PEA's. The Plans policy framework enables the NRW concerns to be addressed as part of the consideration of development proposals on their particular merits. It is not considered that the policy should be amended.

Policies PE3 to PE13

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631	PE3: Employment Development Outside Allocated Sites and Principal Employment Areas	Object	The principle of a criteria-based policy for employment development outside of the Tier 3 settlement boundaries is supported. However, we do have a number of concerns with the policy. 7.2 Firstly, part ii(b) requires that the development "is specifically for a rural activity". However, the policy is to permit new industrial, office and warehousing development. National planning policy is strongly supportive of the rural economy but does not say that it should be restricted to only 'rural activities'. This element of the policy should be deleted. Secondly, part ii(c) the development is of an appropriate scale and well related to the form of the settlement and does not exacerbate ribbon development or result in a fragmented pattern of development. The part we take issue with is "exacerbate ribbon development". It will be extremely difficult to fulfil parts ii(c) and ii(d), which refers forming a logical site boundary, if infilling along a road (which could be interpreted as ribbon development) is restricted. We therefore consider that the	National planning policy is strongly supportive of the rural economy but does not say that it should be restricted to only 'rural activities'. This element of the policy should be deleted. We therefore consider that the reference to ribbon development should be deleted.	Not accepted. Policy PE3 simply provides guidance on the assessment of new employment development which is outside of either allocated employment sites or principal Employment Areas. The policy provides guidance firstly, on sites within settlement boundaries and secondly on sites outside settlement boundaries. It forms part of a suite of development management policies in relation to employment development. The council notes the representation however with regards to Criteria (ii) part B referring to rural activity, the policy as a whole provides a number of options for development outside settlement boundaries. It is considered that the suggestion to remove part B would allow numerous types of development and the purpose is to help control development within the smaller areas that are allocated in Tier 3 and 4. With regards to ribbon development this is not deemed acceptable for any proposed use within any tier and therefore it is vital to ensure policy PE3 also does not allow for ribbon development. Therefore the council does not agree with the deletion of this part of the policy.

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			reference to ribbon development should be deleted. Finally, for the reasons set out elsewhere within this statement, the presence of the Green Barrier around Northop, when combined with other constraints, means that the policy is unlikely to result in the development of any sites around Northop. Therefore, the policy does not negate the need to consider the need for allocations within the village, and also the restrictive nature of the proposed Green Barrier boundaries.		The green barrier has been reviewed and it is considered that the green barrier around Northop is justified and is needed to ensure that the Tier 3 is not subject to overdevelopment. It is considered LDP01 Background Paper Green Barrier Review provides a robust review of existing Green Barriers and that the decision to designate the site as Green Wedge is appropriate. The LDP has allocated sufficient land for development to meet identified needs during the Plan Period as set out in LDP10 Background Paper 10 Housing Land Supply and additional allocations are not required.
946	PE3: Employment Development Outside Allocated Sites and Principal Employment Areas	Object	Whilst this policy is welcomed the fact is that the PE2.9 PEA is located in/adjacent to the City of Chester which for the purposes of this LDP is not identified in the settlement hierarchy – this needs to be rectified.	PE2.9 PEA is located in/adjacent to the City of Chester which for the purposes of this LDP is not identified in the settlement hierarchy – this needs to be rectified.	Not accepted. Policy PE3 simply provides guidance on the assessment of new employment development which is outside of either allocated employment sites or principal Employment Areas. The policy provides guidance firstly, on sites within settlement boundaries and secondly on sites outside settlement boundaries. It forms part of a suite of development management policies in relation to employment development. The Plans settlement hierarchy identifies settlements within the administrative boundary of Flintshire. Chester is a settlement within Cheshire West and Chester City and only a small part of that settlement, in the form of an employment area, crosses over in Flintshire. The LDP recognizes this as a Principal Employment Area, but this does not automatically lead to the need for it to be shown

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					as a settlement boundary. Many of the Principal Employment Areas delineated on the edges of Flintshire's settlements are not included within settlement boundaries. It would not be appropriate for Chester to be identified as a settlement within the LDP settlement hierarchy.
61	PE4: Farm Diversification	Support	XXX welcomes the intent of this policy to conserve traditional architectural and historic features where appropriate in restoration or conversion schemes		The Council has noted and welcomes the support for Policy PE4 Farm Diversification.
1076	PE4: Farm Diversification	Object	PE4: Farm Diversification - we advise that all development should not be harmful to landscape character and tranquillity.	we advise that all development should not be harmful to landscape character and tranquillity.	Not accepted. The council notes the representation however the Council disagrees with this Representation and believes that the current wording of Policy PE4 (and associated policies such as PC2 and PC3) strikes the right balance between enabling appropriate development in rural settings. The Plan needs to be read as a whole and it is not necessary for criteria to be repeated unnecessarily through numerous policies. The proposed farm diversification policy includes wording that any new proposal cannot have a harmful effect on the surrounding area, thus implying the character and tranquillity of a setting.
896	PE6: Protection of Employment Land	Object	XXX considers that PE6 is unduly restrictive in its present form. XXX consider that PE6 is unduly restrictive and the provisions within PE6 should recognise the role that some non B1,B2, B8 uses have in supporting the wider function and overall sustainability of an Employment Area. Further, it should acknowledge that some Sui	To overcome the objection and address soundness matters, the Council should: • Amend Policy PE6, and the associated explanatory text, to introduce additional	Not accepted. This representation is noted and the council disagrees to the rewording of the policy to include other employment uses. It is considered that the most important and main employment uses that are vital to an area are those categorised as B1, B2 and B8. Nevertheless the policy does go on to state that it would be unreasonable to prevent other uses or development *'However, the policy recognises that there will be circumstances where it would be unreasonable to prevent other uses or development.'* Further details in

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			Generis uses are more appropriately located within Employment Areas. XXX consider that the policy and Explanatory Text should be amended to provide greater flexibility over the Plan period. 10.4. The Plan is its present form is not effective or appropriate. It is considered that the Plan, in its current form, could fail to deliver sustainable development in accordance with the policies in the PPW.	flexibility regarding non B1, B2 and B8 uses that support the function of Employment Locations or are more appropriately located in Employment Areas.	relation to justifying employment are provided in Background papers: ELR 2015 and Employment and housing advice 2019. It is considered that the objectors suggested wording offers too much flexibility and therefore uncertainty about retaining employment land and buildings. It is better to treat each proposal on their own merits.
800	PE7: Retail Hierarchy	Object	XXX objects to the non-allocation of Broughton Shopping Park as a designated town centre in the current Deposit Plan, contrary to the preceding proposed allocation within the Preferred Strategy. This objection relates primarily to policies STR9, PE7, the proposals map, as well and the broader commentary in the Deposit LDP relating to Broughton Shopping Park (principally paragraphs 6.20, 6.22 and 6.23). PPW v.10 (and previous iterations) indicate that: "Planning authorities should establish a hierarchy of retail and commercial centres in their development plan strategy, identifying boundaries on the proposals map" (para 4.3.10). In	This objection relates primarily to policies STR9, PE7, the proposals map, as well and the broader commentary in the Deposit LDP relating to Broughton Shopping Park (principally paragraphs 6.20, 6.22 and 6.23). PPW v.10 (and previous iterations) indicate that: "Planning authorities should	Not accepted. The Broughton Shopping Park has been outside the retail hierarchy in previous development plans based on the fact that it is an out of town regional shopping park. The Plan's preferred Strategy did propose the reconsideration of the inclusion of the Shopping Park within the Retail Hierarchy as a town centre. This picked up on the fact that the 'offer' of the Shopping Park had broadened over time, particularly in respect of the cinema and leisure / restaurant developments. The findings of the Retail Study and the continued 'town centres' first principles within PPW10 led to a reconsideration of the Retail Hierarchy whereby Broughton Shopping Park was recognised as a sub-regional shopping centre. The Retails Study states in para 6.17 'Broughton Shopping Park comprises an out-of-town retail park rather than a traditional town or district centre,..'

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			this regard, the Flintshire Preferred Strategy (November 2017) stated: "In many respects the biggest retail and leisure offering within the County is that of Broughton Shopping Park. This out of town shopping park has been omitted from the retail hierarchy in previous development plans, in order to reinforce its 'out of town' location and to prevent it attracting smaller scale retail and other uses which might compete with nearby defined centres, by controlling the scale and nature of retail and other proposals which arise. Nevertheless, the scale and composition of the shopping park has changed since its inception with the subdivision of retail units and a broader shopping 'offer'. It has also seen recent major investment in leisure development in the form of a cinema and accompanying restaurants…" (para 6.3.5)	establish a hierarchy of retail and commercial centres in their development plan strategy, identifying boundaries on the proposals map" (para 4.3.10). In this regard, the Flintshire Preferred Strategy (November 2017) stated: "In many respects the biggest retail and leisure offering within the County is that of Broughton Shopping Park. This out of town shopping park has been omitted from the retail hierarchy in previous development plans, in order to reinforce its 'out of town' location and to prevent it attracting smaller scale retail and other uses which	Whilst the retail offer of the park has broadened over time, it does not fulfil the role of a town centre nor does it have the character of a town centre. In a typical town centre it is usual to find a range of uses including retail, other commercial, employment, leisure uses and public / civic facilities and services. Broughton Shopping Park does not have this multi function role and is still predominantly retail. It also does not have the character of a typical town centre whereby the town centre is the focal point of a surrounding residential neighbourhoods. By contrast the Broughton Shopping Park is very much on the edge of the settlement, and it is this distinction and the outcome of the retail Study that has informed the status of Broughton Shopping Park outside of the retail hierarchy in the deposit LDP. The Retail Study comments on the Retail Hierarchy as follows: 'However, we advise that currently, Broughton Shopping Park should not be allocated as a defined town centre. BSP is an out-of-centre facility with no policy protection and there is no justification for BSP to be a defined centre within the Development Plan. As set out in Paragraph 4.6 of Technical Advice Note 4 (November 2016), through time, destinations [such as out-of-centre retail parks] should be assessed as to whether these centres have matured into retail and commercial centres in their own right, offering the same level of service provision and being as accessible as traditional centres. Main town centre uses typically include retail, leisure, entertainment, and more intensive sport and recreation uses, offices, arts, culture and tourism development. The offer at BSP is predominantly retail, cinema and restaurant uses. In our view, BSP does not contain the same level of service provision as traditional centres and

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				might compete with nearby defined centres, by controlling the scale and nature of retail and other proposals which arise. Nevertheless, the scale and composition of the shopping park has changed since its inception with the subdivision of retail units and a broader shopping 'offer'. It has also seen recent major investment in leisure development in the form of a cinema and accompanying restaurants…" (para 6.3.5)	until it does, BSP should not be a defined centre within the Development Plan. BSP should be monitored and further assessments on this issue should be made in the future'. In view of the findings of the Retail Study and in the context of national policy in PPW10 which has a town centres first principle, the outcome of the reconsideration of the status of BSP outlined in the Preferred Strategy, has been undertaken in the preparation of the deposit Plan. The park's non-inclusion in the retail hierarchy is fully justified. The Welsh Government in their formal comments on the deposit LDP are supportive of the strategy of the plan stating that they have "no issues" in this respect. There is nothing to indicate that the non-inclusion of BSP in the retail hierarchy affects the soundness of the LDP.
1	PE10: District and Local Centres	Object	I think the wording of PE10 itself is clear and well-balanced and does seek to maintain and promote the range of facilities communities want to see in Flintshire's District and Local Centres. I am however concerned that the further guidance given within Para 18.25	I would propose a revision of the final sentence of Para 18.25 so it reads as follows:- "As a consequence proposals for retail and non-retail	Partially accepted. It is accepted that the second sentence of para 10.25 pre-determines that non retail commercial uses are more difficult to accommodate in district and local centres and that it would be better if each type of use is considered on its merits. If the Inspector considers that the objectors suggested amendments to para 10.35 improve the implementation of the policy then the Council would have no objection to this.

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			does somewhat contradict PE10, as it implies a bias against proposals for commercial uses which are not A1 Retail within Local Centres. Looking at my most local Local Centres of Broughton Hall, Penyffordd, Hope/Caergwrle, Buckley – Lane End and Hawarden I see an existing range of retail and non-retail commercial uses which are all equally valued by those communities. I doubt that the ratio of retail to non-retail uses in these locations is significantly different to that within the District Centres. Clearly, due to the generally larger size of District Centres, the scale and range of individual retail and non-retail uses will be greater, but I don't see any following justification for applications for proposals for non-retail commercial in Local Centres to be treated differently to similar proposals in District Centres. I think that would be at odds with how our Local Centres look today and how they should continue to look in the future in order to best serve the needs of their communities. I think the key differences in the way proposals should be looked at differently in Local Centres to District Centres are already in the Policy, and these	commercial uses may be more difficult to satisfactorily accommodate in such Local Centres, and the importance of safeguarding residential amenity will be a key consideration." I believe my proposed amendment will mean that proposals in Local Centres will be more fairly accessed on the basis of their own individual merit, rather than against an arbitrary pre-judgement.	

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			are that in Local Centres commercial uses should be intended to meet the "day to day needs of the local neighbourhood" and that "safeguarding residential amenity will be a key consideration".		
180	PE11: Edge and Out of Town Retail Development	Object	Flintshire County Council has published the Deposit Local Development Plan Deposit Draft (LDP) for consultation. XXX has been instructed by Aldi Stores Ltd to review the deposit LDP and has prepared this representation on behalf of the operator. In particular XXX notes concern with regards to draft Policy 39: PE11 'Edge and Out of Town Retail Development' within the Flintshire LDP.Within PPW: Retail Impact Assessments Paragraph 4.3.25 states that retail developments outside designated retail and commercial centres, and which are not located on an allocated site, can impact on the viability and vibrancy of a centre [our emphasis]. The PPW does not include the word 'attractiveness'. In addition, TAN 4 Retailing and Town Centres does not make any reference to 'attractiveness'. It is therefore considered that the use of the word 'attractiveness' within draft Policy 39: PE11	It is therefore considered that the use of the word 'attractiveness' within draft Policy 39: PE11 appears to create a test in itself and can be subjective. XXX therefore strongly recommends that the word 'attractiveness' is removed from draft Policy 39: PE11, as it is not clear how 'attractiveness' can be tested.	Not accepted. Welsh Government identifies in para 4.3.3 PPW a number of overarching objectives for retail and commercial centres. The guidance states that 'the planning system must' followed by three bullet points and the second bullet points references 'sustain and enhance retail and commercial centres' vibrancy, viability and attractiveness'. The word 'attractiveness' is mentioned in para 4.3.7, 4.3.16, 4.3.22 and 4.3.39 of PPW. In particular, para 4.3.20 of PPW states '…. New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community, and should not be allowed if they would be likely to put development plan retail strategy at risk….'. In the context of PPW it is quite appropriate for policy PE11 to refer to 'attractiveness'.

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			appears to create a test in itself and can be subjective. XXX therefore strongly recommends that the word 'attractiveness' is removed from draft Policy 39: PE11, as it is not clear how 'attractiveness' can be tested. XXX has also reviewed the Town Centre boundaries across the county as Aldi has stores within many of those centres and has no comments in this regard. It is concluded that the Flintshire LDP in its current form is unsound, for reasons provided above.		
1024	PE11: Edge and Out of Town Retail Development	Object	However, the Council has some concerns regarding policy PE11 and how planning applications for out of town retail development at Broughton Retail Park would be assessed. The Council considers that the impact assessment (bullet point (c)) should in addition consider harm to designated retail centres that are outside of Flintshire (i.e. Chester City Centre) rather than just Town, District and Local Centres designated by the LDP. Chester is a sub-regional shopping centre and contains the Northgate development, which is a key retail and leisure regeneration scheme, identified in the Cheshire West and Chester Local Plan (Part	Furthermore, the Council considers that the threshold of 2,500 m2 for the application of a Retail Impact Assessment is too high, as a development of this size could cause unacceptable harm to the vitality, attractiveness or viability of another designated centre. A threshold of 1,000 m2 is considered more appropriate, and would be in line	Not accepted. The policy wording summarises the approach taken in PPW10 with regard to retail impact assessments. Para 4.3.26 states 'All retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment'. It is not considered appropriate or necessary for the Plan to deviate from well established guidance in PPW. If the Inspector considers that the wording of criteria c of policy PE11 would be improved by referring to impacts on retail centres outside the County boundary, then the Council would have no objection to this.

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			One). Furthermore, the Council considers that the threshold of 2,500 m2 for the application of a Retail Impact Assessment is too high, as a development of this size could cause unacceptable harm to the vitality, attractiveness or viability of another designated centre. A threshold of 1,000 m2 is considered more appropriate, and would be in line with the Cheshire West and Chester Local Plan.	with the Cheshire West and Chester Local Plan.	
238	PE12: Tourist Accommodation, Facilities and Attractions	Object	Policy PE12 – Tourist Development: The committee considers that criteria c) and d) relating to 'non-permanent accommodation' (such as chalets, pods, glamping and tents) and new build tourist facilities outside existing settlements do not provide adequate environmental safeguards to control inappropriate development affecting the AONB. There has been a noticeable increase in proposals for chalet or similar developments in particular over recent years which can be extensive and generate significant change in the character and appearance of an area to the detriment of the AONB. The committee does not consider chalet development to be non-permanent'. Notwithstanding the	Notwithstanding the additional guidance set out in the supporting text, the committee would recommend that the need for enhanced environmental safeguards for such development within the AONB or its setting should be specifically articulated in the policy.	Not accepted. The Council considers that the current wording of Policy PE12 (and associated policies) strikes the right balance between enabling appropriate tourism development and protecting the rural resource that tourists come to the area to enjoy. Policy PE12 provides adequate protection for the AONB. There are policies elsewhere in the LDP that deal with landscape and other environmental impacts which will be taken into account in relevant cases, including a specific AONB policy EN5, that states *'in assessing the likely impact of development proposals on the natural beauty of the AONB, cumulative impact will also be taken into consideration.'*

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			additional guidance set out in the supporting text, the committee would recommend that the need for enhanced environmental safeguards for such development within the AONB or its setting should be specifically articulated in the policy.		Simply repeating guidance in PE12 that is already within EN5 will not bring with it any additional protection to the AONB. The objectors suggested revision to the wording of the policy is not considered to be necessary.
839	PE12: Tourist Accommodation, Facilities and Attractions	Object	Policy PE12 (Tourist Accommodation) Policy PE12 of the Deposit Plan states: "The development of new or extensions to existing self-catering and serviced tourist accommodation and tourist attractions and facilities will be permitted within the defined settlements where proportionate in scale to the site and its surroundings. Outside defined settlement boundaries development will be supported in the form of: a. The extension to existing tourist accommodation and facilities; or b. The conversion of existing buildings whereby in accordance with TAN6: …. c. Non-permanent accommodation such as chalets, pods, glamping and tent camping sites; …" Bourne Leisure endorses the Council's aspirations in draft Policy PE12 to permit the extension of existing self-catering and serviced tourist accommodation inside and outside	The emerging policy should be amended as follows: ""The development of new or extensions to existing self-catering and serviced tourist accommodation, and tourist attractions, and associated or ancillary facilities will be permitted within the defined settlements where proportionate in scale to the site and its surroundings…"	Not accepted. The council notes the representation however the Council disagrees with this Representation as criteria d addresses the objectors concerns, criteria d states that: d. new build tourist attractions and facilities outside settlement boundaries if: 1. an open countryside location is essential; 2. the proposal cannot be accommodated within an existing building or within a defined settlement boundary; 3. the development is based upon a geographically restricted resource or activity. The occupancy of tourist accommodation will be restricted to holiday use only.

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			of defined settlement boundaries. The approach will contribute to achieving draft Objective 14. However, Policy PE12 should ensure that the development of on-site facilities that are ancillary to tourist accommodation are also explicitly supported through this policy to ensure there is no ambiguity in the application of the policy once the plan is adopted. The emerging policy should be amended as follows: ""The development of new or extensions to existing self-catering and serviced tourist accommodation, and tourist attractions, and associated or ancillary facilities will be permitted within the defined settlements where proportionate in scale to the site and its surroundings…"		Therefore the council believes that the current wording of Policy PE12 (and associated policies) strikes the right balance between enabling appropriate tourism accommodation and protecting the surrounding area. Clarification is not needed to add the development of on-site facilities that are ancillary to tourist accommodation are also explicitly supported through this policy to ensure there is no ambiguity in the application of the policy once the plan is adopted as this can be categorised within the policy as 'other facilities' which is mentioned within the policy.
1054	PE12: Tourist Accommodation, Facilities and Attractions	Object	These policies designate large areas of land as being suitable for tourism land use as well as directing that specific development 'will be permitted'. The tourism policies outlined above relate to areas that lie partially within Zone C1 and/or Zone C2, as defined by the DAM and within the 1%/0.5% (1 in 100/1 in 200) and/or 0.1% (1 in 1000) Annual Exceedance Probability (AEP) event flood	We would advise that to overcome this issue the Policy needs to include specific criteria to appropriately guide future development away from flood risk areas.	Not accepted. The Council considers that the current wording of Policy PE12 (and associated policies) strikes the right balance between enabling appropriate tourism development and protecting the rural resource that tourists come to the area to enjoy. It is considered that the objector has misinterpreted policy PE12. The policy provides general support for tourism development in settlement boundaries and then adopts a criteria based to tourism development outside settlement boundaries. The policy does not designate any specific parcels of land or large tracts of land for tourism development on

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			outlines according to our Flood Risk Map. We would advise that to overcome this issue the Policy needs to include specific criteria to appropriately guide future development away from flood risk areas. The Shoreline Management Plan (SMP) policy must be considered in relation to continued development of tourist accommodation within the Talacre area. It should be noted that the SMP policy for Policy Unit 11a PU4.4 which covers the northern section of coast (the sand dune system) at Talacre is 'managed realignment' for Epochs 1 (20 years), 2 (50 years) and 3 (100 years). We therefore object to a Policy which concentrates further development in this location.		the proposals maps. Any tourism areas which arise in flood risk areas will need to be assessed against policy EN14 as well as PPW10 and TAN15. Additional criteria are unnecessary. Relevant proposals will not be considered in light of policy PE12 alone but in the context of all other relevant planning policies.
239	PE13: Caravan Development in the Open Countryside	Object	Policy PE13 – Caravan Development in Open Countryside: Given recent trends to replace static caravans with chalets it should be clarified whether this policy or PE12 applies to chalet development. Although this policy does contain environmental safeguards in criteria a) i)-iii), the committee would recommend that specific reference should be made to the sensitivity of the AONB and the need to conserve and enhance	The Joint Committee would therefore recommend that consideration be given to defining a new PE13 area restricting such developments in the Wheeler Valley area similar to the restrictions in place in the Talacre,	Not accepted. The council notes the comments on policy PE13, however does not agree to the rewording of the policy as the council believes that the policy strikes the right balance between enabling appropriate development and protecting natural area. The policy title and subject matter is 'caravan' development and will include all forms of holiday accommodation which fall within the definition of a 'static caravan' and will include lodges and chalets. Any proposed development located within close proximity or within an AONB will have to comply with policy EN5, Area of Outstanding Natural Beauty that states ' Proposals for development outside the AONB that would detract unacceptably from its setting will not be permitted.

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			the AONB and its setting when considering such proposals. In addition, there has been significant growth of static caravan and chalet sites in the Wheeler Valley area over recent years and the committee is of the view that the area has now exceeded its capacity to absorb such development without causing further harm to the AONB or its setting. The Joint Committee would therefore recommend that consideration be given to defining a new PE13 area restricting such developments in the Wheeler Valley area similar to the restrictions in place in the Talacre, Gronant and Gwespyr area.	Gronant and Gwespyr area.	All proposals should include details of the extent of landscaping proposed, and reflect the importance of protecting features which are identified as important. Developers are encouraged to use LANDMAP to assist in assessing the character of the local area.' The areas identified by the representor are not all located within AONB additionally, the area is not comparable to the area around Gronant and Talacre where there are restrictions to caravan development. The Gronant area has a flat topography and has a scale of holiday caravan parks that has impacted on the landscape historically. It is also a sensitive area in in terms of international nature conservation. Although Afonwen area has a number of existing caravan parks and proposed new pars and extensions to existing parks, it does not has the scale of development that is present in the Gronant area. Furthermore, the landscape is more varied and should be more capable of absorbing each development. If a caravan proposal/extension was to be submitted for planning each site will be assess on its own merits and will assess the cumulative impacts.
841	PE13: Caravan Development in the Open Countryside	Object	PE13 (Caravan Development in the Open Countryside) Significant investment by Bourne Leisure is made at it parks, resorts and hotels to achieve this. Should planning policies fail to support such investment the ability of the Company to continue to attract new and repeat visitors will result in stagnating facilities which will be	On this basis, the following amendments are required to ensure that this element of the Plan would satisfy the tests of soundness: "a. The development of new	Not accepted. The council notes your representation however disagrees with the policy rewording. The current wording of Policy PE13 (and associated policies) strikes the right balance between enabling appropriate caravan development and protecting the rural resource that tourists come to the area to enjoy. The objector refers to investment in its parks and the need for a positive planning framework to facilitate further investment. The policy seeks to prevent 'new' sites in the

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			a harmful outcome for the Company and would, in turn, have wider detrimental effects on the local economy (e.g. reduced employment and local spending). It is vital therefore for the LDP to have a positive planning framework to facilitate the delivery of this investment and the delivery of the Plan objectives. The draft Policy provides a generally positive framework for static caravan accommodation in Flintshire. The emerging policy recognises the need to be consider any extensions to existing parks in the context of the individual sites and that appropriate landscaping can be used to mitigate impacts of development. However, there is a need to include greater clarity on some of the aspects of the emerging policy in order for the Plan to be found sound. Without it, the Plan risks being unclear and potentially not being deliverable in terms of Objective 14. Whilst there is a defined gap between Talacre and Gronant this should not mean that all development would be unacceptable, particularly where development is not on the coastline itself. Further the existing tourism infrastructure provides significant	static caravan parks accommodation will be permitted outside the Talacre, Gronant and Gwespyr area (as defined on the proposals map) where:iv. There would be no material harm to the landscape character and environmental quality of the surrounding area, either individually or cumulatively with other sites in the vicinity; and v. The scale of the proposal together with the number, siting and layout of unit	Gronant area but does allow for appropriate extensions to existing sites, subject to satisfying criteria. The objector has put forward amended policy wording in the form of an additional criteria under criteria (a). However, the subject matter referred to is already addressed in other policies in the Plan i.e. EN3, EN4 and EN6. The Plan needs to be read as a whole. It must be stressed that the ‘gap’ referred to by the objector is sensitive for a number of reasons, including green barrier, flood risk and nature conservation and therefore the Plan is quite justified in seeking to prevent further new caravan development, given the amount of such development already in situ.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			benefits to the County and the need to continue investing in the Parks is vital for reasons set out above. On this basis, the following amendments are required to ensure that this element of the Plan would satisfy the tests of soundness: “a. The development of new static caravan parks accommodation will be permitted outside the Talacre, Gronant and Gwespyr area (as defined on the proposals map) where:iv. There would be no material harm to the landscape character and environmental quality of the surrounding area, either individually or cumulatively with other sites in the vicinity; and v. The scale of the proposal together with the number, siting and layout of unit		
1055	PE13: Caravan Development in the Open Countryside	Object	These policies designate large areas of land as being suitable for tourism land use as well as directing that specific development ‘will be permitted’. The tourism policies outlined above relate to areas that lie partially within Zone C1 and/or Zone C2, as defined by the DAM and within the 1%/0.5% (1 in 100/1 in 200) and/or 0.1% (1 in 1000) Annual Exceedance Probability (AEP) event flood	We would advise that to overcome this issue the Policy needs to include specific criteria to appropriately guide future development away from flood risk areas.	Not accepted. The objector is considered to have misinterpreted the policy wording which sets out that caravan development will be specifically excluded from the Talacre, Gronant and Gwespyr area. This is further explained in the latter part of para 10.36 and is an approach carried over from the UDP. Outside of this area, the policy adopts a criteria-based approach to consider subsequent proposals for caravan related development. If the Inspector considers that the policy can be worded more clearly with regard to the approach to development

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			outlines according to our Flood Risk Map. We would advise that to overcome this issue the Policy needs to include specific criteria to appropriately guide future development away from flood risk areas. The Shoreline Management Plan (SMP) policy must be considered in relation to continued development of tourist accommodation within the Talacre area. It should be noted that the SMP policy for Policy Unit 11a PU4.4 which covers the northern section of coast (the sand dune system) at Talacre is 'managed realignment' for Epochs 1 (20 years), 2 (50 years) and 3 (100 years). We therefore object to a Policy which concentrates further development in this location.		in the Talacre, Gronant and Gwespyr areas then the Council would not object to this. Any concerns regarding flood risk will be assessed at the application stage and development will only be permitted if the proposal complies with relevant local and national flood risk policies. Additional criteria are unnecessary. Relevant proposals will not be considered in light of policy PE13 alone but in the context of all other relevant planning policies.
14	PE14: Greenfield Valley	Support	welcomes the inclusion of a specific policy about the Greenfield Valley in the Development Plan reflecting its importance to the county as a focus for tourism as well as a site of environmental and heritage importance. However the Trust would welcome a rewording of the policy to include a positive encouragement for development proposals that would enhance the tourism potential of the valley as long as they do not harm current	XXX would welcome a rewording of the policy to include a positive encouragement for development proposals that would enhance the tourism potential of the valley as long as they do not harm current attractions	Not accepted. This representation is noted and the council welcome the support of Policy PE14, Greenfield Valley. The suggestion of rewording the policy to ensure that the policy includes the positive encouragement for development that would enhance tourism without causing a detrimental impact on the surrounding area is not accepted as when the plan is read as a whole, the purpose is to ensure that any proposed development enhances the area without causing any detrimental harm to the surrounding area. It is believed that the current policy wording is sufficient.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			attractions or areas or features of landscape, nature conservation or historic value.	or areas or features of landscape, nature conservation or historic value.	
62	PE14: Greenfield Valley	Support	XXX welcomes the intent of this policy to prevent harm to the historic value of the important industrial remains at the Greenfield Valley		This representation is noted and the council welcome the support of Policy PE14, Greenfield Valley.
1056	PE14: Greenfield Valley	Object	These policies designate large areas of land as being suitable for tourism land use as well as directing that specific development 'will be permitted'. The tourism policies outlined above relate to areas that lie partially within Zone C1 and/or Zone C2, as defined by the DAM and within the 1%/0.5% (1 in 100/1 in 200) and/or 0.1% (1 in 1000) Annual Exceedance Probability (AEP) event flood outlines according to our Flood Risk Map. We would advise that to overcome this issue the Policy needs to include specific criteria to appropriately guide future development away from flood risk areas. The Shoreline Management Plan (SMP) policy must be considered in relation to continued development of tourist accommodation within the Talacre area. It should be noted that the	We would advise that to overcome this issue the Policy needs to include specific criteria to appropriately guide future development away from flood risk areas.	Partly accepted. It is considered that the objector has misinterpreted the policy. It recognizes that the Greenfield Valley is an important tourism attraction but that it is also an important resource for its recreation, landscape, nature conservation and historic importance. The policy does not seek to encourage or promote new development but instead permits new development where it does not detract from its features and character. The Development Advice maps illustrate that only small areas along the edge of Greenfield Valley are located within Zone C1, with a section located at the weir and next to Dyke Wats being located in C2. Any issues arising from flood risk will be dealt with on a site specific basis against policy EN4 and PPW/TAN15. However, if the Inspector considers that the wording of the policy could be improved to clarify that it seeks to protect from development rather than promote development, the Council would have no objection.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			SMP policy for Policy Unit 11a PU4.4 which covers the northern section of coast (the sand dune system) at Talacre is 'managed realignment' for Epochs 1 (20 years), 2 (50 years) and 3 (100 years). We therefore object to a Policy which concentrates further development in this location.		

Policy HN1.1 to HN1.6

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
211	HN1.1 Well Street, Buckley	Object	The development of the site for residential use would significantly increase the amount of traffic travelling along Well Street, resulting in a significant loss of amenity to the residents of Well Street as a result of traffic noise and a remarkable increase in background noise levels. Increased traffic would undoubtedly make it dangerous for residents, particularly on the lower part of Well Street, leaving and entering their properties from the road. The lower part of Well Street is a narrow lane, with limited visibility and limited areas for vehicles to pass, especially to pass large agricultural vehicles. Increased traffic would also result in danger to horse riders and horses entering the livery stables, also located along Lower Well Street.	Removal of allocated site Well Street, Buckley	Not accepted. The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. **General** Buckley is located in the east of the County and it is the second largest settlement in the Plan Area. Buckley has been classified as a Main Service Centre in the LDP because of its strategic role in the delivery of services and facilities. The candidate site is located on the south western side of Buckley and is situated within the existing settlement boundary and allocated for housing in the existing UDP. The principle of development is already broadly established. The site is bounded by residential development comprising mainly of semi-detached properties on two sides, to the north along Monza Close and the east by Langford Crescent. Well Street is the boundary to the south. Mature hedgerows define the south and western boundaries. To the west adjoining the site is the Bryn Y Pys Farm complex. It represents a logical extension to the settlement within well-defined physical boundaries and is

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					in a sustainable location having regard to its location within a Main Service Centre. The site was allocated as part of the UDP - HSG1(3) for 162 units and is unconstrained, but was not developed due to delays by the owners Welsh Government in releasing the site to the market. Recently, the site was considered as part of the Councils SHARP scheme in collaboration with the developer Wates. Subsequently to this interest, the site is now in the final legal stages of being sold to a Regional Housing Association who are designing a housing scheme in readiness to submit a planning application for a mixture of open market and affordable homes. The latest information from the Regional Housing Association as at March 2020 is that an outline planning application is likely to be submitted by the end of April 2020. Clearly, this timescale may be impacted by the implications of Covid-19. The fact that the site is in the process of being bought by a willing developer shows that there is genuine developer interest in the site. In addition to the lack of technical constraints it is therefore likely to be developed within the plan period and given the site's location within the settlement boundary, is also capable of early delivery prior to the adoption of the LDP, something that the objectors alternative site cannot. It is important to point out that the undeveloped allocated sites in the UDP have been considered like any other Candidate site and have been through the Candidate Site Assessment process like all of the other sites. Only those previously allocated sites where we consider that they are still sustainable and deliverable and will come forward have been allocated. Also the LDP takes a different approach to the UDP. Whereas the UDP had a more

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					dispersed distribution of allocations with many smaller sites, the LDP has a more focused approach to distributing allocations to the most sustainable settlements. The aim of this strategy is to ensure that allocations are in the most sustainable locations and of a scale to be attractive to house builders so that they are likely to be more deliverable. In relation to the Well Street site, whilst there has historically been delays in Welsh Government releasing the site to the market, there has now been a step change in circumstances with the involvement of a Regional Housing Association who are in the final stages of purchasing the site in order to subsequently develop it, and where an application is already being prepared. This clearly demonstrates that the site is viable and deliverable within the LDP time period. **Traffic** The site is already allocated in the adopted UDP and located within the settlement boundary so the broad principle of developing the site is established. The site's suitability for development was investigated thoroughly as part of the UDP Public Inquiry, in the light of objections to the allocation. The UDP Inspector concluded that the site was suitable for development and recommended that it should be allocated in the Plan. As part of the consideration given to the site at the UDP Public Inquiry, matters relating to highway access and traffic impact on the local network were considered. The UDP Inquiry Inspector commented on highways matters

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					[page 337 paragraph 11.37.6 of the Inspector's Report] as follows "Access/highways to the site is potentially from Daleside, a cul-de-sac serving semi-detached houses and/or Well Street, a through road serving houses at its northern end. To the south Well Street narrows and takes on the character of a country lane until it links in with Rose Lane, a similar road running between the A549 and the A5118. Both Daleside and Well Street to the north have junctions with Springfield Drive/Nant Mawr Road. There is no doubt that development at Well Street would add to existing traffic. However, there is the potential to design the Well Street access to discourage traffic travelling south. Unless the road is physically closed I acknowledge that not all traffic would be discouraged from travelling south, but it would nevertheless reduce the amount of traffic. The nature of Well Street and Rose Lane mean that walkers and riders already have to be vigilant when using the lanes. Whilst the development may add to the number of vehicles, it would not fundamentally change the rural character of the lane. A consequence of discouraging southbound trips would inevitably mean more traffic travelling north and using the Springfield Drive/Nant Mawr Road junctions. Whilst because of their width, alignment, pavements and lighting these are better able to accommodate more traffic, conditions are not ideal and I accept that bends, parking and the like affect road conditions. However, the access review of August 2007 and the traffic survey of September 2007 indicate that conditions are not such that the road system could not satisfactorily accommodate the anticipated growth in traffic from the development". In paragraph 11.37.8 of her report, the Inspector went on to state that "It is inevitable that traffic flows will vary depending on the season, day and time. I visited the

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					locality of the site at different times and saw varying traffic conditions. However, nothing I have seen, read or heard convinces me that the local road system cannot accommodate the additional traffic which would be generated by the development. In this respect I have looked at the more distant junctions including with Mold Road. If there is an access from Daleside it will inevitably result in more vehicular movements, but it would only be domestic and traffic normally associated with housing areas. The situation would to my mind be no different to many other housing areas nor result in material harm to people's living conditions". Notwithstanding the time since the UDP Public Inquiry, it is the view of the Council that the Inspector's comments from the UDP inquiry still stand. The highway authority have reviewed the principle of allocating the site as part of the LDP and have stated that a Transport Assessment will be required to support the development of the site and in relation to the present network, consider that the Inspectors comments are still valid, in that the roads leading to the site can accommodate the increases in traffic without detriment to the amenity of existing residents and road users. Highways officers have also considered the lower more rural part of Well Street and have commented '' whilst the principle of residential development has been accepted, a junction layout that will limit additional movements onto the rural section of Well Street will be required along with roads laid out to adoptable standard and appropriate cycle provision.''

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					The allocation of the site under policy HN1 is accompanied by summary guidance which clearly references the need for the site access onto Well Street to be designed so as to prevent right turn. Environmental health officers have also been consulted and have not objected to the proposal in terms of noise or air pollution. Also in terms of air pollution – The North Wales Authorities Collaborative Project '2019 Air Quality Progress Report' states that 'The North Wales Authorities have not declared any Air Quality Management Areas (AQMAs) and as a result, have not published an Action Plan'. **Support** Comments are noted.
715	HN1.1 Well Street, Buckley	Object	This Policy provides details of the proposed housing allocations across the County which are expected to come forward during the currently proposed LDP period up to 2030. Table 3 of Background Paper 10 contains details on each of the proposed allocations. It is noted that two of these sites comprise previous allocations in the UDP which failed to come forward; these are land at Well Street in Buckley for 159 dwellings, and Highmere Drive in Connahs' Quay for 150 dwellings. Paragraph 2.15 of the Background Paper states that information obtained from developers and landowners	Deletion of allocations at Well Street Buckley and Highmere Drive, Connah's Quay due to issues around deliverability. these should be replaced with alternative sites with more certainty around delivery.	See response to id 211

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			suggests that there is confidence these two sites will come forward. However, the same paragraph then goes on to state that the flexibility allowance is proposed in the event that they do not. We object to the continued allocation of these two sites; they have failed to come forward consistently since the UDP was adopted in 2011, and there is evidently no certainty that they will. Whilst there may be some tentative developer interest in them, unless there is a firm legal/option agreement in place, that will not necessarily translate into delivery. Accordingly, it is our position that these sites should be deleted as proposed housing allocations, and replaced with deliverable sites; of the 41 sites allocated in the UDP, 13 of these sites failed to come forward. Hence, it is unclear why these two sites have been treated differently to the remaining 11 sites.		
1209	HN1.1 Well Street, Buckley	Object	Policy HN1: New Housing Development Proposals 7.2. Table 3 of Background Paper 10 contains details on each of the proposed allocations. It is noted that two of these sites comprise previous allocations in the UDP which failed to come forward; these are land at Well Street in Buckley for 159 dwellings, and Highmere Drive in Connah's Quay for 150 dwellings. Paragraph 2.15 of the	Removal of allocated sites at Well Street Buckley, and Highmere Drive Connah's Quay due to deliverability concerns and replacement with alternative sites to ensure the housing	See response to id 211

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Background Paper states that information obtained from developers and landowners suggests that there is confidence these two sites will come forward. However, the same paragraph then goes on to state that the flexibility allowance is proposed in the event that they do not. Our Client objects to the continued allocation of these two sites; they have failed to come forward consistently since the UDP was adopted in 2011, and there is evidently no certainty that they will do so with known issues around land assembly and aspirational land values. Whilst there may be some tentative developer interest in them, unless there is a firm legal/option agreement in place and/or a clear disposal strategy in place by the respective landowners, that will not necessarily translate into delivery. Accordingly, it is our Client's position that these sites should be deleted as proposed housing allocations, and replaced with deliverable sites; of the 41 sites allocated in the UDP, 13 of these sites failed to come forward. Hence, it is unclear why these two sites have been treated differently to the remaining 11 sites.	supply is deliverable.	
1179	HN1.1 Well Street, Buckley	Object	Policy HN1: New Housing Development Proposals This Policy provides details of the proposed housing allocations across the County which are expected	it is our Client's consideration that additional housing land should be	See response to id 211

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			to come forward during the currently proposed LDP period up to 2030. In addition to the two proposed strategic allocations, 6 sites are allocated in the Tier 1 'Main Service Centres,' 3 sites in the Tier 2 'Local Service Centres,' and 2 sites in the Tier 3 'Sustainable Villages.' In total, 11 sites are allocated, plus the two strategic allocations. This contrasts starkly to the 41 site allocations under Policy HSG1 of the previous UDP. Table 3 of Background Paper 10 contains details on each of the proposed allocations. It is noted that two of these sites comprise previous allocations in the UDP which failed to come forward; these are land at Well Street in Buckley for 159 dwellings, and Highmere Drive in Connahs' Quay for 150 dwellings. Paragraph 2.15 of the Background Paper states that information obtained from developers and landowners suggests that there is confidence these two sites will come forward. However, the same paragraph then goes on to state that the flexibility allowance is proposed in the event that they do not. Our Client objects to the continued allocation of these two sites; they have failed to come forward consistently since the UDP was adopted in 2011, and there is evidently no certainty that they will. Whilst there may be some tentative developer	released at Tier 3 of the settlement hierarchy to accommodate this outstanding need.	

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			interest in them, unless there is a firm legal/option agreement in place, that will not necessarily translate into delivery. Accordingly, it is our Client's position that these sites should be deleted as proposed housing allocations, and replaced with deliverable sites; of the 41 sites allocated in the UDP, 13 of these sites failed to come forward. Hence, it is unclear why these two sites have been treated differently to the remaining 11 sites. Given our earlier comments regarding the underplayed role of Sustainable Villages in the Deposit Plan, it is our Client's consideration that additional housing land should be released at Tier 3 of the settlement hierarchy to accommodate this outstanding need.		
1280	HN1.1 Well Street, Buckley	Object	There is genuine risk that proposed allocations cannot be delivered, either at all or in the timeframes envisaged. Several sites have been simply carried forward (rolled over) from the current LDP despite concerns with delivery. The Local Development Plan ('LDP') Manual (Edition 2) identifies the requirement for a new form of measuring the deliverability of sites, and whether they have a realistic chance of coming forward over the next	Allocate additional sites	See response to id 211

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			5 years. It states “When putting forward sites, developers and landowners should include sufficient data to allow a robust assessment to be made (see section 6.4.1&2) including affordable housing, community infrastructure and that the development is financially viable.” The draft LPD Manual 3 (which was consulted on by Welsh Government in September 2019) then goes a step further. Table 18 in draft Manual 3 states that historic allocations should only be ‘Rolled Forward’ from previous plans where ‘careful justification’ is given that there has been a ‘substantial change in circumstances to demonstrate sites can be delivered and justify being included again’. This is relevant as many of the proposed housing allocations have been simply ‘Rolled Forward’. The table at Appendix 2 shows the housing allocations and our analysis of realistic deliverability. It identifies 6 of the 11 housing allocations are undeliverable in the next 5 years and a further 4 have questionable delivery over the plan period. This has significant implications for the 5-year supply position and overall delivery of the plan. For example, the Buckley Site		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			(emerging Policy HN1, Site 1) was first identified in the UDP preparation stages in 2004. The site has no obvious developer interest, and the allocation contradicts the Councils adopted Speculative Housing Development Proposals SLD / Developer Advice Note. There is no progress towards submission of a planning application and the site has stagnated since 2004.		
1288	HN1.1 Well Street, Buckley	Object	Of the eleven housing allocations set out in the above policy, we would question the deliverability of the following 2 allocations: HN1-1 Well Street, Buckley (159 units) and HN1-3 Highmere Drive, Connah's Quay (150 Units). We are also concerned that the Council are continuing to rely on these sites which were previously allocated in the UDP (HSG1(3) and HSG1(5)) despite these not delivering housing over the previous plan period. Well Street, Buckley - This site is owned by the Welsh Assembly Government. The site is considered to be in a good market area however the site has not been delivered in the previous plan period and we have seen no evidence to demonstrate the Site can be delivered now. It is unrealistic	Inclusion of additional sites.	See response to id 211

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			that this site will be developed within the forthcoming plan period. Highmere Drive, Connah's Quay - The site has been allocated for development in the previous plan. It is also in a good market area and there have been previous offers made to purchase the land by various parties which have been unsuccessful Based on the issues highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged over the life of the emerging Local Plan. The capacity and deliverability assumptions are overly optimistic. The inclusion of these Sites within the Housing Land Supply which total 309 units are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development		
1290	HN1.1 Well Street, Buckley	Object	Of the eleven housing allocations set out in the above policy, we would question the deliverability of the following 2 allocations: HN1-1 Well Street, Buckley (159 units) and HN1-3 Highmere Drive, Connah's Quay (150 Units). We are also concerned that the Council are continuing to rely on these sites which were previously allocated in	Allocate additional sites.	See response to id 211

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the UDP (HSG1(3) and HSG1(5)) despite these not delivering housing over the previous plan period. Well Street, Buckley - This site is owned by the Welsh Assembly Government. The site is considered to be in a good market area however the site has not been delivered in the previous plan period and we have seen no evidence to demonstrate the Site can be delivered now. It is unrealistic that this site will be developed within the forthcoming plan period. Highmere Drive, Connah's Quay - The site has been allocated for development in the previous plan. It is also in a good market area and there have been previous offers made to purchase the land by various parties which have been unsuccessful Based on the issues highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged over the life of the emerging Local Plan. The capacity and deliverability assumptions are overly optimistic. The inclusion of these Sites within the Housing Land Supply which total 309 units are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1292	HN1.1 Well Street, Buckley	Object	Of the eleven housing allocations set out in the above policy, we would question the deliverability of the following 2 allocations: HN1-1 Well Street, Buckley (159 units) and HN1-3 Highmere Drive, Connah's Quay (150 Units). We are also concerned that the Council are continuing to rely on these sites which were previously allocated in the UDP (HSG1(3) and HSG1(5)) despite these not delivering housing over the previous plan period. Well Street, Buckley - This site is owned by the Welsh Assembly Government. The site is considered to be in a good market area however the site has not been delivered in the previous plan period and we have seen no evidence to demonstrate the Site can be delivered now. It is unrealistic that this site will be developed within the forthcoming plan period. Highmere Drive, Connah's Quay - The site has been allocated for development in the previous plan. It is also in a good market area and there have been previous offers made to purchase the land by various parties which have been unsuccessful Based on the issues highlighted above, we consider there is a realistic prospect	Allocate additional sites.	See response to id 211

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			these Sites will not deliver the quantum of housing envisaged over the life of the emerging Local Plan. The capacity and deliverability assumptions are overly optimistic. The inclusion of these Sites within the Housing Land Supply which total 309 units are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development		
664	HN1.1 Well Street, Buckley	Support	Well Street, Buckley, 159 units A water supply can be provided for this site. The public sewerage network can accept potential foul flows from this development site. The proposed growth in the Buckley Wastewater Treatment Works (WwTW) catchment area would require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.		See response to id 211
1238	HN1.2 Broad Oak Holding, Mold Road, Connah's Quay	Support	Broad Oak Holding, Mold Road, Connah's Quay, 32 units This site has planning permission and we have no further comment to make. Welsh Water made representations on this site through planning application 058583. Potential developers need to be aware that this site is crossed by a water main and protection measures in the form of an easement width or a diversion of the main would be required, which may		Support Noted.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			impact upon the housing density achievable on site.		
597	HN1.3 Highmere Drive, Connah's Quay	Object	OBJECTS to the inclusions of 150 dwellings from Policy HN1 (3) - Highmere Drive, Connah's Quay within the housing trajectory. It should be noted in passing that there is no objection to the principle of developing the site. 7.2 By way of background it is material to note that the site was allocated in the UDP (2000 – 2015) – see Policy HSG1(5) Highmere Drive but the site didn't come forward due to the owner's unwillingness to sell the site at that time. However, it is said that the owner has demonstrated a renewed commitment, supported by key background studies providing reassurance that the site is now available, viable and deliverable. 7.3 According to the Development Plans Manual Edition 3 allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan: "There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered. The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable. If an LPA	Given that the UDP covered a 15 year period and that it expired over 4 years ago there has been plenty of opportunity for this site to come forward. On the basis of past performance, we consider that the prudent approach to take would be to allocate the site but make no allowance for it in the housing trajectory.	HN1.3 Highmere Drive Not accepted. The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General Connah's Quay is located in the north east of the County and it is the largest settlement in the Plan Area. Connah's Quay has been classified as a Main Service Centre in the LDP because of its strategic role in the delivery of services and facilities. The candidate site is located on the western side of Connah's Quay and is situated inside the existing settlement boundary. The site is bounded by residential development to the north at Courbet Drive and Degas Close. A high voltage overhead line defines the whole length of the eastern boundary beyond which is residential development comprising mainly of semi-detached properties. The western boundary is marked by a hedgerow and contains semi mature/mature trees.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			wishes to retain such sites but cannot evidence they will be delivered, i.e. for aspirational or regeneration purposes, they can still be allocated in the plan but not relied upon as contributing to the provision. It will not be appropriate to include such sites in the windfall allowance. They should be treated as 'bonus sites'." 7.4 Given that the UDP covered a 15 year period and that it expired over 4 years ago there has been plenty of opportunity for this site to come forward. On the basis of past performance, we consider that the prudent approach to take would be to allocate the site but make no allowance for it in the housing trajectory.		The site was allocated as part of the UDP - HSG1(5) Highmere Drive, but did not come forward due to the owners unwillingness to release the site. The site was included by the Council as a Candidate Site to ensure that it was assessed in the same consistent manner as all other candidate sites. It must be stressed that Connah's Quay is a strong housing market area where there is a proven track record of sites being developed in successive Plan periods. There is also no public opposition to the site compared to other allocated sites. Given that this site was previously allocated in the UDP and had been agreed as a sustainable allocation by the UDP Inspector, prior to the site being re-allocated in the LDP, assurances were sought from the owners and their agent that this site was genuinely available given that there are no constraints to its development, and this has brought about a renewed commitment to the site being released to the market. A Transport Assessment and an additional technical note, and Agricultural Land Classification background studies were unilaterally undertaken by the owner and the Council is aware that discussions are taking place between the landowner and a number of interested housebuilders. It must also be stressed that a planning application could come forward at any time as the site is within the settlement boundary due to it being previously allocated in the adopted UDP. Given that there is now market interest in the site with negotiations ongoing about a scheme to deliver 150 units, this removes any concerns about viability and deliverability of this previously allocated site. Discussions with Highways have confirmed that there is suitable site access.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					Notwithstanding the site's previous allocation in the UDP, there has been careful consideration given to the re-allocation of this site in order to be compliant with the Development Plan Manual 3. It is considered that the site is a robust allocation which has the potential to be developed early within the LDP period as demonstrated in the trajectory in Background Paper 10 Housing Land Supply. The site is quite properly allocated and included in the trajectory and that there is no case for the site to remain in the Plan but be excluded from the trajectory.
764	HN1.3 Highmere Drive, Connah's Quay	Object	Policy HN1: New Housing Development Proposals 7.2. Table 3 of Background Paper 10 contains details on each of the proposed allocations. It is noted that two of these sites comprise previous allocations in the UDP which failed to come forward; these are land at Well Street in Buckley for 159 dwellings, and Highmere Drive in Connah's Quay for 150 dwellings. Paragraph 2.15 of the Background Paper states that information obtained from developers and landowners suggests that there is confidence these two sites will come forward. However, the same paragraph then goes on to state that the flexibility allowance is proposed in the event that they do not. Our Client objects to the continued allocation of these two sites; they have failed to come forward	Removal of allocated sites at Well Street Buckley, and Highmere Drive Connah's Quay due to deliverability concerns and replacement with alternative sites to ensure the housing supply is deliverable.	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			consistently since the UDP was adopted in 2011, and there is evidently no certainty that they will do so with known issues around land assembly and aspirational land values. Whilst there may be some tentative developer interest in them, unless there is a firm legal/option agreement in place and/or a clear disposal strategy in place by the respective landowners, that will not necessarily translate into delivery. Accordingly, it is our Client's position that these sites should be deleted as proposed housing allocations, and replaced with deliverable sites; of the 41 sites allocated in the UDP, 13 of these sites failed to come forward. Hence, it is unclear why these two sites have been treated differently to the remaining 11 sites.		
1190	HN1.3 Highmere Drive, Connah's Quay	Object	Policy HN1: New Housing Development Proposals This Policy provides details of the proposed housing allocations across the County which are expected to come forward during the currently proposed LDP period up to 2030. In addition to the two proposed strategic allocations, 6 sites are allocated in the Tier 1 'Main Service Centres,' 3 sites in the Tier 2 'Local Service Centres,' and 2 sites in the Tier 3 'Sustainable Villages.' In total, 11 sites are allocated, plus the two strategic allocations. This contrasts starkly to the 41 site	it is our Client's consideration that additional housing land should be released at Tier 3 of the settlement hierarchy to accommodate this outstanding need.	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			allocations under Policy HSG1 of the previous UDP. Table 3 of Background Paper 10 contains details on each of the proposed allocations. It is noted that two of these sites comprise previous allocations in the UDP which failed to come forward; these are land at Well Street in Buckley for 159 dwellings, and Highmere Drive in Connahs' Quay for 150 dwellings. Paragraph 2.15 of the Background Paper states that information obtained from developers and landowners suggests that there is confidence these two sites will come forward. However, the same paragraph then goes on to state that the flexibility allowance is proposed in the event that they do not. Our Client objects to the continued allocation of these two sites; they have failed to come forward consistently since the UDP was adopted in 2011, and there is evidently no certainty that they will. Whilst there may be some tentative developer interest in them, unless there is a firm legal/option agreement in place, that will not necessarily translate into delivery. Accordingly, it is our Client's position that these sites should be deleted as proposed housing allocations, and replaced with deliverable sites; of the 41 sites allocated in the UDP, 13 of these sites failed to come forward. Hence, it is		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			unclear why these two sites have been treated differently to the remaining 11 sites. Given our earlier comments regarding the underplayed role of Sustainable Villages in the Deposit Plan, it is our Client's consideration that additional housing land should be released at Tier 3 of the settlement hierarchy to accommodate this outstanding need.		
1201	HN1.3 Highmere Drive, Connah's Quay	Object	This Policy provides details of the proposed housing allocations across the County which are expected to come forward during the currently proposed LDP period up to 2030. Table 3 of Background Paper 10 contains details on each of the proposed allocations. It is noted that two of these sites comprise previous allocations in the UDP which failed to come forward; these are land at Well Street in Buckley for 159 dwellings, and Highmere Drive in Connahs' Quay for 150 dwellings. Paragraph 2.15 of the Background Paper states that information obtained from developers and landowners suggests that there is confidence these two sites will come forward. However, the same paragraph then goes on to state that the flexibility allowance is proposed in the event that they do not. We object to the continued allocation of these two sites; they have failed to come forward consistently since the	Deletion of allocations at Well Street Buckley and Highmere Drive, Connah's Quay due to issues around deliverability. these should be replaced with alternative sites with more certainty around deliver	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			UDP was adopted in 2011, and there is evidently no certainty that they will. Whilst there may be some tentative developer interest in them, unless there is a firm legal/option agreement in place, that will not necessarily translate into delivery. Accordingly, it is our position that these sites should be deleted as proposed housing allocations, and replaced with deliverable sites; of the 41 sites allocated in the UDP, 13 of these sites failed to come forward. Hence, it is unclear why these two sites have been treated differently to the remaining 11 sites.		
1289	HN1.3 Highmere Drive, Connah's Quay	Object	Of the eleven housing allocations set out in the above policy, we would question the deliverability of the following 2 allocations: HN1-1 Well Street, Buckley (159 units) and HN1-3 Highmere Drive, Connah's Quay (150 Units). We are also concerned that the Council are continuing to rely on these sites which were previously allocated in the UDP (HSG1(3) and HSG1(5)) despite these not delivering housing over the previous plan period. Well Street, Buckley - This site is owned by the Welsh Assembly Government. The site is considered to be in a good market area however the site has not been delivered in the previous plan period and we have seen	Allocate additional sites.	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			no evidence to demonstrate the Site can be delivered now. It is unrealistic that this site will be developed within the forthcoming plan period. Highmere Drive, Connah's Quay - The site has been allocated for development in the previous plan. It is also in a good market area and there have been previous offers made to purchase the land by various parties which have been unsuccessful Based on the issues highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged over the life of the emerging Local Plan. The capacity and deliverability assumptions are overly optimistic. The inclusion of these Sites within the Housing Land Supply which total 309 units are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development		
1291	HN1.3 Highmere Drive, Connah's Quay	Object	Of the eleven housing allocations set out in the above policy, we would question the deliverability of the following 2 allocations: HN1-1 Well Street, Buckley (159 units) and HN1-3 Highmere Drive, Connah's Quay (150 Units). We are also concerned that the Council are continuing to rely on these sites which were previously allocated in the UDP (HSG1(3) and HSG1(5))	Allocate additional sites.	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			despite these not delivering housing over the previous plan period. Well Street, Buckley - This site is owned by the Welsh Assembly Government. The site is considered to be in a good market area however the site has not been delivered in the previous plan period and we have seen no evidence to demonstrate the Site can be delivered now. It is unrealistic that this site will be developed within the forthcoming plan period. Highmere Drive, Connah's Quay - The site has been allocated for development in the previous plan. It is also in a good market area and there have been previous offers made to purchase the land by various parties which have been unsuccessful Based on the issues highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged over the life of the emerging Local Plan. The capacity and deliverability assumptions are overly optimistic. The inclusion of these Sites within the Housing Land Supply which total 309 units are highly questionable without significant further evidence that takes account of site constraints,		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			developable area and the overall viability of development		
1293	HN1.3 Highmere Drive, Connah's Quay	Object	Of the eleven housing allocations set out in the above policy, we would question the deliverability of the following 2 allocations: HN1-1 Well Street, Buckley (159 units) and HN1-3 Highmere Drive, Connah's Quay (150 Units). We are also concerned that the Council are continuing to rely on these sites which were previously allocated in the UDP (HSG1(3) and HSG1(5)) despite these not delivering housing over the previous plan period. Well Street, Buckley - This site is owned by the Welsh Assembly Government. The site is considered to be in a good market area however the site has not been delivered in the previous plan period and we have seen no evidence to demonstrate the Site can be delivered now. It is unrealistic that this site will be developed within the forthcoming plan period. Highmere Drive, Connah's Quay - The site has been allocated for development in the previous plan. It is also in a good market area and there have been previous offers made to purchase the	Allocate additional sites.	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			land by various parties which have been unsuccessful Based on the issues highlighted above, we consider there is a realistic prospect these Sites will not deliver the quantum of housing envisaged over the life of the emerging Local Plan. The capacity and deliverability assumptions are overly optimistic. The inclusion of these Sites within the Housing Land Supply which total 309 units are highly questionable without significant further evidence that takes account of site constraints, developable area and the overall viability of development		
1258	HN1.3 Highmere Drive, Connah's Quay	Object	There are inconsistencies in the way the council has assessed potential sites, with reference to the assessment of our client's site. Background Paper 9 'Assessment of Candidate Sites and Alternative Sites' (2019), which forms part of the LDP evidence base, discusses the site (ref: BROU001) and states: 'The site is well defined by existing roads and wraps around existing residential development… Although the site is in close proximity to Bretton, the configuration of the site and its relationship with Bretton would ensure that development would not harm the present character and appearance of	Need to allocate more sites.	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the settlement…' 'The site is considered suitable at present for consideration as an allocation.' [NJL Consulting emphasis] The evidence base is clear that the site is appropriate for residential development and should be considered for allocation, yet an allocation has not been taken forward. However, other less sustainable and less deliverable sites are allocated. For example, Northop Road (Flint) has no planning consent (two applications from September 2017 (ref: 057565) for 20 units and April 2018 (ref: 058314) for 145 units remain undetermined) and has identified constraints to delivery, yet the site is allocated. The same applies to the New Brighton (Cae Isa) site (Site 10), which is proposed to be allocated for 105 units but there is no clear evidence of delivery yet clear evidence of constraints. Two further sites are proposed for allocation despite previous planning applications being withdrawn or dismissed on Appeal. The Highmere Drive (Connah's Quay) allocation (Site		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			3) was promoted for 185 dwellings in 2005 (ref: 043873) but a subsequent Appeal was withdrawn in 2008 and there has been no progress on the site. The Wrexham Road (Hope) allocation (Site 9) was subject to a now withdrawn planning application from 2018 (ref: 058163), and there has been no further progress. Therefore, the council's assessment of sites is inconsistent. There is a need for additional sites to be allocated, such as Bloor's site BROU001.		
1282	HN1.3 Highmere Drive, Connah's Quay	Object	There is genuine risk that proposed allocations cannot be delivered, either at all or in the timeframes envisaged. Several sites have been simply carried forward (rolled over) from the current LDP despite concerns with delivery. The Local Development Plan ('LDP') Manual (Edition 2) identifies the requirement for a new form of measuring the deliverability of sites, and whether they have a realistic chance of coming forward over the next 5 years. It states "When putting forward sites, developers and landowners should include sufficient data to allow a robust assessment to be made (see section 6.4.1&2) including affordable housing, community infrastructure and	Allocate additional sites.	See response to id 597

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			that the development is financially viable." The draft LPD Manual 3 (which was consulted on by Welsh Government in September 2019) then goes a step further. Table 18 in draft Manual 3 states that historic allocations should only be 'Rolled Forward' from previous plans where 'careful justification' is given that there has been a 'substantial change in circumstances to demonstrate sites can be delivered and justify being included again'. This is relevant as many of the proposed housing allocations have been simply 'Rolled Forward'. The table at Appendix 2 shows the housing allocations and our analysis of realistic deliverability. It identifies 6 of the 11 housing allocations are undeliverable in the next 5 years and a further 4 have questionable delivery over the plan period. This has significant implications for the 5-year supply position and overall delivery of the plan. The Highmere Drive allocation (emerging Policy HN1, Site 1) was also first identified in the UDP preparation stage in 2004. There is no developer attached to the site and there has been no planning application since an application for residential development		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			and subsequent appeal were dismissed prior to 2008. The site has been identified since 2004 and has been included in the 5-year housing land supply since 2010, with no progress made so far. There is no clear evidence to demonstrate deliverability, therefore we consider the site should not be allocated. Furthermore, the LDP approach to assessing potential allocations is inconsistent and this further undermines the soundness of the sites which are simply rolled forward.		
1239	HN1.3 Highmere Drive, Connah's Quay	Support	Highmere Drive, Connah's Quay, 150 units A water supply can be provided for this site. The public sewerage network can accept potential foul flows from this development site. Connah's Quay Wastewater Treatment Works (WwTW) can accommodate foul flows from the proposed development site.		See response to id 597
566	HN1.4 Northop Road, Flint	Object	I have been instructed by Flint Town Council to register an objection to the proposed housing allocation at Northop Road, Flint (Ref. HN1-4) for up to 170 dwellings. the site in question is located at the extreme southern end of the town and it extends into open countryside. The site is some distance from Flint Town Centre itself which is not within reasonable walking distance. On this basis, it is highly probable that future	Removal of Northop Road Flint allocation.	HN1.4 Northop Road Flint Not accepted. The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and prepared one response covering all points made in support and in objection to the site. Therefore the

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			residents would be reliant on private motor vehicles to go about much of their daily business. To this end, the proposed allocation conflicts with Planning Policy Wales which states that minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport are important considerations when selecting sites for new residential development (paragraph 3.38). It also conflicts with policy STR4 of the emerging LDP which states that new development should be accessible and connected, allowing ease of movement. For these reasons, it is asserted that the proposed allocation is not a sustainable location for such a significant amount of housing. Accordingly, it does not meet the first test of soundness ie. it does not fit with the aspirations of national planning policy and the principles of sustainable development. In light of the above, the Council is respectfully invited to reconsider the soundness of this proposed housing allocation.		following response may cover additional issues to those raised by the objector. **General** Flint is a large settlement and is Categorised as a Tier 1 settlement which has a wide range of facilities, services and employment. The town has the benefit of a main line railway station and has good bus links to Chester, Mold and Holywell. In the UDP (and the previous draft North Flintshire Local Plan) it was seen as a sustainable location for growth with the Croes Atti development representing a main focus for this. Since the development of Croes Atti has made good progress in recent years it was felt appropriate that this Tier 1 sustainable settlement was capable of supporting an allocation in the LDP. The Northop Road site was considered at the time of the UDP and originally allocated in the deposit UDP. At that time the site at Croes Atti had gained planning permission for over 600 dwellings but had not commenced at the time of the UDP Inquiry. The allocation was subsequently removed from the deposit plan by proposed change PC322, in order to allow the development of the large site at Croes Atti to be brought forward given its committed status. Although not allocated for housing or included within the settlement boundary in the adopted UDP, the land was not designated as green barrier in order to allow future consideration of the site as a housing allocation when the UDP was reviewed as part of progressing the LDP.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					The UDP Inspector supported the Council's proposed change PC 322 which was to delete that part of allocation HSG1(11) between Halkyn Road and Northop Road and in doing so commented - ''The Croes Atti site will provide a mixed use development to be phased over the duration of the plan. I consider the planning permission on that site to be a material change in circumstances that justifies the review of the allocations in Flint. Given its scale it is reasonable not to release a further substantial area of land in Flint until progress has been made on its development. It is for this reason that PC322 deletes HSG1(11) and amends the settlement boundary accordingly. '' The inspector also states in Chapter 4 GEN5:5 '' I support the deletion of the allocation between Halkyn Road and Northop Road. 4.78.5. In order to introduce a degree of permanence to the identified green barriers and ensure that they will not fundamentally change again; and in the knowledge that the LDP preparation will inevitably bring about some changes, the areas where it is considered there may be potential for further development have not been included within the green barrier. I consider this is a sensible approach which will ensure a level of consistency with future plans. In this case the Council does not discount the possibility that the area may be considered appropriate for development in the future and on that basis does not designate it a green barrier.'' The location of the site is within reasonable distance of the town and main facilities. The site is within 1200m of Flint town centre and there is a convenience store at the garage on Northop Road directly opposite to the site. Also

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					there is a local shopping parade some 450metres from the site with a range of outlets including a convenience store, takeaways, other businesses and a pub serving food. The nearest bus stop is on Northop Road approximately 120 m from the site where the number 28 bus runs an hourly service to and from Flint town centre (where there are with good links to Chester and Holywell) and Mold on Monday to Saturday. Flint High school is 300m from the site and there are also three primary schools, Cornist School, Gwynedd School and St Marys Catholic Primary School approximately 1500m distance from the site. The site is also within easy reach of Active Travel Routes around Flint being approximately 250m from Route FL9 and 1100m to FL6/1 and FL6/2. The site is therefore considered to be within reasonable walking distances of a wide range of services and facilities, both locally and in the town centre. There is also a good bus service linking the site with Flint and Mold The site is considered to be in a highly sustainable location. As such it does fit with the aspirations of the national planning policy. Two planning applications have also been submitted by separate house builders on this site demonstrating that there is genuine developer interest and that the site is capable of being developed early on in the plan period. The two planning applications were submitted on a speculative basis in the light of the [then] 'considerable' weight to be attached to increasing housing land supply in TAN1. The applications are accompanied by a large number of background studies. However, the Council

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					considers that the site should be developed on a more coordinated basis with a single vehicular access to serve both sites rather than two vehicular accesses. This will enable a much improved layout in terms of placemaking considerations. Discussions with both applicants indicate that this is achievable. With the exception of some further ecological work, which will be aided by the single point of access and more coordinated approach to delivering the site, the Council is unaware of any other constraints. The representor mentions that there are ‘’identified constraints’’ to the delivery of this site but makes no further comments on what those constraints are. The site is in the control of two developers who have agreed to work together to bring it forward, it therefore has the potential to make a contribution to the housing supply from 2021 as set out in the trajectory. Traffic Flintshire Council’s Highway Development Control department have been consulted and have not objected to the allocation of this site. Highways have stated that “It would appear possible to construct a junction (roundabout) on Northop Road that would be appropriate to serve a development of this size however careful consideration would need to be given to the existing petrol filling station.” **Alternative sites at Oakenholt** The objector suggests that alternative sites at Oakenholt would be more suitable than the allocation at Northop

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					Road due to the planned new road to link the A55 with the M56. However the objector has not provided a site for the Council to consider. The existing Croes Atti development, at the base date of the Plan's Housing Balance Sheet (April 2018) still had 378 units remaining to be constructed and it would be inappropriate to locate further growth in one part of the town. The Plans approach of locating development in two parts of the town is more balanced and sustainable. The land for the planned new road (Red Route) has been safeguarded on the LDP proposals map, however the road is not under construction and timescales are presently unclear, therefore it would be premature to locate further growth at Oakenholt at this stage, using the objector's logic. The Northop Road allocation is a sustainable option, with no objection from Highways. Flint is a Tier 1 settlement capable of accommodating this growth sustainably.
164	HN1.4 Northop Road, Flint	Object	Proposed Housing development Northop Road flint. I wish to object to this part of the plan because 1 the planning inspectorate ruled against this land in the last plan because the inspector wanted to avoid developments that only provide housing to those who will just leave to work away from the community, this site will do that as residents will just turn right every morning and head to the a55 to work elsewhere. Also it will add not just	Removal of allocated site	See response to id 566

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			160 extra vehicles to Northop Road daily but double that as every family has two cars plus additional online shopping delivery plus all other online delivery products. This will add to an already overused road consisting of heavy lorries and fast moving traffic. Another reason given by the inspector was that flint already has sufficient provision for housing due to the large development at Oakenholt. The comments made were that 650 house still to be built. The proposed development plan shows that flint has the largest number of houses where permission is already granted still to be built. I would suggest that flint does not need the Northop road development at this time. If further development is to be granted I would suggest that Oakenholt is better placed given that congestion will be eased via the new red route planned to link the a55 with the m56		
1073	HN1.4 Northop Road, Flint	Object	HN1.4 - Northop Road - There seems to be a discrepancy with the allocation boundary and Flood Zone C2, with the allocation boundary overlapping a small area of the C2 flood zone. This may have arisen through recent map updates. We suggest this is explored and if needed the allocation boundaries amended to remove HVD allocation form C2. The flood outlines shown on our Flood Risk Map are based on a	HN1.4 - Northop Road - There seems to be a discrepancy with the allocation boundary and Flood Zone C2, with the allocation boundary overlapping a small area of the C2 flood zone. This may have arisen through	See response to id 566

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			present-day scenario and do not take account of the potential impacts of climate change. Given the proximity of the site to the flood outline, we would recommend that it would be prudent to undertake a Flood Consequences Assessment (FCA) in support of this allocation. This is in order to identify potential flood risks and to ensure that flood risk posed to the allocated site is managed over the lifetime of development. We also recommend that the Lead Local Flood Authority (LLFA) is consulted in order to gain their views on this proposed allocation, and to establish whether they have any information relating to flood risk posed by Swinchiard Brook (which is an Ordinary Watercourse) and any historical issues of blockage at the structures within the vicinity of the site. HN1.5 &1.6 - We would welcome inclusion in the policy wording/reasoned justification to draw the following to the attention of future developers e.g.: For major sites that lie within the visual setting of the AONB/ face open countryside, attention to boundary planting; use of recessive colours and non-reflective finishes to roofs and building elevations; and the limited use of lighting (designed to dark sky standards) will be important planning considerations. In regard to supporting	recent map updates. We suggest this is explored and if needed the allocation boundaries amended to remove HVD allocation form C2. The flood outlines shown on our Flood Risk Map are based on a present-day scenario and do not take account of the potential impacts of climate change. Given the proximity of the site to the flood outline, we would recommend that it would be prudent to undertake a Flood Consequences Assessment (FCA) in support of this allocation. This is in order to identify potential flood risks and to ensure that flood risk posed to the allocated site is managed over the	

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the delivery of place making development, Environmental Colour Assessment may be required to develop an appropriate colour palette in addition to building design that reflects what is locally characteristic and distinctive.	lifetime of development. We also recommend that the Lead Local Flood Authority (LLFA) is consulted in order to gain their views on this proposed allocation, and to establish whether they have any information relating to flood risk posed by Swinchiard Brook (which is an Ordinary Watercourse) and any historical issues of blockage at the structures within the vicinity of the site. HN1.5 &1.6 - We would welcome inclusion in the policy wording/reasoned justification to draw the following to the attention of future developers e.g.: For major sites that lie within the visual setting of the AONB/	

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				face open countryside, attention to boundary planting; use of recessive colours and non-reflective finishes to roofs and building elevations; and the limited use of lighting (designed to dark sky standards) will be important planning considerations. In regard to supporting the delivery of place making development, Environmental Colour Assessment may be required to develop an appropriate colour palette in addition to building design that reflects what is locally characteristic and distinctive.	
1256	HN1.4 Northop Road, Flint	Object	There are inconsistencies in the way the council has assessed potential sites, with reference to the assessment of our client's site. Background Paper 9 'Assessment of Candidate Sites and	More sites need to be allocated	See response to id 566

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Alternative Sites' (2019), which forms part of the LDP evidence base, discusses the site (ref: BROU001) and states: 'The site is well defined by existing roads and wraps around existing residential development… Although the site is in close proximity to Bretton, the configuration of the site and its relationship with Bretton would ensure that development would not harm the present character and appearance of the settlement…' 'The site is considered suitable at present for consideration as an allocation.' [NJL Consulting emphasis] The evidence base is clear that the site is appropriate for residential development and should be considered for allocation, yet an allocation has not been taken forward. However, other less sustainable and less deliverable sites are allocated. For example, Northop Road (Flint) has no planning consent (two applications from September 2017 (ref: 057565) for 20 units and April 2018 (ref: 058314) for 145 units remain undetermined) and has identified constraints to delivery, yet the site is allocated. The same		

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			applies to the New Brighton (Cae Isa) site (Site 10), which is proposed to be allocated for 105 units but there is no clear evidence of delivery yet clear evidence of constraints. Two further sites are proposed for allocation despite previous planning applications being withdrawn or dismissed on Appeal. The Highmere Drive (Connah's Quay) allocation (Site 3) was promoted for 185 dwellings in 2005 (ref: 043873) but a subsequent Appeal was withdrawn in 2008 and there has been no progress on the site. The Wrexham Road (Hope) allocation (Site 9) was subject to a now withdrawn planning application from 2018 (ref: 058163), and there has been no further progress. Therefore, the council's assessment of sites is inconsistent. There is a need for additional sites to be allocated, such as Bloor's site BROU001.		
1284	HN1.4 Northop Road, Flint	Object	There is genuine risk that proposed allocations cannot be delivered, either at all or in the timeframes envisaged. Several sites have been simply carried forward (rolled over) from the current LDP despite concerns with delivery.	Allocate additional sites.	See response to id 566

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			The Local Development Plan ('LDP') Manual (Edition 2) identifies the requirement for a new form of measuring the deliverability of sites, and whether they have a realistic chance of coming forward over the next 5 years. It states "When putting forward sites, developers and landowners should include sufficient data to allow a robust assessment to be made (see section 6.4.1&2) including affordable housing, community infrastructure and that the development is financially viable." The draft LPD Manual 3 (which was consulted on by Welsh Government in September 2019) then goes a step further. Table 18 in draft Manual 3 states that historic allocations should only be 'Rolled Forward' from previous plans where 'careful justification' is given that there has been a 'substantial change in circumstances to demonstrate sites can be delivered and justify being included again'. This is relevant as many of the proposed housing allocations have been simply 'Rolled Forward'. The table at Appendix 2 shows the housing allocations and our analysis of realistic deliverability. It identifies 6 of the 11 housing allocations are		

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			undeliverable in the next 5 years and a further 4 have questionable delivery over the plan period. This has significant implications for the 5-year supply position and overall delivery of the plan. For example, Northop Road (Flint) technically has no planning consent (two applications from September 2017 (ref: 057565) for 20 units and April 2018 (ref: 058314) for 145 units remain undetermined) yet is allocated. No clear evidence of delivery.		
367	HN1.4 Northop Road, Flint	Support	1.3 The Site was promoted at earlier stages of the Local Plan process (Candidate Site references FLI007 & FLI015). Anwyl Land currently have legal agreements in place with two of the three landowners that own land forming part of this draft Allocation – by way of Promotion Agreements. Discussions are taking place with the remaining landowner regarding a collaboration agreement. All landowners agree there are no ransom situations in terms of access, and it is noted the proposed Allocation is to be served by a single access. The Site Location Plan at Appendix 1 confirms the area of land currently controlled by Anwyl Land, and the Illustrative Layout at Appendix 2 demonstrates how the site can be served via one vehicular access from Northop Road, via two separate planning application (which is		Support noted See response to id566

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			the subject of the draft collaboration agreement between all of the interested parties). 1.4 The Draft Allocation identifies 170 dwellings within the LDP Deposit Draft (Allocation HN1-4 Land at Northop Road) and these representations demonstrate why the Site is deliverable. Please also see attached Representation due to word restriction limits for this question		
1240	HN1.4 Northop Road, Flint	Support	Northop Road, Flint, 170 units Welsh Water has made representations on this proposed site through planning application 058314. A water supply can be provided for this site. The public sewerage network can accept potential foul flows from this development site. Flint Wastewater Treatment Works (WwTW) can accommodate foul flows from the proposed development site.		See response to id 566
1241	HN1.5 Maes Gwern, Mold	Support	Maes Gwern, Mold, 160 units This site has planning permission and we have no further comment to make. Welsh Water made representations on this site through planning application 056742 and 058992.		Support Noted.
283	HN1.6 Land between Denbigh Road and	Object	Clearly, MOL025/044/045 is a long way from being the best option for a number of reasons which singly and cumulatively make it a poor choice compared to some of the other sites available: (1) it is the most actively	Reassess the H1.6 site and retain the UDP Inspectors' judgement of this site as a countryside site. The	**HN1.6 Land Between Denbigh Road and Gwernaffield Road, Mold** Not accepted. The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all

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	Gwernaffield Rd, Mold		farmed of these sites; (2) it sits most prominently within a green landscape, visible from major approaches to Mold (3) is the most obviously "open countryside" site of them all with rolling hills on three sides. (The UDP Inspector alluded to the "significant incursion" into the countryside represented by developing this site); (4) has the least favourable location in terms of the road infrastructure; (5) has a significant mains trunk water pipe on site prone to emergency flooding; (6) is a flood risk; (7) sits in close proximity to a chemical factory (8) it sits in an area of Physical Environment Deprivation according to The Welsh index of Multiple Deprivation (12th worst out of 1909) In the Housing Land Monitoring Report Para 3.5, FCC claim that "the LDP will ensure that sites can be identified based on a rigorous and transparent assessment and against an agreed spatial strategy rather than on an ad hoc basis." That should surely apply to all the site assessments and documents but as shown above the assessments are not objective, rigorous or transparent. There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 3.40	assessment is not objective as commented elsewhere. Close study of Background Paper 8 reveals that in the assessment of the largest sites in Mold, they all repeat the mantra that the MOL025/044/045/H 1.6 site is preferable for development, but the reasoning is inconsistent, citing features that could just as easily apply to the H1.6 site. The other sites (e.g. MOL002, MOL007, MOL019, MOL024, MOL041) are said to be: open countryside, too conspicuous in the landscape, not very urban etc. It seems clear to me that the assessor has decided that the H1.6 site is to be the sacrificial lamb that will not be	points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. **Petition** A petition with 102 signatures has made the following objections: • Scale of allocation • Increased traffic • Wildlife • Agricultural land • Water pipe • Sewerage problems • Surface water / fluvial flood risk These points are addressed below. **Compliance with PPW** The Plan and the choice of allocated sites has been prepared in the context of the latest version of Planning Policy Wales (version 10). The Plan is supported by a Sustainability Appraisal which forms part of a broader Integrated Impact Assessment (IIA). The spatial distribution of growth across the County is based on a revised settlement hierarchy which is informed by a comprehensive series of settlement audits which sought

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				defended/protected, in order to save the other sites. Perhaps they feel that there has been "enough development already" in the south/south west area of Mold. If so, I would point to the UDP Inspector's guidance, last time around, that he/she was not convinced by the argument that an accessible area needs a period of respite (see S3.5.38 of the Inspector's report).	to establish the sustainability of each settlement and its position in the revised settlement hierarchy. Mold is clearly a Tier 1 settlement which is a sustainable location for accommodating planned growth and the Background Paper 'Candidate Sites' provided a summary explanation as to whether each site was or was not suitable to be considered as an allocation. The site between Denbigh Rd and Gwernaffield site is clearly an edge of settlement site. The Plan is considered to be in conformity with PPW. **General** The Plan preparation has involved a number of distinct stages, each of which has involved engagement and consultation. The Deposit Plan was in the public domain (as part of reports to Cabinet and Council) several months before it was made available for consultation in September 2019. The Plan was available in Council offices and libraries, permanent exhibitions were in place at Offices and libraries and drop in sessions were arranged including one in Mold in the early part of the consultation process. Elected Members and members of Town and Community Councils were given the opportunity to attend briefing sessions at County Hall ahead of the consultations. The Plan was advertised by public notice, by prominent exposure on the Council's website, by direct mailings to those persons who had requested to be added to a mailing list, by the placing of site notices at the sites of housing allocations and by social media posts by the Councils PR team. It is not possible to write to every household in the County. The Plan has embraced a growth led strategy in the broader context of North East Wales forming part of the

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					Growth Bid, and the draft NDF confirming that Wrexham and Deeside are seen as a focus for growth. The Council is required by Welsh Government (Development Plan Manual 3) to have a flexibility allowance of at least 10%. The Welsh Government commented on the Plan Strategy 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect.' The existing haulage business is accessed off Pool House lane and the allocation will allow for access to be retained to the property / business. The allocation will also restrict residential development to the land to the south of Pool House Lane which result in a buffer between housing and the haulage business. The site may be in an area of Physical Environment Deprivation based on the Welsh Index but it is not explained why this should prevent new development from providing a quality residential environment which would benefit future residents. In respect of air quality, the North Wales Authorities Collaborative Project '2019 Air Quality Progress Report' states that 'The North Wales Authorities have not declared any Air Quality Management Areas (AQMAs) and as a result, have not published an Action Plan'. In respect of proximity to Synthite there are residential properties closer than the allocated site, which is separated by a buffer of open land. No objections to the allocation have been made from Health and Safety Executive or from any other statutory consultee. In respect of flood risk there is no objection from NRW to this allocation. The IIA has been undertaken on behalf of the Council by specialist consultants Arcadis using well established procedures and guideline and based on

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					experience of undertaking IIA and Sustainability Appraisal of projects, plans and strategies. The IIA is clearly presented and explained and is considered to be compliant with Regulations. The Plan has been prepared over a number of years and through a number of distinct stages where documents have been the subject of engagement and consultation. The Plans preparation has been overseen by a small working group of Members who are drawn from the planning committee but whose role in relation to the LDP is to oversee its production and make recommendations to the Council's Cabinet. The membership has remained stable throughout the process to ensure familiarity with the Plan and consistency in considering its progression. It would not be reasonable for every supporting document to be considered by Planning Strategy Group, and this would also apply to Cabinet and then Full Council. The recommendations to Cabinet and Full Council recognised that the Plan had been endorsed by Planning Strategy Group and produced in line with and justified by an extensive evidence base. A comprehensive range of documents have been provided as part of the consultation and it is the purpose of this consultation to enable interested parties to make representations both to the plan and the supporting evidence. Clearly there will be differences of opinion of certain documents and it is the purpose of examining the Plan to enable these to be considered. Clearly objectors have opinions about the Council's evidence base and the degree to which it supports the Plan's allocations, but whilst the various documents mentioned are criticized by objectors, there is

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					no clear evidence or alternative assessments submitted that add weight to these opinions. Existing housing is closer to Synthite than the proposed housing on the allocated site would be. There is also a buffer between the allocated site and the Synthite site which is formed by the land on the south side of Denbigh Road. No representations have been made by Health and Safety Executive or from any other statutory consultee. The settlement audit for Mold identifies a base dwelling stock of approximately 4,500 dwellings for Mold and in this context it is not accepted that the 246 anticipated yield from this site is disproportionate to the size or character of Mold. The town has a range of employment opportunities and is the administrative centre for the County and is less than 10 miles and less than 20 mins from Deeside Industrial Park. Mold is one of the County's most vibrant Main Service Centres and is a sustainable location to accommodate growth. There are no green belts in the Plan. The land to the north west of Mold is not green barrier as there is no risk of coalescence with any nearby settlements. **Non-conformity with Mold Town Plan** FCC has worked with Mold Town Council on a number of recent studies including Mold Sense of Place Study, the Mold Opportunity Sites Study, the Mold Town Plan and the Mold Green Band project and whilst it helped resource the production of the Town Plan, this was done independently by the Town Council. The Mold Town Plan

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					identified that the north western part of Mold was the preferred area for the future growth of the town. It identified sites on the north and south of Gwernaffield Road but only proposed that half the width of each site was developed. Rather than working with firm and defensible physical boundaries, the Town Plan sought to create new artificial boundaries in the belief that this would reduce visual impact of development in the landscape. The Town Plan approach would necessitate all access from Gwernaffield Road or from existing residential estate roads. Instead, the LDP seeks to work within existing landscape features and to provide a new vehicular access off Denbigh Road which can relieve pressure from existing estate roads and known pinchpoints at Dreflan. There is therefore close conformity both with the principle of growth in this location and the quantum of growth in the LPD period, but where the LDP approach is a more sustainable use of land and also has the potential to facilitate more sustainable future growth and development in this location, which can be considered as part of a review of the LDP. **Alternative Sites** Mold has strategic spatial constraints in terms of the direction for growth which, in combination, point to the north west of the town representing the most suitable and sustainable option for further growth. This has also been recognised by the Town Council as part of the Town Plan. The River Alyn Valley to the north and east of the town represents a flood risk constraint, the green barrier seeks to protect the relatively narrow gaps between Mold and outlying settlements, particularly between Mold and Mynydd Isa to the north east and Mold and

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					Gwernymynydd to the south west. The A494(T) bypass to the south of the settlement effectively provides an outer edge to the expansion of the town. The north western part of the town is therefore the only location free from such strategic spatial constraints. It is not accepted that land to the north and south of Ruthin Rd is within the 'Mold boundary'. To the north of Ruthin Rd the settlement boundary follows the edge of existing built development and land to the west is part of the green barrier between Mold and Gwernymynydd. To the south of Ruthin Road the land also forms part of the green barrier between Mold and Gwernymynydd and is part of a very attractive and sensitive gateway to Mold given its visibility from the A494(T) and Ruthin Rd and the presence of the listed former Mold Jail. Development of this land would harm the purpose of the green barrier between the two settlements and also harm the setting of an important historic asset. The Pen y Bont site may sit within the line of the A494(T) bypass but it does not fall within the settlement boundary for the town which follows the line of existing built development at Woodlands Road. Successive development plan Inspectors and a planning appeal Inspector have concluded that the site forms an integral part of the green barrier between Mold and Mynydd Isa. Adopting a sequential approach it is entirely inappropriate to seek to develop land within a green barrier ahead of land to the north west of Mold which is not within a green barrier. In preparing a development plan and identifying housing allocations it is necessary to balance a number of

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					planning constraints and considerations. Therefore agricultural land must be considered alongside other considerations such as green barrier and flood risk. The preparation of the Plan has involved a comprehensive assessment of agricultural land and the Plan has sought to minimise the loss of BMV land in accordance with national policy. The approach was explained in the Background Paper and Welsh Government has supported in principle the approach taken and has not objected to the allocated site between Denbigh Rd and Gwernaffield Rd. The Plan's housing balance sheet accompanying policy STR11 includes an allowance for windfalls in the form of large sites (10 units or more) and small sites (9 units or less). The Plan adopts a conservative allowance for each type having regard to past trends and the findings of the Urban Capacity Study. This might include apartment schemes or the conversion of vacant buildings as well as residential units above shops. However, it would be entirely inappropriate for the Plan to be too reliant on this form of housing supply as it would be difficult to establish deliverability and the objectors provide no evidence to quantify where or how much potential housing would be available and deliverable from such sources to clarify what is meant by "contribute substantially". It is for this reason that the Plan adopts a modest level of windfall allowances and identifies sustainable housing allocations which are viable and deliverable, providing greater certainty. **Environment Natural**

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					The North Wales Authorities Collaborative Project '2019 Air Quality Progress Report' has established that there are no Air Quality Management Areas identified in the County. There is not considered to be any sources of pollution or noise which would prevent residential development on the site from taking pace on this site. It is not considered that a residential development of 246 houses would harm the living conditions of existing residents and other receptors in terms of pollution and noise. The site is part of a swathe of rolling open countryside. The site is well bounded by strong physical features formed by Pool House Lane and its hedgerows and this will form a strong edge to the settlement. The site is considered to form a logical urban extension to the settlement. Furthermore, no built development will take place on the northern part of the site between Denbigh Road and Pool House Lane and this will enable the provision of SuDS drainage infrastructure as well as acting as a landscaped buffer when the site is viewed from Denbigh Road. The UDP Inspector only considered the land between Pool house Lane and Gwernaffield Road and considered at that time that the site represented a significant incursion into open countryside. It must be borne in mind that the UDP Inspector was satisfied that there was sufficient provision in Mold as a result of allocations at that time so there was no need to look at additional land releases. This is a new Plan and plan period where new housing sites need to be identified and a larger parcel of land is being considered, which brings about other benefits.

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					With the exception of perimeter hedgerows the only features within the site are a group of mature trees. Given the sites agricultural use, improved grassland is of low ecological value. The provision of green infrastructure and landscaping within the site as well as the retention of trees and hedgerows will enable ecological and biodiversity improvements to be made. The comments on individual sites in Background Paper 8 in terms of landscape character and whether sites better relate to open countryside or urban form must also be considered in the context of a wide range of other assessment factors and material planning considerations. The summary assessments in BP08 are only a summary of whether or not a site is suitable or not to be allocated and is the 'front- end' of a detailed assessment database. It is the case that in terms of strategic constraints including flood risk, green barrier designations and the line of the bypass, the north western part of the town is the only practicable area of search for housing allocations. This is also recognised in the Mold Town Plan produced by the Town Council. **Environment Historic** Bailey Hill is a Scheduled Ancient Monument which lies at the northern edge of the town centre and within the conservation area boundary. It is a distinctive landscape feature which is visible from many parts of Mold and the surrounding landscape. The edge of the SAM boundary lies some 470m to the east of the housing allocation and is separated by existing residential development. It is not considered that residential development on the allocation

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					would harm the setting of the SAM and there are no objections from Cadw. The Alleluia Monument is a stone obelisk on a pedestal erected in 1736 to commemorate the alleged 'Alleluia Victory' of the Britons over the Saxons in AD 420 and is a grade II listed structure. It is located on the south side of Gwernaffield Road some 440m to the west of the allocated site but is sited to the west of a substantial woodland belt which effectively screens the monument from the allocated site. It is unclear how housing development on the allocated site would harm the setting of the monument. To the west of Mold lies the Rhual Estate which comprises a range of listed buildings, a historic park and garden, a scheduled ancient monument and archaeological assets. There is also a zone of essential setting which extends southwards and eastwards and narrows to as it extends eastwards to a point on the western side of the junction of Gwernaffield Rd and Pool House Lane, to the west of Groed-Onnen Cottage. There are no built / historic designations within the allocated site and the zone of essential setting does not directly adjoin the site boundary. The archaeological asset comprising the Alyn Tinplate factory pond, lies outside the boundary of the allocation. There is no objection to the allocation from Cadw. **Traffic / Transport** The allocation of the site provides a new access onto Denbigh Road which is an ‘A’ road. Highways

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					Development Management Officers have no objection to the creation of a new access, nor to the impact of traffic generated from the development, on the road network. Rather than using existing residential estate roads to access the development, the principal access will be a new road from the A541. This ensures that the main direction of traffic seeking to access Mold or the highway network, will be along the A541 and directly over the mini roundabout, rather than the alternative which would have been for traffic to emerge onto Gwernaffield Road and then access the mini roundabout via Dreflan, which is known to be problematic. Although the development will result in additional traffic on the surrounding road network not all vehicles will travel along the same road at the same time. Given that the development will incorporate a new road and access onto Denbigh Road it is unclear why objectors consider that it will increase traffic on Gwernaffield Rd. There is no requirement for traffic lights at the new junction with Denbigh Rd as a T-junction arrangement is adequate to serve the site. It is possible to catch service 5 from Mold Bus Station and arrive at locations within Deeside Industrial park between 6.42 and 6.48 and the last bus back to Mold is 18.03. It is therefore possible to travel for work purposes. It should also be stressed that Mold includes existing sources of employment as well as employment allocations to facilitate further employment development. Traffic from the Hendre Quarry is routed through Rhosesmor and not along the A541 into Mold.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					It is considered that Denbigh Road can accommodate traffic arising from the site. **Flooding / Drainage** The boundary of the allocation lies outside the flood risk area as defined in the NRW Development Advice Map accompanying TAN15 Flood Risk. Pockets of surface water flooding on the site can be addressed through a sustainable urban drainage scheme which will limit surface water run-off from the development to the same rate as from a greenfield site. A SuDS scheme will be worked up as the site progresses to the development management stage. The Council is aware of high pressure water pipes across the site and these can be taken account of through the layout and design of the development and easements retained to ensure access for any maintenance. **Services / Facilities / sustainability** The site is approximately an 800m walk to the health centre and approximately 1100m from the Lidl Store on Denbigh Road. A convenience store and fish and chip shop are found in the local shopping parade on Elm Drive a walk of 700m from the edge of the site. The Cross in the middle of the town centre is approximately 1200m from the site. Service no.6 provides an hourly service between Mold and Pantymwyn along Gwernaffield Rd whilst on Denbigh Road service 14 provides a bus every 2 hours between Denbigh and Mold and service 126 an hourly bus service between Mold and Holywell. This edge of town allocation is clearly accessible on foot and by bus to

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					a range of facilities and is only approximately a 1200m walk from Mold Bus Station where other key services are available: • X4 – Mold, Broughton, Chester every 30 mins • 5 – Ellesmere Port, Deeside Industrial park, Queensferry, Buckley, Mold every 1 hr • 28 – Flint, Mold • 29 – Mold, Wrexham • X1 – Ruthin, Mold, Chester. Residents of the new development will be able to access facilities and services without being wholly dependent on a private car for all journeys. The comments of Welsh Water are noted and will be addressed as the site progresses. The site is in close proximity to Mold Community Hospital / Heath centre and there is no objection to the Plan from Betsi Cadwaladr University Health Board. **Deliverability and Availability** The site allocation benefits from a preferred housebuilder who have unilaterally undertaken a range of background and technical assessments. There is no evidence that the site is either unviable or undeliverable.
301	HN1.6 Land between Denbigh	Object	Objection 19: The H1.6 site has drainage issues but there little discussion or a Drainage Plan The Gwernaffield catchment area for rainfall	REmove the site from the allocation as it is perfectly good agricultural	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Road and Gwernaffield Rd, Mold		is known to have a dry soil that experiences very fast run-off during extended period of rainfall. The topography is such that water drains towards the River Alyn, and the site of H1.6 is in its path. As such, this sloped site also experiences fast run-off due to the slope and its own soil characteristics. Since January 2019, the Welsh Government has more stringent policies on Drainage Planning (over and above the normal planning function) with regulatory power. I have not come across a Drainage Plan in the documentation so believe that this LDP is non-compliant. Not complaint with PPW paragraph: 1.34(i) Referral required, 3.40, 6.6.3, 6.6.16, 6.6.22, 6.6.26 Deposit LDP Para 7.3 states that housing development will be directed to the most sustainable and viable locations. This clearly does not apply to site H1.6 which is not sustainable and not viable Para 8.15 notes the risk of localised flooding but fails to explore this issue fully in the case of site H1.6 and the Gwernaffield rain catchment area and its specific characteristics under extreme rainfall conditions and the effect on the sloped site of H1.6	land but potentially very poor land for development as the site has known drainage issues that have beern omitted from the non-objective assessment	
303	HN1.6 Land between Denbigh	Object	Objection 20: A high-maintenance major trunk high pressure water main cuts across the H1.6 site and has had two catastrophic burst recently causing	Remove Site H1.6 from the allocation as it is unsuitable and the assessment	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Road and Gwernaffield Rd, Mold		local flooding and disruption The candidate site assessment simply states that a “waterbody” crosses the land. In fact there are two Dwr Cymru/Welsh Water high pressure water pipes running across the field requiring that a large section of the site would be given over to easement. One pipe is the Alwen Aqueduct, a major trunk mains pipe supplying water to private consumers and industrial sites in Mold and NE Wales (see leaflet) which has had at least two catastrophic bursts in the winter of 2018/19 , causing several days of flooding and the closure of Factory Pool Lane and flooding in Synthite industrial premises. The contractors, Waterco, were unable to stem the flow on this pipe that is almost 100 years old, eventually closing the water supply at Loggerheads, thereby denying service in Mold while they struggled to solve the problem (The Waterco website has an information leaflet on the aqueduct – see next page). Emergency flooding such as this would present real problems to a housing development, and the people of Mold yet there is no analysis of this in the site assessment document. Not compliant with PPW paragraph: 3.40, 6.6.5, 6.6.9, 6.6.10, Deposit LDP Para 7.3 states that housing development will be directed to the most sustainable	process did not fully recognise the potential problems	

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			and viable locations. This clearly does not apply to site H1.6 which is not sustainable and not viable Para 8.19 states that the quality of water supply and how surface water is treated has to be balanced but significant features on the H1.6 site are ignored – the underground Alwen Aqueduct		
307	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 22: Excessive traffic on the A541 In the Deposit plan, under "Minerals", the recommendation is to reopen the Hendre quarry and to excavate some 11 million tonnes of limestone. This may be a worthy project but that limestone will need to be transported off site most likely along the A541, further exacerbating the Denbigh Road into Mold and potentially further exacerbating the issues to do with Physical Environment Deprivation. To the above can be added the impact of lorries linked to the construction period of any housing development which would put even more pressure on the road system, with all traffic on the A541 having to queue through the (accident prone and narrow) mini-roundabout at the junction with Dreflan. Construction traffic would need to enter and exit the site via Denbigh Road, as it would be unsupportable for those lorries to use the Gwernaffield Road/Dreflan route, an exclusively residential area with its tight 90 degree turn that all traffic has to	Remove site H1.6 from the allocation as the Hendre quarry additional traffic will be pushing the capacity of the A541 without the addition of traffic from 246 new houses. Needs a transport impact assessment.	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			crawl through. Following construction stages, the problem would then be continued by the increased pressure on the A541 from residential users entering and exiting the development. The Paper on “Agricultural land” makes this comment: “A constraint to the westerly expansion of Mold is that the existing road network is poor in terms of its capacity and suitability to serve further development.” I cannot find a Transport Assessment in the documentation that assesses the risks and impact on all residents. Not compliant with PPW paragraph:, 3.21, 3.40, 4.1.4 to 4.1.6, 4.1.47, 4.1.56, 6.7.14		
311	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 23: The LDP and its supporting papers fail to acknowledge that the MOL045/H1.6 site is not particularly well placed either in terms of proximity to services on foot, or access through congested routes to employment and vital services The site assessment in the Plan does not give due consideration to the fact that the nearest shop (Lidl) is one mile away from a central point on the site and the majority of shops, doctors’ surgeries, schools and facilities are on the other side of town. The location is such that most journeys of children to school will be made by car. Most shopping journeys will be by car. Most journeys	Remove site H1.6 from the allocation, It is not a sustainable or viable site and many factors have been missed in its assessment within the Plan	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			to the doctor will be by car. The lack of a railway station means that most journeys to work will be by car. All of this exacerbates emissions and makes the site less sustainable compared to others in Mold. The site does not have access to Mold bypass, and is in the wrong location for ease of access and safe traffic routes. The A541 is a very busy road with many heavy lorries and commercial vehicles as well as cars. New traffic coming off the development would be substantially polluting the road into Mold especially at rush hour, on route to the work destinations mainly in Deeside, Merseyside and NW England. This makes it a non-sustainable site against Planning Policy Wales' guidelines. Cars coming out of the development would be tempted to use rat runs through (1) Gwernaffield Road and Dreflan and (2) Black Brook, a country lane (to bypass the queues on the A541 into Mold and back up towards the A494). Dreflan/Pwll Glas/Gwernaffield Road has a 90 degree turn in the road, and many houses without driveways, so that cars are parked on the road. There would need to be extensive upgrading of the A541 and traffic lights to make all¬¬¬¬¬ this safe. The proposed development would make a significant impact upon the local residential area given the extra		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			volume of traffic and is not compliant with the Well Being Act. Not compliant with PPW paragraph: 1.34(ii) Referral required, 3.21, 3.40, 4.1.4 to 4.1.6, 4.1.13, 4.1.36, 4.1.56		
359	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 25: The Gwernaffield Rd/Denbigh Rd site (and its unique mix of open countryside, farming culture, historic buildings/features, landscape setting) is a gateway into Mold that sets off all of its assets The MOL45/H1.6 site sits about 300 metres from the historic monument, the Allelujha Monument of 1736 commemorating a historic battle in AD420 between the Britons/Welsh and the Picts and Saxon. A late 19th century map (see photo on next page) shows the site , also the position of the original “Factory Pond” at the northern edge of the site, and a Tumulus. Also close to the site is Bailey Hill, a 11th Century Motte and Bailey Castle currently undergoing regeneration under a Heritage Lottery Fund grant of over £1million. The Deposit LDP fails to properly assess the historic and cultural value of the site in this regard. This route into Mold has sufficient appeal and historic assets to support the tourism/visitor offer, which in turn leads to a mixed and resilient local economy. The quality of the landscape in this site is much higher than on other allocated sites in the Mold	Remove site allocation H1.6 and preserve the special character of the north west corner of Mold. Visitors from North Wales use this route and it forms part of the appeal of a small market town with historic and cultural assets as well as a significant proportion of Flintshire's Welsh speakers.	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			area. It is in a different, higher league yet this environmental context is essentially ignored by the LDP's assessment of the site, despite the Welsh Government's instructions to assess environmental context when considering development. The undeveloped north west corner of Mold is the last piece of green land that maintains the identity of Mold as a rural town. It contributes strongly to the character and history of Mold, its landscape and history. FCC should recognise this and protect it. Not compliant with PPW paragraph: 2.19, 3.40, 6.0.2, 6.3.3 to 6.3.4		
361	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 26: Development on site H1.6 would result in loss of habitat connectivity and very old mixed species hedgerows. Whilst there may be not appear to be any rare creatures on the site – only rooks, gulls, starlings, swallows, sparrows, tits, goldfinches, robins, woodpeckers, hedgehogs, badgers - there is a significant corridor of ancient hedgerow running along both sides of Gwernaffield Road and Factory Pool Lane. Faced with climate change, strange weather patterns and loss of habitat, we cannot be complacent about any living creatures, and some birds and mammals once thought common are now becoming endangered. These old hedgerows are old, mixed species	Remove the site allocation H1.6 and preserve the old mixed species hedgerows that form an important part of the biodiverse ecosystem of the area. Hedgerow Regulations should be applied	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			ash, hazel, oak, sycamore, blackthorn, hawthorn, holly and ivy and not replaceable in the short or medium term and so habitat connectivity might be lost for a long time. FCC does not appear to have consulted the Hedgerow Regulations on this matter. Not compliant with PPW paragraph:3.40, 6.4.3, 6.4.4, 6.4.7, 6.4.21, 6.4.25 Deposit LDP Para 12.8 notes the importance of green infrastructure but states that new development “may” be required to “contribute” to green infrastructure. This means that an old hedgerow of significant length on the H1.6 site is not protected if development goes ahead. Para 12.26 refers to Hedgerow Regulations but I see no reference to this in the LDP in relation to site H1.6 or any other site		
449	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffield Road/Denbigh Road Mold. We are greatly concerned about the impact of the proposed development on neighbouring residents. The increase in traffic will lead to even more congestion and greater number of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At peak times traffic along Denbigh Road is already backed up from the King Street roundabout to the mini roundabout at Dreflan and beyond. The	Remove allocation at Gwernaffield Road/Denbigh Road Mold	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			proposed 246 houses could potentially lead to another 500 vehicles regularly travelling along this road, several times each day. We do not think that this is in accordance with the plans aims to providing a sustainable environment with an improved quality and well-being to local residents of Mold.		
453	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffield Road/Denbigh Road Mold. We have run a haulage business adjacent to the site for over 40 years and are very concerned about any negative impact this proposed development will have to the running of this business.	Removal of the allocation at Greenfield Road/Denbigh Road Mold	See response to id 283
534	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objections to Gwernaffield Road Denbigh Road Mold site site 1. Quantity of houses required - the projections within the LDP of 6,950 house plus 14% flexibility and the provision of 8000 to 10,000 jobs is too high. Estimates of housing needs, evidence from the National Development Framework, brownfield sites and the number of house for sale in Mold all show that these figures are too high. 2. Selection and categorisation of the green barrier-land shown in green strips on the attached map shows land within the Mold boundary with good access to the by-pass, land within the by-pass is preferable as the by-pass was built to alleviate traffic, set the town boundary,	Removal of the Gwernaffield Road / Denbigh Road Mold allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			to prevent coalescence and facilitate traffic infrastructure as it exits Mold. 3. Assessment of Gwernaffield Road Denbigh Road Mold –Agricultural Land quality Grade 2 and 3, no highways infrastructure, increased congestion on Denbigh Road, no traffic management plans and road safety issues of using minor roads such as Black Brook. Flood risk, air quality and pollution issues. 4. Water Main –two high pressure trunk water aqueducts mains run through the site, 2 significant busts in the last 12 months. 5. Road Safety – increased traffic on Gwernaffield Road, Park Avenue and Dreflan. Bus services do support travel to Deeside for work with services to meet 24hr shift pattern services from Flint Mancot and Connahs Quay but not Mold. 6. Land quality and use of farm land - the land is Agricultural Grade 2 and 3a.		
604	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	I wish to register our opposition to the building plans on a field between Denbigh Road and Lon y Waun. The field seems to be exceptional agricultural land judging by the cattle and the crops that have been grown there over recent years. It's a healthy open air area which is enjoyed by many in this part of Mold. However, our main reason for opposing this is the inevitable and significant increase in traffic it is bound to cause locally. This	Removal of allocation	See response to id 283

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			is likely to increase safety risks including local children and those starting to make use of the roads for cycling. The development is sure to increase the number of accidents involving local road users particularly near to Dreflan. There's a danger of increasing risks from the impacts of pollution on the health of the local population, particularly children and the elderly. There is also talk that there are water mains on the site. When you consider there are better places to build, I would be grateful if you could please take these objections into consideration.		
268	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	MOLO25/44/45 The plan fails to mention the existence of two high pressure trunk water aqueducts running across the site that burst twice last year causing disruption to residents water supply and flooding to the area and Synthite factory which closed A541 Denbigh road for several days whilst contractors battled to stem the flow. If these bursts had occurred within a residential area it is likely properties would have been flooded. The plan fails to mention that the Mold West ward is very poorly rated in the lowest 10 for Physical Environment, according to the Welsh Index of Multiple Deprivation. This index measures;	Remove allocation.	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			• Air Quality • Pollution • Proximity to industrial sites e.g. Synthite • Flood risk The increased congestion on the A541 will lead to poorer air quality, increased noise, disturbance, dust and hazards along this stretch of road. This would appear to be contrary to PC2 of the LDP which states that any development should not have a significant adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard, or the adverse effects of pollution.The site on Gwernaffield Road/Denbigh Road is the third largest (246 houses) and most prominent piece of actively farmed land proposed for development in the Deposit Plan excluding Warren Hall (300) and the Northern Gateway (1000). The latter two are declared strategic growth sites in officially designated growth areas close to manufacturing and Flintshire's employment land opportunities. Mold is not cited by the Welsh Government as being an area where high growth is being encouraged or targeted, so a 246-dwelling site is not "needed" in the		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			strict sense of the word, nor appropriate. The size of the site is disproportionate to Mold's environment, history, character and culture, and would severely harm the landscape and its contribution to the charm and historic assets of Mold and Flintshire. PPW 10 states 'grades 1, 2 and 3A should be considered as a finite resource for the future and considerable weight should be given to protecting such land from development because of its importance'. It states that this land should only be developed if lower grade land is unavailable or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological that out-weigh the agricultural consideration. The plan fails to mention the very busy A541 road. I understand vehicular access is to be onto the A541 Denbigh Road. I believe that vast majority of these vehicles will travel into Mold to access facilities and employment. This will greatly increase traffic flows on the Denbigh road into Mold. There is currently congestion at peak times at the King Street roundabout with tailbacks to the mini roundabout serving Dreflan/Gwernaffield road. It is reported that there are frequent minor accidents at the mini roundabout and increased		

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			traffic is likely to result in additional problems I believe motorists will make use of Black Brook Road to Sychdyn to gain access to the A55 and to Flint. Motorists will also use Gwernnafield rd/ Dreflan to try to take advantage of the priority right of way at the mini roundabout, this road has a sharp bend which because of cars parked by people's houses often causes traffic to come to a halt in order to negotiate this bend. It is highly dangerous now and will not accommodate an extra 500+ cars each day. I am not aware of any plans from Flintshire C.C. to improve the Denbigh Road or Gwernnafield/Dreflan to accommodate the increased traffic flow. PPW10 (para5.35) requires development plans to set out an integrated planning and transport strategy. The Infrastructure Plan supporting the LDP states that a full Transport Assessment is necessary for the site MOL008/MOL044/MOL045 but does not appear to have been produced under the Road Traffic Reduction Act 1997. PC5 of the LDP on page 119 states new development proposals must be supported by appropriate transport infrastructure, and depending on the nature, scale, location and siting of the proposal, will be required to Mitigate any significant adverse effects upon the transport		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			network that arise from the proposed development including improvements to transport infrastructure and traffic management where required. Flintshire C.C. at its Council meeting on 23rd July 2019 approved the content of the Flintshire Deposit local plan 2015-2030 to go out to consultation. At that meeting the plan was presented to the members but none of the numerous background supporting documents were made available to them to consider or approve. The background documents are now available as part of the consultation and contain considerable amount of detail that helps to explain the deposited plan. All papers should have been made available to all council members prior to the council approving the plan.		
284	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 16: Candidate Site Assessment 'Scoring' Methodology is very poorly explained and executed The LDP's Appendix E "Assessment of Site Allocations" is a very poor assessment document. It suggests that sites are being "scored". This infers it is an objective process. It is not. The site factors are assessed by placing them on a non-continuous scale of effects (Major positive; positive; neutral; adverse; major adverse; uncertain; positive/adverse), but there is no rigorous underpinning methodology to	Reassess site H1.6/MOL044/MOL 4045 as the assessment methodology is weak and not objective and incomplete.	See response to id 283

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			show how the decisions are actually being made. The “Scoring” system used by the IIA (which is not explained or referred to in the “Candidate Sites Assessment Methodology” May 2015 paper) yields it mysterious results for the Gwernaffield Road/Denbigh Road site and some of the assessments are worthy of closer attention. I will focus on the anomalies within the assessment. The plus rating (i.e. positive effects) is given to: • Education – states that one primary school is 1km away also a secondary school and they do have some spaces. But this housing development is for 246 houses, so where will the extra children be educated? And there might well be other developments at the same time, with children all competing for the same few spaces. Appears to be oblivious to the fact that Mold West Ward is in the very bottom 10% for Education Deprivation in Welsh Index of Multiple Deprivation. The + score is therefore puzzling. Neutralizing to zero would be more appropriate • Welsh Language – notes the proximity of 2Km to a Welsh medium secondary school and Welsh medium primary school and this seems to be enough to win this factor a double plus. The “analysis” does not assess the number of places needed by the children in the 246 houses, plus other		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			development sites in Mold. Nor any assessment of how many parents would want/expect their children to attend a Welsh medium school in Mold i.e without key info the double plus "score" is simply optimistic guesswork. The analysis is full of anomalies, weak methodology, and subjective assessments.¬¬ If the Planning Committee cannot show how it arrived at its site allocation decisions via a detailed explanation of methodology (in Appendix E, LDP) and had no Green Barrier Review and no Habitats Regulations Assessment review to inform site assessment then the process and the decisions are unsound. There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 3.4, 6.7.9		
286	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 17: This Deposit Plan advocates using up a finite resource – good quality agricultural land – for housing The Gwernaffield Rd/Denbigh Rd site forms part of the central belt of Grade 2 land stretching through Denbighshire "all the way into Mold" (Flintshire LDP Background Paper 9, p5). There is little or no Grade 1 land in Flintshire so this type of land represents the best and most versatile quality land in our county, and helps to ensure the viability of the farming community and agriculture in our area. It is an	Para 7.3 states that housing development will be directed to the most sustainable and viable locations. This clearly does not apply to site H1.6 which is not sustainable and not viable Para 7.9 & 7.15 the Welsh Govt no longer require a five	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			irreplaceable resource that enhances biodiversity and makes the county more resilient to future environmental change and to climate change. It is also clear that we need to become more self-sufficient in food production and to reduce food miles and the air-freighting of food across continents. Although there is evidence that PPW's hierarchy of questions regarding agricultural land usage has been considered, there is no explicit outline of the relevant answers (that I can find) in relation to the Gwernaffield Rd/Denbigh Rd site). So this is my analysis: • lower grade land sites are available and, furthermore, they are not being as actively farmed for both arable and dairy farming as occurs on the Gwernaffield Rd/Denbigh Rd site • the alternative sites (of lower grade land) are arguably of much lower significance to the landscape and character of Mold than the Gwernaffield Rd/Denbigh Rd site • lower grade land is available within the bypass to the south of Mold, closest to the urban area and the majority of services such as schools, doctors' surgeries, bus routes, and the bypass roads out of Mold. The Inspector of the UDP noted that development on the Gwernaffield Rd/Denbigh Rd site would represent "significant incursion into open countryside". It should also be noted	year supply and in putting forward this site of agricultural land the LDP is in breach of PPW rules and not the most appropriate use of the land In section 9, the list of PC2 requirements (a-f) are all breached by the development of site H1.6 In section 9, the list of PC5 requirement b and c are breached by the development of site H1.6 Changes required to remedy the above	

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			that the Background Paper on the treatment of agricultural land was also only made available in September 2019 so this is another document which could not influence the decisions of Flintshire CC. Again, this is fundamentally unsound, given the sensitivities of the sites under consideration. Not compliant with PPW paragraph 1.19, 1.34(ii) Referral required, 3.40 Deposit LDP Para 9.3 Site H1.6 by virtue of its scale and size (capacity for 246 houses) is prominent in the landscape and will harm the character and nature of that area/setting for listed buildings and historic assets		
300	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 18: Proposed H1.6 site entrance/exit is not resilient against climate change There are unacknowledged issues of resilience and sustainability attached to this site. Flood risk is discussed elsewhere, but there are a few additional points to be made here. In the Habitats Regulations Assessment paper (a paper that was not available until September 2019), on page 50 there is a description of the Gwernaffield Rd/Denbigh Rd site in Mold as “Open countryside in the UDP, abutting settlement boundary. Flood risk on part of MOL044. Site comprises two areas of grazing pasture on northwest edge of Mold”. The plan	Remove the site from the allocation.	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			accompanying the LDP (showing the site designated at H1.6) cuts off part of MOL044, presumably to remove the portion that is plagued by flooding, however, problems remain. In terms of positioning a new exit for a development onto the A541 there are two options: (1) use the existing Factory Pool Lane exit, in which case there is a blind bend obscuring the view of traffic approaching from Denbigh towards Mold; or (2) create a new exit further west from Factory Pool Road, which would improve visibility around the blind bend, but this would put the new exit/junction back into the flood risk area of MOL044 and into the A541/Flood Zone B (see online flood risk map on next page, provided by Natural Resources Wales). Option (1) would require traffic lights on the junction, creating more standing traffic and emissions in an area of known Deprivation of Physical Environment. Not compliant with PPW paragraph: 1.34(i) Referral required, 5.7.3, 6.6.26 Deposit LDP Para 7.3 states that housing development will be directed to the most sustainable and viable locations. This clearly does not apply to site H1.6 which is not sustainable and not viable		
306	HN1.6 Land	Object	Objective 21: Development of site H1.6 could aggravate the pre-existing	Remove site H1.6 from the allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	between Denbigh Road and Gwernaffield Rd, Mold		Physical Environment Deprivation levels in Mold West Wards, a factor not explored in the LDP. Missing information from Appendix A , Spatial Option assessment paper and other assessments as follows: (1) the “lowest 10%” Education Deprivation score on the Welsh Index of Deprivation in Mold West Ward; (2) the impact of proximity to the Synthite chemical factory to H1.6 site is ignored. But in another assessment of candidate sites, Mold Alex was deemed unsuitable for development due to its proximity to Synthite. In fact, Synthite is more or less equidistant to Mold Alex and to the H1.6 site. This is not a rigorous and objective assessment (3) the assessments also consistently fail to record that the Mold West Ward is very poorly rated in the lowest 10% for Physical Environment, according to the Welsh Index of Multiple Deprivation. Mold West 1 scores 12 out of 1909, and Mold West 2 scores 129 out of 1909 (where 1 is worst and 1909 is best). This index measures (i) Air quality/pollution, (ii) Proximity to industrial sites (e.g. Synthite?) and (iii) Flood risk. Surely some analysis should take place before a site is allocated, but the Deposit Plan ignores this abysmal performance and it is not even referenced in the site assessment. This	as there are multiple problems that are not being explored before producing the Plan	

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			omission is curious given the Preferred Strategy IIA report of October 2017 clearly states (under Figure M-3) that low scores on Physical Environment may impact on well-being or quality of life of those living in an area. Also the Welsh Government has promoted the Well Being Act of 2015 to protect people in Wales. No analysis of this issue - barely even recognising its existence –means the Plan is clearly in breach of regulatory guidelines. There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 3.21, 3.40, 5.4.15, 6.7.4 to 6.7.7, 6.7.9, 6.7.16 Deposit LDP Para 8.1 stresses the need to protect habitats and to ensure the environment is one which can play a key role in the health and well being of its communities. Yet in the case of site H1.6, the LDP has not explored the underlying reasons for the extremely poor scores in Mold West Ward for Physical Environment and Education. No analysis and no recognition of an important underlying problem which needs to be understood before proposing housing development which might aggravate the problem.		
358	HN1.6 Land between Denbigh	Object	Objection 25: The Gwernaffield Rd/Denbigh Rd site (and its unique mix of open countryside, farming culture, historic buildings/features, landscape	Remove site allocation H1.6 and preserve the special character of the	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Road and Gwernaffield Rd, Mold		setting) is a gateway into Mold that sets off all of its assets The MOL45/H1.6 site sits about 300 metres from the historic monument, the Allelujha Monument of 1736 commemorating a historic battle in AD420 between the Britons/Welsh and the Picts and Saxon. A late 19th century map (see photo on next page) shows the site , also the position of the original “Factory Pond” at the northern edge of the site, and a Tumulus. Also close to the site is Bailey Hill, a 11th Century Motte and Bailey Castle currently undergoing regeneration under a Heritage Lottery Fund grant of over £1million. The Deposit LDP fails to properly assess the historic and cultural value of the site in this regard. This route into Mold has sufficient appeal and historic assets to support the tourism/visitor offer, which in turn leads to a mixed and resilient local economy. The quality of the landscape in this site is much higher than on other allocated sites in the Mold area. It is in a different, higher league yet this environmental context is essentially ignored by the LDP’s assessment of the site, despite the Welsh Government’s instructions to assess environmental context when considering development. The undeveloped north west corner of Mold is the last piece of green land that	north west corner of Mold. Visitors from North Wales use this route and it forms part of the appeal of a small market town with historic and cultural assets as well as a significant proportion of Flintshire's Welsh speakers.	

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			maintains the identity of Mold as a rural town. It contributes strongly to the character and history of Mold, its landscape and history. FCC should recognise this and protect it. Not compliant with PPW paragraph: 2.19, 3.40, 6.0.2, 6.3.3 to 6.3.4		
364	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection 27: The Plan is insensitive to the disproportionate size of the proposed Gwernaffield Rd/Denbigh Road site which is an actively farmed field on the edge of open countryside. The site on Gwernaffield Road/Denbigh Road is the fourth largest (246 houses) after Hawarden (288), Warren Hall (300) and the Northern Gateway (1000). It is a prominent piece of actively farmed land and feels like open countryside. It seems strange to locate such a large 246-dwelling site in the least accessible corner of Mold, in a town some distance from Deeside, in a location where it is not “needed” in the strict sense of the word, on a greenfield last resort site. Nor is it appropriate in terms of the character of the town. The size of the site is disproportionate to the scale of Mold’s environment, not in harmony with the scale of landscape, and would be detrimental to the quiet residential area in that part of town and also detrimental to its residents. Not compliant with PPW paragraph 3.21, 3.40, 6.7.9. Deposit LDP Para 12.15	Remove site H1.6 from the allocation and revise the plan, proposing more realistic targets for employment and hence houses. Also recognise that the recent Welsh Govt NDF makes it clear that fewer houses will need to be built at the country is ahead of schedule and population and migration patterns show only limited growth in Flintshire for teh next 8 years then a period of static population size. Also FCC have stated that they have "ample choice" of sites (in para	See response to id 283

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			states that new development must sit comfortably in its landscape setting. Clearly this is at odds with development on site H1.6 which was classed as open countryside under the UDP	3.67) of LDP, therefore there is insufficient reasoned justification for using agricultural land for a housing development of this size and in this location, where the road infrastructure is poor, where there is a very real risk of flooding, and in the town of Mold where there is no railway station to transport workers sustainably. This is a very poor location for a large housing development	
446	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffield Road/Denbigh Road Mold. I believe that the assessment that have been undertaken leading to this site being proposed are unsound due to the following reasons: This land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and grazing cows The current landscape is high quality with views towards Mold Famau and the Clwydian range. I am therefore concerned about	Removal of allocated site at Gwernaffield Road, Mold	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards got both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems on Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site, any further bursts nearby would cause significant disruption and flooding to new households.		
450	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffield Road/Denbigh Road Mold. We are opposed to the development of this green field for housing purposes. We are particularly concerned about the use of good quality agricultural land being uses for housing. We consider that there are sites around Mold that have a lower quality of agricultural land which will have less impact on the environment. Some of these sites have	removal of allocated site at Gwernaffield Road/Denbigh Road Mold. allocation of brownfield sites around Mold instead	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			easy access to the Mold Bypass and will have less impact on Mold Town Centre and shorter journey times for people. Recently there has been a growth in the provision of new flat developments for the elderly and young in Mold. We consider that further sites should be found to meet this obvious need within close proximity to the town Centre. We therefore question the need for a large housing estate on the fringe of Mold which is some distance from all amenities and will result in more residents to travel, probably by car. We note that there are a number of vacant premises and unused accommodation above shops and we feel that more work could be done to encourage the redevelopment of derelict spaces and improvement of vacant properties with the town Centre itself. This could contribute substantially to the housing provision.		
857	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Gwernaffield Road and Denbigh Road, Mold – FCC paid for the Mold Town Plan to be developed and Mold Town Council consulted residents and businesses at various stages of the two year process to make sure it reflected what people wanted. MTC took the process seriously and met on numerous occasions over the period to consider the FCC candidate sites and their impact on the town. Section H1 of	Removal of allocation. LDP does not reflect the Mold Town Plan. Rather than filling in on either side of Gwernaffield Road behind the existing ribbon housing, the LDP suggests a large new	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the Mold Town Plan reflects the outcomes of this process. Pages 34, 35 and 38, 39 show the sites MTC identified for housing growth. The LDP does not reflect this and has sited all the housing growth on the west side of Mold at just one site between Gwernaffield Road and Denbigh Road, for 246 units. Rather than filling in on either side of Gwernaffield Road behind the existing ribbon housing, the LDP suggests a large new development which will lead to a stagger in the Mold boundary. In future this will inevitably lead to challenges to develop another equally large housing estate across Gwernaffield Road – just as is happening now with Gower Homes on Ruthin Road Mold, to line up with St Mary's Park. By following the Mold Town Plan there would be a similar number of houses, spread out across two sides of the road with access at different points, which would reduce their impact on the landscape, roads in that area, and be more easily assimilated in west Mold. Drainage and potential for flooding are issues that will need carefully resolving before the Gwernaffield Road and Denbigh Road proposals go ahead. The field in front of Pool House, Denbigh Road is prone to flooding now. Emissions and waste from the Synthite factories on Denbigh	development which will lead to a stagger in the Mold boundary. In future this will inevitably lead to challenges to develop another equally large housing estate across Gwernaffield Road – just as is happening now with Gower Homes on Ruthin Road Mold, to line up with St Mary's Park. By following the Mold Town Plan there would be a similar number of houses, spread out across two sides of the road with access at different points, which would reduce their impact on the landscape, roads in that area, and be more easily assimilated in west Mold.	

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Road are monitored by NRW due to the toxic nature of the chemicals they are producing and transporting from and to the site. As could be seen from the flooding on Denbigh Road earlier this year any excess water onto that site causes problems due to the fact that NRW will not automatically allow accidental surface water from the site to be pumped into the River Alyn. The recent flooding was caused by a leak in the major water pipeline passing across the proposed housing site, because there were problems turning the flow off. It would be essential for any new housing to be sited well clear of that pipeline and it's flood area so any new homes were not flooded if the same thing happened in the future.		
1000	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1006	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1014	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1016	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1043	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and	removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1045	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households. Objection to Allocation at Gwernaffield Road & Denbigh Road, Mold. Concerned about the impact of proposed housing on neighbouring residents. The increase in traffic will lead to even more congestion and a greater number of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			peak times traffic along Denbigh Road is already backed up from the King Street roundabout to the mini roundabout at Dreflan. The proposed 246 houses could potentially lead to another 500 vehicles along this road. We do not think that this is in accordance with the plans aims to provide a sustainable environment.		
1047	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1051	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1087	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to Allocation at Gwernaffield Road & Denbigh Road, Mold. Concerned about the impact of proposed housing on neighbouring residents. The increase in traffic will lead to even more congestion and a greater number of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At peak times traffic along Denbigh Road is already backed up from the King Street roundabout to the mini roundabout at Dreflan. The proposed 246 houses could potentially lead to another 500 vehicles along this road. We do not think that this is in accordance with the plans aims to provide a sustainable environment.	Removal of allocation	See response to id 283
1089	HN1.6 Land between Denbigh	Object	Objection to Allocation at Gwernaffield Road & Denbigh Road, Mold. Concerned about the impact of proposed housing on neighbouring	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Road and Gwernaffield Rd, Mold		residents. The increase in traffic will lead to even more congestion and a greater number of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At peak times traffic along Denbigh Road is already backed up from the King Street roundabout to the mini roundabout at Dreflan. The proposed 246 houses could potentially lead to another 500 vehicles along this road. We do not think that this is in accordance with the plans aims to provide a sustainable environment.		
1091	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to Allocation at Gwernaffield Road & Denbigh Road, Mold. Concerned about the impact of proposed housing on neighbouring residents. The increase in traffic will lead to even more congestion and a greater number of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At peak times traffic along Denbigh Road is already backed up from the King Street roundabout to the mini roundabout at Dreflan. The proposed 246 houses could potentially lead to another 500 vehicles along this road. We do not think that this is in accordance with the plans aims to provide a sustainable environment.	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1104	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	HN1(6) Land between Denbigh Road and Gwernaffield Road Mold. We wish to register our objection to the proposed development. We are greatly concerned about the impact of the development on residents living on Denbigh Road, Gwernaffield Road, and Dreflan. The increase in traffic will lead to even more congestion and greater numbers of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At peak times traffic along Denbigh Road is already backed up from King Street roundabout to the mini roundabout at Dreflan and beyond. The proposed 246 houses could potentially lead to another 500 vehicles regularly travelling along this road several times a day to access shops, schools, work and all leisure facilities in Mold and beyond. We do not think this is in accordance with the plans aim to providing a sustainable environment with an improved quality and well being of local residents.	Removal of allocation	See response to id 283
1114	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to Allocation at Gwernaffield Road/Denbigh Road, Mold. Petition with 102 signatures. Local residents are shocked at the size of the proposed allocation. The main areas of concern are: The perceived increase in traffic on Denbigh Road, Dreflan and Gwernaffield Road leading to greater levels of pollution, at a time when steps	Removal of allocation at Gwernaffield Road/Denbigh Road Mold.	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			should be taken to reduce its environmental impact. It is thought that traffic from the development would exacerbate highway safety issues, where there are already considerable congestion and parking problems in the Denbigh Road and Dreflan areas. The environmental impact of the development with the loss of wildlife havens such as hedgerows, mature trees and ditches and the loss of a quality natural landscape The loss of fertile farming land which should be protected and used only as a last resort. Concerns regarding the high pressure water main crossing the site and the disruption arising from recent bursts Local residents reported problems with the current sewerage system in the area and question the ability of the system to cope with increased demand. Concern has also been expressed regarding the surface water drainage arising from housing and roads on the site being discharged into the River Alyn and the subsequent increased likelihood of flooding this may cause to other parts of Mold and the surrounding area.		
1001	HN1.6 Land between Denbigh Road and	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Gwernaffield Rd, Mold		following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1003	HN1.6 Land between Denbigh	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Road and Gwernaffield Rd, Mold		being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1015	HN1.6 Land between	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Denbigh Road and Gwernaffield Rd, Mold		been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1042	HN1.6 Land	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	between Denbigh Road and Gwernaffield Rd, Mold		believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1044	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			cause significant disruption and flooding to the new households.		
1046	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			on this site any further bursts would cause significant disruption and flooding to the new households.		
1062	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1064	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory.	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
1088	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to Allocation at Gwernaffield Road & Denbigh Road, Mold. Concerned about the impact of proposed housing on neighbouring residents. The increase in traffic will lead to even more congestion and a greater number of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At peak times traffic along Denbigh Road is already backed up from the King Street roundabout to the mini roundabout at Dreflan. The proposed 246 houses could potentially lead to another 500 vehicles along this road. We do not think that this is in accordance with the plans aims to provide a sustainable environment.	Removal of allocation	See response to id 283
1090	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to Allocation at Gwernaffield Road & Denbigh Road, Mold. Concerned about the impact of proposed housing on neighbouring residents. The increase in traffic will lead to even more congestion and a greater number of accidents at the mini roundabout, and will also increase pollution and noise levels in the area. At peak times traffic along Denbigh Road	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			is already backed up from the King Street roundabout to the mini roundabout at Dreflan. The proposed 246 houses could potentially lead to another 500 vehicles along this road. We do not think that this is in accordance with the plans aims to provide a sustainable environment.		
1102	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	HN1(6) Land between Denbigh Road and Gwernaffield Road Mold. We believ the LDP is flawed .1. We were not properly consulted. 2. the Housing targets in the plan are excessive. 3. the site is currenty open countryside grade 2 agricultural land. 4 the land is green belt. 5. ther are trees and birds on the site. 6. Adverse effects the site is on the edge of Mold away from facilities on the character of the area. 7. the plan fails to mention the 2 high pressure waterpipes running through the site 8. the site is close to the synthite works. 8.The road infrastructure is inadequate. 9. increase In demand for health care	Removal of allocation	See response to id 283
1105	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objects to HN1(6) Land between Denbigh Road and Gwernaffield Road, Mold. We are opposed to the development of this green field for housing purposes. We are particularly concerned about the use of good quality agricultural land. There are other sites around Mold of lower quality land which will have less impact on the	Removal of allocation, look at alternative sites around Mold with lower quality agricultural value.	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			environment. Some of the site have easy access to Mold bypass and will have less impact on Mold town centre with shorter journey times for people. There have been new flats in Mold for elderly and the young, further sites should be found to meet this need within close proximity to the town centre. Question the need for a large new housing estate on the fringe of Mold away from all amenities. We note that there are a number of vacant properties and unused accommodation above shops and we feel that more work can be done to encourage the redevelopment of derelict spaces improvement of vacant properties within the town itself. This could contribute substantially to the housing provision and should be considered further in the LDP.		
1248	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to Denbigh Rd Mold Site: 2. GREEN BELT AREAS AROUND MOLD We wish to challenge the methodology of using green barriers to prevent coalescence around Flintshire towns and settlements. PPW10 (Planning Policy Wales Edition 10 December 2018) states that green barriers can be used to prevent the coalescence of large towns and cities from other settlements. In paragraph 4.1 of the LDP you appear to wish to amend the definition to suit the types of	Remove Allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			settlements in the County. We would contend for example Mold is not a large town, as its population in the 2011 census was 10,058. We do not regard this as a large town. 3. CANDIDATE SITE ASSESSMENTS OF MOL025 & MOL045 LAND NORTH OF GWERNAFFIELD ROAD, MOLD AND MOL044 LAND ADJACENT POOL HOUSE, DENBIGH ROAD, MOLD We understand candidate sites were subject to an assessment form, considered by a council group. A summary of the outcome of this assessment is then published in Background paper 8 Assessment of Candidate Sites and Alternative Sites. • WATER MAINS • MOLD FLOOD ALLEVIATION SCHEME • LAND QUALITY • HIGHWAYS		
1250	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Object	Objection to allocation at Gwernaffied Road and Denbigh Road, Mold. I believe the assessments that have been undertaken leading to this site being proposed are unsound due to the following reasons: The land has been actively farmed for many years, with the local farmer regularly fertilizing, cropping and also grazing his cows. The current landscape is high quality with views towards Mold Famau and the Clwydian Range. I am therefore concerned about the visual impact any	Removal of allocation	See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			such development would have. I am concerned about the substantial increase in traffic along the Denbigh Road. As a local resident I am already aware of considerable congestion and minor accidents that have occurred along this busy road. Any additional traffic would significantly increase safety hazards for both commuters and pedestrians. I am not aware of any proposals from the Council to improve the traffic problems along Denbigh Road. There are two high pressured water mains running across the entire site and these mains have burst recently resulting in flooding to the field, Denbigh Road and the local factory. This caused major disruption to the entire area. If houses were to be built on this site any further bursts would cause significant disruption and flooding to the new households.		
325	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Support	The Site has been allocated for 246 dwellings within the LDP Deposit Draft (Allocation HN1-6 Land between Denbigh Road and Gwernaffield Road). The Council has acknowledged that the allocated site represents a logical development opportunity on the edge of a Main Service Centre which is highly sustainable and close to existing services, employment opportunities and is well served by public transport and		See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			the surrounding road network. Part of the Site is also included within the Mold Town Plan (2017-2030) which acknowledges the need for Mold to accommodate new homes to meet growing housing needs. Our client strongly supports this allocation and will work closely with Flintshire County Council in the future to ensure residential development on the site is delivered in a timely manner. the site is available now. Investigations to date have concluded that there are no known constraints that would affect delivery of housing commencing on site within 5 years and so the site offers the opportunity for the early delivery of a high-quality residential development that will provide both market and affordable housing and would make a valuable contribution to addressing housing land supply in Flintshire. The Vision Document which supports this representation summarises the detailed technical investigations which have been undertaken to support the development of this Site for housing. The technical investigations have enabled the development of a Parameters Masterplan which is now proven to be deliverable in the context of Site constraints, this includes matters such as drainage, highways and ecology. Detailed reports can be		

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			provided to the Council on request. The IIA which supports the Flintshire LDP assesses each housing allocation and reasonable alternative sites against the IIA objectives and are presented in Table 6-4 on page 57 of the document. The Site between Denbigh Road & Gwernaffield Road (H1.6) scores favourably or neutral on 9 out of the defined 18 objectives. The contribution the site will make to boosting housing supply and employment provision in the County is noted. The neutral or minor negative effects can be overcome through mitigation. The assessment within the IIA therefore clearly reinforces the allocation for the Site.		
1242	HN1.6 Land between Denbigh Road and Gwernaffield Rd, Mold	Support	Land between Denbigh Road and Gwernaffield Road, Mold, 246 units A water supply can be provided for this site. Potential developers need to be aware that this site is crossed by strategic 19” and 20” water mains and an easement width would be required which may impact upon the housing density achievable on site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage		See response to id 283

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). Mold Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.		

Policy HN1.7

Due to the large number of representations received to this allocation, and the fact that a number of common issues were raised by objectors, a collective response has been provided at the end of this table which covers all of the points raised within each of the individual representations.

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
22	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Not enough infrastructure yet more green belt land lost to cheap nasty housing, the roads can't cope now, I believe it will pose a risk to life scenario with the amount of traffic. Just do your jobs properly and see that this will finish Ewloe and the surrounding area off as a community. Your trying to turn this area into a city with nothing to support it which long term will turn Ewloe into an overcrowded dump	Remove Ewloe site
44	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Flintshire Local Development Plan. Site Reference: EWL017. Name / Location of Site: Land West of Hilltop Close and South of Holywell Road, Ewloe. I am registering my objection to the proposed development of the new housing estate outlined in the Flintshire Local Development Plan, site reference EWL017. As a local resident, my reasons are many: 1. This proposed location is a greenfield site, brownfield sites in the county must be considered as a priority before existing farm land is utilised. 2. The building disruption would be considerable and work has already begun on the Old Boars Head Public House site, which is already a disruption. 3. The traffic that will be generated with regard to this new development will be considerable. Traffic along Holywell Road is already congested at peak times and queues are frequent. 4. Additional pressures on Ewloe Green Primary School (which is already oversubscribed) is a concern. 5. Ewloe is already overdeveloped with commercial buildings that generate traffic congestion.	Removal of allocation.
48	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	I would like to object to the proposed development plan of Holywell Road in Ewloe which goes around and to the sides of Circular Drive. I feel that a development of this scale will negatively impact on the area, not only will it increase traffic on already clogged up roads, the loss of green space and footpaths will have a detrimental effect on a lot of the local residents. At a time when the country is supposed to be aiming to become more self sufficient with Brexit and global warming, I do not see the benefit of building all over farm-land. The schools in Ewloe and Hawarden are already full to bursting and it is nigh on impossible to get a Doctors appointment at the moment because they are also full. Surely the unused and derelict land in towns in Flintshire, not to mention the houses already lying empty would be better than building all over green space. Ewloe has already had it's fair share of new housing estates, very few of which can be afforded by first time buyers. I accept that houses need to be built, but there needs to be the local infrastructure to support them, which Ewloe Green does not have.	Removal of allocation.

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
55	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objections to policy: HM!, STR11, H1.7, Appendix - Deposit LDP, IIA, Site Allocations Assessments. Proposed site in Ewloe Green: massively increased population in the area school are full and oversubscribed doctors surgeries in the area struggle to provide care for existing patients currents roads and layouts are inadequate for such increase in traffic that this development will bring.	The A494 roundabout gives access to the B5127 and B5125. This area is already under severe traffic pressure at various times. Road access needs improving. school and doctors provisions need to be put in place.
163	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the development of housing on the allocated site in Ewloe because houses will be built on a wetland area, under which are a large number of bore holes supplying spring water, some of which is used for drinking. Not only will building on such land put at risk clean drinking water but will cause possible flooding as well. On the grounds that many more houses will inevitably increase the amount of traffic thus increasing pollution and the danger from the number of cars. On the basis that building a large number of houses there will create massive light pollution. on the grounds that building a large number of houses there will destroy substantial amounts of flora and fauna and so be environmentally unsound. on the grounds that the local infrastructure for water and sewerage is rickety and at breaking point. Building more houses on the proposed sites would therefore be a disaster.	Remove allocated site at Ewloe
167	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	I am emailing on behalf of Northop Hall Community Council, who have considered the Local Development Plan in detail and would like their views to be noted as part of the consultation process. Northop Hall Community Council wish to state that they have no objections to the Local Development Plan but would like to express great concern, that improvements are needed at the junction of Holywell Road and Mold Road at Ewloe. Traffic regularly backs up along Holywell Road in the mornings, with a log jam at Ewloe roundabout in the evenings and the Community Council feel, that a large new development in Ewloe could only make the situation significantly worse.	Improvements needed to the Junction of Holywell Road and Mold Road, Ewloe.
169	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	removal of allocated site in Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
175	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. Because homes will be built on a wetland area, under which a large number of bore holes supplying spring water some of which is for drinking. Not only will building on such land put at risk clean drinking water but cause flooding as well. On the basis that building a large number of houses that will create massive light pollution On the grounds that building a large number of houses there will destroy substantial amounts of flora and fauna and so is environmentally unsound On the grounds that local infrastructure for water and sewage is rickety and at breaking point. Building more houses on the proposed sites would therefore be a disaster. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocated site in Ewloe
186	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	The comments relate to the proposed housing development on 13 acres of green belt land with access routes impacting Holywell Road - Ewloe, Green Lane - Ewloe, Old Mold Road - Ewloe and Pinfold Lane - Northop Hall (see plans attached) Environmental Impact: 1. The development site encompasses a natural wetland area 2. Just beneath the surface of the field, adjacent to Holywell Road, are significant water ways which feed the residents of Holywell Road & Stamford Way's bore holes 3. The site's underground water tributaries feed directly into Wepre Country Park which supports, in addition to its ancient woodland, numerous species mammals/birds/fish/amphibians/vegetation/plants. Highways Impact - 1. The policy department confirmed that the Highway's department had yet to fully assess the Health & Safety risk of increased traffic along the country roads which has already seen a 500% increase in traffic since the completion of the following developments Education Services Impact 1. It is worth noting that during the St David's Park development, a new primary school was pledged; this school failed to materialise as the section 106 funds were diverted to other projects. Traffic Pollution Impact - NHS Impact - 1. The owners of the following properties, The Bungalow, Thornfield, and Newbridge Farm have legal easements through the site, allowing unrestricted access to conduct works and inspections on the underground pipe network.	Removal of allocated site at Holywell Road/Green Lane Ewloe.
190	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. I do not believe this is a sound plan. Local schools are over-subscribed now! Pupils are already using mobile classrooms at Ewloe Green. There is no scope to extend this school. Negative impact on road safety at and around Ewloe Green School. Already a dangerous area for pedestrians. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocated site in Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
196	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation at Ewloe
198	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. Excessive tree and hedgerow removal can affect drainage, soil stability, wildlife habitat and appearance of the area. Stress on infrastructure, over development of Ewloe Green. Highway safety. Already struggling with heavy traffic in Ewloe Green. Traffic generation to the whole area. Overlooking/loss of privacy by new development. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of alloacted site at Ewloe
441	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	I would like to add my objections to the Local Development Plan, specifically the proposed development between Holywell Road and Green Lane. I have outlined my objections below: the proposed site is in green barrier land, The Ewloe Green area is already struggling with its local infrastructure. The LDP states that “Tier 1 Main Service Centres” are the preferred locations for new housing developments. Traffic in the area is already pushed to the limit especially at rush hour and school pickup/drop off times. Several environmental issues also make this site unsuitable for this development. These are: 1. The New Inn Brook and the ancient woodland near the site is a SSSI and SAC 2. National Resource Wales maps shows that the site has known surface water flooding issues 3. There are aquifers serving local bore holes in the area. Any damage to these could result in flooding 4. Access to the site would require drainage ditches to be re-routed 5. A footpath goes across the site that is regularly used by local walking/rambling groups	
445	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	I wish to submit my objections to the Ewloe Green allocation: • It goes against FFC policy of accommodating “modest” levels of growth in the Tier 2 classification that Ewloe has been given. It is the largest development included in the LDP • There is not the infrastructure to support such a development in the area directly going against PPW (3.38) • Going on from infrastructure, there is currently school place issues in the school nearest the site and there is on going issues with doctor spaces. One of the health centres serving the area is under special measures. • Significant highway/traffic issues that would be exacerbated • It does not promote a sustainable and safe transport system in the area-lack of public transport links • The high school that serves the area has no safe route to the school from this site. Pupils of the local	Removal of allocated site at Holywell Road /Green Lane Ewloe.

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				high school currently have to cross two busy, dual lane slip roads without any safety precautions; i.e. crossings etc • Environmental/wildlife concerns • The site is in the green barrier as defined by the UDP • It is the only “new” site to be considered in the LDP housing allocations and the two sites which have been combined to form the Ewloe Green allocation were both classed as “amber” in the initial candidate site appraisal and have been placed in the LDP ahead of sites classed as “green”. • The green barrier needs to protect the SSSI and SAC in the vicinity. • There is a risk of coalescence between Ewloe, Shotton, Aston and Connah’s Quay if the green barrier is built on. I would like to also object to the extension proposal of the traveller’s site on Magazine Lane. There was heavy objection to this when it was finally passed.	
447	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	We are writing this email to OBJECT to the proposed housing development at Holywell Road/Green lane, Ewloe, Deeside, Flintshire. This is green belt land and I believe that it is national policy NOT to build on such land. Access to the site would have a huge impact on both traffic and pollution levels on already congested roads making it unsafe. I feel that the local infrastructure has not been considered and this development would have a huge impact on local schools, doctor's surgeries and roads. Local schools are already at full capacity due to the closure of other schools in the area. Parking at these schools is already a major concern. It is a struggle to get an appointment at the local doctor's surgery.. Local roads, especially Holywell Road, Mold Road and St David's Park Road, are already ridiculously busy, even more so at peak times, which causes a knock on effect on other roads including Carlines Park estate. Hundreds more cars increases pollution, something which the council are clearly already concerned about hence the introduction of the new speed limit along the A494. I would also like to point out that the FLDP Consultation Portal is not at all user friendly	Removal of allocated site at Holywell Road /Green Lane Ewloe.
477	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation Ewloe Environmental Impact - emissions from traffic, loss of trees, impact on wildlife Inadequate Infrastructure – traffic issues, Coalescence of villages – further urban sprawl as Buckley draws ever closer to Ewloe	Removal of allocation at Ewloe
485	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	I am writing to you as a Community Councillor for Ewloe and governor of a local school in regards to the Local Development Plan. I have had a large number of people speak to me regarding future developments in the area and their concerns over them. These concerns not only come from people living in the vicinity of the proposed sites but people from all over the Ward of Ewloe and the area Hawarden Community Council covers. Concerns raised include: The effects to local services included GP surgeries, dentist and local hospitals People are struggling to get appointments to been seen by a GP already extra people in the area would	Removal of Ewloe allocation.

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				just make this situation worse. The impact on our primary schools and high school I believe several schools are already over subscribed. The environmental impact to the area. Not only expanding the size of Ewloe by building past the current boundaries but we will be losing green fields forever. Also recently the A494 Aston Hill has had average speed cameras place there this is not for speed but because of pollution any homes build locally now would only add to the pollution. The extra traffic to the area Not only this have a environmental impact as mentioned above but also an impact to the condition of our roads and the safety of our children and pedestrians I could go into a lot further depth into each of these concerns but know you will be receiving much more correspondence from others regarding the LDP so wanted to keep it as brief as I could. Please keep all these concerns in mind when making your final decisions.	
550	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocated site Ewloe. The proposed sites are not suitable I believe it would increase the likelihood of flooding and the destruction of local ecology and habitat with a SSSI and SAC sites within a mile, not to mention the already appalling traffic conditions	I don't think a single change is required but a complete revision of the whole plan, there is plenty of vacant land i.e. MOD Sealand previously used for residential purposes.
560	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe No more building. Schools, roads etc. too overcrowded already	No more building. Schools, roads etc. too overcrowded already
562	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe The proposed sites are not suitable not only on the environmental factors e.g bat habitats, lack of infrastructure, poor road layout, leading to increased congestion and pollution, no local GP practices, schools are full. All in all the Council has not done its due diligence.	Build on a plot that has less pressure (quieter area) i.e. the land where the allotments are on upper Aston hall lane that the Council already own.
570	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green	Object	Objection to allocation at Ewloe Taking greenbelt before using up all the Brownfield sites is totally unacceptable. Greenbelt is full of nature/wildlife, including Badgers, the trees, some are very mature, and the hedgerows go back hundreds of years, by building on here you are taking away history too. You are also taking away public footpaths which run through this greenbelt	Brownfield should be used before taking Greenbelt

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
		Lane, Ewloe		land. Air pollution would be increased during construction and then from the extra cars/vans attached to the new houses. How will the drainage system cope if you take away the existing trees which soak up gallons of water per day and help with air pollution. Traffic will also be increased greatly, traffic is already very heavy in this area, and is already going to increase due to the new development on Boars Head site. This additional traffic will be dangerous and is unacceptable. Green Lane is a single track lane, this makes it inappropriate and unacceptable to have access to a new housing development. This site does not have suitable access. The school traffic is already very busy and parking is a big problem at Ewloe Green. Ewloe Green Primary is already oversubscribed and using teo porta cabins as classrooms. Hawarden High has some spaces but would not be able to take all the children that the new housing would create and therefore would be full. Doctors and Dentists are struggling to cope now, they would not cope with any more new houses. Th local cemeteries are now nearly full. Local bus service is reduced	You have no infrastructure!
572	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe The pressure on local GP Practices are already high, and are struggling with the volume of patients now. There is a shortage of GPs at our local practice, they have 8,500 patients and only 2 full time and 1 part time doctors at the practice.	Removal of Holywell Road /Green Lane Ewloe allocation.
628	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Previously developed land and underutilized sites should be considered in the first instance. Whilst it is clearly appropriate for Green Barrier designations to be reviewed as part of the LDP process, it is asserted that the green barrier in this location continues to perform an important function in safeguarding the countryside from encroachment, preventing the coalescence of settlements and maintaining openness. Policy WSTR2 of the emerging LDP directs that Tier1 Main Service Centres should be the main location for new housing development. Ewloe is defined as a Tier2 Local Service Centre and as such is deemed more suitable for more modest levels of new housing development. It is asserted that the proposed housing allocation in Ewloe conflicts with the logical approach within the housing strategy. The allocation would almost double the part of Ewloe and would amount to a disproportionate increase in size. This allocation is larger than the largest residential allocation in Tier1 (246 dwellings in Mold). The site does not enjoy a sustainable location. The majority of local services are not within reasonable walking distance, whilst public transport services are limited. To this end, the proposed allocation is also in direct conflict with PPW which states that minimizing the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport are important considerations when selecting sites for new residential development. The land sits adjacent to New Inn Brook, which is a wildlife site that continues on from the Deeside and Buckley Newts SAC. On this basis it is not unreasonable to	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				suggest that a range of ecological issues could frustrate the development of the site or at least reduce the number of dwellings that could realistically be delivered. Road safety concerns, traffic issues School capacity issues Lack of access to open space and recreational space	
671	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Previously developed land and underutilized sites should be considered in the first instance. Whilst it is clearly appropriate for Green Barrier designations to be reviewed as part of the LDP process, it is asserted that the green barrier in this location continues to perform an important function in safeguarding the countryside from encroachment, preventing the coalescence of settlements and maintaining openness. Policy WSTR2 of the emerging LDP directs that Tier1 Main Service Centres should be the main location for new housing development. Ewloe is defined as a Tier2 Local Service Centre and as such is deemed more suitable for more modest levels of new housing development. It is asserted that the proposed housing allocation in Ewloe conflicts with the logical approach within the housing strategy. The allocation would almost double the part of Ewloe and would amount to a disproportionate increase in size. This allocation is larger than the largest residential allocation in Tier1 (246 dwellings in Mold). The site does not enjoy a sustainable location. The majority of local services are not within reasonable walking distance, whilst public transport services are limited. To this end, the proposed allocation is also in direct conflict with PPW which states that minimizing the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport are important considerations when selecting sites for new residential development. The land sits adjacent to New Inn Brook, which is a wildlife site that continues on from the Deeside and Buckley Newts SAC. On this basis it is not unreasonable to suggest that a range of ecological issues could frustrate the development of the site or at least reduce the number of dwellings that could realistically be delivered.	Removal of allocation at Ewloe
683	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Having applied for Planning Permission in 2012 to build a bungalow on my own land I was rejected. That this area was green belt. Why now is there positive plans to build directly up to the back of the same property? Has the green belt been abolished in this area. As it has previously in Green Lane for the Travellers.	Removal of allocation
102	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to housing allocation at Ewloe, and Gypsy traveller site extension Magazine Lane, Ewloe As part of your consultation procedure for the L.D.P I write to contribute observations on both the proposals to develop land at the rear of the Ewloe Green Estate which borders on Holywell Road Ewloe and Green Lane, Ewloe Green plus the proposed extension to the gypsy site in Ewloe Green. Holywell Road and Green Lane developments: Coalescence Infrastructure: Services, - The local school in Mold Road Ewloe Green is usually full to capacity each year, heavy, drainage in this area is problematic as evidenced by the number of times the	Removal of housing allocation at Ewloe, and Gypsy traveller site extension Magazine Lane, Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				road at the junction of Maes Hewitt has had to be excavated. traffic air pollution Road Safety: Access to Ewloe Green School from Holywell Road involves the use of inadequate pavements, Magazine Lane Gypsy Site: it now stands out garishly.	
172	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocated site at Ewloe
178	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. Local amenities Inadequate to cope with increased traffic. More Green Barrier land taken up for development The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Remove allocated site in Ewloe
179	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. B5125 Road inadequate to take volume of traffic and junction between Mold Road and B5125 congested enough already. Local school overstretched already. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocated site in Ewloe
187	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocated site at Ewloe
189	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the Ewloe allocation which will invade a designated UDP green barrier. I do not believe this is a sound plan. This proposal would greatly increase pollution and carbon emission levels. This would not be acceptable. Traffic volume along Holywell Road and at Green Lane are already very high and these routes are extremely congested. Local schools are already oversubscribed, pupils are using mobile classrooms now! This no scope to extend Ewloe Green school. This proposal would negatively impact road safety for adults and children alike. Despite the traffic crossing on Mold Road, any increase in traffic volume would make it	Removal of allocated site at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				very dangerous. The community has struggled for decades to live with the remnant, poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	
444	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	objection to Ewloe Green I have been told that the candidate sites have not been ranked as it is stated they should be in the Local Development Plan Manual – Edition 2 at 5.3.4.11. Without this information members of the public could not assess different similar sites and make comparisons. I contend that this breach of the rules has made the consultation impossible for the public. The Ewloe Green site was in the green barrier in the UDP but has been placed in the LDP ahead of local candidate sites which were not in the UDP green barrier. Policy GEN 4 in the UDP describes an updated stronger green barrier policy with a strong degree of similarity with Green Belts, it states at 4.13 that there has been a "strategic and consistent review of existing green barriers The LDP background paper 1, Green Barrier Review states in the review for GEN 4 (12) where the Ewloe Green site is located "there is a chance that the settlement boundary could be compromised and resulting in the threat of coalescence of Ewloe Green, Shotton and Aston and part of Connah's Quay." It then goes on to justify the compromise of the settlement boundary "two candidate sites have been allocated for housing. Although this requires a drawing back of the green barrier.....". Furthermore, it states that New Inn Brook, a wildlife site "acts as a firm and defensible boundary" while in fact to protect the wild life it will be necessary to retain the current green barrier space between it and the settlement boundary. It has been stated that there are aquifers serving numerous bore holes in the area under the ground proposed for the Ewloe Green housing allocation site. The B5125/B5127 junction is a major bottleneck during peak times and can cause traffic to back up onto The Highway.	Removal of allocated site at Holywell Road /Green Lane Ewloe.
466	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation Ewloe Environmental Impact - emissions from traffic, loss of trees, impact on wildlife Inadequate Infrastructure – traffic issues, Coalescence of villages – further urban sprawl as Buckley draws ever closer to Ewloe	Removal of Holywell Road /Green Lane , Ewloe allocation.
547	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Ewloe: Petition attached with 146 signatures. I wish to object to Flintshire County Council's Local Development Plan, as I feel that the Planning Dept./ Policy Makers have not shown due diligence in developing parts of the plan strategy, policies and assessments with particular regard to the allocation for housing of site reference number H1.7 (EWL017 and EWL020). CONTENTS: RELEVANT SOURCE MATERIAL INCLUDING: IMPACT ASSESSMENTS LDP AND WELSH GOVERNMENT OBJECTIVES FCC LDP POLICIES TESTS OF SOUNDNESS	In conclusion then, I would like to urge Flintshire County Council to rethink the strategy which unduly and inappropriately allowed

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				(WELSH GOVERNMENT AND FCC) APPENDICES: EVIDENCE TO BACK UP MY REPRESENTATION IIA Objectives and Sustainability Appraisal (Integrated Impact Assessment) IIA for Housing Development Site H1.7-First Page	the allocation of site H.17 ewl017/ewl020 (Holywell Road/Green Lane), and which will also facilitate the redrawing of the settlement boundary, thus removing the green barrier status afforded to the land in the UDP and allowing further encroachment onto the open countryside. I feel that the plan has been rushed through after the UDP expired and more thought, and in particular more public consultation should have gone into producing it. To make it sound then this would therefore have to be remedied with regard to areas where it is unfit for purpose.
549	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocated site Ewloe Environment, Fields, Fauna, Wildlife, Greenbelt area, air pollution from extra cars, possibly 390+, schools, doctors, dentists, land drainage, floods by houses Holywell Road, ancient system. Not fit for purpose. Dangerous junctions, especially busy times 8:30-9:00 Danger to school children 3pm-7pm. Horrendous extra traffic from Northop hall when houses built on Plas Isaf site, plus traffic from fisheries, Buckley, Mold all passing green lane junction opposite school. Danger to all, especially children at school. More traffic joining A55. More pollution from increased traffic.	Remove allocated site at Ewloe
557	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	I am writing to give my observations on the proposed sites EWL017 (Holywell road, Ewloe) and EWL020 (Green Lane, Ewloe).With regards to the test of soundness of the above proposals i would like to comment as below; EDUCATION The sites, as stated by the Site Allocations Assessments by ARCADIS are within 500m of EWLOE GREEN PRIMARY SCHOOL and indeed 2km of HAWARDEN HIGH SCHOOL. Both these schools are full as is indeed PENARLAG PRIMARY SCHOOL, EWLOE, and HAWARDEN PRIMARY SCHOOL,	Removal of allocation at Ewloe

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				HAWARDEN. These 3 primary schools serve Hawarden and Ewloe. HIGHWAY/TRAFFIC/SURFACE WATER/MINERALS I am advised that to this date there has not been a traffic assessment for the proposal The NRW map shows that there are known surface water flooding issues on the site and that just south of the site there is a significant size C2 flood zone area. There is no certainty that the proposed highway improvements can be delivered due to drainage and ecology issues.. The mineral resources map shows the area as a Category 1 Aggregates Safeguarding Area. It is contrary to Welsh Government guidance to sterilise the mineral resources. HEALTH As stated by the allocation assessment the Site EWL017/EWL020 is situated within 1-4km of a GP surgery. Ewloe and Hawarden are serviced by 3 GP Practices. Hawarden surgery is full , the overflow are being directed to Broughton GP surgery notwithstanding the high population in Broughton including the new developments. Ewloe is serviced by the 2 surgeries in Buckley ACCESS As stated by the allocation assessment the Site EWL017/EWL020 is located within 500m of a bus stop, 1.8km of Hawarden Railway Station and 500m of a key service centre. The reality regarding these quotes are that the key service centre consists of one small shop and 2 takeaways (fast food). . EMPLOYMENT The industrial estate on St David's Park, has grown considerably over the last several years. This in itself does show employment opportunities, what it fails to highlight is the excess vehicles that commute to this area daily adding to the traffic chaos which already causes major issues in this vicinity, which brings me onto traffic emissions. BIODIVERSITYAs stated by the allocation assessment the Site EWL017/EWL020 is within 500m of Connahs Quay Ponds and Woodland SSSI (not adjacent) and within 500m of Deeside and Buckley Newt Sites SAC (not adjacent). The proposed development could potentially affect priority of protected species, such as breeding birds, as the site is c	
569	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	I have been instructed by my client to object to the proposed housing allocation for up to 298 dwellings on land at Holywell Road/Green Lane, Ewloe Green (Ref. HN1-7) in the strongest possible terms. The site in question currently lies within the Green Barrier as defined by the adopted Flintshire Unitary Development Plan (UDP). the proposed allocation of this site does not accord with at least two of the tests of soundness in so far as it does not 'fit' with the national planning guidance outlined and it is not of an appropriate scale in light of the settlement hierarchy of the emerging Local Development Plan itself. In addition, the land sits adjacent to New Inn Brook, which is a wildlife site that continues on from the Deeside and Buckley Newts SAC. On this basis, it is not unreasonable to suggest that a range of ecological issues could frustrate the development of the site or at least reduce the number of dwellings that could realistically be delivered. Accordingly, it is strongly asserted that the land at Holywell Road/Green Lane, Ewloe Green is not appropriate for a large scale residential development and the proposed designation does not meet the tests of soundness.	Removal of Holywell Road/Green Lane Ewloe allocation.

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577	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Potentially 298 new homes could equate to 600 extra vehicles (2 per home) at a minimum. Consequently volume of traffic making it unsafe for local children going to and from schools. Pollution also an issue. Getting in and out of Ewloe Green estate even more difficult than it is now. the junction at Holywell Road B512 & B5127 is a nightmare now! Due to increased traffic from new housing and office developments.	Removal of Holywell Road/Green Lane Ewloe allocation
621	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Previously developed land and underutilized sites should be considered in the first instance. Whilst it is clearly appropriate for Green Barrier designations to be reviewed as part of the LDP process, it is asserted that the green barrier in this location continues to perform an important function in safeguarding the countryside from encroachment, preventing the coalescence of settlements and maintaining openness. Policy WSTR2 of the emerging LDP directs that Tier1 Main Service Centres should be the main location for new housing development. Ewloe is defined as a Tier2 Local Service Centre and as such is deemed more suitable for more modest levels of new housing development. It is asserted that the proposed housing allocation in Ewloe conflicts with the logical approach within the housing strategy. The allocation would almost double the part of Ewloe and would amount to a disproportionate increase in size. This allocation is larger than the largest residential allocation in Tier1 (246 dwellings in Mold). The site does not enjoy a sustainable location. The majority of local services are not within reasonable walking distance, whilst public transport services are limited. To this end, the proposed allocation is also in direct conflict with PPW which states that minimizing the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport are important considerations when selecting sites for new residential development. The land sits adjacent to New Inn Brook, which is a wildlife site that continues on from the Deeside and Buckley Newts SAC. On this basis it is not unreasonable to suggest that a range of ecological issues could frustrate the development of the site or at least reduce the number of dwellings that could realistically be delivered.	Removal of allocation in Ewloe
712	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. This development would increase pressure on an already struggling and insufficient infrastructure – schools, doctors etc. Traffic would increase and prove difficult and dangerous on a number of levels: Fumes and traffic jams.	Removal of allocation at Ewloe
718	HN1: New Housing	HN1.7 Holywell	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier	Removal of allocated site

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	Development Proposals	Rd / Green Lane, Ewloe		area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Lack of facilities within the local schools as well as overcrowded classrooms affecting my education (in a negative manner) More risk and danger on my journey to school due to increased traffic. This is already a hazardous route. Lift of the green barrier area affecting future generations as less nature and increased pollution.	
722	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. I do not believe the Deposit LDP meets the needs of a growing population due to traffic congestion off the roundabout to Buckley and right towards Northop. Traffic is currently an issue at today’s levels an increase will adversely affect both the population now and increase.	Removal of allocation at Ewloe
726	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. More school places and GP Surgery needed to support community development	Removal of allocation
730	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation
732	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation

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746	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Drainage problems as most of the area in over coal mines.	Removal of allocation in Ewloe
749	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Object, children attend school at Ewloe Green, infrastructure not in place currently and proposed development will put huge strain on roads and schools and emissions, already struggling.	Removal of allocation at Ewloe
751	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation at Ewloe
789	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. The roads are congested. The schools are full, there’s nothing for the children. Having a GP appointment is impossible. Amenities are non-existent. It will be like living on a building site for years. There is no way that this area can accommodate these houses. The roads are congested enough now at the summer time is even worse.	Removal of allocation at Ewloe
687	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to Allocation at Ewloe	

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713	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. There is already too much congestion on the roads around the area There would be a negative impact on the local facilities which are already under constraint and stretched. Too much disruption, noise and pollution.	Removal of allocation at ewloe
719	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. I object as the junction between the B5125 and B5127 are highly congested now. Extra houses means extra vehicles in an already congested and dangerous for pedestrians. Pedestrian route for children to walk to Hawarden High School is already dangerous, particularly at the junction of the B5125 and B5127. Object to the huge impact on building on green barrier land. The loss of habitats and increase in pollution and waste is far from responsible.	Removal of allocation in Ewloe
725	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Traffic is crazy around Ewloe Green and 300 houses will only add to it with an accident waiting to happen.	Removal of allocation at Ewloe
727	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. I am concerned at how much extra traffic would be channelled through an already congested junction, and the associated impact on air quality.	Removal of allocation at Ewloe

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731	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. The schools in the local area are already oversubscribed and I would like to know how you plan to accommodate the increased pupils.	Removal of allocation at Ewloe
733	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. My concern is the amount of traffic on Holywell Road which is heavy in the morning/afternoon. Plus the junction would be unsuitable.	Removal of allocation at Ewloe
737	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. I am concerned about inevitable increase in an already over congested transport system	Removal of allocation at Ewloe
739	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. The local infrastructure is unsuited to further development – traffic reduction and safety must be improved before further development takes place.	Removal of allocation in Ewloe
741	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. This Proposal will cause significant	Removal of allocation

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				reduction in open rural space in the area, reducing the quality of the area and environmental damage. The proposal will be hugely detrimental to the existing residents due to a huge increase in traffic associated with the primary school in the catchment area. Parking issues on current estate.	
745	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Traffic congestion B5125 & Mold Road junction	Removal of allocation at Ewloe
747	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. No room in any of the existing schools. A no go to new residents.	Removal of allocation Ewloe
750	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation at Ewloe
752	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Why is there another proposed development in Ewloe/Hawarden area. There are no plans for developments between flint and Gronant where improvements are needed.	Removal of allocation
754	HN1: New Housing	HN1.7 Holywell Rd /	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of	Removal of allocation at Ewloe

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	Development Proposals	Green Lane, Ewloe		dangerously congested “B” roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. We object on the basis that the effect on local amenities i.e. schools, medical facilities, congestion to local roads, extra pollution to the village due to extra traffic.	
792	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. This looks like goodbye nature, greenery and trees. We have already lost a great verity of wildlife and birds. What chance does nature now? The present sewage systems cannot cope now, sometimes when sitting in my garden I can smell the sewers.	Removal of allocation at Ewloe
794	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Ewloe Green has had 2 residential housing estates over the last few years – one being on Holywell Road where more housing is proposed. The other off Liverpool Road opposite Green Lane. There is also building going on for over 55’s accommodation where Boar’s Head was. Looking at the proposal there seems to be other areas where no recent building has taken place which would be more suitable.	Removal of allocation in Ewloe
798	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Need school as well. Need GP and traffic light otherwise no for new buildings	Removal of allocation
812	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Poorly planned access and egress from the site increasing the risk to pedestrians from Green Lane and Ewloe School. The landscape will be changes and wildlife will be reduced/replaced Increased emissions from increased vehicle use around Ewloe Green school and Boars Head. Plus increased emissions from A55	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				migrating into area. Ewloe Green school is oversubscribed with classes being held in mobiles. No capacity – goes against County priorities.	
814	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. My concern is for the lack of school places in particular Ewloe Green that currently has children in portacabins. After being informed at drop in session no emission test has been done, grave concerns for local environment from a massive increase in traffic.	Removal of allocation at Ewloe
816	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. We should not be building on Green lane end of! The field you propose to allow planning on has a natural pond which in heavy rain becomes a lake. Wild geese nested there for years! We also have bore holes in this field. The wildlife consists of badgers, foxes, wild geese, woodpeckers, owls, hedgehogs and bats which all use the 200 year old hedgerows and natural water source/pond. Their habitat will be eradicated. There will be an increase in light pollution which will effect wildlife. Also car emissions will be excessive which has an impact on people's health. The settlement boundaries for Ewloe Green have already been exceeded. We are a village with green areas which are disappearing. Myself and my family regularly walk in these fields, which brings us much joy and helps with our mental health. We used to walk Magazine Lane but can't now as Gypsies dogs attack us. We will have nowhere to walk. The additional 100+ people to the area will put huge strain on already over stretched hospital/doctors/schools/roads/Council services.	Removal of allocation at Ewloe
818	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. This area being proposed for housing development has natural springs and boreholes that supply water to streams and properties. As such this land should remain as green barrier at least. Loss of this green barrier will be bad for people's well-being and mental health. The fields are used regularly by ramblers and dog walkers. Light pollution caused by additional development in this area will further reduce dark nights and the ability to view stars/moon, which is a good relief for mental health. This would	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				also have a negative effect on the nocturnal wildlife on the site, this includes badgers, foxes, hedgerows, bats & owls. There is a natural pond in the area of the proposed housing area. This expands to cover a huge area of the field. This will cause a loss to Wildlife and add to risk of flooding. Loss of former green space from this area. Including the 200 year old hedges, will have adverse affects on the wildlife that use it. Foxes, Badgers, Bats, Hedgehogs, Owls and Jays are all seen and heard here. Additional housing in this area would have further negative impacts to the already struggling infrastructure. Roadways in this area suffer with severe congestion which already causes pollution concerns.	
822	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation
828	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation
791	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Junction at Holywell Road near Boars Head and Mold Road needs to be rectified now, no matter what the outcome! Extra traffic a danger for local children crossing with 298 new homes that's possible 600 extra cars at a minimum. GP's are overstretched. #notes on surgery wall (local) that they are finding if difficult to meet our needs. With 8,500 patients at present. Local schools are full, how will they cope with the potential increase with intake of new families.	Removal of allocation at Ewloe
793	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green	Object	Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. GP surgeries are under pressure now and patients find it difficult to get	Removal of allocation in Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
		Lane, Ewloe		appointments, especially routine. By building the homes proposed will put these surgeries under more pressure. I understand Betsi has stated that the surgeries can cope with demand but have they actually asked the GP practices, GPs, patients and all staff if they agree. Ewloe green has seen 2 large housing estates built in the last few years. Traffic congested at peak times, particularly during school term. If the proposal for housing to be built the traffic will worsen but also could make it very unsafe for children to cross the roads, but also making the car journey longer. Before long there will be no countryside around which is going to affect both people living in the area but also wildlife as hedges will be removed so nowhere to make nests. Having asthma and one of the reasons we live where we do was because if Greenfields and less pollution.	
797	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation
799	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. No additional school No additional GP Traffic nightmare	Removal of allocation
805	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. No road system in place to take all this extra traffic which is not going to be made any better by this proposed development. We were never informed about this development, seems to have come in through the back door! There are children still crossing two main carriage ways to get to and from school, I think that needs addressing, and now another 300 homes. The encroachment of the green barrier to accommodate this development is unfair. Seems you can build anywhere if it suits your needs. I am really worried about flooding. My home backs onto the proposed development and we have been dogged by drainage problems for over 30 years. 4 weeks wait for doctor appointments, and now 300 new homes. Schools oversubscribed the children are learning out of a portacabin. 300 new homes no new school on the table. Land mitigation won't be adhered	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				to. I have worked in the building industry and they will chop down and kill everything in their way.	
809	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Lack of pedestrian crossings, notably none on Holywell Road, which will become even more impossible to cross safely during busy times with an increase in traffic. No pavement outside Ewloe social club has meant I've had to walk in the road with my child due to vehicles parked on pavement from Boars Head.	Removal of allocation at Ewloe
811	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Increase in demand for primary/high school places Increase in traffic through St David;s roundabout and Holywell Road junction. Already a dangerous junction the majority of the day. Air pollution increase and effect this will have on our children.	Removal of allocation at Ewloe
825	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation in Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested B Roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose.	Removal of allocation
829	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. Ewloe Green School already has a full year group being educated outside in portacabins. The children have to use toilet facilities inside the main school and also access other equipment they need. This is not too bad during summer months but during winter months it is far from ideal especially for children with health conditions, will the school also be expanded if building in the local area.	Removal of allocation
845	HN1: New Housing	HN1.7 Holywell	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of	Removal of allocation

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
	Development Proposals	Rd / Green Lane, Ewloe		dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. We continuously struggle to access healthcare in the area. Made to call over 80 times to be able to get through to our doctors to book appointment which only do emergency appointments. Waiting lists are currently longer than ever unable to access support for our son when he left hospital due to resources being overstretched. Told if we lived in England wouldn't of had a problem. More housing are you providing more services?	
847	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. Current road system is inadequate for current traffic without adding another potential 600 cars to the mix. Plus it removes previous green belt land, adding more concrete and potentially increasing flood risk.	removal of allocation at Ewloe
850	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. The roads around Ewloe Green are so busy already that more traffic from 300 houses will cause many problems we don't want. The roads around Ewloe School are already too congested as it is. The roundabout at the A55 is dangerously slow at rush hour. 300 houses will bring 600-900 vehicles worst hazard for a junior school to have close by.	Removal of allocation at Ewloe
866	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. Local schools oversubscribed GPs full Traffic pollution Local infrastructure unable to cope	Removal of allocation at Ewloe
868	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
		Lane, Ewloe		aggravates the situation, and it not fit for purpose. Additional traffic/pollution Loss of green belt Destroying wildlife Noise pollution	
872	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. We are concerned about school facilities in Ewloe area Traffic problems in area	Removal of allocation
874	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. Loss of green belt land and destroying wildlife habitats not to mention the loss of open much needed space Extra congestion of traffic generation this build would cause traffic is already horrendous as it is.	Removal of allocation at Ewloe
878	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. The schools are not equipped to take more pupils. Most of the schools are in need of repair. The roundabout and slip road cannot take any more cars. Children are always at risk crossing. The environment will be damaged. Health and wellbeing of all in the area will be damaged. The road between 8 and 9 am Monday to Friday is difficult to cross for school children. More cars more risk of an accident.	Removal of allocation at Ewloe
882	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. Ewloe Green continues to be overdeveloped for housing purposes. The existing site serves a legitimate green barrier function and an alternative brown filed or previously developed site should be found. The existing community schooling and medical facilities could not cope with the rise in local population.	Removal of allocation at Ewloe
884	HN1: New Housing	HN1.7 Holywell Rd /	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck	Remove Allocation

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
	Development Proposals	Green Lane, Ewloe		skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. I am very aware of the protected newt species on this land as there is some in my pond on Shotton Lane in Ewloe.	
892	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. This development will bring more pollution to the area, crowded schools, doctors surgery already struggling.	Remove allocation at Ewloe
898	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. I often walk on the public right of way paths through this proposed site as it is one of few open spaces left. I often see pheasants, and I know there are foxes and badger dens nearby. Develop Brownfield sites first.	Removal of allocation at Ewloe
900	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. Traffic congestion could cause a problem due to increased number.	Removal of allocation at Ewloe
902	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose.	Removal of allocation
904	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Hawarden Community Council Objections to Ewloe Green Housing Allocation site within the LDP The basis of these objections is local council member knowledge, Planning Policy Wales (PPW) and Flintshire County Council's own planning policy. As councillors, we have had a huge number of residents contact us with their concerns and objections to this site. When considering any development in an area, we need to ensure that communities have access to a mix of services. Because of this, there are several infrastructure issues within the Ewloe Green/Ewloe and wider Hawarden Community Council area. There are currently capacity	Removal of allocation

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				issues in the schools within the catchment area of this development already. The health centres in the area are already showing signs of stress due to the amount of service users; one of which is currently under special measures. With the addition of 298 houses this will certainly exacerbate the above issues. Under the LDP, “Tier 1 Main Service Centres” are the preferred locations for new housing developments. Ewloe is defined in the LDP as a “Tier 2 Local Service Centre”. As such, we do not have the facilities/infrastructure to comply with PPW (3.38) “for minimising the need to travel, reducing the reliance on the private car and increasing walking, cycling and use of public transport are important considerations when selecting sites for new residential developments.” We have inadequate public transport links to comply with the policy and have very limited local amenities. In conclusion, the Ewloe Green allocation site needs to be rejected. It goes against planning policy of both FFC and Welsh Government regarding green barriers, safe guarding community identity and coalescence, promoting sustainable and safe transport systems, understanding infrastructure provision, recognising the flood risk in the area, developing brownfield sites over green barrier and protection of agricultural land. Ewloe already had significant growth, over the projected allocation and expectations of the UDP. The area is just not the right site for the size of the development proposed.	
842	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose.	Removal of allocation
844	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. Very difficult to get a doctor’s appointment now, the infrastructure isn’t good enough to support a lot more people, also there is a lot of wildlife to consider.	Removal of allocation
853	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. We have problems already with too much and unsafe traffic. More traffic is far too dangerous. Traffic already a hazard with pedestrians	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				and school children. The area is very busy and we don't need more traffic and people at doctors, dentist, shops, and chemists. We have problems already.	
863	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. I object to concerns about the flora and fauna of this green barrier, such as badgers and bats. Also I have concerns about the natural spring , drainage and flooding There isn't the infrastructure to support so many houses, cars and people. Sewers are old, roads are massively congested and in poor condition, GP and hospitals are impossibly overloaded already.	Removal of allocation at Ewloe
865	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. The traffic coming off the roundabout and waiting to turn right onto Holywell Road often causes the traffic to come to a standstill, the estate opposite the school gets very congested at school times. The school is already full. Building more homes would exacerbate the situation.	Removal of allocation at Ewloe
867	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. Increased air pollution from extra traffic. Traffic congestion Holywell Road/Liverpool Road Junction. Already inadequate infrastructure won't cope with such an increase in population and vehicles. Loss of green land and effects on nature/wildlife.	Removal of allocation at Ewloe
871	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. The increase in harmful emissions that would result from this development is a major concern. This area already suffers from this issue and I fear the health risks for us all if the development proceeds.	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
873	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and it not fit for purpose. Ewloe is already heavily populated as it is! Providing road access on an already fast heavily used road is dangerous and endangering public safety. I object to overlooking and causing loss to our privacy from this build not to mention no care to nature conservation which must be taken into account. I object to the noise levels, smells, dirt, disruption and disturbance from building yet more unnecessary not needed houses from trucks and diggers!	Removal of allocation at Ewloe
877	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. Drainage is bad enough the extra pressure with more houses would be horrendous The volume of traffic is bad enough now on Holywell Road, Liverpool Road etc. Imagine what it would be like with extra cars in the area. Schools in the area are already oversubscribed including Hawarden high as John Summers School has shut and children from other areas using it. Children walking to school via roundabout will find it really difficult. Very dangerous for both child and driver.	Removal of allocation at Ewloe
881	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. Ewloe Green continues to be overdeveloped for housing purposes. The existing site serves a legitimate green barrier function and an alternative brown filed or previously developed site should be found. The existing community schooling and medical facilities could not cope with the rise in local population.	Removal of allocation at Ewloe
885	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. Our schools are already full, the road congested, it is already difficult to see a doctor. We are losing our valuable green areas. There are already thousands of empty properties in Wales! We strongly object to the development.	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
891	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. Although I don't live in Hawarden I and my fellow walking group walk in this area regularly, this proposal would spoil the beautiful countryside around Hawarden.	Removal of allocation at Ewloe
895	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. I object to the buildings being on green belt land.	Removal of allocation at Ewloe
903	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. The condition of many road surfaces in the area needs attention. What happened to the school promised in the Redrow development	removal of allocation at Ewloe
907	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. I believe the infrastructure, schools, doctors and roads do not exist to support the increase in housing planned.	Removal of allocation at Ewloe
909	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. There is already a problem with school run parking on the estate, this will only get worse. Also we will lose the use of a leisure activity on Green Lane. Plus added pollution problems.	Removal of allocation at Ewloe
1020	HN1: New Housing	HN1.7 Holywell Rd /	Object	Objection to allocation at Ewloe Road/Highways Infrastructure LDP03 Infrastructure Plan Appendix 2 Table – reference is made to the requirement of a Transport Assessment as improvements are required to the Junction of Holywell Road and Mold Road to increase	Removal of allocation

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
	Development Proposals	Green Lane, Ewloe		capacity. Para 2.54 identifies “Highways improvements in Flintshire”. This junction is not mentioned which leads me to believe no improvements are intended or if they are, why are they not available for viewing? The whole infrastructure including design in this area is dangerously lacking and woefully inadequate and will not support more vehicles. A segment of the A494 including a section which runs directly through the communities of Ewloe and Ewloe Green has had a 50mph limit implemented in recognition of traffic pollution yet you seek to increase the number of vehicles who will connect to/travel through this same area, this is at odds with a LDP which should support and serve its residents. BP8 - Disagree that the irregular shape boundary does not justify significant encroachment/extension into open countryside and loss of green barrier. BP8 – Disagree that the existence of New Inn Brook is no less of a firm and defensible barrier as is the existence of the Wrexham-Bidston railway line which is not deemed a firm and defensible barrier despite it being fixed and substantial infrastructure (see BP1 page 17). I therefore do not agree that the removal of this parcel of land will not harm the integrity of the wider Green Barrier.	
1032	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Drainage & flooding concerns Schools - not enough spaces now, how are you going to accommodate more children? Traffic on Holywell Road and Mold Road – it is congested now so will make it worse.	Removal of allocation at Ewloe
1034	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. I am concerned about the current sewage system. First time buyers homes should be a lot less than £150,000 Traffic already backed up to Northop Hall We will need a new school due to the fact of portacabins are already in use. New doctors and chemist needed. Note needed on final decision.	Removal of allocation
1036	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. The land is supposed to be green belt and when we bought our house we bought the Countryside. The traffic will be a nightmare, schools overcrowded, Our property will lose value.	Removal of allocation at Ewloe

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
1039	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Increased traffic and pollution Already traffic issues at the moment Building on green belt Air quality issues Danger to Ewloe Green school children Already issue around school places, doctors etc.	Removal of allocatio at Ewloe
1069	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to Allocation at Ewloe Objection to proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is therefore not fit for purpose. Substantial increase in traffic directly past an already busy entrance to a school, where parking is already non-existent. Vehicles are parked blocking the entrance into Green Lane and bus stops.	Removal of allocation.
1081	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to Allocation at Ewloe Objection to proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is therefore not fit for purpose. Why are the majority of preferred sites in Deeside? There are no medium to large sites outlined between Flint and Gronant, a huge area of our County.	Removal of allocation
1083	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to Allocation at Ewloe Objection to proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is therefore not fit for purpose. Ewloe Green School and Hawarden High are already full where are the extra children going to, increasing car travel on already busy roads.	Removal of allocation
906	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Object to the proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation and is not fit for purpose. I regularly photograph the wildlife on this land, including buzzards and barn owls. I am also aware of great crested newts on this site.	Removal of allocation

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1033	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Impact to the local farm, milking time is 5pm and already impacts on commuting along Holywell Road, what will 300+ families add to this. The 298 houses is basically a new town/village. Will struggle to integrate into the local community Increased traffic on the junction of B5125 & Holywell road and from the Ewloe roundabout. Local services, doctors, school, shops, wifi.	Removal of allocation at Ewloe
1035	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Increase of traffic Will be a danger to children and other pedestrians in the area Health and wellbeing – the disruption may cause the elder generation to feel stressed which may cause anxiety and depression. Destroying the greenery. Doctors can't get in now nevermind when 298 more houses Over development. It will double the size of Ewloe, destroy local community spirit. Local schools are at full capacity Environment – increase in traffic plus more emissions The impact of more traffic on children walking to school.	Removal of allocation at Ewloe
1038	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to allocation at Ewloe Objection to the proposal to invade designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. Traffic problems will escalate Schools already over crowded Doctor and medical services already pressed. Air pollution greatly increased and noise levels Loss of even more green land, which is loss of wild floral, wildlife etc. Danger to children coming and going to school Water supplies and drainage issues.	removal of allocation at Ewloe
1082	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to Allocation at Ewloe Objection to proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested 'B' roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is therefore not fit for purpose.	Removal of allocation

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1084	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to Allocation at Ewloe Objection to proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is therefore not fit for purpose. I particularly object to the scale of environmental damage that will be incurred through the loss of tree cover and the further loss of natural habitats for birds and small animals.	Removal of allocation
1117	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	HN1 (7) Holywell Road / Green Lane Ewloe. The arrival of this Deposit LDP and the public consultation is woefully less than transparent and accessible. Ward residents have repeatedly said that the consultation portal is difficult to use, the language difficult and the process apparently fragmented across the formal documents to the point that evidence is dispersed and difficult to link. The process should not be so impenetrable and apparently weighted to accept the proposal. There needs to be a far more thorough account taken of the current situation that residents live including the extremely congested B5125/B5127 bordering this proposed site, school places, access to the GP surgeries and loss of amenity of this formerly designated green barrier site (UDP lapsed in 2015). Any design for housing in Ewloe should take in the 'White Elephant' site of the weigh bridge in order to do more than cosmetically adjust desperately dangerous road junctions leading on and off the A494/A55 dual carriageway bottleneck.	The process should not be so impenetrable and apparently weighted to accept the proposal. There needs to be a far more thorough account taken of the currant situation that residents live including the extremely congested B5125/B5127 bordering this proposed site, school places, access to the GP surgeries and loss of amenity of this formerly designated green barrier site (UDP lapsed in 2015). Any design for housing in Ewloe should take in the 'White Elephant' site of the weigh bridge in order to do more than cosmetically adjust desperately dangerous road junctions leading on and off the A494/A55 dual carriageway bottleneck.

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
1197	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	As a resident of Upperdale Hawarden for my entire childhood, and now as a resident of Mancot, I do not believe we can sustain much massive future development. We already have a big water/drainage problem in my street and more development will no doubt increase that issue. Parking for Hawarden Village School creates massive issues for entrance into Mancot, not limited to picking up and dropping off times. Further development with egress on to Ash Lane will only increase those problems in this area but also in Sandycroft, Pentre and onto Cottage Lane. Development would see the district lines between Hawarden and Mancot blurred. As a former resident of Hawarden, I was lucky enough to be able to buy my terraced house in Mancot as an affordable option. I doubt that any future development would provide small houses for people in my position at that time, those who are not on the social housing register. Smaller houses do not bring in the same profit for the developer. The new houses at the top of Overlea Drive prove this to be the case! I would also like to register my objection to the Ewloe site by Green Lane being included in the LDP. My niece and nephew attend Ewloe Green School and aside from the increase in pupil numbers that would result in such a development, the traffic outside the school is already at an unacceptable level. I worry for their health due to traffic pollution, not only at drop off/pick up time but also whilst they are at play due to the proximity of the road. In both cases, Flintshire has already identified other smaller brown sites for development in the UDP. Why are these not developed first?	Removal of allocation at Ewloe
1085	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	Objection to Allocation at Ewloe Objection to proposal to invade a designated UDP green barrier. The community has struggled for decades to live with the remnant poor design of dangerously congested ‘B’ roads and main junctions, connecting the A494 (A55) bottleneck, skirting the site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is therefore not fit for purpose. Development would lead to the loss of an area of Grade 3a best and most versatile agricultural land which should be resisted	Removal of allocation
1097	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Object	HN1(7) Holywell Road Green Lane Ewloe allocation. I feel that over the years Ewloe has suffered enough, if the scheme goes ahead the result will be more traffic on Old Mold Road. The latest being the removal of the Boars Head Public House dated 1704 (if it had to go, a missed chance to put in a roundabout at the junction). I've lived in Ewloe all my life so I remember the 'good old days'. I could go on and make a rambling letter but all I now wish to say is that I make you my objection to the scheme.	Removal of allocation
552	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Support	Support for allocation at Ewloe Transport Access It has been noted in supporting documentation, and demonstrated through traffic surveys, not only of the rods bordering site, but as well as roads at major junctions locally, and an analysis of traffic at peak times in the morning and evening, leaving and entering the A494 main dual carriageway. The transport report and proposals conclude the proposals entirely satisfies the full maximum number of housing units to predictable levels, as well as resolving identified existing traffic congestion at	

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
				peak morning and evening times close to the A494, by localised and cost effective road widening and lane management, all within the proposals Green Barrier The site currently lies within the Green Barrier, which covers a large area regionally, The proposals are to remove this site from the barrier; being located as a natural overflow to the existing urban infrastructure, as supported by Flintshire Local Authority. The associated reports noted above look to support the proposals, and have addressed specific concerns such as ecology, landscape, visual impact, soil type and geo-environmental aspects. Ground conditions As part of the proposals, the site has been assessed in terms of minerals and below-ground coal mine presence, The in-depth report notes suitability for housing with some very low coal seams, but not of any specific concerns precluding early development of the site The combined site within the LDP is fully deliverable and appropriate in the context of the Local Development Plan. Discussions with local housebuilder, Anwyl Homes, as well as interest from other local and regional developers, have shown deliverability of the site, promoting employment for local people during the construction stages.	
564	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Support	Support for allocation in Ewloe. More houses in this area would be good for my commute, I've been looking to move closer to work.	The plans for 40% affordable homes would not be suitable
563	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Support	Support for allocation in Ewloe More houses in Ewloe would benefit the local area. It would build the area to a family area and help with the local businesses	I don't think they should build them in Mancot on Ash Lane, But build the community in Ewloe with larger family homes.
565	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Support	The area needs a larger selection of 4 and 5 bedroom houses for growing families to move into.	The plan to have 40% affordable housing is disproportionate to the areas requirements, 10% to 15% is more in keeping.
1113	HN1: New Housing	HN1.7 Holywell Rd /	Support	Support for allocation at Ewloe. More familiy homes are needed in Flintshire.	40% affordable housing is too high. This is not consistent with the local

ID	Title	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
	Development Proposals	Green Lane, Ewloe			area's requirements. 15% would be sufficient.
1243	HN1: New Housing Development Proposals	HN1.7 Holywell Rd / Green Lane, Ewloe	Support	Holywell Road/Green Lane, Ewloe, 298 units A water supply can be provided for this site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). Potential developers need to be aware that this site is crossed by a sewer and an easement width would be required which may impact upon the housing density achievable on site. The proposed growth being promoted for the Queensferry Wastewater Treatment Works (WwTW) catchment would require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.	

Council response

HN1.7 Holywell Rd / Green lane, Ewloe

The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector.

General

Not accepted. The categorisation of Ewloe as a Tier 2 settlement is based on the settlement audits which informed the Plans settlement hierarchy as consulted upon in the Key Messages document and confirmed in the Strategic Options consultation document. Ewloe has a good range of facilities and services as well as employment and has good road and bus communications and is close to Hawarden Railway Station. An Inspector in a recent appeal decision stated 'The site is located adjacent to a sustainable settlement which has a range of services and facilities and is accessible by transport modes other than the private car'.

The detailed responses later in the Council's response will set out the level of services and facilities, the public transport, the proximity to other settlements and employment areas and the opportunities for Active Travel being pursued by the Council's Transport Strategy Team. The allocated site is therefore considered to comply with para 3.38 of PPW10 in terms of minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport.

In the 15 year UDP period Ewloe saw an actual growth of 16.1% (completions of 367 units) which was just above the indicative growth band of 8-15% for a category B settlement in the UDP. In the first 3 years of the LDP period Ewloe has seen a further 65 completions, largely as a result of the speculative permission Anwyl secured at

Council response
Greenhill Avenue. At the Plans base date for the Housing Balance Sheet of April 2018 there were commitments for a further 40 units giving a growth rate of 4%. Taking into account the units form the allocated site the growth for Ewloe over the Plan period would be 15.2% which is broadly in line with the previous growth bad in the UDP. The Inspector in that appeal decision concluded that the proposal would '…not result in Ewloe having an unacceptable housing growth rate'. The rate of growth in Ewloe is not considered to be excessive and higher rates of growth have been experienced in other settlements. The Council is now preparing a Plan for a new Plan period and Ewloe remains as a Tier 2 settlement which is capable of sustainably accommodating further growth. On the one hand objectors claim a lack of services and facilities and on the other hand claim that Ewloe is overloaded with commercial buildings. It is these commercial and employment buildings, largely centred on St Davids Park, which adds to the role and character of the settlement and adds to its sustainability credentials. The objection does not explain how the scale of building will negatively impact on the settlement as a whole. Objections appear to regard Ewloe Green as a separate settlement whereas it forms part of a larger settlement of Ewloe. In this context the site is not considered to be out of scale or harmful. Ewloe has seen previous housing developments and each has provided the requisite affordable housing. The Viability Study which informs policy HN3 identifies that this allocation should be able to provide 40% affordable housing. Comparing the size of this housing allocation with other housing allocations in other settlements only looks at part of the overall provision. The allocation in Ewloe may be larger than the Denbigh Rd site in Mold but it is the only site in Ewloe whereas in Mold there are two allocations and other committed sites. It is necessary to look at Ewloe as a whole settlement and not just the Ewloe Green part. The presence of sand and gravel and other minerals on candidate sites has been assessed by the Council's Minerals and Waste team and there is no requirement for 'prior extraction' of any reserves. It is unclear whether objectors are suggesting that the site be held back for future minerals extraction as this would surely have detrimental impact on residents and the environment. The IIA recognises that measures can be put in place to secure additional educational capacity. This was also commented on in the Wrexham LDP Inspector's Interim Findings letter where she stated 'The final reason for reducing the housing requirement was that the level of growth identified was considered to place too much strain on infrastructure such as highways, education, schools, council services and health providers. Again, we are not convinced that this is relevant to the assessment of need. Moreover, it is always a requirement for developers to make provision, through planning obligations, for infrastructure to be provided where existing capacity would not meet the additional demands and needs of new development. This would be commensurate with the scale of development'. The Wrexham Inspector also commented 'We heard during the sessions of the shortcomings in the County Borough in the provision of health facilities. The local health Board, which does not object to the LDP, states in its consultation responses that it is not the provision of buildings for additional services which is the issue but the availability of the required workforce. We have little evidence, therefore, that the availability of health services is a compelling reason to prevent or limit residential development'. It must be stressed that the Ewloe site will not deliver completed houses until 2023-24 with 28 completions forecast in the first year and 45 per year thereafter. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for both the Heath Board and the Education Authority to support the delivery of growth that is identified in the Plan. There is no formal objection from either statutory body to the Plan nor allocation.

Council response
The UDP Inspector clearly considered Ewloe to be a sustainable location in recommending housing allocations within Ewloe. A subsequent appeal Inspector also considered that Ewloe was a sustainable settlement. The Settlement Audit which informed the earlier stages in the Plans preparation sets out the range of facilities and services within the settlement, and this was widely consulted upon as part of the Plans earlier engagement phases. The sustainability of the settlement is not just as reflected in the settlement itself but also in the proximity of other nearby settlements such as Buckley, Drury, Northop Hall, Connah's Quay, Hawarden and the Deeside settlements as well as Deeside Industrial Park. The B5125 Mold Road is the route of two key bus services. Service 5 runs between Mold and Ellesmere Port and provides an hourly service calling in at Deeside Industrial Park. Service X4 runs between Chester and Mold and provides a link through Hawarden and runs every 30 mins. The site is also just over 2km to Hawarden Railway Station. Ewloe Green has a convenience store and a number of take aways, a social club and there are further facilities and services in Ewloe. There are also a series of Active Travel schemes as shown on the Flintshire Active Travel Integrated Route Map (Central). A key strategic route is the F6 'Connecting Settlements' route from Mold through Buckley to Ewloe. This links with other localised routes which includes: • EW2-16(1) – a route from Mare Hay Lane along the road to the rear of the Social Club and on to the roundabout. • EW2-16(2) – Route from Mare Hay Lane including the provision of a new footbridge with ramps, over A494(T). • EW2-16(3) – route from footbridge through Lakeside Business Park. • HA2-15(1) – two way cycle track along The Highway between roundabout and Hawarden High School. • SH2-12(1, 2, 4, 5) - shared use cycle and pedestrian lane along the 494(T) Aston Rd from the Ewloe roundabout to Shotton / Queensferry. It is evident that Ewloe, both as a settlement in its own right and in conjunction with nearby settlements and employment areas is a sustainable location to accommodate further growth, and that travel is not wholly car dependent. Policy STR2 criteria a. states that Tier 2 Local Service Centres 'will be the locations for more modest levels of new housing development'. The amount of housing development in settlements is not just made up of new allocations but also completions during the early years of the Plan and existing commitments (as well as possible windfalls). It is not appropriate to interpret the policy as indicating a more modest site size. Ewloe Green is predominantly made up of post war modern estate type development and is not considered on the whole to have a particular character that is different to Ewloe. The two have been considered as one settlement for successive development plans for 25 years. The site size is determined by the fact that the two candidate sites work hand in hand in bringing about a logical urban extension. The site does not have constraints that would prevent its development and the site promoters consider that the site is viable and deliverable in accordance with the Councils trajectory in the Housing Land Supply Background Paper. This site is not the only new housing allocation in the Plan. Each site, whether new or previously considered, needs to be assessed on its individual merits. **Brownfield/Alternative Sites** The Plan preparation has involved the assessment of several hundred sites, the vast majority of which are greenfield. The County has large areas of brownfield or previously developed land particularly along the Dee Estuary. However, these are former mining and heavy industrial areas and often areas where landfill has taken place. These areas

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are affected by flood risk, contamination and their proximity to the Dee Estuary, which is of international nature conservation importance. These areas are not suitable to accommodate residential development which is a 'highly vulnerable' land use in terms of flood risk. It is accepted that there are potentially smaller parcels of unused and derelict land and buildings in towns but these can be difficult to allocate in terms of predicting their availability, viability and deliverability. This is why the Plan makes a conservative allowance for small and large site windfalls as part meeting of the Plans overall housing requirement, thereby recognising that such sites can make a modest contribution to overall supply. A Plan which places too much reliance on such unidentified windfalls is likely to be found unsound. Each candidate site (and alternative site) has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously consulted upon. The assessment is detailed involving in excess of 30 assessment criteria which would have been too detailed to publish as part of the Deposit consultation documents. Instead the Council published a summary assessment of each candidate site in the form of a Background Paper and this took the form of a conclusion on each site. This provided a clear explanation as to why each site was considered appropriate or otherwise to be allocated. There are obviously some constraints to a site being allocated that are not capable of being resolved and this might include flood risk or an ecological designation. However, in the main, many constraints are capable or being either avoided or mitigated. Planning is therefore not black and white and is not always a scientific or numeric exercise. Rather, it is a matter of planning balance in weighing up the evidence before making a decision. Merely totting up scores and allocating the highest scoring is too regimented and simplistic and fails to take account of other considerations or the application of planning judgement. It is acknowledged that para 5.3.4.11 of the Development Plan Manual (2) stresses the need to use a clear assessment methodology in order to rank sites, which can then inform plan allocations needed to deliver the strategy and signpost potential reserve sites which may be required later. However, this version of the DPM has now been superseded by Edition 3 (March 2020) and there is no requirement for sites to be scored or ranked for the obvious reasons given above, that it is not a mathematical exercise. It is documented in the Integrated Impact Assessment that both the allocations and a number of reasonable alternative sites were appraised. Clearly, the reasonable alternative sites are not considered to perform as strongly as the allocated sites. In assessing candidate sites (and alternative sites) the Council has undertaken a consistent and detailed assessment of sites against an agreed methodology. Sites have been assessed against a wide range of criteria, designations and constraints of which green barriers is one. Alongside the assessment of sites is a review of green barriers. In the case of the Ewloe allocation the site is considered a sustainable location and a site which does not harm the overriding purpose of this particular green barrier given the remaining extent of the green barrier. The Plans settlement hierarchy and spatial strategy is based on a comprehensive suite of settlement audits which established the sustainability of each settlement in terms of location, size, character, role and level of services and facilities. The most sustainable settlements are generally located in the eastern part of the County close to major sources of employment. The lack of new allocations in the western part of the County should not be interpreted as there being no growth. There will be existing commitments (planning permissions) and also completions secured in the early years of the Plan period. For instance there are two large site commitments in Holywell, one of which is under construction and a large site commitment at Caerwys which is also under construction. A Council site being promoted by Wates as part of the SHARP scheme also has planning permission at Gronant, along with a further site at Pen-y-ffordd. It is a normal occurrence of the housing market for properties to be for sale or to be empty. This is known as 'churn' and an allowance is made for this as part of preparing forecasts of population and household growth. When projected household growth is converted to dwellings an assumption is added about vacant properties and second

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homes in the stock of 3.1%. The 'Population and Housing Projections Technical Paper' in Nov 2017 which accompanied the Preferred Strategy explains that Welsh Government recommends a notional average allowance of about 4% with a range between 1.5% and 8% depending on local evidence. Each of the 'alternative' sites put forward are commented on in turn: The Northern Gateway site is a key strategic mixed use allocation in the Plan. It forms a key part of the regional growth initiatives and is consistent with the draft NDF which identifies Deeside as a growth area. The site has two outline planning permissions and both parts of the site have a reserved matters approval for housing - Countryside Homes have commenced construction on the first phase of housing on the northern part (300 homes), and Keepmoat have now secured approval for the first phase of housing on the southern part of the site (120 homes). A reserved matters approval exists for a large B8 warehouse and distribution centre. The ethos behind the site is that it is a mixed use development with employment, housing and community facilities and it would be inappropriate to simply re-assign the employment areas to housing. The Gateway to Wales Hotel site recently suffered a fire and is reported in March 2020 to have been bought by a Manchester based developer with consideration being given to a range of uses being considered https://www.dailypost.co.uk/news/north-wales-news/gateway-wales-hotel-site-bought-17875172. The site though is relatively small and is not comparable to the allocated site. Neverthless, the Plans allowance for small and large site windfalls allows for sites such as this to come forward over the Plan period. The former Bengal Dynasty restaurant in Shotton is a small site which is not comparable to the allocated site. The site is capable of coming forward as a windfall over the Plan period. The Halfway House pub on Church Street in Connah's Quay is presently closed. The future intentions of the landowner are not known but it is relatively small and is not comparable to the allocated site. The site is capable of coming forward as a windfall over the Plan period. During the latter part of 2019 land at Hope Hill Farm, Hope was for sale. However, the land is in open countryside and is greenfield land not brownfield and relates poorly to the form and pattern of built development in Hope. The site is not appropriate or suitable to be allocated in the Plan The former Morrisons site Wepre Drive has potential to deliver a retail or commercial development / use and it is inappropriate to be considered for residential development. Preparations are being made for the demolition of the later phases (rear) of County Hall. Development is complicated by the need to retain the theatre, law courts and Llwynegrin Hall and the need to ensure some office space is retained for FCC. The site is also challenging in terms of mature trees, a listed building, green space, protected species and topography. In this context there was considered to be insufficient certainty regrading deliverability for it to be allocated. However, the site has the potential to deliver housing in the form of a large windfall site which the plan's housing balance sheet makes allowances for. The allotments on Upper Aston Hall are not owned by the Council. The allotments were opened by Hawarden Community Council on 08/06/13 and are fully let to local residents through an Allotment Holders Association. The site is not available nor suitable for housing development as it is a valued local community facility.

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Green Barrier The site was designated as part of green barrier (GEN4-12) in the UDP which covers land between Connah's Quay, Northop Hall, Ewloe and Shotton. The Council is required during the preparation of each development plan to review existing green barriers as confirmed in para 3.64 of PPW10 'Green wedges are local designations which essentially have the same purpose as Green Belts.... Green wedges should be proposed and be subject to review as part of the LDP process'. The Council has explained its approach to the review of the green barrier in Background Paper No.1. The overriding objective or function of this green barrier is to prevent the coalescence of the 4 settlements. Given the large extent of this green barrier, the modest drawing back of the green barrier to accommodate the two candidate sites which make up the allocation are not considered to represent a risk to the coalescence of Ewloe with Northop Hall or Connah's Quay. This is because the wooded valley comprising New Inn Brook forms a robust physical feature which prevents the expansion of Ewloe in a north westwards direction. The wildlife site at New Inn Brook (a continuation of the Wepre SSSI, SAC/SPA) would also require a buffer between it and development and this further protects against development. Although the green barrier is reduced by the housing allocation it does not undermine its effectiveness in seeking to prevent the coalescence of settlements. The physical arrangement of the site and green barrier does not result in development being any closer to Buckley. The town of Buckley lies to the south west of Ewloe. Green barriers (or green wedges as defined in PPW10) are not designated based on the quality of the landscape. The suitability and sensitivity of the landscape in terms of accommodating the proposed development is a separate consideration. Planning applications must be determined in accordance with the prevailing development plan in force. The planning application (050275) for a dwelling was refused 07/02/13 against the policies in the adopted UDP at that time on the basis that as the site was in open countryside and a green barrier and that there was no special justification for a new dwelling then the application was contrary to policy. The Council is now preparing a new development plan for a new time period, to meet a new housing need and this has involved a review of candidate sites, settlement boundaries and green barriers. **Site Assessment** The site was assessed against the Preferred Strategy and was classed as an amber site 'The site complies with the Council's Preferred Strategy, however there are site constraints that would need to be overcome to allow the site to be developed' with a further explanatory note 'This includes sites where there are known constraints which would need to be overcome such as highways improvements, flood risk or ecological constraint. This would also include policy constraints such as existing green barrier. It would also include sites where there might be a potential viability or deliverability concern particularly when a site has not come forward'. The fact that a site was classified as amber at Preferred Strategy stage did not mean that it was unsuitable to be considered for inclusion in the Deposit Plan provided that constraints can be overcome. Each of the objectors concerns about constraints will be addressed in turn: • Green barrier – this is addressed above • Agricultural land – it is accepted that the site will result in the loss of grade 3a agricultural land. The Council's approach to minimising the loss of BMV agricultural land is set out in Background Paper 9. Welsh Government has supported in principle the approach taken and has not objected to this housing allocation • Road improvements – there has been long standing concern about the junction between the B5125 Holywell Rd and the B5127 Old Mold Rd at the former Boars Head Inn. This was particularly the case when planning applications on the site of the Boards Head were under consideration. The developer of the allocation will

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implement road improvements by improving the capacity of the junction to enable it to function more efficiently both for new and existing traffic. The provision of a vehicular access to the smaller part of the site off Green Lane will bring about the improvement of the junction of Green lane with the B5127 Mold Rd. • School capacity – This is considered later in the Council's response under 'Infrastructure'. • Sewer – Welsh Water identified earlier in the Plan preparation process that there is a sewer crossing the site. The detailed layout and design of the site will need to take into account the route of the pipe and ensure an easement for future maintenance is provided. • Ecological surveys – An ecological survey of the site has been unilaterally undertaken and submitted by the site promoters and assessed by the Council's Ecologist. Given that the site is improved agricultural grassland it is not of high ecological value with the exception of trees and hedgerows which can be retained in the main as part of a detailed layout for the site. The development would need to provide an Ecological Impact Assessment with appropriate avoidance and mitigation measures. The proximity of the SAC means indirect impacts would also have to be considered and this could be achieved by either using the public right of way network to direct recreational pressure away from the SAC and wildlife site, or through commuted sums towards management works within the SAC and wildlife site. NRW have been consulted and have not objected to the allocation. • Landmap – The NRW Landmap system identifies the following evaluation scores geological landscape (moderate), Landscape habitat (high), visual and sensory (moderate), historic landscape (high) and cultural landscape (high). A Landscape and Visual Impact Appraisal has been unilaterally undertaken and submitted by the site promoter for the site. In terms of the wider landscape character this concludes that the proposal would result in a Slight-Moderate Adverse effect to the positive characteristics of the site and wider landscape. However, it adds that the proposed development would establish over time as an extension of the Ewloe settlement and result in a residual effect of Slight – Moderate Neutral by year 15. The Study recommends a number of mitigation measures including retaining, enhancing the hedgerow boundary that surrounds the site along with design measures such as scale, massing, materials and building type that reflect local vernacular, retain the public footpath for permeability alongside structure planting through open spaces and streetscapes which would help soften the built form. • Character of settlement – The site is well framed by Green Lane and existing development to the south, by existing residential estate type development to the east and by Holywell Rd to the north. The western boundary is defined by mature hedgerows. The site is therefore considered to represent a logical extension to the settlement. Given that the bulk of development in this part of Ewloe is post war estate type development it is unclear why further residential estate type development would be out of character with the settlement, given that this is already the prevailing character of the settlement. • Mining – the site sits within an area where mining has previously taken place. However, there is no objection from British Coal in terms of the presence of any technical constraints to development. A detailed Geo-Environmental study has been unilaterally undertaken and submitted by the site promoter and this has not identified any issues. • Landfill – there is no landfill within the site boundary. A former landfill exists on land adjacent to Ewloe Green Primary School but this is now developed for housing and any legacy from landfill would have been dealt with through mitigation measures. • Sand and gravel reserves – this is commented on elsewhere in the Council's response • Tenant farmer– this is commented on elsewhere in the Council's response **Amenity** Construction nuisance - It is inevitable that a new housing site will bring some disruption as a result of construction, wherever it is located. This is not a compelling reason to remove the allocated site from the Plan. A planning permission can include conditions relating to hours of work and construction arrangements. Most developers will also work to a Construction Management Plan. Ultimately nuisance from a development site will be a matter for Public Protection and Planning Enforcement to address, if any occur.

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Overlooking / privacy / light – The Council already has an adopted Supplementary Planning Guidance Note relating to Space Around Dwellings which seeks to ensure that the residents of new houses and residents of existing houses enjoy satisfactory living conditions in terms of privacy and light. This is a matter for the detailed layout and design of the site to address at the planning application stage and does not affect the principle of development. Air pollution – The Council, through its Public Protection service, is responsible for monitoring air quality and the levels of pollution across the County. This is done through a network of monitoring stations throughout the County. All North Wales authorities contribute to an Annual Air Quality Progress Report in fulfilment of Part IV of the Environment Act 1995. The Reports for 2018 and 2019 show that within Flintshire and indeed across North Wales, there are no Air Quality Management Areas (AQMA) and in consequence has not published an Action Plan. In Ewloe there are monitoring stations at St Davids Close, Ewloe (monitoring station 2), Aston Hill Roadside (3/15), Hawarden High School (ms4), Ewloe Green Primary School (ms46), Aston Hill Roadside (ms3,15), South Bank, Aston Park Rd, Queensferry (ms5,9,10), 4 Belvedere Close, Queensferry (ms16). The conclusion of this evidence is that are no air pollution issues within the County or locally. In addition to this, Welsh Government installed their own continuous monitoring station at South Bank in Aston prior to the consultation for the red/blue route and the Aston Hill improvement scheme prior to that. At no time has the Governments action level of 40 µg/m3 NO2 been exceeded in any year so the Council have not had to make this stretch of road or any other area in Flintshire an Air Quality Management Area. Nevertheless, Welsh Government have introduced formalised speed restrictions along the A494(T) in order to generally reduce air pollution, whereby speed limits have been reduced to 50mph from the DIP junction to beyond Ewloe. It is the case though that speed limits for much of the route (River Crossing to Ewloe) have been 50mph for several years anyway. Welsh Government published the report 'Tackling roadside nitrogen dioxide concentrations in Wales - Welsh Government supplemental plan to the UK plan for tackling roadside nitrogen dioxide concentrations 2017 – Interim Data on NO2 Concentrations for the Motorway and Trunk Road' in September 2019. The report highlights that since 2017 air pollution has reduced at roadside locations and will continue to reduce. A further consideration is that in the longer term, the implementation of the Red Route will have the effect of reducing traffic levels on the A494(T) and will be likely to lead to further reductions in pollution. Continued reductions in petrol / diesel emissions through tighter controls, combined with increasing levels of electric vehicles will also have the likely effect of reducing pollution further. This clearly points to a context of reducing levels of pollution in the area / County over time. The Council's Pollution Control Officer considers it is unlikely that the allocation alone would contribute enough additional pollution to push the levels currently being measured above the government action level of 40 µg/m3. However, the developer will be required to investigate and provide thorough Noise and Air Quality assessments to support any application in order to protect amenity and consider air quality in line with WG legislation and Future Generations Act. Light pollution – The detailed layout and design of the scheme will need to address the issue of light pollution as required by policy EN18 of the LDP. This must be viewed in the context of existing light pollution from existing development and street lighting. PROW – The detailed layout of the site will need to ensure that the public footpath through the site remains as an attractive route, without the need for a diversion. This can be achieved by incorporating the public footpath as part of green infrastructure, so that it retains an open, non-urbanised feel. It is usual for improvements to a public right of way to be secured such as improved surfacing to improve usability. During construction works it may be necessary to temporarily close a public footpath in view of health and safety considerations. However, in this case there is a public footpath to the west of the site which runs from Green Lane to Holywell Road (Newbridge Farm) and links

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in with public footpaths into Wepre Park. There is a further public footpath on the far side of New Inn Brook which again links Green lane with Holywell Road. There is clearly a network of alternative footpaths. Apart from the construction phase, which is commented on above, it is unclear how or why a residential development would result in noise pollution to existing residents of a neighbouring residential development. **Traffic** A Transport Assessment has been unilaterally prepared and submitted by the site promoters, and assessed by the Council's Highway Development Control team. This confirms that the road network has the capacity to accommodate the development. It is acknowledged the road network around Ewloe is busy at the rush hour peaks but this does not mean that additional development cannot be accommodated. The development will provide for the improvement to two junctions to i) facilitate the delivery of the site but also to II) facilitate a significant junction improvement at the junction adjacent to the former Boars Head Inn in order to improve capacity. This is a known long standing problem and in the present financial climate, the junction improvements would be unlikely to be delivered in the absence of developer funding. It is unclear from the objection which country roads have experienced such an alleged increase in traffic. It is accepted that parking problems have occurred on residential roads. However, this is an existing problem and it is unclear how additional housing development which will have its own parking provision, will make this worse. The site is proposed to have two points of access, one onto Holywell Rd and one onto Green Lane. The provision of a through road between the two access points would result in residential estate roads becoming a rat run. Instead the proposed development will deliver an improved junction between Green Lane and Mold Rd and significant improvements to the junction of Mold Rd and Holywell Road including right turn lanes to add additional capacity at the junction. A Transport Assessment has been unilaterally provided by the site promoter which establishes that the road network can satisfactorily accommodate the development. The site is within easy walking distance of Ewloe Green School and its development need not ad to existing problems. The improvement to the junction of Green Lane and Mold Rd may also help improve traffic movements in the area around the school. As referenced above, work is progressing in the Ewloe area in terms of Active Travel which will improve links to Hawarden High School. The Infrastructure Plan lists road schemes that are already identified by Welsh Government or by the County Council, where it is necessary to safeguard the route in the LDP. Examples include the red route identified by Welsh Government and a number of other schemes identified in the Local Transport Plan by the Council. The Ewloe housing allocation is only a proposal at the moment as is the two sets of road improvements proposed (and referenced in policy HN1). Therefore the two proposed junction improvements are referenced in Appendix 2 of the Infrastructure Plan as part of the highways section for this site. The proposed improvements to the Holywell Rd and Mold Rd junction will be carried out by the developer within FCC Highways land i.e. the adopted highway. The proposed improvements to the Green Lane and Mold Rd junction will be carried out by the developer using adopted highway land and also land to the west of Green Lane which is within the control of the one of the site landowners. However, neither the Council nor the developer has any control over land at Weighbridge Rd in terms of major road improvements. Nevertheless, the Council's Active Travel Integrated Network Map shows a proposed Active Travel along Weighbridge Rd.

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Infrastructure No objection to the Plan or allocation has been made by the Local Education Authority. The commentary of the Wrexham LDP Inspector referenced in detail above, establishes that it is normal practice for new development to address capacity issues through developer contributions. The development will not deliver completed houses until 2023-24 and will take several years for the development to be completed. The impact on infrastructure will therefore be gradual and will not be in 'one hit'. This gives the Local Education Authority time to address how the growth in the Plan can be accommodated in terms of school capacity. The Planning Service continues to work with the LEA to secure appropriate mitigation for the delivery of planned LDP sites. No objection to the Plan or allocation has been made by Betsi Cadwaladr University Health Board. Flintshire has a number of relatively new Primary Health Care Centres and the issue is one of lack of sufficient staff including GPs, rather than a lack of facilities as also commented on by the Wrexham LDP Inspector above. As stated in the preceding paragraph in relation to education capacity, there is ample time for the Health Board to plan for how it intends to meet the health care needs of the Plan's growth levels. The Council continues to work with the Health Board in securing the appropriate provision of infrastructure such as health for the delivery of LDP sites. The presence of services and facilities in Ewloe Green and Ewloe is commented on above, with the conclusion that there is a good range of facilities and services in the settlement which are within walking distance of the site. The issue of education capacity is identified and responded to above. The IIA reflects that measures exist to address school capacity. The issue of the public footpath is commented on in detail above. The medical centre in Hawarden village centre is 2.7km from Ewloe, medical centres in Buckley are 2.8km from the site and medical facilities in Queensferry and Shotton are within 4km of the site. The IIA is therefore correct that there are doctors within 1-4km of the site. The history of St David's Park is not a matter for this LDP. The Council has engaged with and consulted internally throughout the Plans preparation. Indeed the Plan has safeguarded two sites for cemetery extensions at Treuddyn and Greenfield. No such need for sites has been identified elsewhere in the County by the appropriate area of the Council. The site adjoins an existing play area at the junction of Greenville Avenue and Circular Drive. The development will also provide on-site play space and open space as well as a Multi Use Games Area (MUGA). In addition the existing public footpath will be sympathetically integrated into a green infrastructure network for the site, so that it remains an attractive walking route. **Environment – Natural** The site is not green space. It is presently agricultural land and with the exception of the public right of way has no right of access to the public and is otherwise private land. The public footpath will be retained as part of the detailed layout of the development and is commented on in more detail earlier in the Council's response.

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Trees and hedgerows, with the exception of hedgerows to secure vehicular access, will be retained as both landscape and ecological features. This is a matter for the detailed design and layout of the development. There is no objection to the allocation from NRW. An ecological survey of the site has been unilaterally undertaken and submitted by the site promoter which has been evaluated by the Council's Ecologist. Whilst the site is close to the SAC and Wildlife Site there is no objection to the principle of development subject to avoidance and mitigation measures. These could involve using the public right of way network to avoid cumulative impacts of recreational pressure on ecological habitats or it can be achieved through commuted sums to contribute towards off site ecological management works. This is commented on under 'Site Assessment' above. The implications of the 1986 Agricultural Tenancy Act is a matter between the tenant farmer and landowner. The Council has no financial interest in or involvement in such arrangements and it will be for parties involved to resolve. The issue of the use of agricultural land is commented on earlier in the Council's response under 'Site Assessment'. The site is not adjacent to the New Inn Brook wildlife site as there is buffer of land between the two. The ecological issues have been commented on above and do not frustrate development or reduce the number of units. The site may be open countryside at present but it is 'improved' grassland where the previous and present agricultural practices have sought to maximize its agricultural productivity. With the exception of trees and hedgerows such land typically has low ecological value. It is accepted that any development will have some impact on landscape through the loss of open countryside. However, the site has an irregular boundary as it follows hedgerows. The undulating nature of the site plus the provision of landscaping and green infrastructure can help to soften the appearance of the development. A Landscape and Visual Impact Assessment has been unilaterally prepared and submitted by the site promoter and sets out the assessment of the site and the proposed mitigation measures. This is commented on in more detail earlier in the Councils response. **Environment – Historic / Heritage** The Council's historic environment mapping records show only one asset in the vicinity which was an archaeological find of a 'finger ring' to the rear of Newbridge Farm. The policy already specifies the retention of hedgerows and trees. **Flood Risk / Water Infrastructure** The site may have small areas which are wet (as indicated on the NRW flood risk maps) this does not equate to the site being a natural wetland. The NRW Advice Map shows that the site is not within a zone C1 or C2 flood risk but that there are pockets of surface water flood risk. NRW have not objected to the allocation. National Legislation requires the use of Sustainable Urban Drainage Schemes to ensure that surface water run-off from the development is no greater than the run-off from a greenfield site. The soil structures within the site will be taken into account in the design of a drainage scheme.

Council response
The findings of the Geo Environmental Report unilaterally prepared and submitted by the site promoter will inform whether and how a SuDS scheme can be satisfactorily designed for the development given existing ground conditions and topography. The intention of SuDS is to sustainably drain the surface water run-off from a development to no more that the equivalent greenfield run off rate. In this context it is not considered that the perceived risk of flooding to adjoining properties can be increased, and an effective SuDs scheme has the potential to provide significant betterment to any present situation. Any surface water problems outside Ewloe Social Club are an existing issue and not related to the proposed development of the allocated site. The detailed design work associated with the improved Green Lane, B5127 junction will address surface water run-off. As explained earlier in the Council's response the allocated site is not within either a C1 or C2 flood risk zone. A detailed Geo Environmental Study has been unilaterally undertaken and provided for the site and this has shown that there are no water abstraction licences relating to the site. In addition, no objection has been made to the site by either Welsh Water or NRW. Any easements or legal rights relating to the site are a civil matter between the site owners and third parties and ultimately the developer. No objection has been made by Natural Resources Wales in respect of the relationship of the site with Wepre Park SSSI/SAC. Welsh Water have made representations on the plan as set out below and confirm that a water supply can be provided to the site and that improvements to the Queensferry WWTW will be required. **Energy** The IIA recognises that both the construction phase of development and the operational phases of development will involve energy usage. However, that energy usage would happen whichever site was allocated in the Plan. Dwellings on the site will be constructed in accordance with the current Building Regulations in terms of energy efficiency. Policy EN12 will also require that new development maximises the potential for renewable or low carbon energy technology. **Welsh Language** The issue of education capacity is addressed above. The teaching of Welsh is a compulsory part of the curriculum for Welsh schools and pupils. **Tests of Soundness** The Councils Delivery Agreement sets out how it intended to engage with and consult consultees, stakeholders and the public. The Council has exceeded statutory requirements. The Plans preparation has involved a number of documents being made available and distinct consultation exercise: • Key Stakeholder Forums • Delivery Agreement consultation • Call for Candidate Sites

Council response

- Candidate Site Assessment Methodology
- Publication of Candidate Site Register
- Key Messages Document
- Strategic Options
- Preferred Strategy and Invitation for Alternative Sites
- Publication of Alternative Sites Register
- Deposit Plan

The key stages have been publicized by public notices, direct mailings to consultees, direct mailings to those on mailing list, availability of documents on web and advance notification to Council Members and Members of Town and Community Councils with an expectation that they would assist in publicizing the Plan locally. The Deposit stage involved site notices for housing allocations and strategic sites. The Council's PR Officers have also used social media to publicise the Plan. The Council has taken all reasonable steps to publicise the various stages of the Plan where the public and stakeholders needed to be involved and there is no requirement in the regulations to consult on Candidate Sites. The Council nevertheless made the register of candidate sites publicly available as soon as it was compiled, complied with changes to Welsh Government regulations to indicate at the Preferred Strategy Stage how the Council felt candidate sites complied with the Preferred Strategy or not, and then published a summary of the assessment and planning view of all candidate sites at the deposit stage.

The Council has used an industry leading specialist consultation portal which is used by a large and growing number of planning authorities in Wales and England. It is disappointing that objectors claim they found it difficult to use but the Council made it clear that the portal was not the only means of making representations as they could also be made via letter, representation form and e-mail. The Council produced two 'step by step' guides to i) register on the portal and ii) how to comment on the portal, and these were available both on the website and in hard copy. The Plan was also made available to physically view at a number of consultation venues.

The Deposit Plan was accompanied by an easy to understand leaflet explaining the Plan and the consultation. The Plan has to meet certain legislative requirements and Welsh Government guidance and it is inevitable that the Plan has to be accompanied by a range of supporting documents and that certain terminology is used and is therefore by definition a complicated document. Objectors did not have to read the whole plan or all supporting documents to understand the allocation of the land at Ewloe.

These matters are addressed in the relevant sections above. In terms of i) The Health Board do not object to this site or the plan as a whole, or on the basis of their inability to meet the demand from the growth that the Plan will facilitate over its plan period. They do not object at all. Provided that the requisite improvements in infrastructure capacity is provided then it is unclear why 300 dwellings will prevent a cohesive community from being enabled. Whilst the process of constructing a housing development will inevitably bring with it some disruption to existing residents, this would be the case whatever site was allocated in the Plan and is capable of being managed effectively via appropriate planning conditions. It is not a reason to question the soundness of the Plan.

The site adjoins an existing post war residential development which is of an estate type character, and which incorporates green space and a play area. In broad terms this is no different to what is being proposed on the allocated site, a housing development which incorporates a green infrastructure network, play area and MUGA. In no way, shape or form can Ewloe Green be described as a 'hamlet' as it has estate type development, commercial development, and an urban context in terms of the road network, proximity to the A494(T) and being part of the wider settlement of Ewloe. The site is not considered to be inappropriate in terms of its context and the Plan is not considered to be unsound in the terms set out.

Council response
The site promoter has invested a considerable amount of time and resources into unilaterally undertaking a comprehensive set of background studies to inform the deliverability of the site which is a key part of demonstrating its soundness. The Council is also aware that initial discussions have also taken place between the site promoter and a number of house builders with a view to identifying a preferred development partner. The identification of a developer by the time of Examination will also assist in demonstrating delivery and therefore soundness. The Plan has been prepared in the light of government guidance and is not considered to be out of accord with PPW10. The issue of the scale of the allocation relative to the settlements categorisation as a Tier 2 Local Service Centre is commented upon earlier in the Council's response. The allocation is considered to be in accord with the Plans spatial strategy. The Plan was made publicly available several months prior to the commencement of the consultation exercise, at the time that is was reported for approval to Cabinet and Council in July 2019. Considerable publicity was given to the consultation in good time before the start of the 6 week period involving direct mailings to people on the mailing list, press notice, articles on the Council website and social media posts. Advance briefings were also given to all elected members as well as to Town and Community Councils. The Council is also aware that public meetings were arranged by the community prior to the start of the six week formal deposit consultation and the drop in session provided in the community was the most well attended of all the sessions provided. It is not clear therefore why or how local people were not aware of the proposal, the consultation, and judging by the high level of response, the various means of making comments on the plan The consultation involved permanent exhibitions, a full range of documents at Ewloe and County Hall and key documents at libraries and Connects Centres. The full range of documents were available on the Council's website through the consultation portal. The consultation exercise was in conformity with, and indeed, in excess of with Welsh Government requirements and was also in line with the Council's Statement of Community Involvement as set out in the Delivery Agreement. Welsh Government require that a development plan is supported by a range of background documents which forms the evidence base for the Plan. The range of documents accompanying the Plan is in accordance with these requirements. They were clearly listed within the Public Notice. Several of these documents are technical in nature but are written with introductions or executive summaries which seek to explain their context and purpose. The Plan is by definition a complicated document, but residents did not need to read the whole plan or all supporting documents, to understand the allocation of this land the Plan, or to make their views known. It is unclear how the consultation process is weighted in favour of this proposal as the Council is merely following prescribed Welsh Government procedures. **Supporting Representations** The support for the allocation is noted and the submitted studies will be useful at Examination in support of the deliverability of the allocation. The support for the allocation is noted. However, the Local Housing Market Assessment (and subsequent Update) clearly reference the need for smaller units of accommodation and that new developments should not comprise solely of 4/5 bedroom units. Policy HN2 seeks to ensure a mix of housing units by size and type to ensure that cohesive communities can be created. The LHMA has identified a need for affordable housing across the County and the Viability Study has assessed the ability of sites within different housing market sub-areas to deliver affordable housing whilst still remaining viable and deliverable. Ewloe sits within a strong housing market sub area where the Viability has demonstrated that 40% affordable is reasonable.

Policy HN1.8

Due to the large number of representations received to this allocation, and the fact that a number of common issues were raised by objectors, a collective response has been provided at the end of this table which covers all of the points raised within each of the individual representations.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
2	HN1.8 Ash Lane, Hawarden	Object	Delineation of Mancot & Environmental Impact This area clearly allows delineation of the village of Mancot, a vibrant community in its own right which this proposed development would subsume into an enlarged Hawarden. The village of Hawarden has been subject to a frankly ridiculous level of expansion and overbuilding over the last three decades. Removal of this green space would choke both Hawarden and Mancot even further. Given the current environmental concerns around carbon and air quality I am appalled at the proposal to use what was set aside as greenbelt rather than the huge swathes of available brownfield sites elsewhere in Deeside. Drainage Issues and Flooding The fields directly behind Park Avenue are prone to flooding with large areas of standing water, exacerbated by the overbuilding in Hawarden which has reduced the land available to soak up rainwater. I am quite sure building on this land would push the water onto existing development causing significant flooding, a problem which already exists in Mancot and Sandycroft. Local Services The schools in Hawarden are currently at capacity with all the attendant issues of car parking, pollution and children having to travel further afield when they do not get the placement of their choice. Despite significant developments in Hawarden in recent decades there have been no new schools. I and my family, including two school age children, have been unable to register at the local doctor's surgery and travel to Broughton. I believe the Broughton surgery is now at breaking point and my mother who also lives in Hawarden is finding it increasingly difficult to get an appointment at her surgery in Shotton. Planning should be holistic, ignoring issues around local services, utilities and highways on the basis they are not included in planning regulations is disingenuous and frankly unacceptable. Highways There are significant local issues with car parking around school, peak hour congestion on the Queensferry roundabout and the adjoining A494, noted by Highways as one of the busiest roads in England & Wales. Additionally, even since the Redrow development adjoining Penlan Street / Bennetts' Lane Turning from Park Avenue or Cottage Lane onto Gladstone Way has been very difficult at peak times. Cottage lane itself is extremely narrow, lacking in p	
9	HN1.8 Ash Lane, Hawarden	Object	In reference to the Park Ave / Mancot plot, the plan will cause the delineation of the village of Mancot, the plot is prone to flooding, local doctors and schools are already full and the surrounding roads are inadequate for the amount of increased traffic.	Removal of allocation.
11	HN1.8 Ash Lane, Hawarden	Object	Housing Allocations Housing Ash Lane HN1.8 Tier 2 Section 8 Ash Lane, Hawarden 288 Homes We object to the proposal to build housing on the land between Ash Lane, Gladstone Way and Park Avenue in Mancot as local schools are already over-subscribed with pupils. there are already significant traffic and safety issues outside of Hawarden Village Church School, Sandycroft Primary School and Hawarden High. Building additional houses will exacerbate this. Building on land prone to flooding could have devastating	As above. Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			implications for existing dwellings and the local environment. The field were the proposed housing is planned is already categorised as a flood risk as are the connected roads in Mancot. (Source National Resources Wales) This development will lead to a further loss of green belt land and will lead to a growth which would go above recommended levels and would result in growth beyond what is sustainable for a village with the current facilities and infrastructure. Increased traffic will lead to increased pollution at a time when the Welsh Government has declared a climate emergency. Local government should be looking to significantly reduce its environmental impact. Further environmental impact will be caused through the loss of wildlife havens such as hedgerows, ditches and mature trees having a detrimental impact upon local wildlife and animals. Previous mining in the area has already led to houses on Park Avenue in Mancot being underpinned. There is limited burial space remaining in Hawarden Cemetery as indicated in a recent BBC News article (11/10/19). It is unjustifiable to build dwellings on the proposed site when this land could be used to extend the cemetery. There are many brown field sites in the area that could be developed instead making the modification of this land unjustifiable. The land is fertile agricultural land and should be protected to ensure future food supply. The Councils preferred strategy document indicates this site is categorised as an amber site having significant constraints that would need to be overcome to allow the site to be developed. such as traffic and flood risk improvements. Back in 2010, the council listened to residents legitimate concerns regarding the flood plain, rain water, old mines and lack of infrastructure (schools full, bad traffic, lack of amenities etc.) when faced with a similar building proposal. As far as I'm aware, none of these issues have been addressed in the following 9 years.	
34	HN1.8 Ash Lane, Hawarden	Object	Proposed Development (Ash Lane) Objection The area dedicated for the proposed development is classified as “Green Belt” land. 1.3. The area of the proposed development is liable to flooding, even in a period of rainfall in June 2019, the area was flooded, schools were closed due to drain surges and flood water and parts of Sandycroft were also underwater. Infrastructure: Given the scale of the proposal, there is no conceivable way local roadways, including access via Ash Lane are able to manage with the additional vehicle traffic. No traffic survey has been submitted, no impact survey on existing road infrastructure or alternatives to provide relief to the local roadways.	Removal of the Ash Lane allocation.
36	HN1.8 Ash Lane, Hawarden	Object	Ash Lane Mancot Traffic and congestion creating disruption which at unacceptable levels along Gladstone Way and existing access causes major problems Regular Long Traffic queues impacting on infant/junior school access Frequently blocked access to Glynne Way & village amenities, affecting motorists and pedestrians Bus routes via G/way cant keep to timetable due to traffic Road safety risk factors, residents have issues exiting driveways on G/way pedestrians have difficulty crossing the roads Number of homes proposed, average household now owns 2/3 cars this immediately increasing local traffic problems. Pollution impacting air quality, there is a need to protect the green spaces and agricultural land increased drainage issues due to concrete Previously mined land creating an increase in flooding and landslip. lack of infrastructure Pressure on schools, GP practices,	Removal of allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
49	HN1.8 Ash Lane, Hawarden	Object	Ash Lane: I strongly object to the above development due to a number of reasons namely: 1. Over crowding at the local schools. 2. Lack of doctors. 3. Flooding in the fields. 4. More traffic in a narrow main road through village. -- 1. The Junior and High schools cannot cope with the number of pupils they already have. The traffic is horrendous already. I have enclosed photos of Cross Tree Lane and Ash lane, as you can see the cars are parked all along Cross Tree Lane from Gladstone Way through to Glynne Way and past the Cemetery in Ash Lane. It is an accident waiting to happen. I cannot imagine what the pressure of cars driving possibly up to 500 hundred more children to school will make. 2. The doctors surgery is beyond capacity already with only two doctors serving 3 surgeries , Hawarden, Saltney and Buckley. You cannot get an appointment with a doctor, only a practice nurse or a pharmacist . I dread to think what an influx of roughly a thousand more people will mean to even trying to seeing those professionals. 3.The fields that you are going to build on are constantly flooded and the drains cannot take the water. The people in Mancot and Pentre have sewage in their garden now without more houses being built. The drains just cannot cope with anymore. 4. Our historic village has a narrow main road and additional traffic will make it dangerous at commuter times and the school run. In essence, there is no infrastructure in place to cope with this development and I urgently ask you to refuse this plan.	Removal of allocation.
51	HN1.8 Ash Lane, Hawarden	Object	Ash Lane: The objection is based on the following: Land drainage and the recent English Office of Environmental Protection (OEP) that is scheduled to also be implemented in Wales. The proposal is at the odd of the OEP and will destroy natural environments. 2014 River Dee Catchment/ Flood Management Plan by NRW says that sea levels will rise and additional development will increase flood risk considerable and indeed, flooding in Mancot has worsened. i.e June 2019 media report saying that water was gushing down Ash Lane flooding properties off Mancot Lane and blocking access to the library. The proposal will worsen the situation. The land is a habitat for many species including brown hare which whilst not protected is still endangered in the UK and classified as a priority species in the UK bio diversity plan.	Removal of allocation.
53	HN1.8 Ash Lane, Hawarden	Object	Proposed Ash Lane / Gladstone Way development Schools – Both primary schools in the area are already over subscribed. Doctors / Dentists– The practices in Hawarden, Saltney and Buckley cannot cope now. They are already over subscribed. Environmental impact through the loss of wildlife havens such as hedgerows, ditches, mature trees would be unacceptable along with removal of further green space when brown belt land exists elsewhere. Vehicles / traffic – A proposed development of 288 houses will inevitably lead to increased pollution at a time when climate change should be the top of everyone's agenda. Limited public transport Environment – Lower Mancot and Sandycroft were flooded this year. Both are in flood risk areas, adverse weather and an inability for the drainage systems and sewers to cope could lead to something similar. I am also aware that the area has a lot of disused mining sites, there is a historic railway line and platform opposite my house.	Removal of allocation.
98	HN1.8 Ash Lane, Hawarden	Object	Objection to Mancot: Ash Lane This would have a detrimental effect on the community of Mancot. Mancot is a village. If this scheme went ahead the amount of traffic generated would be far too much for the village especially now that you are going ahead with traffic calming measures. Mancot would not be a village! You	Removal of allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			have already resisted development here as there would be no distinction between Hawarden and Mancot this reason is still valid. The roads around Mancot would actually not be able to support the amount of traffic that would be generated. The Pollution from the extra vehicles would be unacceptable. There are measures all around the area at the moment to stop the pollution yet this will cause more! According to Natural resource Wales The land at the top of the hill and field itself is categorised as a flood risk and the connecting roads in Mancot leading to Sandycroft which would then have an effect on the excisitng dwellings in Mancot and Sandycroft. The Schools are over subscribed as it is especially with John Summers being closed. Simply there are not enough places for the children. Adding 300 houses I would say at least 400 children. Where are they going to go? The Doctors are at breaking point. Have you tried getting an appointment at the doctors in this area? Impossible. People put of going as they know they have a fight just to get to see a doctor. That in itself causes long term problems as they could then end up with something more serious.	
100	HN1.8 Ash Lane, Hawarden	Object	I would like to take this opportunity to bring to your attention, that there is only 4 years worth of grave spaces left at the graveyard in hawarden. There is also insufficient parking outside Hawrden Junior and infant schools. Wouldn't the land be better used for burial plots and car parking for the local schools? There are 27,000 houses/flats empty in Wales currently. Surely, the use of these premises should be considered before building new ones? I thought it might be worth mentioning the Stables medical centre in Hawarden, Im sure this has been brought to your attention. The GP's surgery there is just a complete disaster. Trying to see a doctor is extremely difficult and frustrating. It can actually take weeks on end before your phone call is even taken. The last 3 times i have been there, I havent even seen a doctor, i have seen a pharmacist on 2 occasions and a practicing nurse on the other occasion. If you go on the Google reviews for the Stables medical centre, you can see other reviews from other people to give you an idea of the state of the medical centre. 9/10 they don’t actually have a GP onsite. Could you let me know if a new medical centre is to be built if these new houses are built on the gladstone fields? As the surgery cant cope with the number of people it has to deal with now, let alone the hundreds that would need it if the houses are built. Just another point i would like to make is that at the moment there is a number of houses due to be built at the airfields in Garden City, with a large section of the land being used for business development, which I have been told no business' have taken up. Wouldn't this be an opportunity to look at this and possibly alter the plans and turn it into a housing development instead?	Removal of allocation.
106	HN1.8 Ash Lane, Hawarden	Object	I recently found out about your prospective plans for a development on the farming / green belt land between Park Lane and Ash Lane in Mancot. I have a number of objections to this proposal, but the most significant regard the facilities needed by any new residents. Namely • the schools on Cross Trees Lane (Hawarden Village and Church School / Primary school) and Leeches Lane (Sandycroft County Primary) appear to be full and since moving into the area 2 years ago I have to time my journeys out of the village to avoid the massive congestion caused at either end of the village. From speaking to neighbours, this has been a problem for many, many years and I do not have any confidence that the current situation will be improved by the Council and that is before the problem is exacerbated by the addition of several hundred	Removal of allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			houses. The congestion caused by parking during school pick-up and drop-off times is very dangerous, especially due to the nearby junctions. • There is a massive issue getting a medical appointment at the Stables Medical Practice (in order to try to get an appointment two weeks ago for my wife I had to call them over a hundred and ninety times before getting through – by which time there were no appointments available). This situation will also get much worse with the proposed new development. • I am very concerned that the development is proposed to go ahead on green belt land. This land serves a useful purpose of separating Hawarden and Mancot and allowing the two villages to coexist each with their own character. As I suffer from depression I also make great use of the green belt land to walk and enhance my mental well being and mental health - the loss of this land would have an effect upon both. I understand the need for more houses, especially affordable options, however I feel that there must be better options available, including a much smaller development or development of alternative sites which are more suited to providing the infrastructure support any new development requires.	
108	HN1.8 Ash Lane, Hawarden	Object	I am sending this email to object to the proposed development plans for Ash lane/ Park Lane in Mancot. I am very concerned about the loss of green belt land that I, and many others, make extensive use of for dog walks and enjoying the closeness to nature. The proposed access via Ash Lane will add to complex traffic issues around school drop-off and pick-up times in particular. It will lead to a virtual merger of Hawarden and Mancot despite the fact that these are currently two distinct communities, each having their own character and sense of “belonging”. I had never experienced this fantastic village feel until moving into Mancot 2 years ago. This would almost certainly be lost. Access to GPs is already extremely difficult, in fact in several cases I have given up and just wait to see my oncologist or surgeon for advice. This would inevitably deteriorate further with the addition of lots more homes.	Removal of allocation.
112	HN1.8 Ash Lane, Hawarden	Object	Ash Lane, Mancot: ruin the character of the village overdevelopment lack of facilities no bus service aging population increased traffic no vacancies in doctors, dentists, schools flood risk due to surface water run off in heavy rain located on a greenfield site which residents use for recreational purposes reduction in farming land	Removal of allocation.
116	HN1.8 Ash Lane, Hawarden	Object	We wish to object to the proposal HN1.8 for housing development to take place on land adjoining Ash Lane, some of which forms part of the agricultural tenancy of our client (for whom we are instructed to make this objection) he is tenant of St Deiniols Ash Farm. We are instructed to object on the following grounds: 1. the land is good agricultural land and forms an important part of his holding and thus his livelihood. Strategic policy 5.2 states that the council's policies should meet the needs of all the community, but this seems to ignore the farming community. 2. building on this land seems to be in contravention of STR13 as it does not protect an environmental asset i.e. valuable farmland. 3. development of this land is going to affect the landscape character in the area (ENV4) and trees, hedgerows and woodlands (ENV7)	Removal of allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
118	HN1.8 Ash Lane, Hawarden	Object	I wish to formally submit my opposition to Ref HWN 005 (HN1(8) Ash Lane housing development. The reasons for my objection are :- Issue of weight of traffic congestion around the School on Cross Tree Lane and Ash Lane is used as a ratrun. Residents of Mancot and Hawarden have great difficulty accessing doctors and dentists due to a deficiency of such professional at local surgeries. Should hundreds more people live in this area there will be greater waits for appointments.	Removal of allocation.
127	HN1.8 Ash Lane, Hawarden	Object	Should this development be approved it will be in direct contradiction to PPW of not building on greenfield sites. The development will also contravene the National Governments Policy of building on Brownfield sites before Greenfield sites. there are Brownfield sites within Flintshire which are not fully utilised for building, one example if the former site of County Hall Mold. I am concerned that if this development gets approved, properties on Lower Mancot and Pentre will suffer more frequent flooding events. Already in 2019 properties in Pentre were flooded. I have tried to find the report into this on FCC's website but it does not appear to have been completed, against FCC's policy of investigating all such flooding events. Should the development go ahead and a massive swathe of green belt land be concreted over less flood water will be absorbed by the land and will flow down the hillside to properties at the bottom of the village.	Removal of Allocated site at Ash Lane
129	HN1.8 Ash Lane, Hawarden	Object	I would like to object in the strongest words to the building of houses on Ash Lane Mancot for the following reasons: The drains and sewage pipes are already unable to cope with the amount of rain fall. As I live at the bottom of the village, we constantly get water problems. It only takes a reasonable heavy shower for my garden to flood from rain water running down the hill both as surface water and in sewage pipes. Please see attached photos of the far end of my garden. Both doctors and dentists are under great pressure due to the number of patients. To get a doctors appointment, you either have to go and stand outside the surgery at 8 am of a morning or try ringing. Due to the number of calls the doctors receive, when you eventually get through, all appointments for that day are gone and you have to go through that same process the next day. Both primary schools (Hawarden and Sandycroft) are oversubscribed. Where would the children be expected to go to school? Or would the current schools be asked to admit more pupils. Surly this would be detrimental to the learning experience? The roads in Mancot were built over 70 years ago. In some places they are quite narrow. There is a plan in progress to try and alleviate the traffic issues but to add at least another 550 cars (presume two per house) would not help even after the new scheme is installed. There is no public transport apart from three buses per day. This would necessitate the need for the home owner to use cars. Not very green in this day and age.	Removal of allocated site at Ash Lane Mancot
135	HN1.8 Ash Lane, Hawarden	Object	The proposed plan to potentially develop the land between Ash Lane and Gladstone way (which I believe is green belt ?) Is in my opinion a ridiculous one. I agree that with the population rising year on year all of the country require more homes being developed, but why oh why is nothing being done in the local area to sort out the already under pressure infrastructure to the residents who already struggle with many problems in Mancot and the surrounding area. You struggle to get a doctors appointment , traffic is a nightmare all through our village and schools are at bursting point . My main concern amongst plenty of other issues regarding this plan is the school on cross tree lane. The situation there at school drop off and	Removal of allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			collection times is bordering on deadly, we are simply waiting for a serious accident to occur before anything seems to be done about it ! The plan would see another 288 homes built, just roughly I guess at maybe another 350 vehicles trying to route through our village as part of their daily commute etc. We see grid lock on Ash Lane and Cross tree lane daily, I m led to believe a survey on traffic was taken whilst Ash Lane was being resurfaced a few weeks ago, if that's the case what a shambles the council are for letting this happen ? The road was closed for several days so was not open for traffic . Like I say at the start of my email there are plenty of reasons to object to this seemingly ridiculous lpd	
139	HN1.8 Ash Lane, Hawarden	Object	Proposed Development - Ash Lane Hawarden Sir, I write to register my concerns about the likely impact of the proposed development. I live on Gladstone Way, therefore I believe I have valid insight. 1) Traffic Gladstone Way - the density and flow along Gladstone Way at peak times are already intolerable. 2) Local Primary and Secondary Schools are at capacity - local children are being offers places Saltney and Hope as Hawarden schools have zero capacity. 3) GP Services - I suffer from a chronic condition requiring check ups twice yearly yet I simply cannot secure an appointment in any Hawarden Surgery. I pay to see a private GP in Chester. 4) Air quality is concerning as is the environmental impact caused by additional private vehicles and impact on water drainage in an area prone to flooding. Please consider the impact of this application before making a balanced decision. I feel a review of the traffic management plan for lower Hawarden would alleviate many of my concerns. During Airbus shift changes, I queue to get off my drive, this can take 5 mins or more. Ironically, even through I work in motorsport (hence I understand the dangers of speed), I would like to see an enforced 20mph speed limit on lower Gladstone Way, this considered as part of the planning process for the proposed new development.	Removal of allocation.
141	HN1.8 Ash Lane, Hawarden	Object	I hereby object to the proposed development of new homes on multiple fields between Gladstone Way and Ash Lane.	Removal of allocation.
156	HN1.8 Ash Lane, Hawarden	Object	Objection to the development of houses on the allocated site at Ash Lane, Hawarden. The Land is good agricultural land and is being used as such - but my main objection to the development is the additional traffic it will create in the area and the pressure on already overstretched local services.	Removal of allocated site at Ash Lane, Hawarden
158	HN1.8 Ash Lane, Hawarden	Object	Objection to the allocated site at Ash Lane, Hawarden. There is no good reason why this green barrier should be destroyed. this land is prime agricultural land, currently sustaining livestock and crops, in addition is supporting a haven for wildlife with badgers, bats and an abundance of birds. within this designated land there are a number of magnificent trees, the felling of which will be detrimental to the ecology system. Some of these are subject to preservation orders. this must not become another concrete zone robbing yet another tract of land of its natural drainage. Following heavy rainfall this immediate area regularly floods and in turn flows into the adjacent gardens. The whole area is riddled with dis-used mine shafts to the effect the land is sinking, in quite recent times a number of properties have suffered subsidence. A development of this magnitude will involve large increases in traffic. Once properties are	Removal of allocated site at Ash Lane Hawarden

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			occupied, assuming 3 per property, traffic movement could approach an additional 4,000 movements per day. Presently there is no frequent bus service serving Mancot village, nor the area of the proposed site. All of which suggests even more use of personal transport will be essential. There is no infrastructure to accommodate these horrendous traffic volumes the present essential amenities will not cope with this proposed development. Education - there are no facilities, the schools are full and unable to cope with further influx of pupils. Medical (and dental) again, no facilities a situation that is currently desperate with the inability to obtain a doctor's appointment, a visit to hospital emergency results in painful waiting times - 15 hours! Law and order, concerns that there is insufficient Police presence for the whole area of Pentre, Mancot and Hawarden. Provision will be required to maintain adequate cover following development of this magnitude. The protection of this green barrier will serve to prevent coalescence of the Hawarden and Mancot communities, whilst the housing allocation will bring this about.There have been enough of Flitnshire villages becoming towns!	
8	HN1.8 Ash Lane, Hawarden	Object	HN1.8 Ash Lane - not supported Issues that have appear to not have been addressed are: Road network - large development - no consideration given to how a large development will affect road network. Already area in Ash Lane/Cross Tree is busy and a proposal to make this one way around the school would worsen the situation around the area. The Gladstone way up to The highway gets very busy and Gladstone Way towards Queensferry gets very congested. Schooling - Hawarden High is an oversubscribed school. Hawarden Village Church School has limited places. Although provision is made to get developers to pay for extra educational provision, is there the land at either site to build extra facilities without losing the recreational facilities. GP/Health Care - Hawarden Surgery is full. It is extremely hard to get an appointment already. Does the HB have a provision to increase capacity at the Surgery? If there is not a current provision this should be a requirement before the land being approved for housing. Substation - where would this be sited and will this put pressure on the existing network Water - document mentions limited flooding but makes no mention of the reasonably regular water mains leaks along Gladstone Way. This has been going on for a number of years and continues despite the upgrade to the sewage network that occurred a few years ago. A large housing estate would put extra pressure on a system that already is struggling to cope Lower Mancot and Sandycroft experienced flooding last year and the conversion of a large area of Green land to housing will have an impact on the ability for surface water to be absorbed and increases the likelyhood of flooding occurring again. The LDP also states that although the site was proposed last time, it wasn't adopted. The reasons for this aren't explained clearly or addressed within the new LDP as to why the site is now considered suitable as nothing has changed within the site. It also states that the owners of the land are in consultation with developers. Is this the reason why the site is being reconsidered rather than addressing the issues which led to the site being rejected last time	Removal of allocation

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
10	HN1.8 Ash Lane, Hawarden	Object	Despite comments on the proposed Ash Lane development, local provision of existing health and education facilities are already saturated and rapidly declining in availability of access. Local residents already have great difficulty in obtaining GP appointments. Increased traffic on the A550 (Gladstone Way) would increase air pollution in this residential area. The council have already spent money, time and effort reducing air pollution on the nearby roads (Aston Hill) so why now transfer the problem here? Whenever there is a problem on the Aston Hill, which is occurring more and more frequently, Gladstone Way is gridlocked. The new estate would be used as a rat run for those trying to avoid such hold-ups. At the beginning and end of every school day Cross Tree Lane and adjoining roads are practically impassable due to the extremely high volume of parked vehicles. This could cause major problems if emergency vehicles needed access. A detailed plan of how these traffic issues are to be resolved is needed before planning permission is granted. Grave concern also exists regarding the increase in both light and noise pollution which would be generated around this historic and picturesque village. Harm to the Grade 1 listed building St Deiniol's Ash Farm.	A re-evaluation of the extent and proximity of the proposed development.
16	HN1.8 Ash Lane, Hawarden	Object	This objection is made on behalf of my wife and I in the strongest possible terms for the reasons outlined below. Mancot is a village with a diverse demographic, ranging from young children, teenagers, middle aged and pensioners. People who have lived here all their lives, people like my wife and I who moved here more than fifteen years ago in the full acknowledgement that we were going to be part of village life. My wife and I are both from Liverpool, a city where we had grown up but which we no longer wanted to live in for the exact reasons we are objecting to this plan. It is a village. There isn't the infrastructure to cope with additional houses. There has been a recent consultation about the 'Safe Routes to School,' due to perceived risks for schoolchildren attending schools and complaints from residents, myself included, about the existing dangers of increased traffic and speeding motorists in the village. As a result a number of traffic calming measures are being introduced, speed limits, sinusoidal humps etc. It seems incomprehensible to add to that existing problem. Schools – Both primary schools in the area are already over subscribed. Doctors / Dentists– The practices in Hawarden, Saltney and Buckley cannot cope now. You can never get an appointment and waiting times are 6 weeks Environmental impact - through the loss of wildlife havens such as hedgerows, ditches, mature trees would be unacceptable along with removal of further green space when brown belt land exists elsewhere. Vehicles / traffic – A proposed development of 288 houses will inevitably lead to increased pollution at a time when climate change should be the top of everyone's agenda. Most if not every household has a vehicle, often multiple vehicles. Increased fumes, increased traffic on the roads, queuing to exit junctions, queuing for petrol, impact on commuting to and from work due to volume, impact on road surface condition which will ultimately lead to road closures and disruption when remedial work is needed. Environment – Area was flooded this year. Both are in flood risk areas, adverse weather and an inability for the drainage systems and sewers to cope could lead to something similar. In addition, rightly or wrongly there will be increased litter from the increase in residents, bins not being emptied, fewer public services. I regularly have to contact Streetscene due to the state of the roads for litter. Lack of local transport - Arriva Wales removed their service.	The development needs scrapping and alternative sites sought instead which will have less of a detrimental effect on a small village.

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26	HN1.8 Ash Lane, Hawarden	Object	the policy does not consider the wider impact of the proposal relating to item 8 (Ash Lane). the knock on impact of such a sized development would be unmanageable within the local community and result in worse outcomes for the existing community, in particular in the areas of schooling, healthcare, and traffic infrastructure.	a proper consultation with local communities on the real impact of the proposals is needed.
38	HN1.8 Ash Lane, Hawarden	Object	Ash Lane Mancot: The proposal would destroy the aspect of the listed property of Ash Farm on Ash Lane. This house of particular historical and architectural note to see its aspect ruined in such a way would be a high loss to the local community and the county.	Removal of allocation.
50	HN1.8 Ash Lane, Hawarden	Object	Ash Lane enclosed is a map illustrating that there are mines located at the back of the white bear public house. This area of Mancot is well known for mines. There is a tunnel that goes from Daniels Ash Farm in Ash Lane to the Church and the Castle. It is considered that the mines could be unstable.	Removal of allocation.
52	HN1.8 Ash Lane, Hawarden	Object	Ash Lane: Increase Traffic - dangerous congestion along Ash Lane/Cross Tree/Gladstone Road due to the school. Cars parking on the bends cause a blind corner. Insufficient Infrastructure - bus routes reduced, local post office closed, library voluntarily run. However Broughton has all these facilities thus the traffic will increase to access these services. Health - no GP surgery or dentist. Graveyard covers a wise catchment area and this attracts even more traffic both for funeral services and to visit. natural springs in the area.	Removal of allocation.
58	HN1.8 Ash Lane, Hawarden	Object	Inclusion of greenbelt land between Ash Lane and Park Avenue in Hawarden and its allocation for housing development in the Local Development Plan (HWN005) Green Belt Provision and Coalescence of Hawarden and Mancot Settlements Lack of Local Knowledge and Transparency Road Networks and Environmental Impact Magnitude of Development	Removal of allocation.
87	HN1.8 Ash Lane, Hawarden	Object	The proposed housing development between Ash Lane and Park Avenue, Hawarden should not happen due to many reasons. This site is a green belt land separating Hawarden from Mancot. Planning for Wales states green belt should not be built on. There are brown field sites from the UDP that have already been allocated but have not been developed for housing yet. These should be developed before green belt land. If this land is built on, it means a huge settlement would be created including Ewloe, Hawarden, Mancot, Pentre, Sandycroft, Queensferry, Shotton and Connah's Quay. This green belt land should be protected to separate these settlements. Also there are flooding concerns, as the field floods regularly throughout the year, particularly in winter. If this new development goes ahead, it will increase the risk of flooding to the land and houses surrounding these fields, especially those on Park Avenue and Ash Lane. There was a big flood in Pentre earlier this year caused by the current developments in Hawarden and the fact those drainage issues have not been sorted, these floods will only get worse with any further local housing developments. Another concern is the transport and road safety concerns for school children. There is a congestion problem in the roads in and around Hawarden already with recent speed restrictions added due to air quality concerns. The primary school on cross tree lane causes huge traffic problems with already parking on Ash lane for this. This will only get worse with more housing here. The schools are	Removal of allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			oversubscribed, so there are already no local school places. It is also really difficult to get a doctor's appointment and I am still registered in Broughton, as I am still unable to register in Hawarden after moving here 10 years ago. My final concern is that we will also lose the unique Hawarden village identity on top of the environment and safety concerns for my children.	
97	HN1.8 Ash Lane, Hawarden	Object	Mancot: Ash lane 1. I feel it is an erroneous move to lose the divide between Mancot and Hawarden. Hawarden is already merged into Ewloe, as any green space dividing the two has been built upon in the recent past. One sprawling site of Ewloe, Hawarden, Mancot, Sandycroft, Pentre, Queensferry and arguably Shotton and Connahs Quay would be a tragic loss to Welsh Village culture. When cultural changes such as these begin they are irreversible and the effect is deep reaching for this and following generations. 2. Current resources in Hawarden are already extremely strained. I have lived in Hawarden since 2009 and yet have never been able to register with the GP practice here. On the numerous occasions I have asked they have replied that they are full and not taking on new patients. Moreover, dentists are full and people are already having to go further and further out of area to find a practice able to take them on as patients. 3. My children attend the Hawarden schools and I can report from daily experience that Hawarden Village Church School is presently a severely problematic traffic situation at both ends of the school day. In the school Newsletter, parents are commonly told that near misses with children have occurred due to the extreme number of cars essentially gridlocked in a space ill prepared to handle them. The proposed development is barely a kilometre or two away from the very epicentre of this traffic nightmare. It's self-evident that the building of more houses which will result in more traffic, will exacerbate the already intolerable and frankly dangerous situation, thus rendering the development ill advised. 4. Hawarden exists as a historic treasure amidst green space. To lose vast chunks of the land that lends Hawarden its identity, and to build right up to and around historic buildings such as the beautiful old farm on Ash Lane, would be to forever alter this unique village. In so doing myriad culture and sense of what has gone before would be stolen from us, our children and all those who are to come after us. It falls to us to protect the beauty around us.	Removal of allocation.
99	HN1.8 Ash Lane, Hawarden	Object	I would like to object to the proposed plans for the above development please. This is green belt land and should not be built on. As a Mancot resident it is here that will potentially suffer the most from these plans. Also, where are the schools, libraries, services for these additional homes? Our school is already struggling for funds for the existing children.	Removal of allocation.
105	HN1.8 Ash Lane, Hawarden	Object	Ash Lane Mancot: On a personal level , having lived in Hawarden for 23 years, the strain on our primary and High School will be immense. When Redrow built new homes on St David's Park the village was promised a new school which did not materialise. We have Inez Doctors Surgery in the village which is already struggling to arrange appointments for the patients already at the surgery.	Removal of allocation.

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107	HN1.8 Ash Lane, Hawarden	Object	I am writing to object to the proposed inclusion of Little Mancot (HN18) in the LDP update. 1, The proposal is inappropriate as it would result in the loss of important green belt land whereas priority should be given to use of brownfield sites 2, The greenbelt site is crucial in separating the Hawarden and Mancot and its loss would adversely affect the distinction and character of the two communities. 3, The scale of the development envisaged would exacerbate the problems already experienced on cross tree lane eg in regard to congestion and traffic safety in the vicinity of the school 4, Local GP and school services are already struggling with current demand and do not have the capacity to meet the large increase the development would require.	Removal of allocation.
109	HN1.8 Ash Lane, Hawarden	Object	I wish to object to the proposal to build more than 280 houses on land between Park Avenue, Hawarden and Ash Lane, Mancot, as detailed in the Local Development Plan. The magnitude of this development would place excessive demands upon the schools within this area - schools which are currently full. The proposal that children on the new housing development could be transported to other schools by buses/taxis provided by the Local Authority is not acceptable as it would mitigate against being part of the local community. Similar pressures would be placed upon GP and Dental practices within Hawarden. I know that local people regularly struggle to get a Doctors appointment when they need one due to the very high demand that currently exists. This will only become worse when hundreds more people are also trying to get appointments. The infrastructure in Hawarden would not be able to support this level of expansion.	Removal of allocation.
111	HN1.8 Ash Lane, Hawarden	Object	I would like to object to the proposed development in Mancot / Hawarden. There are numerous reasons for this but my main concern is the increase in traffic and access/egress around the village. As I'm sure you are aware the traffic on Gladstone Way, Cross Tree Lane and Ash Lane is heavy and congested at the best of times, and horrendous during school time. To build an extra 288 houses would surely make the situation far, far worse both for motorists and pedestrians alike. When there is congestion on the A494 (which there frequently is) motorists come up Gladstone way trying to avoid delays. However, at the top of Gladstone Way, in Hawarden village traffic comes to a standstill and trails all down Gladstone Way, sometimes as far as the Garden Centre. The extra traffic the new houses would create would be a nightmare!	Removal of allocation.
113	HN1.8 Ash Lane, Hawarden	Object	objection to Mancot: schools are full to capacity doctors are full traffic is already an issue there is land that can be used for development elsewhere where it will not impact on peoples happiness	Removal of Ash Lane allocation.
128	HN1.8 Ash Lane, Hawarden	Object	I believe that, if it is approved, this development will go against Flintshire County Council's policy to not coalesce settlements. If houses are built on this land there will be no distinction between Hawarden and Mancot. At present the two villages are disparate settlements with a narrow lane, only allowing one vehicle access at a time, connecting the two. I have lived in Mancot for 81 years and am worried that the village identity is being whittled away by the Council allowing the amount of house building proposed. Should this	Removal of allocated site at Ash Lane Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			development be approved it will be in direct contradiction to the Welsh Assembly's directive (Planning Wales) of not building on greenfield sites. The development will also contravene the National Governments policy of building on Brownfield sites before building on Greenfield sites. There are Brownfield sites within Flintshire which are not fully utilised for building, one example is the former site of County Hall in Mold.	
138	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane Mancot: Spoil a village and scenic area The introduction of 300 additional properties will not only remove this feeling of village life that we have invested our money, life and family in but it will ruin the area as a whole. traffic issues - make the roads unsafe again, cause parking issues, and have a very negative impact on the immediate environment. Local services such as doctors, and dentists are already very difficult to register for or even get an appointment, the development of new surgeries and services is, in my opinion not a viable solution to this because this would again lead to increased traffic, increased building on village land and increased impact on the environment. you should not be building on Green belt land. Sandycroft school is one of the top performing primary schools in North Wales if not the whole of Wales, the development will have negative impact on the current school day but the future learning of all children.	Removal of allocation.
137	HN1.8 Ash Lane, Hawarden	Object	I am concerned that as part of its Local Development Plan, Flintshire County Council is considering the possibility of making green belt land between Ash Lane Mancot and Park Avenue Hawarden available for the building of nearly 300 additional houses. 1) The use of green belt land 2) Infrastructure 3) Settlement identity	Removal of allocation.
140	HN1.8 Ash Lane, Hawarden	Object	OBJECTION I strongly object to the above LDP proposal, chiefly for the following reasons... 1. Primary School Places As an employee of Flintshire County Council based at Hawarden Village Church School, I have first-hand knowledge that there would be insufficient school places for such a considerable number of new families potentially moving into the area. 2. Access, Traffic & Pollution The existing road systems and parking facilities could not cope with what's an already highly congested area, especially during school run and commuting hours - imagine 288 more houses; therefore a minimum of 576 more vehicles. Access on to either Ash Lane and Gladstone Way would be highly dangerous. 3. GP Facilities As a local resident, the local GP service at The Stables is currently over-subscribed - even more potential patients would jeopardise further the chance of ever getting an appointment. 4. Environment This is prime GREEN BELT land owned by the Gladstone Estate, fringing a Grade 1 listed farm. Enough said. 5. Mancot or Hawarden? Settlements would lose their boundaries and identities, creating a sprawling town rather than two contrasting villages. Joined up by a blot on the landscape of soulless newbuilds. I suggest alternative BROWN BELT land is sourced for all future housing developments across Flintshire, taking full consideration of infrastructure, environment etc. Please register my objections without further ado. Thank you in advance.	Removal of allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
142	HN1.8 Ash Lane, Hawarden	Object	I'm objecting to the proposed development of the fields between Park Avenue and Mancot. My concerns are the increase in traffic and deterioration in AQ. I walk my children to school HVCS and there is chaos on the roads at school times without the increased population.	Removal of allocation.
153	HN1.8 Ash Lane, Hawarden	Object	HWN005 This green field land is high quality farm land and is used as such currently. The land is category 2/3 (only 3 in places where there is a coal seam running through it). This farm land should not be developed for housing. PPW policy states: The Best and Most Versatile Agricultural Land 54. 3.54 Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC)15 is the best and most versatile, and should be conserved as a finite resource for the future. 55. 3.55 When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.	Protection of high quality farming land as a finite resource in keeping with the National PPW policy. Removal of allocation at Ash Lane.
162	HN1.8 Ash Lane, Hawarden	Object	Objection to the development of housing on land at Ash Lane, Mancot Merging of Hawarden and Mancot - Mancot has its own unique identity and are not joined on to Hawarden. It has a single track road without a footpath which links them in any way. The National Policy is that Green Belts are not built on, and this is a green belt. Insufficient consideration of alternative sites - There are Brownfield sites available which have not been considered yet, these areas have already had buildings or other development ont hem previously. Developers are attracted to this site as it would be a large development and much more easier and more cost effective to develop that a smaller site but that reason in itself does not form part of Flintshire's own criteria. Access to the Ash Lane site - There would be a significant impact on traffic, plus pollution levels especially around the Hawarden Village school, making it unsafe. Local Knowledge - Attention has not been paid to the significant interest and actual conditions and location, focus has been mainly on database scrutiny i.e. maps and charts rather than on the ground assessments. The process lacks transparency. No considerations have been made for impact on schools, surgeries etc. the roads are already blocked at key times and Ash Lane would not cope with more traffic with the junction at the top of Cross Tree Lane already recognised as a dangerous junction with no school crossing patrol. More cars increase pollution something the Council are already concerned about hence the reduced speed limit on the A494. Earlier developments in the local area have led to flooding therefore developing this land would cause Park Avenue and Mancot further flooding. St Deiniol's Ash Farm - one of the oldest occupied buildings which is Grade 1 listed. this development would build right up to the farm house, therefore it would destroy the character of the farm house. The process itself is flawed because it is not compliant with other national policies i.e. Welsh planning don't build on Green Belt. It is not supported by robust,	Removal of allocated site at Ash Lane Hawarden

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			proportionate and credible evidence. it is not clear and focused, therefore, it is overly burdensome and difficult to access.	
176	HN1.8 Ash Lane, Hawarden	Object	Ash Lane • The land is identified as green belt land. • St Deniols Ash Farm, a 16th century building; is one of the oldest, if not the oldest residential building in locality. • The development would mean the coalescence of 2 neighbouring communities of Hawarden and Mancot. • For many years the areas of Mancot, Pentre and Sandycroft have been exposed to flooding. • The current village infrastructure can not withstand further housing development. • Impact on the local environment, though increase pollution levels.	Removal of allocated site at Ash Lane, Hawarden.
199	HN1.8 Ash Lane, Hawarden	Object	I am writing to object against the Park Avenue/Ash Lane Development. Being a resident I have first hand experience of the problems that already exist and with this development the further problems this will cause. Firstly the flooding issue, my garden floods NOW!!!!!! With further development this will make matters worse, any sort of rain the garden is at least an inch under water. Secondly - Doctors, My family and I are patients at the Stables Medical Centre in Hawarden village and it's near on impossible to get an appointment now and with the possibility of an additional 500 plus patients not including children the chances of getting an appointment are going to be slim to non. This could possible have a knock on effect even more so on the NHS as people will go to A&E instead. Also where are people going to park, as the car park will only accommodate approximately 12 cars. Not only do residents park there but parents that take their children to the schools park there as Tinkersdale car park gets full, Cross Tree and Ash Lane is dangerously over used. (Cars are parked both sides of the road) This is a safety issue as with the volume of cars parked it is dangerous for anyone to cross the road and with the extra amount of vehicles from the development this will make matters a lot worse. Conservation wise - We back on to the fields on Park Avenue and every year we get wildlife coming into our garden, for example Hedgehogs, Frogs, Toads, Newts, Bats and Foxes. And we also know that there are Hares and Badgers in the fields behind which will be wiped out if this is allowed to go ahead. Cemetery - As for the grave yard, What is going to happen in the next 5, 10, 20 years time? It might seem trivial to you but for someone that has lived in Hawarden all their life, I want to be buried in Hawarden. So with this proposed development where is the extra land going to come from when the Cemetery is full. As residents we know that it is nearly full already. Green belt land - I have been on the Planning policy wales, what you are proposing contradicts everything that it states in paragraph 4.8.15 and 4.8.16. There is plenty of Brown belt land available close by for example Manor Lane Hawarden, Drury (Airbus), Etna Mount Buckley or opposite the Farm Shop as there are a lot of fields that aren't being used for anything. There is also the old RAF Sealand site which is going to waste.	Removal of allocated site at Ash Lane, Hawarden.
203	HN1.8 Ash Lane, Hawarden	Object	With reference to proposed development Ash Lane/Park Avenue – Mancot I am writing to strongly oppose the development on the following grounds 1 – Increased flooding - the proposed development area is above the Mancot/Sandycroft/Pentre area which due to current and recent developments are very often flooded. Fields adjacent to the B5129 are more or less permanently under water. Only very recently	Removal of allocated site at Ash Lane, Hawarden.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			(Summer term 2019) Sandycroft Primary school was closed due to being flooded. Building such a large development as this would dramatically increase water run off and therefore flooding to areas below it. 2 – Traffic flow from Ash lane heading towards Hawarden. Cross Tree Lane is currently under investigation to become a one way system due to the current levels of traffic particularly during school hours. I actually live off this road and my daughter attends the local school. The road is extremely dangerous to cross at school time. Also out of school hours the road is particularly dangerous due to the sharp dip and then rise of the road with people speeding along it. If more cars are added to this area – it is an accident waiting to happen. 3 – Congestion in Hawarden Village – currently the village is fairly busy with traffic using the village to travel from the expanded Aerospace factory and Broughton retail park. Flintshire is already investigation air pollution on the A494 surely the air quality around two of the local schools – Hawarden High and Hawarden Village Church school will be affected. 4 – Local Schools are currently full. I recently attended the Open day at Hawarden High School as my daughter is due to move up to high school – to be told by the Head that the school is over-subscribed each year. Where are any new children supposed to go to school - Flintshire have recently closed the next nearest school at John Summers and I am lead to believe shelved the proposed plans for the “super size school” in Saltney. 5 – Local Doctors surgery – the current practice at The Stables on Glynne Way is buckling under the volume of people using this surgery. I challenge any councillor to try and get an appointment here. Unless you are seriously looking to improve the local amenities and local road layout – this development would bring nothing but chaos to an already busy area.	
206	HN1.8 Ash Lane, Hawarden	Object	I would like to object to the proposed building of up to 280 houses between Ash Lane and Park Avenue in Mancot. I have lived in Mancot for the majority of my life and have gradually seen buildings swamping the green fields I once played in as a boy playing in the trees and making swings and be able to catch tadpoles in the stream that ran along it when there were no houses existed on the right and side of Ash Lane from the junction of Sunnyside up to Banks Road sadly development of this land took it away from the future generation. This is a green field site with many hedgerows and trees that border the fields on the proposed site, any destruction of these would have an effect on the wildlife that inhabit this area when in an age of saving bees butterflies and insects is becoming more and more important allowing this development to proceed would be a travesty. Therefore I would like you to recognise my objection to this proposal Traffic issues are increasingly causing major problems throughout the village, the amount of cars that are parked outside both Hawarden and Sandycroft schools is dangerous. In a time where a section of Queensferry bypass has been reduced to 50mph to reduce dangerous emissions around that area, we now see a proposed development for 280 houses within a village how much pollution will those extra cars produce? A typical family own an average of two cars this development would potentially be an increase of 560 cars. This would cause mayhem on the roads of Mancot. There are large swages of land on the old Sealand airfield site and the old Shotton steelworks site that are more suitable to development and give premium access to much larger road systems.	Removal of allocated site at Ash Lane, Hawarden.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
219	HN1.8 Ash Lane, Hawarden	Object	I wish to strongly object to the proposed housing development between Park Avenue, Hawarden and Ash Lane, Mancot. On the following basis: 1. They will be building on green belt land 2. This building plan coupled with the additional housing development (Airfields in Garden City, Deeside) will substantially increase the number of children in the area. There will not be enough place at the local primary and secondary schools. 3. More importantly, is the Health and Safety of the pupils at Hawarden Village Church School and Sandycroft School. One school is at the top of the planned access road to the site and the other school at the bottom	Removal of the Ash Lane allocation.
226	HN1.8 Ash Lane, Hawarden	Object	Site 8 - Ash Lane, Hawarden development. The area is classified as Green Belt land. There is a national government reg. intended to limit the use of green belt land for development which has not been taken into account. There has not been, or any public consultation of, alternative sites for development, including brown field sites and those more suitable with regards to infrastructure. The area is liable to flooding, even in a period of rainfall in June 2019, the area was flooded, schools were closed due to drain surges and flood water and parts of Sandycroft were underwater. There is no rectification principle to relive the risk of flooding or risk assessment as to the additional impact of flooding in the local area given the additional demands on local drainage and surface water removal. Infrastructure: Given the scale, there is no conceivable way local roadways inc. access via Ash Lane are able to manage with the additional vehicle traffic. No traffic survey has been submitted, no impact survey on existing road infrastructure or alternatives to provide relief to the local roadways. Traffic increases are already a problem, from ongoing traffic issues on the A494 leading to a programme of repairs on the bridge crossing, to traffic delays on a constant basis at the Chester junction onto the A494 at Deeside. The number of vehicles in the area is already increasing, a significant increase in these numbers resulting from the proposed development will make this problem worse. The subsequent effect is also on pollution in the local area, something clearly important to Flintshire County Council given the recent speed limits imposed on the A494 cited as “pollution reduction” measures. During busy periods the local roadways are dangerously overcrowded, the proposed development would exacerbate this problem and create a dangerous-to-life situation on the local roads. Local schools are already over-subscribed & limited development opportunities at other schools in the area mean that there is almost nil capacity for additional intake. Helathcare, dentist, clinics are over-capacity, consistently no appointments available and no spaces for additions. There is no possibility for these services to absorb this additional burden. No recognition, provision or mitigation in the proposal.	Remove Development at Ash Lane
248	HN1.8 Ash Lane, Hawarden	Object	Ash Lane Mancot: 1. The site is green belt land and should not be built on re Planning Wales own guidelines 2. We have concerns about the coalescence of Mancot and Hawarden,and planning states settlements should not be joined, this has already happened with Hawarden and Ewloe. 3. We should preserve the historic character of our lovely village of Hawarden not have it gridlocked with yet more traffic. 4. We have great concerns about the access to the site, Cross tree lane with access to the school is	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			already very congested and quite dangerous, with no room to make improvements. Cottage lane is bound to become a cut through and has no pavement, and a bad bend for access to Kennedy Drive. 5.Why have the parcels of land identified under URD not been taken up? Is this because this larger site is more profitable to develop? 6.We think it is time planning officers actually came out to see the site, not look at a map and make decisions. The site is in use by the farmer and sheep and cows are grazing on the land now. Birds and wildlife are nesting in the surrounding hedgerows.	
255	HN1.8 Ash Lane, Hawarden	Object	Mancot Ash Lane: This objection covers the following key objections: ? Coalescence of Hawarden and Mancot ? Insufficient consideration of sites ? Jumping to previous UDP solution ? Magnitude of development ? Lack of local knowledge ? Lack of transparency ? Access to the Ash Lane site ? Air Quality Levels In summary, the we believe that the inclusion of the Ash Lane site within the LDP is fundamentally flawed, is contrary to national and local planning policy and not in the best interest of the local or wider Flintshire community. We request that the council withdraws the site. Should the council decide to endorse the Ash Lane Site's inclusion within the LDP, we believe there are various grounds to challenge this decision in the future.	Removal of allocated site at Ash Lane Mancot.
288	HN1.8 Ash Lane, Hawarden	Object	Existing green barrier between Mancot & Hawarden. There is a distinctive green barrier between the two settlements which the proposed candidate site would destroy. It would appear that the planning department are more focused on maintaining a green barrier between historic Hawarden and the rest of Hawarden, then they are with maintaining a well-established Green Barrier between Hawarden and Mancot. This point was made more unreasonable when one considers: (a) Some propertied on Gladstone Way and Park Avenue are at least as old as some within the Historic Hawarden conversation area. (b) If the development of the site at Ash Lane were to go ahead, this Grade 1 listed building would be significantly encroachment by new development; of this were the case, it would make a mockery of the rationale for maintaining a Green Barrier between Historic Hawarden and it's neighbouring areas. (c) The planning department were keen to draw our attention to a map which allegedly formed a Green Barrier between the two communities; however, the ground level context suggests a different reality, given the Green Barriers are in fact playing fields.	Remove site at Mancot: There is a distinctive green barrier between the two settlements which the proposed candidate site would destroy. It would appear that the planning department are more focused on maintaining a green barrier between historic Hawarden and the rest of Hawarden, then they are with maintaining a well-established Green Barrier between Hawarden and Mancot.
294	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane due to safety caused by increased traffic to area which has already had noted issues both at the top and bottom of Ash Lane. I have attached agile but my biggest issue by far is road safety as it is already perilous day both headteachers are constantly addressing this issue without success thus far.	

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
366	HN1.8 Ash Lane, Hawarden	Object	Objection to allocated sites at Ash Lane Mancot I believe that, if it is approved, this development will go against Flintshire County Council's policy to not coalesce settlements. If houses are built on this land there will be no distinction between Hawarden and Mancot. At present the two villages are disparate settlements with a narrow lane, only allowing one vehicle access at a time, connecting the two. Due to the houses on both sides there is no way to increase the width of this lane. Access to the site is proposed to be from Ash Lane. This road and Cross Tree Lane already cause issues with weight of traffic. There is a school on Cross Tree Lane and parents park on the brow of the hills and force traffic on to the opposite side of the road, on a blind bend. Ash Lane is used as a "rat run" for Airbus, Sandycroft and Broughton retail park workers attempting to avoid congestion on Chester Road East between Queensferry and Airbus. It is believed that the traffic survey was undertaken during the period Ash Lane was closed to through traffic due to Flintshire CC re-surfacing the road. It is my belief that the data collected is categorically incorrect and should not be used in the planning decision. The road from Queensferry to Sandycroft, Chester Road East, is already congested at peak times and busy during the day, to add hundreds more vehicles to an already busy road will cause more and more misery for motorists and residents in the affected areas.	Removal of allocated site at Ash Lane, Mancot
375	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane, Mancot. This will have a profound impact on our village. Firstly being safety for residents, Ash Lane is what it says, a Lane! You are proposing to have the entrance to this new development on Ash Lane. Ash Lane is already dangerous with the amount of traffic coming from the schools, Airbus, Broughton Park. If you did a survey on the lane (NOT when the lane is closed for resurfacing) You would see the impact traffic has on the already busy lane. Put another 1000 plus residents and their cars into the mix and it will be total carnage! Green Barrier - The Council's own policy is to safeguard and protect communities and avoid merging villages with other villages. Yet you choose to merge Mancot and Hawarden. Impact on 16th Century Ash Lane Farm and outbuildings. We cannot afford to lose such an important part of our heritage; the impact of your development will destroy the farm. What will happen to the farm and buildings when you start building up to 280 plus homes? The impact on wildlife in the hedgerows and fields will have a serious impact on the surrounding area, and yet you can't find anywhere else to have your development?	Removal of allocated site at Ash Lane, Mancot
397	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. There is only one main road linking Hawarden to Pentre. Mancot is a village; we have lanes and footpaths. This road has no pavement in several places, and at each end of this road there is an infant/primary school. There are cars parked on this road at several times during the day, as each age group leaves at different times. Judging by the increased number of children who will be using this road, and the volume of traffic it will entail, pollution caused by increased cars waiting at pick up times will become a matter of health and safety. The proposed land is also green belt and should not be built upon. Are there not sufficient brown field sites available in Flintshire?	Removal of allocation at Ash Lane
403	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Access to the site is proposed to be from Ash Lane. This road and Cross Tree Lane already cause issues with weight of traffic. There is a school on Cross Tree Lane and parents park on the brow of the hills and force traffic onto the opposite side of the road, on a blind	Removal of allocated site at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			bend. Ash Lane is used as a “rat run” for Airbus, Sandycroft and Broughton Park workers attempting to avoid congestion on Chester Road East. It is believed that a traffic survey was undertaken during the period Ash Lane was closed to through traffic, it is my belief that the data collected is categorically incorrect and should not be used in the planning decision. At present the residents of Mancot and Hawarden have great difficulty in accessing Doctor’s and Dentist appointments due to a deficiency in local surgeries. Should hundreds more people live in the area there will be greater waits for appointments.	
420	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot This development will go against Flintshire Council’s policy to not coalesce settlements. If houses are built on this land there will be no distinction between Hawarden and Mancot. At present the two villages are disparate settlements with a narrow lane, only allowing one vehicle access at a time, connecting the two. Due to houses on both sides there is no way to increase the width of this lane. This development will also contravene the National Government policy of building on brown field sites before building on Greenfield sites. There are brown field sites within Flintshire which are not fully utilizes, one example is County hall in Mold. Access to the site is proposed to be from Ash Lane. This road and Cross Tree Lane already cause issues with weight of traffic. There is a school on Cross Tree Lane and parents park on the brow of the hills and force traffic onto the opposite side of the road, on a blind bend. Ash Lane is used as a “rat run” for Airbus, Sandycroft and Broughton Park workers attempting to avoid congestion on Chester Road East. It is believed that a traffic survey was undertaken during the period Ash Lane was closed to through traffic, it is my belief that the data collected is categorically incorrect and should not be used in the planning decision.	Removal of allocation at Ash Lane, Mancot
422	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Loss of green belt land - need to consider using brownfield sites first Diverse wildlife within the area The Merging of communities Lack of infrastructure – doctors, schools and roads Road Safety – School routes Historical Impact on Ash Farm Listed building	Removal of allocated site at Ash Lane, Mancot
428	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot This proposal would exacerbate traffic problems through any direct access on to Gladstone Way, and increased use of Cottage Lane and Colliery Lane, both are narrow with no pavements in places. Increased use of Ash Lane via Cross Tree Lane which is already congested by school traffic, and its use as a by-pass/rat run to avoid Hawarden village. Welsh Government guidelines are against the coalescence of settlements, the use of green belt land and the threat of absorption of historic buildings, namely Grade 1 St Deiniol’s Ash This development would increase pressure on already over stretched local schools, medical services	remove allocation at Ash Lane, Mancot
430	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Welsh Government has specifically declared in Planning Policy Wales that green belt land is to be maintained and that such land cannot be re-designated. Development should be on brownfield sites such as the airfield, Deeside, or re-look at former UDP allocations. Impact from air, light and sound pollution from the additional traffic generated from the site. Impact upon the listed building, Ash Farm and the historic character of Hawarden. Coalescence of settlements, which is against Flintshire’s own policies. Infrastructure unable to cope with new residents.	remove allocated site at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			Not enough capacity in local schools Safety of children travelling to school has not been considered. Not enough capacity in local doctor's surgeries without additional residents from the new site. Flooding issues – Pentre has already suffered from flooding, these additional houses would increase flood risk.	
436	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot I appreciate there is a need for housing in the County but the appropriateness of Ash Lane seems ill conceived and inadequately researched. The Greenfield site provides a clear gap between the villages and avoids creating urban sprawl. Greenfield sites such as this have a high importance in Welsh Government policies and preserving and protecting them is a major planning priority. Brownfield sites along the River Dee would be preferred.	Removal of allocation at Ash Lane, Mancot. Develop brownfield sites instead
440	HN1.8 Ash Lane, Hawarden	Object	Mancot Ash Lane Development: flooding, Schools oversubscribed, doctors full, increased traffic.	Removal of allocated site at Ash Lane Mancot
442	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane/Park Avenue development on the LDP for Flintshire and more specifically Mancot/Hawarden. The basis for my objections are:- (i) That the merging of 2 distinct villages, Mancot/Hawarden, that would lead to a 'Coalescence of Settlements', resulting in the use of Green Belt land. (ii) The lack of local knowledge and transparency regarding both of the communities in question and the already strained resources that are at breaking point. My wife has a life threatening lung condition that means frequent visits to our fantastic, but severely under-resourced, doctors surgery at the top of Cross Tree Lane. Our concern is that the availability of medical resource will be even more scarce given that 288 houses will no doubt involve circa 600 new residents drawing on the resource. (iii) The increase in vehicular traffic will also add to the pollution effect that is already a concern in the area, given the speed restriction that are in place on the A494 Aston Hill (iv) The development of the Ash Lane site will present undue burden on the drainage system that is also prone to frequent failure in the Mancot Lane/Hawarden Way area. (v) Insufficient consideration has been given to existing Brown Field Sites in pursuit of profit to be gained from a larger site.	Removal of allocated site at Ash Lane Mancot.
448	HN1.8 Ash Lane, Hawarden	Object	I am emailing you to object against the above development. Having lived in Hawarden for many years I know how this development will impact on the area. Firstly the land in question is Green belt land and in the Planning policy wales it basically states that any Green belt land will not be built on. Our back garden floods with normal rain fall so with the possibility of all these houses being built will only make matters worse. Also the traffic is bad several times a day down Ash Lane and Cross Tress Lane with parents/grandparents dropping off at school twice a day and picking up from school twice a day. It's not just school traffic it's also normal works traffic too. It's a safety issue for anyone that uses that area. I am a patient at the Stables Medical practice in Hawarden village and for many years it has been almost impossible to get an appointment, but again with the possibility of 280 plus houses where are all the extra patient's going to go. Our mp Mark Tami has more complaints about that Surgery than any other in	Removal of allocated site at Ash Lane Mancot.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			Flintshire, how is this going to help? More complaints, no appointments and if you do manage to get one you won't stand a change of seeing your actual doctor!.	
452	HN1.8 Ash Lane, Hawarden	Object	I am objecting to is the Ash Lane Development site HWN005. My concern is regarding the traffic problems around Hawarden Village Church School Cars are parked along the whole length of Cross Tree Lane making 2 way traffic flow difficult. The junction at Cross Tree Lane and Ash Lane is very unsafe to cross and there has been a prolonged advert for a new School Crossing Patrol but the post remains unfilled after over one year. An increase in traffic of new residents commuting to work and possibly doing school drop off will be detrimental to this already difficult situation. Please read the following specific objection. Policy STR4 iv: Ensure that the local highway network either has, or can be upgraded, to provide capacity to accommodate sustainable levels of development; Firstly it has been unclear in plan details regarding site access - "Just from Ash Lane" as stated by the Lead Planner or "Ash Lane and Gladstone Way road access without a through access" from a planner at the open evening in Mancot Hall). With 2 access points it would be expected that half of the traffic would be exiting onto Ash Lane, if it was just Ash Lane access then it would be all traffic. Ash Lane and Cross Tree Lane	The magnitude of this development exceeds the local road infrastructure currently and so the size of development needs reducing or stopping.
157	HN1.8 Ash Lane, Hawarden	Object	Objection Ash Lane: 1. Traffic Safety - Cross Tree Lane and junction with Ash Lane. Already a dangerous crossing area due to parked vehicles at the local school. Lane used constantly as short cut to village and parents on the school run. Adding 280 houses will greatly exacerbated this already serious problem. 2. Area classification - government policy states green belt land should be conserved as much as possible and if alternative sites are available then development should be directed to land of the lower grade. I understand alternative lower grade sites are available. 3. Ash Tree Farm. House of historic interest. The development would infringe great on this property. 4. Climate impact - the increase in traffic would inevitably increase traffic volumes thereby by reducing air quality.	Removal of allocated site at Ash Lane, Hawarden.
161	HN1.8 Ash Lane, Hawarden	Object	I am sending an objection to the proposal development between Gladstone Way and Ash Lane not only does it go against the policy of the Welsh Government on building on Green Belt land but you have not filled your other sites that you have ear marked for development.	removal of allocated site at Ash Lane, Hawarden
165	HN1.8 Ash Lane, Hawarden	Object	Ash Lane Mancot: I reside at Hawarden, which property was built by my grandparents and which has been lived in solely by members of my family for almost one hundred years. I wish to register my very strong objection to the proposal to allocate the above land for development, as set out in the Deposit Local Development Plan. Many and diverse objections will, I'm sure, be validly made by others, but I simply wish to place on record my firm belief that the already inadequate infrastructure in the vicinity will simply be unable to withstand the pressures caused by the proposed, or indeed any, intensification of use such as is contemplated. There are already times of the day when it is useless even to contemplate venturing out on to Gladstone Way , Ash Lane or Crosstree Lane unless you are prepared to tolerate gridlocked road conditions. I am particularly concerned at the wholly unsatisfactory visibility splay at the junction where Ash Lane joins Crosstree. All the above is without reference to the likely destruction of "village" life	Removal of allocated site at Ash Lane, Hawarden

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			currently enjoyed in the two vibrant though separate villages of Hawarden and Mancott, and the resultant semi suburban sprawl which would follow the coalescing of the two communities.	
171	HN1.8 Ash Lane, Hawarden	Object	I wish to object proposals to develop fields between Ash Lane: climate emergency very recently, enforcing speed restrictions in a bid to reduce emissions in the area. increased traffic on this road from will inevitably raise the air pollution levels here local infrastructure - schools are over subscribed, aren't the facilities to accommodate the new families in local schools I feel Ash Lane land between Gladstone Way & Park Avenue is not suitable for development as it would result in the coalescing of Hawarden and Mancot	Removal of allocated site at Ash Lane, Hawarden
173	HN1.8 Ash Lane, Hawarden	Object	I am writing to object against the Park Avenue/Ash Lane development. Being a resident in Hawarden, I know of the impact it will have on the existing problems in the area. The traffic in the area is terrible as it stands, the A55 and A494 was supposed to of taken a lot of the heavy vehicles away from the village when it was built, but that hasn't happened. So when 280 plus houses are planned to be built you are looking at least 280 plus extra vehicles on the road. This will lead to more emissions and as you are aware the speeds have been reduced on the bypass to lower them. Therefore this planned development will make matters worse and will defeat the object especially with the area being on amber. There is also safety issues as Cross Tree Lane and Ash Lane is very busy during the morning for the school drop off, the drop of and pick up in the middle of the day and the afternoon pick up. Cars are parked everywhere and it is dangerous for anyone. As for the schools we know from experience trying to get your children into your local school is hard enough at the best of times, as there are no longer feeder schools. Where are the extra children and/or the local children going to go as the schools are full. Transport isn't an option as it incurs costs which parents cannot afford. The land in question I believe is Green Belt Land. Planning Policy Wales states: (1) to check the unrestricted sprawl of large built-up areas, (2) to prevent neighbouring towns merging into one another, (3) to assist in safeguarding the countryside from encroachment, (4) to protect the setting and special character of historic towns, (5) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. (Brown Belt). Therefore I would like you to lodge my objection to this development.	Removal of allocated site at Ash Lane, Hawarden.
200	HN1.8 Ash Lane, Hawarden	Object	Mr Farrow, I am a resident of Park Ave Hawarden and have lived here for over 30 years and brought up my children here. I have seen many changes over these years and now are faced once again with the potential development of nearly 288 houses on the land at the rear of my property. This was quashed a number of years ago for various reasons and here we are again and nothing has changed. My objection is first and foremost that this is still a green belt area (Planning Wales) and should not be built on. How can you possibly therefore build on this. You appear to be making up your own rules as you go along not giving a dam about what is right and lawful and totally contradicting your own policies. It's a green belt area that can't be built on but you want to go ahead and build. You are just abusing your authority and position to do what you want and it all boils down to money. What about all of the wild life. What about our heritage and historic character of St Deniol,s Ash Farm? Please don't let this development go ahead.Its going to destroy the Mancot and Hawarden area.The current infrastructure can't cope at the moment so	Removal of allocated site at Ash Lane, Hawarden.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			it's going to be chaotic and an absolute nightmare for the schools, doctors surgeries to try to deal with another 600 people +. Traffic is bad enough at the moment but you are going to create absolute turmoil particularly on Ash Lane with Cross Tree Lane school. This will create more danger for the children and there no doubt will be a serious accident . You will have this on your conscience Do you have children or grand children? Think about it I am just a normal person who wants to preserve my village, heritage, my children and grandchildren and their children. This is their future. Please DONT DO THIS	
202	HN1.8 Ash Lane, Hawarden	Object	I am writing to object to the proposed building of hundreds of homes in the Mancot/Hawarden Ash lane area. There is insufficient access to the site, and would cause congestion on the local roads. It would merge the villages of Mancot and Hawarden by removing the greenbelt, which is against the council and government's housing criteria. The local amenities, namely schools, doctors, dentists are already overstretched and can not support further homes within the area. The removal of the grass would lead to flooding in Mancot.	Removal of allocated site at Ash Lane, Hawarden.
204	HN1.8 Ash Lane, Hawarden	Object	I would like my objections to the merging of Mancot and Hawarden on green belt be noted. My objection is negative impact on the local area There are already significant traffic and safety issues outside both Sandycroft Primary School and Hawarden Village Church School. GP surgeries and dentists in the area are "limited in number and are also over-subscribed and struggling to cope with demand locally." local transport services have already been cut substantially and "will struggle to cope with further demand." The land between Ash Lane and Park Avenue in Mancot "is categorised as a flood risk. So are most of the connected roads in Mancot leading down to Sandycroft." A recent 50 mile per hour speed enforcement on the a494 to help cut impact on the environment due to an already large population in area has just been put in place. The development goes against the climate emergency.	Removal of allocated site at Ash Lane, Hawarden.
216	HN1.8 Ash Lane, Hawarden	Object	I would like to register my objection to the planned development in Mancot between Gladstone way and Ash Lane. I have lived in Mancot for the last 12 years and for some time have been concerned around the levels of infrastructure within the area. Mancot is a fantastic family area, and has a choice of schools. However, both of these (Sandycroft and Harwden village) are currently at maximum capacity. With an additional 283 houses in the area, I see a greater strain on local schooling, risking the quality of tuition for children. Within the current Local Development Planning, I can see no plans or provisions for increasing investment in local schooling. Therefore feel this would lead to increased traffic and people are required to travel further for local schooling. In addition, within the local area there are already a number of over subscribed Doctors surgeries. With Hawarden and Deeside practices being full, it is always a source of distress trying to get an appointment locally. Plans need to be put in place to ensure infrastructure is enabled at the same rate and housing increase in the area.	Removal of allocated site at Ash Lane, Hawarden.
218	HN1.8 Ash Lane, Hawarden	Object	I am emailing you with my objections to the proposed development plans for Ash Lane/Park Avenue, Mancot, Deeside. My main objection is regarding the wildlife that is abundant in the area including hedgehogs which are, in law, a protected species. The British Hedgehog Preservation Society is a useful	Removal of the Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			guide which I refer you to for clarity. I know, without a doubt, that there are hedgehog nests in the hedgerows within the fields of the proposed development as I lived in The Paddock, Mancot close to the gated entrance to the fields up until last year's hibernation period. I fed hedgehogs every night throughout the year until their hibernation and when they emerged from it, studying in which direction they came and went. This nightly procedure confirmed to me that hedgehogs do live in those fields. There are also owls which regularly frequent the area which my husband and I used to listen to nightly. The fields are Green Belt land which is, as I understand, unable to be used for development to protect the area and its wildlife. My second objection is regarding the traffic which will be greatly exacerbated where the proposed entrance to the development will be. The amount of vehicles that use Mancot as a cut through from Hawarden to Pentre and Sandycroft, using Ash Lane, Mancot Lane and Hawarden Way is already too much. This is a danger to the villagers, their pets and wildlife. There is already major congestion at the top of Ash Lane and Cross Tree Lane twice a day which is absolute mayhem and extremely dangerous. Vehicles park on a blind bend and hill making it impossible to see traffic or people clearly from either direction and the only way to proceed in a vehicle is to mount the kerb or to be pushed into the hedgerow. This will only be made worse by the increase in traffic the proposed development will produce. Finally, our local doctors surgery and primary school are already struggling to cope. It is extremely difficult to get an appointment at the doctors surgery and parking is very limited. Flintshire Council itself has agreed to introduce traffic calming around the school due to the amount of vehicles that are already parked by the school so should already be aware of the surrounding area's capacity without the addition of the proposed development. Thank you in anticipation of your submission to the planning committee of my objections.	
227	HN1.8 Ash Lane, Hawarden	Object	Site 8 - Ash Lane, Hawarden development. The area is classified as Green Belt land. There is a national government reg. intended to limit the use of green belt land for development which has not been taken into account. There has not been, or any public consultation of, alternative sites for development, including brown field sites and those more suitable with regards to infrastructure. The area is liable to flooding, even in a period of rainfall in June 2019, the area was flooded, schools were closed due to drain surges and flood water and parts of Sandycroft were underwater. There is no rectification principle to relive the risk of flooding or risk assessment as to the additional impact of flooding in the local area given the additional demands on local drainage and surface water removal. Infrastructure: Given the scale, there is no conceivable way local roadways inc. access via Ash Lane are able to manage with the additional vehicle traffic. No traffic survey has been submitted, no impact survey on existing road infrastructure or alternatives to provide relief to the local roadways. Traffic increases are already a problem, from ongoing traffic issues on the A494 leading to a programme of repairs on the bridge crossing, to traffic delays on a constant basis at the Chester junction onto the A494 at Deeside. The number of vehicles in the area is already increasing, a significant increase in these numbers resulting from the proposed development will make this problem worse. The subsequent effect is also on pollution in the	Remove Development at Ash Lane

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			local area, something clearly important to Flintshire County Council given the recent speed limits imposed on the A494 cited as “pollution reduction” measures. During busy periods the local roadways are dangerously overcrowded, the proposed development would exacerbate this problem and create a dangerous-to-life situation on the local roads. Local schools are already over-subscribed & limited development opportunities at other schools in the area mean that there is almost nil capacity for additional intake. Helathcare, dentist, clinics are over-capacity, consistently no appointments available and no spaces for additions. There is no possibility for these services to absorb this additional burden. No recognition, provision or mitigation in the proposal.	
254	HN1.8 Ash Lane, Hawarden	Object	The area dedicated for the proposed development is classified as “Green Belt” land. There has not been, or any public consultation of, alternative sites for development, including brown field sites and those more suitable with regards to infrastructure to support the committed housing increase by Flintshire County Council.The area of the proposed development is liable to flooding, even in a period of rainfall in June 2019, the area was flooded, schools were closed due to drain surges and flood water and parts of Sandycroft were also underwater. Traffic increases are already a significant problem in the area, from ongoing traffic issues on the A494 leading to a programme of repairs on the bridge crossing, to traffic delays on a constant basis at the Chester junction onto the A494 at Deeside. Local schools are already over-subscribed. Local healthcare, doctors’ surgeries, dentists, medical practitioners, clinics etc., are already over-capacity.	Removal of Ash Lane allocation.
259	HN1.8 Ash Lane, Hawarden	Object	I am contacting you to express my concerns and to object to the proposed LDP between Mancot and Hawarden. My reasons and concerns are listed below. 1. My initial objection is regarding the use of Greenbelt Land and the ignoring of other Brown-belt Land in the area. The proposed site would impact on a historical farm, the result of which would coalesce two separate settlements. This action whilst being totally anathema to local residents who wish to keep their village identity, is I believe against Flintshire CC’s own stated policy regarding the issue of protecting community identity. 2. My second concern is regarding the local infrastructure. I am a patient at Hawarden Surgery, The Stables Medical Centre. As with most other surgeries in Wales and the rest of the UK, the Surgery are short of Doctors. The Surgery is struggling to provide adequate health care provision for their patients and is doing so by employing Nurse Practitioners and Prescribing Pharmacists. Having previously been treated by both, I recently had the need to book an appointment with a Doctor, had to wait three weeks for the appointment and travel to the branch surgery in Saltney. Many patients would not have been able to do that and would then have had to take an emergency appointment. I understand that Betsi Cadwaladr Health Board have been consulted and have said that the prosed development would not cause any problems that would impact on this Surgery but I ask the question ‘has anyone asked the Surgery if they feel that they could cope with the influx of patients that the proposed development would bring?’. When there is a shortage of GP’s nationally, how will BCHB suddenly manage to get an increase GP’s in Hawarden when they have not been able to for the last two or three years? Also the Surgery is small and is unable to expand so it would be unable to provide the extra space that an increase in population would need. 3. Again on the matter of	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			struggling resources, whilst the Education Authority say I believe, that local schools could cope, have the local schools been asked for their views? My understanding is that both Rector Drew Primary School and Hawarden High are struggling to cope with demand. I think that it would be totally unfair if the increase in pupil population that would inevitably result from the development had to go outside of their immediate vicinity. All of the above factors are compounded by my concerns that the extra traffic would pose problems	
295	HN1.8 Ash Lane, Hawarden	Object	This development will put increased pressure on a road that has primary schools at each end where there are already significant safety issues due to the volume of traffic exacerbated at school times. There are already issues at the top of Ash Lane, there has been no Lollipop person there since the last one resigned due to the dangerous nature of the job and the abuse she received from impatient drivers. The increased volume of cars will only make this junction more dangerous and increase traffic going past primary schools.	Remove allocation.
352	HN1.8 Ash Lane, Hawarden	Object	As a resident of Hawarden for my entire childhood, and now as a resident of Mancot, I do not believe we can sustain much massive future development. We already have a big water/drainage problem in my street and more development will no doubt increase that issue. Parking for Hawarden Village School creates massive issues for entrance into Mancot, not limited to picking up and dropping off times. Further development with egress on to Ash Lane will only increase those problems in this area but also in Sandycroft, Pentre and onto Cottage Lane. Development would see the district lines between Hawarden and Mancot blurred. As a former resident of Hawarden, I was lucky enough to be able to buy my terraced house in Mancot as an affordable option. I doubt that any future development would provide small houses for people in my position at that time, those who are not on the social housing register. Smaller houses do not bring in the same profit for the developer. The new houses at the top of Overlea Drive prove this to be the case! I would also like to register my objection to the Ewloe site by Green Lane being included in the LDP. My niece and nephew attend Ewloe Green School and aside from the increase in pupil numbers that would result in such a development, the traffic outside the school is already at an unacceptable level. I worry for their health due to traffic pollution, not only at drop off/pick up time but also whilst they are at play due to the proximity of the road. In both cases, Flintshire has already identified other smaller brown sites for development in the UDP. Why are these not developed first?	Removal of allocated sites at Ash Lane, Mancot and Ewloe
363	HN1.8 Ash Lane, Hawarden	Object	Objection to the allocated site at Ash Lane, Mancot the reasons for my objection are: It's green belt it is already difficult to get an appointment with the doctor It could lead to more flooding	Removal of allocated site at Ash Lane, Mancot
377	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. There will be only one way in and one out of the site onto Ash Lane causing another 200 to 400 cars onto an already extremely busy road where children are walking to and from school, which is a designated safe route by the Council. A lot of expense has been incurred to reduce the speed limit to 50 MPH to improve emissions, but surely with increased traffic the proposed	Removal of allocated site

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			carbon footprint is in doubt of ever improving what is saved on one hand is wasted on another. The stables surgery would struggle to take on new patients as it is already extremely hard to get an appointment. Even if promised more GPs, everyone knows there is a national shortage of GPs. As a very concerned resident of 69 years I would hope that all objections submitted show the great concern for the Countryside, Environment, climate impact, safety and future of your children.	
378	HN1.8 Ash Lane, Hawarden	Object	I wish to formally submit my opposition to allocation of land Ash Land and Park Avenue Hawarden. Should this development be approved it will be in direct contradiction to the Welsh Assembly's directive (Planning Wales) of not building on greenfield sites and also contravenes National Government policy on building on brownfield site before greenfield sites. There are brownfield sites in Flintshire, for example, the former site of County Hall Mold. Should this development go ahead it will completely destroy the historic character of St Deiniol's Ash Farm, part of its character is the rural surroundings. Allowing building of new houses on the land associated with this historic building will be a complete travesty.	Removal of allocated site at Ash Lane Mancot
382	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane, Mancot. The land is green belt land and under Planning Wales should not be built. Mancot will be at risk of losing its identity and will not be a separate settlement. I thought the Council had a policy not to merge two settlements. Also the road structure would be unable to cope with all the extra traffic. Ash Lane is bad enough now when a traffic census was done a few weeks ago it was done when there was road works and it was one way traffic and part of it was closed. Also where are the schools because there is no space now in Hawarden High or the primary Schools. Where are the doctor's surgeries going to be, you are unable to get an appointment now. Flooding in the area has increased since more houses have been built. So what impact will an extra 280+ have. Ash Farm building is 16th Century and the development will surround it. It is just too dangerous to pour all that traffic onto Ash Lane.	removal of allocated site at Ash Lane, Mancot
390	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane allocation. The road structure would not be able to cope with all the extra traffic, Ash Lane is bad enough now. When a census was done it was at a time road works were taking place and part was closed and the other was one way. The proposed land is green belt land and should not be built on. Ash Farm a 16th Century building stands on that land and would be surrounded. Also Mancot and Hawarden would merge it would take away the identity of both villages, I understand it was policy not to merge two settlements. Has any thought gone into where children are going to go to school, both primary and high school are full. Also doctors and dentists both are difficult to get appointments without this development. ~if this development is allowed to go ahead the impact it would have on the area would be devastating. The infrastructure just can't take it.	remove allocated site at Ash Lane
407	HN1.8 Ash Lane, Hawarden	Object	I would like to register my objections to the development of Ash Lane Mancot. 1.The proposed site only has one access and this alone will cause a great deal of difficultly for pupils attending local schools and other residents. 2. The site is on Green belt land and Planning Wales state that there should be no use of green belt land for the building of houses. 3. The infrastructure available cannot cope with the present drainage in Mancot. 4. The historic distinction between Mancot and Hawarden would disappear when the	Removal of allocated site at Ash Lane Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			two communities would be joined and the Grade 1 Listed St Deiniols Ash Farm should be considered. 5. The local schools are already over subscribed. 6 Traffic on Ash Lane would be increased making an already busy road a greater danger to pedestrians and residents. 7. There would be a greater number of people seeking employment. 8. The only doctors surgery is at Hawarden and it is difficult to get an appointment, the access is difficult which leads to on road parking making the junction dangerous.	
421	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot This site green belt land with Ash Farm a 16th Century building standing on it. Ash Lane would not be able to cope with extra traffic at the moment there are problems when its term time at the school and would become more dangerous with added traffic. Both Mancot and Hawarden would lose there identity at the two settlements would merge, it is just not acceptable. Where are the school places going to be for children moving to the area, both primary and high schools are struggling for places? Also a problem with doctors' surgeries. There are brownfield sites in the area why not use them to build on, this site would have a devastating effect on both villages with traffic etc.	Remove allocation at Ash Lane, Mancot
425	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot This proposal would exacerbate traffic problems through any direct access on to Gladstone Way, and increased use of Cottage Lane and Colliery Lane, both are narrow with no pavements in places. Increased use of Ash Lane via Cross Tree Lane which is already congested by school traffic, and its use as a by-pass/rat run to avoid Hawarden village. Welsh Government guidelines are against the coalescence of settlements, the use of green belt land and the threat of absorption of historic buildings, namely Grade 1 St Deiniol's Ash This development would increase pressure on already over stretched local schools, medical services	Remove allocated site at Ash Lane, Mancot
437	HN1.8 Ash Lane, Hawarden	Object	Mancot: Ash Lane • Schools – Both primary schools in the area are already over subscribed. • Doctors / Dentists– The practices in Hawarden, Saltney and Buckley cannot cope now. They are already over subscribed. • Environmental impact through the loss of wildlife havens such as hedgerows, ditches, mature trees would be unacceptable along with removal of further green space when brown belt land exists elsewhere. In a day and age when you are actively encouraged to get out and exercise, it is uplifting to walk and exercise my dogs past open green fields. • Vehicles / traffic – A proposed development of 288 houses will inevitably lead to increased pollution at a time when climate change should be the top of everyone's agenda. In order to combat this, one could argue that there is a drive to use public transport and not add to the environmental impact by using your vehicle. • Environment – Lower Mancot and Sandycroft were flooded this year.	Removal of allocated site at Ash Lane Mancot
456	HN1.8 Ash Lane, Hawarden	Object	OBJECTION TO ASH LANE/PARK AVENUE DEVELOPMENT Mancot is small village that sits alongside Hawarden - we are two villages that complement each other. Mancot village is a small community village with our own unique identities. You live in Mancot for the views and peaceful community with Hawarden complementing the village offering additional shops, countryside and of course places to eat. Mancot is an individual village with its own Pub and village shop. I have no children yet but having lived in Mancot for	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			the best part of 33 years I have seen it become a very busy village and packed with cars and traffic and the community is becoming very populated. This is resulting in local families not being able to have their childrens places in schools even though they live within the village and very congested around the school entrances - already very dangerous and will create more risk of accidents with children! Roads are already extremely busy and this is really starting to pollute our villages! we are already finding ourselves sitting in more traffic with families growing within the village so this development would have more negative impacts as we have minimum roads in and out of the villages as it is with many people using us as a cut through. The school parking and most of all the flooding! Being in Mancot we have seen more flooding over the last few years compared to others and since developments have been built! Hawarden being the historic would also no longer be the lovely village alongside Mancot as it would be almost be merged. This is a large development that would change the way the two villages would live. Doctors and Schools will also suffer as no room to expand so would be stretching our facilities even more to how we already are!!! Finally, how can you even start to think of such a large development with the flooding that has already been experienced with the most recent developments within the area. I STRONGLY OBJECT TO THIS DEVELOPMENT!!!!	
458	HN1.8 Ash Lane, Hawarden	Object	I'm emailing you direct to post my concerns about the current development plan for the site in mancot as a resident of mancot for 15 years I object to this as an extra 280 houses with an average of two cars per houses gives a possible extra 560 cars in the village this means more toxic exhaust fumes poisoning us and especially the kids walking to and from school. This in a time when the speed limit on Queensferry bypass has been reduced to try and limit the poisonous emissions from cars Hawarden village school is already really struggling with the traffic issues and safety issues that come along with it and it's also the same for the Sandycroft school also have you tired to get into the doctors and dentist around here the strain on these facilities is already at bursting point. Plus there is a lot wildlife in and around the planned site and we have always had a flood drainage problem in Mancot around the library as I can remember the houses opposite getting flooded quite a few times. So I'm voicing my concerns to this development as I think it will be disaster for the Mancot Hawarden Sandycroft community's.	Removal of Ash Lane allocation.
464	HN1.8 Ash Lane, Hawarden	Object	With reference to the Ash Lane Mancot and Park Avenue Hawarden building development I would like to formally object to this proposal on the following grounds. * This development would result in further loss of green belt land, currently used by tenant farmers, for both crops and livestock. * This development would also destroy a large wildlife habitat, killing wildlife in the process as hedgehogs etc are no match for a bulldozer. * The increased number of families in this area would have a major impact, on the existing population, with regard to community facilities such as GP’s services etc. * To combine the villages of Mancot and Hawarden, which this development would do, would destroy the individuality and character of these villages making one big sole less urban sprawl. * The increase in traffic because of the development would increase both pollution and noise and of course be an extra hazard to pedestrians and cyclists especially as most of the surrounding roads are village roads and not main roads. These are all valid objections which I hope you will consider very seriously.	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
468	HN1.8 Ash Lane, Hawarden	Object	Objection to the proposed development HWN005 Ash Lane The local school does not have capacity for more children and there is not the space on site to build greater capacity. Local traffic at present on the following roads at peak time became gridlocked and stay generally busy throughout the day The doctor's surgery is not able to provide an adequate service to local residents, In addition to the huge impact on an already struggling infrastructure Environmentally, this development would also be very damaging as I believe building houses on this site would have an impact on flood risk. The farmhouse and farm itself deserves protection, being a Grade 1 listed building and the oldest building in Hawarden. Given the speed of the consultation, the lack of communication with the community, the lack of information provided to the community and the difficulty the community has had in finding and understanding information, I find it impossible to believe the council has properly and adequately investigated this proposal in terms of suitability.	Removal of Ash Lane allocation.
470	HN1.8 Ash Lane, Hawarden	Object	I am writing to express my objection at the proposed development on Ash Lane, Mancot and Park Avenue, Hawarden as proposed in the Authority's Local Development Plan (LDP). Firstly, I would like it to be noted that I believe that the LDP itself is flawed as it is not compliant with other national policies, it is not locally specific nor is it accessible, clear or focused. I found it extremely difficult to read and access. 1. Merging Mancot and Hawarden coalescence 2. Green Belt Land 3. Magnitude of development 4. Lack of knowledge and transparency 5. Access to Ash Lane site 6. Infrastructure	Removal of Ash Lane allocation.
472	HN1.8 Ash Lane, Hawarden	Object	I am writing to object to the proposed plans to build 280+ houses on the land between Gladstone Way and Ash Lane. Having recently imposed a 50 mph speed limit along part of the A494 past RAF Sealand due to concerns of high levels of pollution due to traffic volume. The building of 280+ new houses would significantly increase vehicle numbers in excess of 500 (based on only 2 vehicles per household) subsequently increasing vehicle pollution in the area to even greater levels. This would also increase the volume of traffic along Ash Lane onto Cross Tree Lane which is already extremely dangerous for children going to school even more so since the school buses were taken away and this now being the proposed safe walking route for children to Hawarden High school and people going to and from the doctors and the graveyard etc. The local primary and high schools are already over crowded and with the recent withdrawal of funding for teaching assistants throughout the country the increase in more pupils going into the schools will create an even bigger strain on the facilities they have to use. Doctors appointments at the Stables medical centre are an absolute nightmare to make with no doctors being available to cover the volume of patients they have therefore this is putting a even bigger strain on the out of hours GP's and the hospitals with people having go there instead. I have lived in Mancot since 1995 and have seen the gradual decline of the villages identity due to the development of housing within the Ewloe, Hawarden, Mancot, Pentre and Sandycroft areas making them look more like one rather large town instead of individual villages. Parking is also another issue in the area especially at school times. When St Davids Park was built we were told new facilities e.g. doctors, schools, car parks etc. would be built and as of yet I have seen no evidence of this happening. This proposed large building plan will also take a large	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			proportion of green land that will be lost for ever. Before considering building on green belt land all efforts should be sort to use brown site areas as this would be in-line with current environmental thinking.	
474	HN1.8 Ash Lane, Hawarden	Object	I am writing to lodge an objection about the proposals to build on land adjacent to Ash Lane in Mancot/Hawarden. As a lifelong resident of Hawarden, I strongly object to the proposals for the following reasons: Increased traffic The development would also significantly impact upon access to Hawarden Village Church School. Impact upon local schooling I understand that Hawarden High School is also operating at maximum capacity. Access to medical provision The sole dentist in the village does not have NHS patients and the dental practice in Ewloe has limited availability. Hawarden Cemeteries Hawarden is an old village with historic roots. A short visit to the lower cemetery off Ash Lane in Hawarden and one can see that it is virtually full, making a total of three cemeteries in the village. Merging of Hawarden and Mancot boundaries The area under consideration is green belt and should not be considered for development.	Removal of Ash Lane allocation.
476	HN1.8 Ash Lane, Hawarden	Object	As a resident of Mancot, I am opposed to the building development being allocated nearby. This development will have negative effects on the area and environment around Hawarden. The local school and doctors are already struggling with demand. With some families sending children to separate schools outside of Hawarden as a result. The increase in housing will mean more traffic and noise pollution through Glynne Way at peaks times. Not to mention the construction of 250+ homes and transport routes, road works and traffic. Our village does not have the infrastructure to support this many properties and people. I hope that you take my concerns into consideration and the council remove the land from the local development plan.	Removal of Ash Lane allocation.
478	HN1.8 Ash Lane, Hawarden	Object	After moving to Hawarden in 1982, I have always lived in the area. I brought my daughter up here and it's an area I'm proud to live in. I spend a lot of time in Hawarden and my commute and access to shopping and local amenities is both in Hawarden, and accessing such amenities requires me to travel through it. It has come to my attention that you are hoping to push another housing development I was made aware of this development by someone who lives nearer to it and felt compelled to write an objection. This council is destroying our village and merging our smaller communities with total disregard for the residents and impacts on them. From what I've heard in local drop ins, it seems that no local knowledge has been utilized in the making of the plans. They demonstrate a lack of understanding of the local communities' identities. For example, you would be merging Hawarden and Mancot by building these houses. I have noticed that a 50mph limit has been implemented on the A494 due to air quality I'm a keen walker and enjoy the Hawarden area, in the farmland and fields surrounding it. This housing development would threaten the integrity of this historic building as it will be packed in with hundreds of houses, both destroying this building's historical value and the general ignoring of the need to protect our overall history. It is so incredibly disappointing to see this council trying to throw away both our history, and our future in one fell, profit wielding swoop.	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
480	HN1.8 Ash Lane, Hawarden	Object	I am writing to raise my objection to the development on Gladstone Way / Ash Lane. My objections are three-fold, as follows: 1. Your conduct as a council in this process 2. The use of green barrier land and it's impact 3. Merging of Hawarden and Mancot 4. The use of green barrier land	Removal of Ash Lane allocation.
482	HN1.8 Ash Lane, Hawarden	Object	I am writing to you to express my concerns and objections to the above proposal. I am a Hawarden resident, and for the past 20 years I have lived on Gladstone Way near the junction with Cross Tree Lane. My concerns and objections are as follows :- 1. The proposal will take away an existing green space which is understood to be designated as Green Belt Land for agricultural use. 2. The proposal will put more pressure on the already overrun Stables Medical Practice within Hawarden village which at present cannot fulfil appointment request expectations of patients without having to wait in some cases weeks. 3. Traffic congestion and parking issues along Crosstree Lane and at the Ash Lane junction around school drop off and pick up times is now at saturation. This would be exasperated during the construction phase of the housing development and add to an increase generally from the residents of the new housing. 4. In conjunction with item 3, the traffic situation generally on the B5125 through Hawarden Village during the normal day time period is now very heavy and is virtually at the levels it was back in the early 1980's before the A55 was redirected to the new Hawarden by pass. The proposal would inevitably increase the local traffic levels in and around Hawarden and Mancot with the added issues relating to vehicle exhaust emissions and the impact on air quality and the environment in general.. 5. The proposal would see modern housing and potentially new access roadways encroaching on the historic character of St Deiniol's Ash Farm which is a grade 1 listed building. 6. The distinction and separation between the communities of Mancot and Hawarden will be lost through building on the green space as these settlements would coalesce with the proposal.	Removal of Ash Lane allocation.
488	HN1.8 Ash Lane, Hawarden	Object	I would like to express my objection and concerns regarding the proposed development of the land between Ash Lane and Park Avenue. These are as follows: Increase in emission levels. Road safety. Already over stretched services, including schools and doctors surgeries. Drainage of flood plane area. Historic green belt land situated in a village location should not be built upon where there are other more suitable brownfield sites.	Removal of Ash Lane allocation.
490	HN1.8 Ash Lane, Hawarden	Object	I write to object to the proposed development in Mancot, (Being proposed as Hawarden). My Objections are; The land proposed is greenbelt, so should be maintained as greenbelt. The local highways will not support the increase in traffic, there is no scope for improving the Ash lane junction due to there not being sufficient space. There are schools at either end of Ash Lane. There are insufficient facilities to support the development, doctors, schools and dentists are already bursting at the seams, and need additional resource to manage the existing requirement. There are known issues with the area of the development area with regards to underground streams. Any development in this area is likely to increase the already high chance of flooding in the lower areas. The development merges the Hawarden and Mancot towns together, this should not happen according to your own planning rules. The development is being sold as a Hawarden development, whilst it is clearly in Mancot, this is likely due to the fact that the housing can be	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			sold at a higher price! I moved to Mancot in 1987 from Connahs Quay, due to the exact same type of planning regime. I moved because in Mancot I could walk in 3 directions and see countryside within 5 - 10 minutes. It will be a great shame if this development goes forward, as it will spoil the enjoyment of the area for a significant number of long term local people, and cause significant distress for people living in the Pentre area, already suffering due to over-development through flooding.	
492	HN1.8 Ash Lane, Hawarden	Object	Mancot: 1) This is green belt land. The national policy is that Green belts are not built on. 2) There has been no consideration of alternative sites for this development. Sites where maybe there is a better infrastructure to support such a development. No brownfield sites have been suggested? 3) The scale/magnitude of the development is huge. Therefore, the impact on local services/infrastructure is huge. 4) Access via Ash Lane is ridiculous. The amount of traffic and parked cars, especially at school times is already high. 5) Flooding in this area is already a huge problem. In June this year we had significant rainfall which resulted in floods. Sandycroft school closed due to drain surges and floods. Parts of Sandycroft were under water. Picture attached. 6) Local primary and high schools are already at full capacity. John summers high school was recently closed meaning some local children have to go to Buckley or Saltney high schools. Where will all of the new children to the area go to school? 7) Doctors surgeries are also at full capacity. I live in Mancot and use the stables in Hawarden. It usually takes over 100 phone calls to be told there are no appointments available. How will they cope with 300 extra families? Hospitals and dentists too are full to capacity. 8)Traffic will also be a problem. Mancot has seen an increase in the number of cars around and extra cars on the road will also increase local pollution. Something which Flintshire council seem to be keen to reduce with the new cameras on the A494 etc. The traffic on cross tree lane is already a massive problem particularly at school time.	Removal of Ash Lane allocation.
494	HN1.8 Ash Lane, Hawarden	Object	Ref: Development for housing on Gladstone Way and Ash Lane I am 81 years old and attend Hawarden doctors surgery on a very regular basis, I have difficulty getting an appointment at present, therefore I am worried and concerned with the increased numbers of houses, it will have a big impact on my health as I won't be able to get to see the doctor when I need to due to the high number of people also needing their service. 2. The increased traffic will drastically affect me as I can't park my car near the doctors at the moment anyway especially at school drop off and pick up times. Also I worry about the children's safety at Hawarden Church School and the safety of children walking to Hawarden High. 3. I am also concerned about the proposal being on green belt land and the loss of agricultural land, I request that the council look for other areas to develop on brown belt land.	Removal of Ash Lane allocation.
496	HN1.8 Ash Lane, Hawarden	Object	Ref: Development for housing on Gladstone Way and Ash Lane I am writing to object to the above planning application on the following grounds – 1. I know that the air quality is worryingly low in our area and its being monitored. The increased traffic that will come due to your proposed housing development will only exasperate the matter. I'm concerned that the council are ignoring this to gain profit. 2. I live next to the field on Ash Lane where you plan to build. I worry every time we have rain as it floods every time	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			and when it heavy rain full it comes onto our land. If there are housing it may come into the house as the drainage is poor now. Please look elsewhere for your development	
498	HN1.8 Ash Lane, Hawarden	Object	Ref: Development for housing on Gladstone Way and Ash Lane I am writing to object to the above planning application on the following grounds – 1. As a council I thought you were trying to protect agricultural land and green belt land. I hope you are not ignoring this important fact to benefit from building houses that would be classed as Hawarden therefore fetch a premium price tag for the developers. I live adjacent to the proposed site, I look onto the field where Deiniols Ash Farm is located. The housing development will have a large impact on my privacy, as I currently look onto an open field. Also depending on the actual housing plan, it could result in loss of light and overshadowing of my property. 2. I am concerned with the effects this could have on my health due to the increased traffic for example the increased noise pollution and increased emissions. 3. I work at the local primary school where places are very limited in all year groups at the moment even before your proposed development, but not only that in June 2019 due to heavy rainfall the school had to close as the drains could not cope and they were overflowing. When we have any severe rainfall the manhole covers and drain covers are lifting and overflowing as a result of to much water entering the system. This occurs now and your proposal of more housing would only exasperate the problems further for the school and local people.	Removal of Ash Lane allocation.
500	HN1.8 Ash Lane, Hawarden	Object	I would like to post my objections to the development of houses between Ash Lane and Gladstone way. The reasons for my objection are: 1. Safety - the congestion around this area during schools times and commuting hours is basically unsafe. Travel through cross tree lane on a daily basis is impossible to navigate and remain on the intended side of the road. This whilst trying to be observant for children is an accident waiting to happen. 2. Climate impact and radon gas zone - there is an unsafe level of pollution around this area which is being ignored for the sake of short term profit and increase in council tax gains. I would like to see a report on the radon gas zone for this area prior to any building works both in the proposed area and the school and local work places which is a legal requirement. in addition these points there are grazing wildlife and oak trees on the land in the area. 3. Green belt - there is a need for local communities to keep their identities. Blending Mancot and Hawarden and naming the are as Hawarden when aiming to gain entry through a Mancot cul de sac is clearly a council tax issue you wish to profit upon. This will directly affect the16th century farm on Ash lane and contravene the by law keeping community identity separate. 4. Community strain - I have personally struggled to get appointments at the local doctors. This will only get worse. I can only imagine the worry this may cause our older residents. There are many areas where additional housing developments would be acceptable and would not have detrimental community issues. I ask you to please consider my points above as I would hate to see our community suffer or a child be injured by an irresponsible development decision at its core.	Removal of Ash Lane allocation.
502	HN1.8 Ash Lane, Hawarden	Object	Objection to the proposed development HWN005 Ash Lane This proposal would be very damaging to community life in Hawarden which, according to the Council's own literature, Flintshire Council has a duty to protect and enhance. Hawarden is already at capacity in terms of the use of the infrastructure. The local	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			roads, particularly Gladstone Way, Ash Lane, Cross Tree Lane and Glynne Way become gridlocked at peak times and are generally busy throughout the day. The surgery is not able to provide an adequate service to local residents. In addition to the huge impact on an already struggling infrastructure, adding this land into the LDP and putting houses onto it would result in Hawarden losing its individual identity. Environmentally, this development would also be very damaging as I believe a development on that site would have a huge impact on flood risk. The farmhouse itself also deserves protection, being a Grade 1 listed building and the oldest building in Hawarden. Given the speed of the consultation, the lack of communication with the community, the lack of information provided to the community and the difficulty the community has had in finding and understanding information, I find it impossible to believe the council has properly and adequately investigated this proposal in terms of suitability.	
504	HN1.8 Ash Lane, Hawarden	Object	Please accept this letter as an objection to the above development. Ash Lane, Mancot. My main reason for objecting is the sheer size of the planned development, increasing the amount of houses in the villages by 288 is totally unacceptable. I have attended meetings locally and found that the information given to local residents has not been open and transparent. For example, information regarding the number of access roads into the development seems unclear. Flintshire county council representatives also admitted during one meeting that green belt land would not be built on. This is in fact green belt land! One such meeting was so well attended, information sheets printed by the council soon ran out and the only ones left were written in Welsh. This was unacceptable and confirms that the council have clearly underestimated the strong feelings of the villagers. The portal set up to object online is not user friendly and many local elderly people have found this impossible to navigate. I would suggest the council look at other areas in the vicinity, especially brown field sites, and not expect local residents to name them.	Removal of Ash Lane allocation.
439	HN1.8 Ash Lane, Hawarden	Object	After my mum explaining the proposals to me I wanted to write to say I do not want houses to be built on Ash Lane in Mancot because I am worried about the amount of traffic in the village. I use Ash Lane to get to and from school. The safe way we have been told to use by Flintshire County Council is using Ash Lane, it is already a busy road and with more houses it will only get busier. The speed and way some cars drive already is quite scary. I am also worried about the future in terms of the environment and building on fields. I like living in an area with lots of green space but if houses keep get built on the green land then there will be none left. My friend's house has also been flooded and I don't want this to happen again, which it might if they keep building.	Removal of allocated site at Ash Lane Mancot.
443	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot As a resident in this area for over 8 years, I am more than aware of the difficulty in securing an appointment to see a doctor. An extra 280 new homes will only make this even more difficult and whilst you might suggest more doctors are sought, I would suggest that there would not be the car parking facilities to accommodate extra appointments. Another issue I have is that the local primary school on Cross Tree Lane would also struggle to accommodate more pupils. Cross Tree Lane is already a no go area for me during term time due to the amount of parked cars making travel difficult and at drop off and collection times, this is complete worse still. More parents collecting mote	Removal of allocated site at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			pupils would be total carnage. I understand that Planning Policy for wales states that green belt land should not be built on.	
455	HN1.8 Ash Lane, Hawarden	Object	I am contacting you to express my concerns and to object to the proposed LDP between Mancot and Hawarden. My reasons and concerns are listed below. 1. My initial objection is regarding the use of Greenbelt Land and the ignoring of other Brown-belt Land in the area. The proposed site would impact on a historical farm, the result of which would coalesce two separate settlements. This action whilst being totally anathema to local residents who wish to keep their village identity, is I believe against Flintshire CC's own stated policy regarding the issue of protecting community identity. 2. My second concern is regarding the local infrastructure. I am a patient at Hawarden Surgery, The Stables Medical Centre. As with most other surgeries in Wales and the rest of the UK, the Surgery are short of Doctors. The Surgery is struggling to provide adequate health care provision for their patients and is doing so by employing Nurse Practitioners and Prescribing Pharmacists. Having previously been treated by both, I recently had the need to book an appointment with a Doctor, had to wait three weeks for the appointment and travel to the branch surgery in Saltney. Many patients would not have been able to do that and would then have had to take an emergency appointment. I understand that Betsi Cadwaladr Health Board have been consulted and have said that the prosed development would not cause any problems that would impact on this Surgery but I ask the question 'has anyone asked the Surgery if they feel that they could cope with the influx of patients that the proposed development would bring?'. When there is a shortage of GP's nationally, how will BCHB suddenly manage to get an increase GP's in Hawarden when they have not been able to for the last two or three years? Also the Surgery is small and is unable to expand so it would be unable to provide the extra space that an increase in population would need. 3. Again on the matter of struggling resources, whilst the Education Authority say I believe, that local schools could cope, have the local schools been asked for their views? My understanding is that both Rector Drew Primary School and Hawarden High are struggling to cope with demand. I think that it would be totally unfair if the increase in pupil population that would inevitably result from the development had to go outside of their immediate vicinity. All of the above factors are compounded by my concerns that the extra traffic would pose problems	Removal of Ash Lane allocation.
457	HN1.8 Ash Lane, Hawarden	Object	I am contacting you to express my concerns and to object to the proposed LDP between Mancot and Hawarden. My reasons and concerns are listed below. 1. My initial objection is regarding the use of Greenbelt Land and the ignoring of other Brown-belt Land in the area. The proposed site would impact on a historical farm, the result of which would coalesce two separate settlements. This action whilst being totally anathema to local residents who wish to keep their village identity, is I believe against Flintshire CC's own stated policy regarding the issue of protecting community identity. 2. My second concern is regarding the local infrastructure. I am a patient at Hawarden Surgery, The Stables Medical Centre. As with most other surgeries in Wales and the rest of the UK, the Surgery are short of Doctors. The Surgery is struggling to provide adequate health care provision for their patients and is doing so by employing Nurse Practitioners and Prescribing Pharmacists. Having previously been treated by both, I recently had the	Removal of allocated site at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			need to book an appointment with a Doctor, had to wait three weeks for the appointment and travel to the branch surgery in Saltney. Many patients would not have been able to do that and would then have had to take an emergency appointment. I understand that Betsi Cadwaladr Health Board have been consulted and have said that the prosed development would not cause any problems that would impact on this Surgery but I ask the question 'has anyone asked the Surgery if they feel that they could cope with the influx of patients that the proposed development would bring?'. When there is a shortage of GP's nationally, how will BCHB suddenly manage to get an increase GP's in Hawarden when they have not been able to for the last two or three years? Also the Surgery is small and is unable to expand so it would be unable to provide the extra space that an increase in population would need. 3. Again on the matter of struggling resources, whilst the Education Authority say I believe, that local schools could cope, have the local schools been asked for their views? My understanding is that both Rector Drew Primary School and Hawarden High are struggling to cope with demand. I think that it would be totally unfair if the increase in pupil population that would inevitably result from the development had to go outside of their immediate vicinity. All of the above factors are compounded by my concerns that the extra traffic would pose problems	
459	HN1.8 Ash Lane, Hawarden	Object	I would like to register my objection to the Ash Lane development, proposed in the LDP for Mancot. Specifically I am concerned about the addition of at least 280 cars to an already over burdened transport infrastructure (please look at Cross Tree Lane) and the amount of emissions concentrated in an area through which many school children walk to school.	Removal of Ash Lane allocation.
461	HN1.8 Ash Lane, Hawarden	Object	I am objecting to the proposed development because it removes Green Belt land from Mancot and more or less merges the village with Hawarden. This goes against Planning Policy Wales which argues that settlements should not be merged (coalescence). I do not feel that these are exceptional circumstances and that it would be in their words an "inappropriate development". The preferred Strategy Consultation Document also says that community identity must be protected and safeguarded. The new plan would effectively merge Hawarden, Ewloe, Mancot and Pentre into one massive bloc. Further concern to me is that Mancot and Ash Lane could not cope with extra traffic (hundreds off cars). It's also obvious that the schools are now at capacity with parking at Cross Tree Lane out of control and ever likely to increase. There are many other issues like access to Mancot through Colliery Lane which has no footpath and even now is a major and hazardous route into the village. Flooding in the Pentre area is not going to go away and with climate changes and more water not being absorbed naturally from your proposed site, what hope is there to solve it? Please take note of my concerns which I consider valid enough reasons to halt any development on this site.	Removal of Ash Lane allocation.
463	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot The proposed location for the new development will occupy a large greenfield site situated in the middle of an existing urban development. We currently hear from Government sources, including Planning Wales, that Green Belt land should not be developed on, especially if there are alternative sites and even more so if this causes coalescence of adjacent	Removal of allocated site at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			settlements such as Hawarden and Mancot. Flintshire's LDP includes many alternative sites that, on reading, appear to offer far better conditions. What is not stated in the plan is why the Mancot site was specifically chosen. The installation of new homes spread between several smaller sites would result in reduced overall impact. One of my main concerns with regard to the Mancot site is its effect on air quality and pollution. As a resident on Gladstone Way for 35 years we have seen a dramatic increase in the volume of traffic using the road as Airbus expanded. Appendix E if the LDP only mentions the impact on air quality during construction, which correctly states that there could be moderate increases in emissions to air. What is not mentioned are the far greater impacts imposed by extra vehicles using Gladstone Way and other roads in Mancot. With 288 properties there could be around 00 extra cars plus associated delivery, service and contractors vehicles. During peak times these vehicles will significantly impact on air and noise quality, more so than vehicles accessing the site during construction. Safety issues – risk to children walking to school from increased traffic. Public services – difficult to get a doctor's appointment now without the added residents. Education – Will need to increase capacity at local schools.	
465	HN1.8 Ash Lane, Hawarden	Object	I am writing to formally register my objection regarding the proposed Ash Lane development in Mancot/Hawarden. I object to this proposed development for the following reasons: 1) The proposed site is on a Green Belt, and a development of the proposed size will result in a merging of the 2 villages of Mancot and Hawarden. 2) Cross Tree Lane is already a dangerous road for most of each weekday. The school staff park along this road, and parents dropping or picking up their children are running a daily gauntlet that will end in an accident as the situation stands. With the addition of nearly 300 houses this dangerous situation will get worse.	Removal of Ash Lane allocation.
467	HN1.8 Ash Lane, Hawarden	Object	I strongly object to the proposed development on the fields between Park Avenue, Hawarden and Ash Lane, Mancot. Firstly, with the recent closure of John Summers High School, there are limited primary and secondary school spaces available and adding another housing development will increase the number of children in the area. Secondly, the facilities in the area (e.g Local Doctors) will be unable to cope with the influx of potentially 1000 people moving to the area. It is already difficult to get a timely appointment with our local GP. Thirdly, the fields in question are green belt land	Removal of Ash Lane allocation.
471	HN1.8 Ash Lane, Hawarden	Object	I would like to lodge an objection to the proposed development in Hawarden/Mancot on the green belt land between Ash Lane and Park Avenue. I have several concerns I would like to raise. Firstly adding 280 new homes to the area will cause many problems to the local infrastructure. It is already very difficult to get an appointment at the doctors surgery, the school is largely at full capacity, and the before and after school clubs which working parents like myself rely on are also fully subscribed. I live on Ash Lane and it is a very busy road, and can take several minutes to get out off the drive. I fear the extra traffic would cause severe congestion, especially around school pickup times, where to be frank it is crazy, and a real concern for the safety of both children and road users alike. I object to building on green belt as this sort of land is what a the character of semi-rural villages like Hawarden and Mancot are based on. I would like to know whether brown field sites have been considered first. Also using this field which you are classing as a Hawarden	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			development, with proposed access from Ash Lane will in effect merge the two villages, which I understand should not be done, under coalescence guidelines. I also worry that this development would add to potential flood risk in the area. My house backs on to the field and there is a ditch running along the boundary which is constantly flowing with water. With less land able to absorb the water due to the extra concrete I fear for the homes further down the hill which have already been effected by flooding. I understand from our house searches when we moved in that there was extensive mining in the area. There are some cracks on our house which I fear could be caused by subsidence. Another concern is pollution, if the council have had to reduce the speed limit on the bye-pass to 50mph, why would you add countless additional vehicles to the area? Also with mature hedges and trees, which I assume would have to be cut down to make way for the development, this would compound the issue further, as less fresh air would be created.	
473	HN1.8 Ash Lane, Hawarden	Object	Below I set out my objection to the development of the Ash Lane site as part of Flintshire's LDP. 1. Merging together of Mancot and Hawarden 2. Insufficient local facilities – particularly schools and doctors 3. Health and Safety Concerns regarding additional traffic, particularly outside local school 4. Difficulty in understanding the LDP process and documentation 5. Lack of promotion of the LDP to enable comment from the wider community.	Removal of Ash Lane allocation.
483	HN1.8 Ash Lane, Hawarden	Object	1. My initial objection is regarding the use of greenbelt land and ignoring brown belt land, the impact on the historical farm, the result of which would coalesce two settlements. Local residents want to keep their village identity and I believe this is against FCC own policies to protected community identity. 2. Local infrastructure - the Stables Medical Centre is short of doctors and is struggling to provide adequate healthcare provision. When there is a shortage of GP's nationally where will BCHB suddenly manage to increase the numbers of GP's also the surgery is small and unable to expand. 3. The education authority have said the schools can cope but have the local schools been asked for their views?. Both local schools are struggling to cope with demand. 4. Extra traffic would pose problems both for safety and congestion. Any increase in traffic will exacerbate an already existing problem. 5. Extra housing could be provided on the airfields site. 6. Why has the proposal been given a Hawarden and not a Mancot postcode?	Removal of Ash Lane allocation.
487	HN1.8 Ash Lane, Hawarden	Object	Ash Lane Proposed Development This development would change the village identity of Mancot and the infrastructure of the area will not cope with such a massive increase in population A recent proposed much smaller development was turned down for similar reasons so I would hope that the council would show the same respect to Mancot residents 1. Key areas of objection regarding this proposed site: 2. The LDP process itself is flawed because, using their own criteria:	Removal of Ash Lane allocation.
489	HN1.8 Ash Lane, Hawarden	Object	I would like to object to the proposed development off Ash Lane,Mancot ,my reasons are as follows: The roads that would have the access/exit points to the new development (Ash Lane,Gladstone Way,Hawarden Way,Leaches Lane) all converge ion dangerous junctions already over used at crucial times of the day, namely school start and finish times, shift changes at British Aerospace etc. There is no	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			easy solution or physical ability to widen the road at these points, the traffic has to navigate a narrowing at the top of Gladstone Way (Cenotaph),and Crosstree Lane onto the Highway made more difficult because of volumes of traffic from parents dropping children off at Hawarden Village School and In Leaches Lane specifically by Sandycroft C.P. School the traffic at these crucial times is increased with parents parking dangerously on areas with parking restrictions and over junctions creating situations which jeopardise the safety of our children. Whilst I welcome the introduction of the measures for 'Safe Routes' I am extremely concerned the effects of having an additional 280 houses and associated cars will contribute to an increased volume of traffic which will 'bottleneck' at the two points that feature our Primary schools. The lanes in Mancot are narrow and already attract drivers seeking 'short cuts' on daily travel to work,this would increase with the development Demands on our schools,drainage system, the effects of a merging of Hawarden and Mancot villages and the use of green belt land where there are brownfield sites available are reasons why Mancot is not a good choice for development. Our village does not have the infrastructure to support a development of this size.	
491	HN1.8 Ash Lane, Hawarden	Object	This letter is to show my objection to the proposed plans to build 280+ houses on the land between Gladstone way and Ash Lane, my reasons for objecting are that the facilities available to existing residents e.g. doctors, schools, transport etc are already over stretched and struggling to cope. The stables medical practice cannot cope with the amount of patients they have currently as getting an appointment there is near impossible resulting in its patients putting a strain onto out of hours and A&E for medical issues that should be seen to by their local GP, the car park for the stables medical practice is also insufficient for its patients currently as it's entrance and exit are the same meaning that drivers very often have to reverse onto a blind bend of the main road at busy times and the car park does not accommodate for more than a dozen cars at one time which also includes the practices staff cars. Cross tree lane is the main route used to get to local primary and high schools and is extremely dangerous with the volume of traffic it currently has on a daily basis. Therefore adding to the existing volume of cars within the area would make the safety of children walking to and from school at a higher risk.	Removal of Ash Lane allocation.
493	HN1.8 Ash Lane, Hawarden	Object	Mancot is semi rural village, this development will completely destroy this. The land to be developed is green barrier currently being used as agricultural land. The primary schools in Mancot and Hawarden already have large class sizes. Hawarden high school is also oversubscribed with local children unable to get a place and having to travel further. I cannot get a doctor or dentist appointment for at least three weeks. This development could increase the number of cars going through the village by at least 500. The roads simply cannot cope with this amount of traffic. Flooding. The road through Sandycroft is often flooded and the houses opposite the Coop are more frequently having to be pumped out.	Removal of Ash Lane allocation.
495	HN1.8 Ash Lane, Hawarden	Object	I write with reference to the above proposed housing development and to my strong objection to it! Both Hawarden village school and Sandycroft CP school are already over subscribed and have a traffic flow problem, These areas are already blackspots without and additional traffic could result in an accident involving a child! Local doctors and dentist surgeries are already saturated! Ash lane is a single track road	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			and couldn't cope with the increased traffic flow this would also have a significant impact on pollution! St Deiniols Ash Farm is Hawardens oldest occupied building and grade 1 listed. This development would build right up to the farm Andy therefore destroy the character of the farm house. The national policy Is that green belt land is not to be built on, this land IS green belt land ! Insufficient consideration of alternative sites, no brownfield sites have been considered! The area Is already suffering with traffic pollution, the A494 has recently seen a speed reduction being put into place to help ease this, more traffic on our roads would increase this and have an effect on our wildlife our health (asthma is already on the rise) and eradicate all being done in other areas. Thank you for taking the time to read my objections, I sincerely hope you take them into consideration before making any decisions.	
497	HN1.8 Ash Lane, Hawarden	Object	Ref: Development for housing on Gladstone Way and Ash Lane I am writing to object to the above planning application on the following grounds – 1. I live next to the field your proposed development will be on, on Ash Lane. I have many worries but my main one is flooding to my property as at present with nothing in the field the field floods and runs down to settle next to me, after heavy rain full it sometimes comes on my land. Therefore, with proposed houses you are going to build the drainage system would not cope and my property is at risk not just my land. I have spoken to the farmer who lives in Ash Lane farm who has confirmed that the fields have always flooded. 2. I am the care taker at Sandycroft CP school and when there is heavy rain the manhole covers raise and in the last heavy rain in June we had to close the school as excrement was coming up through the covers and the water level in the toilet was nearly over the top of the bowl. The drains can not cope now so with the increased houses you are adding 280 houses extra to a system that can't cope now. Will the education of our children be at risk as water finds its lowest point which unfortunately is our local school. It would be far better to use the areas available to you and not use the green belt land that will inevitably course major flooding to our area.	Removal of Ash Lane allocation.
499	HN1.8 Ash Lane, Hawarden	Object	I wish to object to this new planning proposal. We live in the area of Braeside Ave Hawarden & previously lived in Fieldside Hawarden for over thirty years.The last Redrow development has definitely stretched the areas facilities & this new proposal would make matters considerably worse. Also flooding will be more likely as the system is not strong enough to take on additional buildings. The traffic is already heavy & this would make things dangerously unsafe. I cannot see the need for a development of this size taking into account recent developments nearby so hopefully this decision can be turned down.	Removal of Ash Lane allocation.
501	HN1.8 Ash Lane, Hawarden	Object	I am writing to oppose to the development in ash lane Mancot. As with many other residents I object based on the following concerns. 1. Flooding is already a local concern and affects my property, this will only get worse. 2. Local schools are over subscribed. 3. I already struggle to get an appointment at my local doctors. 4. Pollution is a concern in the area and measures have been put into place on the A494 to combat this yet the development will add to it. 5. There is already too much traffic in the village which poses a risk to local children and their ability to access village life. 6. There are already developed houses close by that are derelict, this land could be redeveloped. 7. Green belt land should not be built on.	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
503	HN1.8 Ash Lane, Hawarden	Object	I wish to object to the proposed development in Mancot. Having seen the scale of the plans, it was clear the development exceeded the 8% to 15 % growth limit recommended for a category B settlement. It will completely alter the character of the place. I find it hard to believe Flintshire County Council would not wish to preserve this historic site. The village has grown significantly over the years and I accept infill development is sometimes required to build communities, however, I believe further development particularly into green barrier areas will be detrimental to the character of the village and transform it into a small town. The sprawl into adjoining villages, coalescence, was something I did not believe was accepted within planning laws however surely this large scale development would merge Mancot with the village of Hawarden. The council has only very recently agreed to, but not yet implemented, measures to relieve traffic congestion in the village around the local primary schools. Already at risk of flooding, the addition of 280 houses, will only exacerbate the problems we have seen already in the village.	Removal of Ash Lane allocation.
506	HN1.8 Ash Lane, Hawarden	Object	Ash Lane Mancot 1. My initial objection is regarding the use of greenbelt land and ignoring brown belt land, the impact on the historical farm, the result of which would coalesce two settlements. Local residents want to keep their village identity and I believe this is against FCC own policies to protected community identity. 2. Local infrastructure the Stables Medical Centre is short of doctors and is struggling to provide adequate healthcare provision. When there is a shortage of GP's nationally where will BCHB suddenly manage to increase the numbers of GP's? Also the surgery is small and will be unable to expand. 3. The education authority have said the schools can cope but have the local schools been asked for their views. Both local schools are struggling to cope with demand. 4. Extra traffic would pose problems both for safety and congestion. Any increase in traffic will exacerbate an already existing problem. 5. Extra housing could be provided on the Airfields site. 6. Why has the proposal been given a Hawarden and not a Mancot postcode?	Removal of Ash Lane allocation.
508	HN1.8 Ash Lane, Hawarden	Object	Re Plans to allocate land between Ash Lane Mancot and Park Avenue Hawarden. I wish to voice my objections to this disgraceful plan, this goes against WG own policy on not building on green belt land and would result in the coalescence of the two settlements which also goes against the policy. The infrastructure could not cope, we should be preserving the countryside for the sake of the environment and not causing more pollution with more houses and traffic. Traffic at school times is chaotic and dangerous as the roads are narrowed by parked cars at this times. I hope you will see common sense and cancel this absurd community wrecking plan.	Removal of Ash Lane allocation.
510	HN1.8 Ash Lane, Hawarden	Object	I am very disappointed to hear the fields between Ash Lane and Park Avenue have been put forward for development. Development should not be allowed on green barrier areas which would result of the merging of separate settlements which surely is the council's own policy. To even consider building new houses within 10metres of the Ash Farm listed building is criminal. The land is good agricultural land and a haven for wildlife. There are ancient trees and hedgerows. Flooding has been a problem and will only get worse. Schools in the area are at full capacity. Doctors, hospitals and dentists are also completely full. There are other sites with less impacts for example: Land off Aston Hall Lane, Queensferry and opposite	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			the (Hawarden) Farm shop plus brownfield sites. I trust you will consider what a devastating impact this proposal will have on every part of our lives and remove this proposals from the LDP.	
512	HN1.8 Ash Lane, Hawarden	Object	I am writing in connection to the Ash Lane Development in Mancot, and wish to object. I am Mancot born and bred and my extended family have lived here since the early 1960's. I have many reasons why I believe this development should not go ahead but will list a few as follows: I think one of the main reason is I cannot understand why we would want to build new houses which would surround such a beautiful historic building at Ash Lane Farm. This building has stood in the surrounding fields for centuries and I feel it would be criminal to put new build houses so close to it. The scale of the development would completely spoil this area which is so important to the residents of Mancot. Surely there are many other places within a few miles that would be more suited? I am wondering who has suggested this area in the first place, surely it can't be anyone with knowledge of the local area. Secondly, Flintshire County Council are fully aware of all the traffic problems that Mancot is experiencing at the moment. Traffic issues outside both local primary schools are creating problems for all residents and adding such a large new housing estate to this will have a massive effect. We cannot cope with the amount of new cars this development will bring. Thirdly, it is already impossible to get appointments at the local doctors surgery, and adding patients to this already stretched practice would be ridiculous. The surgery car park is too small and rarely has spaces and the area around Cross Tree Lane is unsuitable. My 88 years old father experiences regular problems parking! Finally, I think the development is far too large. Mancot and Hawarden have always been separate and this will join both villages. Planners need to look at other land within the area, which will have less impact on local people's lives.	Removal of Ash Lane allocation.
514	HN1.8 Ash Lane, Hawarden	Object	Ash Lane, Mancot. My husband and I wish to object to the proposed housing of the above properties. We live on Cross Tree Lane and the traffic is already chaotic, not only are child safety at risk but also the residents. The school can not possibly cope with more children and the doctors are definitely under pressure. I personally have had to wait 4 weeks to see a nurse let alone a doctor. Someone is completely out of their mind for even considering this. You need to think again, life is not all about money	Removal of Ash Lane allocation.
516	HN1.8 Ash Lane, Hawarden	Object	I would like to object the proposal to build 250 houses on the fields between Ash lane Mancot and Gladstone Way Hawarden. There are major concerns regarding the infrastructure in our small community. We haven't got enough school spaces to cope with amount extra children that would be needed. Class sizes would be impacted, thus affecting the education of our children. I live in Mancot and the area is prone to flooding which I have attached pictures to show my garden earlier this year. The drains are not up to standard. With building more at the top of Ash lane will put more strain on wastage and drains at the bottom of Mancot. Sandycroft School will be under more pressure of flooding and drainage issues. Earlier this year they were also affected as waste issues meant that they had to close. I can't see proposals to change drainage in Mancot. Not to mention the number of extra cars on the road CO2 omissions next to primary school. Not good for the environment.	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
518	HN1.8 Ash Lane, Hawarden	Object	I would like to register my objection to the proposed development of land on Ash lane,Mancot. Having lived in the village all my life I consider this development will have a negative effect on the area. My main objections are the destruction of greenbelt land which goes against The Wales planning policy & the increase of road traffic on already congested roads particularly during school term times. I also think the village will loose it's identity by effectively merging with Hawarden. Other considerations that have not been taken into account are the effects on local services that are already over subscribed, we have had our bus route axed by Arriva which forces more vehicles onto the local roads. Unable to access local Doctors/Dentists. Local children are forced to travel some distance to High schools which are not easily accessible on foot increasing traffic flow & pollution.	Removal of Ash Lane allocation.
525	HN1.8 Ash Lane, Hawarden	Object	I am writing to you today to object to the planned development on the green barrier between Ash lane & Gladstone Way I feel that this development would be extremely detrimental to the local community. Firstly, this would mean that Mancot and Hawarden would become homogenized into one village as it would eliminate the green barrier currently in place that separates the two. This would also become a merging of postcodes meaning that council taxes would increase in an already high rate area. Furthermore, it would have a devastating impact on the 16th century farmhouse on Ash Lane which has been a part of our local history for hundreds of years. The wildlife in that area would also take a severe knock. Not only is it a habitat for many, many birds & mammals, there are oak trees on that site which are over 100 years old. The environmental impact on our village of this new development would be crippling. Glynne Way is already being monitored for high levels of pollution. The traffic in & out of the village is already at critical levels at certain times of the day. This not only would exacerbate the levels of toxins local people breathe in, but also be an increased risk to the safety of our children who cross these already busy, dangerous roads. This development would add increasing strain on our already struggling local infrastructure (doctors/schools/bin collections etc). An extra 280 homes would add a possible extra 1000 people in our area who would need to access these services. They simply would not be able to cope. Please seriously consider NOT approving this project as I strongly feel it is an irresponsible decision that will be impossible to reverse once the damage has been done.	Removal of Ash Lane allocation.
527	HN1.8 Ash Lane, Hawarden	Object	Ash Lane - Mancot Increase risk of flooding Breaching boundaries between two villages Increasing traffic and emissions to an area which is already struggling to bring emissions down. Lack of infrastructure and concerns over health and education access in the area Risk to wildlife The loss of the beauty of the area and the setting for historic Ash Farm.	Removal of Ash Lane allocation.
529	HN1.8 Ash Lane, Hawarden	Object	I'm a Hawarden resident and local businessman of 9 years and I write to you to register my objection to the proposed Ash Lane / Park Avenue Development in Mancot. My objection is due to the following reasons; My son currently attends Hawarden Village Church School which is already oversubscribed and the traffic along Cross Tree lane during school drop off and pick-up times is horrendous. So I struggle to understand how the local schools could possibly manage an additional 500 or so children coming into the area. The local Doctors surgery struggles with the number of patients it already has and as a result, it's not	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			uncommon for patients to have to wait up to 3 weeks to get an appointment. An extra 1000 or so people would not help the current situation. The traffic along Gladstone Way is increasingly busy heading into Hawarden, which is a known bottleneck at the two key junctions at the top of Gladstone Way and Cross Tree Lane during peak times. Also speeding along this road is a real problem and having more cars and children crossing at school times is a real concern for safety. The sewerage system at the lower end of Hawarden and Mancot is notoriously troublesome with numerous issues over the last few years and I cease to understand how it would cope with an extra 250 homes without a major upgrade. Not to mention that the land the proposed development is going on is designated green belt land. I'm concerned about the impact this will have on the local environment, wildlife and farming. I hope you will seriously consider my reasons for the objection.	
531	HN1.8 Ash Lane, Hawarden	Object	Residential development at Ash Lane Hawarden for 288 dwellings. I write to object to the proposed plan under the headings: Education - local schools do not have capacity, travel to alternative schools will add to already chaotic traffic associated with the school run and capacity at more distant schools may also be limited. Health - the existing health service will struggle to absorb the influx of 900 new residents. Strong and cohesive Communities – the separate identities of Hawarden and Mancot will be blurred, coalescence of these two diverse communities should be avoided. A similar plan has been not previously been successful, why is this site larger site now being included on green belt land. Biodiversity- Whilst the plan includes mitigation for valuable habitats and protected species the best policy would be to leave the greenfield site alone, green belt land should not be built on and a brownfield site should be sought. Landscape and Townscape - nearly 300 dwellings is bound to increase night ljght pollution. Heritage – The close proximity of 288 houses to would do nothing to enhance the character of this building even with the green infrastructure it will have a detrimental effect, on St Deiniol's Ash Farm.	Removal of Ash Lane allocation.
535	HN1.8 Ash Lane, Hawarden	Object	I write to object to the proposed housing development proposal for 280 dwellings on Land off Ash Lane/Park Avenue, Deeside, Flintshire I have lived in Mancot, Deeside for 34 years, during this time have seen what was once a small village grow exponentially. My principal reason for objecting is that the proposed site is protected by Green Belt designation. The National Planning Policy Framework is clear that the Government "attaches great importance to Green Belt" and that decision makers should continue to afford the Green Belt the highest protection The protection of the Green Belt is one of the Core Planning Principles of the National Planning Policy Framework. "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence" The Green Belt at the location of the proposed development in my view does serve the five purposes of the NPPF • To check the unrestricted sprawl of the built-up areas of Mancot & Hawarden.; • To prevent the historic village of Hawarden from merging into the neighbouring village of Mancot • Assist in safeguarding the countryside from encroachment from further residential development. There is agricultural value in the farmland proposed for development from grazing and hay making; • To preserve the setting and special character of Mancot – which is a mixture of urban and rural land. St Deiniols Ash Farm, is Hawarden's oldest occupied building and grade 1 listed. The proposed	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			development would encroach on the farm house, destroying the character of the building. • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land, of which Flintshire has a considerable amount	
543	HN1.8 Ash Lane, Hawarden	Object	I am writing this email to object to the Park Avenue/Ash Lane site (HWN005) “Safeguard and protect community identity,” “Review green barriers against the criteria in PPW in order to avoid coalescence,” “Focus initially on the availability and suitability of brownfield land,” “Ensure that the characteristics and features of the landscape are recognised and are considered,” “Safeguard the County’s rich and varied built and historic environment including listed buildings,” “Protect built heritage at risk and sensitively managing change in the historic environment,” None of the above points are being followed by going ahead with this development. They are in place to ensure that the human and physical aspects of communities are protected. To protect our communities and people living in them you must not let this development go ahead. Ash Lane site is not a suitable development site as it results in the absolute coalescence of Hawarden and Mancot.The planning department seem more focussed on maintaining a green barrier between ‘Historic Hawarden’ and the rest of Hawarden when ironically the oldest occupied building in Hawarden (Grade 1 listed) is St Deiniol’s Ash Farm. This development will spoil one of the most historical aspects of Hawarden when driving up from Ash Lane. This historical landscape is beautiful. ‘Planning for Wales’ document clearly states that green belt should not be built on to stop urban sprawl! A development of this magnitude will have a detrimental impact on Hawarden residents. Firstly he doctor’s surgery is already over stretched. When trying to make an appointment I can wait weeks to be seen. Secondly the local schools in the area (Hawarden and Sandycroft) do not have the capacity to accommodate more children and do not have the space to build more classrooms	Removal of Ash Lane allocation.
545	HN1.8 Ash Lane, Hawarden	Object	I’m writing to object to the Ash Lane development (HWN005) . I believe that this site is inappropriate for a development of this size. Firstly I believe that Hawarden infrastructure cannot cope with a development of this magnitude. The road layout and close proximity of the building already cause regular traffic jams. Two way traffic is unable to flow without interruption though the village past the Fox as the road is so narrow with over hanging buildings. On coming cars must stop to let buses through. A development of this magnitude will exacerbate this problem further as any traffic travelling south, east and west will drive into the centre of the village. The buildings though Hawarden make it impossible to widen these roads for increased traffic. Secondly I believe that you are ignoring the ‘Planning for Wales’ document which clearly states that green belt should not be built on to stop urban sprawl! On the ground Hawarden and Mancot do not feel joined. There is an alleyway at the bottom of Park Avenue and a small lane (cottage Lane) joining the villages. This development will fully join the settlements. Thirdly the air pollution increase that this development will cause is a massive concern for our young family. We have moved to this area to enable our child to grow up without significant air pollution. Please consider you own policy statements that are in place to safeguard the environment. such as ‘minimise the causes and impacts of climate change, addressing light, noise, air and other types of pollution within the county as part of identifying development sites’. Finally I hope you carefully consider my objection as I have lived in this area for nearly 20 years and	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			have a vested interest in it's future. Can I ask you what has changed in the last 10 years as 10 years ago this site was considered unsuitable for development?	
573	HN1.8 Ash Lane, Hawarden	Object	Ref: HWN005 I would like to know your solutions to the problems listed below that you will cause by turning the fields between Ash lane and Park Avenue into a residential zone. Education: Where are any young residents going to attend school? Local schools are currently high in numbers with very little space. By increasing school numbers it could lead to a poorer quality of education. Medical care How will you stop the local medical practice (The Stables Medical Practice) becoming even more under strain? With many of us local residents struggling to get the medical care we need with the practice not being able to provide appointments because of the amount of people using the practice already. The service will lack even more with added residents using it to. Mancot and Hawarden are currently sharing this practice leading me on to my next point. Mancot and Hawarden Mancot and Hawarden are two different places each having their own park, village hall and their own community. By creating a whole other housing area we may lose that individuality not to mention that they both have their own history which should be recognised. Wildlife Would you want your home to be destroyed? The planning area that you are planning to build on is currently a home to wildlife creatures. I am a resident of Park Avenue with the housing development due to be put into place behind my garden. I have lived here for 14 years and have always had wildlife in my garden from the field, such as squirrels. And more recently badgers and an owl has been seen. Our neighbours have frequent visits from hedgehogs. A baby fox has been heard too. Not to mention other wildlife that may also have their home there. What should happen to these creatures when the habitats are lost?	Removal of Ash Lane allocation.
585	HN1.8 Ash Lane, Hawarden	Object	I'm not in favour of developing land in Mancot for housing for the reasons below. Community deterioration / Lack of research in creating the LDP I would not wish to see a deterioration in the village of Mancot by merging it with Hawarden. Mancot is a separate village. This was noted in 1284 and indeed the name Mancot means "small insignificant places in areas of secondary settlement", that is, an insignificant area which is separate from Hawarden, the main settlement. I moved to Mancot in 1992 and have seen significant changes in attitudes and socially. I'm very proud to tell people that I live in Mancot. The community of Mancot will lose its unique status if it is merged with Hawarden. But, according to the UDP document, Flintshire argues that the villages of Hawarden and Mancot have already merged. Road Safety Cottage Lane has: • a 90 degree corner with cars often on the wrong side of the road. • the road only has small sections of pavement, at both ends of the road, and people have to walk on the road for a large part of the road. • houses on the side of the road with cars parking and exiting the houses. • a section were it turns into a track only suitable for one car. • a road - Kennedy Drive which joins Cottage Lane on the 90 degree corner which makes for very poor visibility. • a road - Brookleigh Avenue which exits onto Cottage Lane as Cottage Lane becomes a single lane. Visibility is very poor. • • a T junction at the end of the road (Mancot Lane). Due to the shape of Mancot Lane, visibility is poor. • a T junction at the end of the road (Mancot Lane). A number of the residents of Wilmslow Terrace park on the road which means that section of the road is only wide enough for one car.	Removal of allocation

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
609	HN1.8 Ash Lane, Hawarden	Object	I am writing to advise you that I strongly object to the planned housing development between Park Avenue and Ash Lane. The main points to my objection are the removal of important greenbelt land and the lack of services and infrastructure. This greenbelt provides a distinct separation between the villages of Hawarden and Mancot and with the proposed construction this will join the two villages and therefore the villages will use their own character and identity. Not only will the construction of this proposed housing development remove important green space but it will have a large impact on local wildlife. As a father, I have been taking my two children to the local schools for the last ten years. During this time, school numbers have increased which has had a negative impact on the roads leading to the schools. I have seen some “close calls” of childrens’ safety being at risk through irresponsible driving and sheer volume of traffic at both schools at drop off and pick up times. This development will put additional pressure on both the local road network and the schools themselves and to date I have not seen or read any proposals to alleviate these ongoing problems. I trust you will take into consideration my concerns when making any final decision for this development	Removal of allocation
615	HN1.8 Ash Lane, Hawarden	Object	It is now 26 years since I first wrote to the Council regarding flooding from the sewerage system in Mancot. Remedial work was carried out which alleviated the problem in the short term, but the Council were well aware of the shortcomings in the local sewerage system. Mr. Mark Tami MP became involved between 2001 and 2004, raising questions in Westminster, and chairing meetings between Welsh Water and Flintshire County Council regarding flooding in Alyn and Deeside. Properties and roads in the Pentre/Sandycroft area have been flooded this year. It could be argued that we live on the River Dee flood plain and should expect flooding to occur. Building 280 extra properties will only exacerbate the problem surely. In the 2003 Unitary Development Plan, it was proposed to build I think 105 houses on green belt land at Leaches Lane between Earle’s Crescent and Duckers Lane. It was stated that ”Mancot is a Category B settlement having an indicative growth potential of between 8 and 15%”. This development plus other builds since 2000 would yield a growth of just under 15%. The current LDP proposal to build 280 houses would be a growth roughly of the order of 25% at least, which far exceeds Mancot’s growth potential. A review of the UDP proposal was carried out if I remember correctly, and an alternative development similar to what is now being put forward in Ash Lane/Park Avenue/Gladstone Way was proposed instead. This naturally met with fierce opposition from residents in that area, and it was dropped, with the Leaches Lane development being adopted instead. Whilst I have no desire to see houses built in the fields behind my house, I would question why the LDP is proposing the Ash Lane development now when it was rejected by the UDP previously. I thought that the Council were opposed to building on green belt land. The Council has also been forced to act on traffic congestion issues outside Sandycroft Primary School, and there are also problems in Cross Tree Lane outside the Hawarden Village Church School. A Councillor who spoke with us claimed to have watched a bus have to wait for about 15 minutes to get past the Sandycroft School due to traffic congestion. At one of the first consultation meetings, the plans for the proposed development showed two access roads onto Ash Lane and Gladstone Way.	Removal of allocation

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
617	HN1.8 Ash Lane, Hawarden	Object	Ref: Ash Lane Proposed Development I write in connection with the above planning application. I have examined the plans and I know the site well as a Mancot resident. I wish to object strongly to the opposed development and I have made my reasons clear below in relation to the local schools, doctors surgeries and safety for local people. School Budgets / Full Schools: With Flintshire continuously cutting school budgets, where are the young people, living within the 280 apposed new build houses going to be educated? Taking into consideration, all the local primary schools are full. I am aware of families currently sending their children to separate primary schools (Hawarden Village School and Ewloe Green), as neither primary school can accommodate both their children. National Union of Teachers (NUT) You may state, that having more young people in schools will bring more money to the schools to resolve the finance crisis that Flintshire schools are in. However, with the current Flintshire deficit, I doubt this is possible? For your knowledge, I have included a copy of the NUT guidelines on class sizes to this objection letter. (Reference 1: Class sizes). Unsafe Road As a local resident of Mancot, I have noticed how unsafe the area is driving past Hawarden Village School during the start and end of the school day. It is only a matter of time, before an accident happens or a young person is knocked over crossing the road. Along Crosstree lane, all the cars park along the same side as the school and the graveyard down Ash Lane, traffic comes from both directions, as you pass Hawarden Village school and heading towards Ash Lane, you encounter a blind bend on a single track. Doctors My current doctors surgery is a nightmare to book an appointment. Their website quotes “We are finding that demand for appointments is increasing and may soon exceed what we can physically manage”, is your apposed housing development going to be the cause of collapse for this local GP surgery? I do hope you understand my concerns regarding the new housing develop and take on board the points I have made clearly in my letter. To conclude, I have bullet pointed my three main points below. • Local schools are FULL. • Crosstree Lane and Ash Lane are UNSAFE during the school run. • Local doctors surgeries are STRUGGLING to accommodate the local community.	Removal of allocation
635	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. Ten years ago this land was deemed unsuitable for this purpose. What makes it more suitable now? Recently Mancot has been subject to flooding. Capacity at the local Schools an issue. Everyone knows we need more housing, but the sort needed is not being built. Its all about how many can be squeezed in to make more money. What is needed is affordable rented accommodation for young couples and single adults who cannot get a mortgage to buy, but are still in their 30s and 40s and have worked since they left school. There are no one bedroom properties. They are just expected to pay extortionate rents to private landlords or live with their parents. Not fair. We do not need more 3 and 4 bedroom private properties. People on the housing ladder do not need more housing to choose from, there is already plenty.	Removal of allocated site
643	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Should this development be approved it will be in direct contradiction to the Welsh Assembly’s directive (Planning Wales) of not building on green field sites. The development will also contravene the National Government’s Policy of building on brown field sites before building on Greenfield sites. There are brown field sites within Flintshire which are not fully utilized for building, one example is the former site of County Hall in Mold. Access to the site is proposed to be from	Removal of allocated site at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			Ash Lane. This road and Cross Tree Lane already cause issues with the weight of traffic. There is a school on Cross Tree Lane and parents park on the brow of the hills and force traffic on to the opposite side of the road, on a blind bend. Ash Lane is used as a “rat run” for Airbus, Sandycroft and Broughton Park workers attempting to avoid the congestion on Chester Road East between Queensferry and Airbus. It is believed that the traffic survey was undertaken during the period Ash Lane was closed to through traffic due to FCC re-surfacing the road. It is my belief that the data collected is categorically incorrect and should not be used in the planning decision.	
505	HN1.8 Ash Lane, Hawarden	Object	I am writing to object to the planned proposals to develop the land between Ash Lane in Mancot and Park Avenue in Hawarden. I believe that the local area could not support the size of the development. I already have to go to a doctor's and dentist out of the area as local practices are full. Schools are at capacity and this could be of detriment to my children who are of school age. I am also concerned about the council services such as bin collections which are already being reduced! I also believe that it shouldn't be built on green belt land.	Removal of Ash Lane allocation.
507	HN1.8 Ash Lane, Hawarden	Object	I wish to formally object to the proposed change of use at Ash Lane Mancot and Park Avenue, Hawarden. My objections are: if the development goes ahead it will go against FCC policy to not coalesce settlements. If houses are built there will be no distinction between Hawarden and Mancot. Properties in Lower Mancot and Pentre will suffer more frequent flooding events. Should the massive swathe of green belt land be concreted over less flood water will be absorbed by the land and will flow down the hillside to properties at the bottom of the village	Removal of Ash Lane allocation.
509	HN1.8 Ash Lane, Hawarden	Object	I am writing to object to the proposed development between Gladstone Way and Ash Lane Mancot you are not taking the impact that building these homes will have between Hawarden and Mancot you are merging two communities which is against your own policy of not merging separate communities .You have already done this in Hawarden and Ewloe so I ask you the cancel this development.	Removal of Ash Lane allocation.
511	HN1.8 Ash Lane, Hawarden	Object	Ash Lane, Mancot .My husband and I wish to object to the proposed housing of the above properties. We live on Cross Tree Lane and the traffic is already chaotic, not only are child safety at risk but also the residents. The school can not possibly cope with more children and the doctors are definitely under pressure. I personally have had to wait 4 weeks to see a nurse let alone a doctor. Someone is completely out of their mind for even considering this. You need to think again, life is not all about money	Removal of Ash Lane allocation.
513	HN1.8 Ash Lane, Hawarden	Object	I would like to complain about the planned housing development on the fields between Park Avenue, Hawarden and Ash Lane in Mancot. Firstly, the area in question is prone to flooding. Our neighbour's gardens have been flooded quite recently. Secondly, I wish to raise my concerns over the additional vehicles moving around Ash Lane, Cross Tress Lane and Gladstone Way. The parking situation outside both schools is a nightmare already. More cars are more hazardous, and there will be more emissions for the children walking to and from school to be subjected to. Thirdly, it is difficult enough already to get an	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			appointment at the local doctor's, with up to 1000 people living in the proposed developments the facilities we have will not be able to cope.	
515	HN1.8 Ash Lane, Hawarden	Object	I am writing to express my objection toward the prospective housing development of Hawarden in Mancot. When I bought my house in 2009 I was led to believe that the fields at the end of my road on Woodville were part of green belt land. I was hoping you could provide me with the evidence to say it's alright to build on this green belt. Also, could you explain to me how you think Ash Lane / Mancot (and its merged areas) will manage the extra traffic? When you consider the congestion on Cross Tree Lane, Ash Lane and Mancot Way during school times at present. I attended a meeting in Mancot some weeks back where the suggested area to be built upon came up to the farm, now I'm told it will be going right up to Cross Tree Lane. Could you clarify just how much green belt land is being considered for this development? I was also told by your colleagues that there were to be two access points, one on Gladstone Way and another on Ash Lane, could you possibly give me a clear idea of all these points? At the last meeting that I attended regarding this proposed development we were told we could suggest an area that we felt would be better suited. I should like your reason as to why the land between Moor Lane and Rake Lane is not being considered. There you have two good roads top and bottom and fewer people surrounding to object.	Removal of Ash Lane allocation.
517	HN1.8 Ash Lane, Hawarden	Object	Re: Proposed Development Ash Lane I write in relation to the proposal of a housing development at the site of Ash Lane, Mancot. I wish to inform you of my objections to any such proposal. The area around Ash Lane is very busy due to the proximity to Penarlag school. At peak times the traffic is heavy. Flintshire Council have also stopped transport to the local high school in Hawarden meaning that the children have to walk to school. The roads are dangerous to cross as it is due to the heavy traffic flow at school/commuter times. An addition of over 200 homes would mean that the children are put in more danger when walking to schools, which will also be over capacity due to the proposed houses. Traffic has increased greatly recently due to the bus service stopping. Most families nowadays have 2 cars, the additional traffic would cause great risk not only to pedestrians but also to the environment. The A494 is already subject to a reduced speed in order to limit emissions, adding not only extra traffic but the electricity/gas etc. used by the proposed homes would eradicate the benefit of this scheme. There is only one surgery in Hawarden, one in Queensferry and two in Shotton. Each surgery has over 5000 patients and are understaffed. Additional residencies will mean that getting an appointment and accessing healthcare will be nigh on impossible. This would also have an impact on the already overstretched public services. The area for the proposed development is green belt land. A development on this site would mean that there would be no distinct boundary between Hawarden and Mancot. These areas should be protected and Green Belt should only be considered as a last resort.	Removal of the Ash Lane Mancot allocation. .
519	HN1.8 Ash Lane, Hawarden	Object	With regard to the proposed planned development in Hawarden [but actually Mancot!] The proposed development will be directly next to Mancot, but separated from Hawarden [i.e. the outer reaches of Hawarden which is Upperdale], by a main road, Gladstone Way. This is a cynical manoeuvre which will increase the pressure on Mancot's traffic and resources while having further housing with the snob value	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			of a Hawarden address, Also affected will be the pressure on the resources used by the Mancot community. Rector Drew and Sandycroft schools will be hard-pushed to accept the extra children, and Sandycroft CP children already have an uncertain future regarding their secondary school, as feeder school status for Hawarden High was taken away many years ago and John Summers has been demolished. I have been registered at Queensferry medical practice for over 20 years, and getting an appointment is currently near to, or actually, impossible. With regard to the end of life, there will soon be nowhere nearby for our burials.	
524	HN1.8 Ash Lane, Hawarden	Object	Reference LDP / Ash Lane Mancot / Hawarden Development (HWN 005) This land is classed as green belt land it is currently in use for livestock grazing. The hedgerows and mature trees on this site support a large amount of varied species of common and rare bird species among them Goldcrest, Blackcap, Wrens and song thrush. On the ground I have witnessed badgers and hedgehogs. The fields in general and healthy trees help soak up vast amounts of rainwater helping stall the flow through streams and drains protecting lower land at Pentre and Sandycroft. At school start and finish times the top of Ash Lane, cross tree lane and Gladstone Way are a nightmare for traffic and currently very dangerous.	Removal of Ash Lane allocation.
526	HN1.8 Ash Lane, Hawarden	Object	I am writing to you today to object to the planned development on the green barrier between Ash lane & Gladstone Way I feel that this development would be extremely detrimental to the local community. Firstly, this would mean that Mancot and Hawarden would become homogenized into one village as it would eliminate the green barrier currently in place that separates the two. This would also become a merging of postcodes meaning that council taxes would increase in an already high rate area. Furthermore, it would have a devastating impact on the 16th century farmhouse on Ash Lane which has been a part of our local history for hundreds of years. The wildlife in that area would also take a severe knock. Not only is it a habitat for many, many birds & mammals, there are oak trees on that site which are over 100 years old. The environmental impact on our village of this new development would be crippling. Glynne Way is already being monitored for high levels of pollution. The traffic in & out of the village is already at critical levels at certain times of the day. This not only would exacerbate the levels of toxins local people breathe in, but also be an increased risk to the safety of our children who cross these already busy, dangerous roads. This development would add increasing strain on our already struggling local infrastructure (doctors/schools/bin collections etc.). An extra 280 homes would add a possible extra 1000 people in our area who would need to access these services. They simply would not be able to cope.	Removal of Ash Lane allocation.
528	HN1.8 Ash Lane, Hawarden	Object	Residential development at Ash Lane Hawarden for 288 dwellings. I write to object to the proposed plan under the headings: Education - local schools do not have capacity, travel to alternative schools will add to already chaotic traffic associated with the school run and capacity at more distant schools may also be limited. Health - the existing health service will struggle to absorb the influx of 900 new residents. Strong and cohesive Communities – the separate identities of Hawarden and Mancot will be blurred, coalescence of these two diverse communities should be avoided. A similar plan has been not previously been successful, why is this site larger site now being included on green belt land. Biodiversity- Whilst the plan	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			includes mitigation for valuable habitats and protected species the best policy would be to leave the greenfield site alone, green belt land should not be built on and a brownfield site should be sought. Landscape and Townscape - nearly 300 dwellings is bound to increase night ljght pollution. Heritage – The close proximity of 288 houses to would do nothing to enhance the character of this building even with the green infrastructure it will have a detrimental effect, on St Deiniol's Ash Farm.	
532	HN1.8 Ash Lane, Hawarden	Object	Subject: Ash Lane Park Lane Development I would like to express my strong objection to the above mentioned development. I live in Ashfield Crescent Mancot and have numerous concerns. My first objection is flooding. My garden has flooded this year and the council have been out today to try and sort out the issues that have caused this both for myself and my neighbours. If you allow this development to go ahead surely the risk of flooding will increase, my property will be lower down the hill that this new development. My second objection is an increase in traffic, it is currently virtually impossible to use Cross Tree Lane at the school opening and closing times, how can this road cope with any more traffic. How can it be considered Ok to build on Green Belt land, how can this be good for the environment? Please add my name and my wife's name to the list of unhappy council tax payers who would very much like our objections to be listened to.	Removal of Ash Lane allocation.
536	HN1.8 Ash Lane, Hawarden	Object	I am writing to object to the proposed plans to build 280+ houses on the land between Gladstone Way and Ash Lane, the traffic increase going along Ash Lane onto Cross Tree Lane is already extremely dangerous for children going to school more so since they took the buses away and this being the proposed safe walking route for the children, people going to the doctors , the graveyard etc. The local primary and high schools are already over crowded and with the recent withdrawal of funding for teaching assistants throughout the country the increase in more pupils going into the schools will create an even bigger strain on the facilities they have to use, doctors appointments at the Stables Medical Centre are an absolute nightmare to make with no doctors being available to cover the patients they have therefore this is putting a even bigger strain on the out of hours GP and the hospitals with people having go there to get seen. I was born and raised in Mancot I have always believed the farm on Ash Lane to be a listed building and therefore these houses would have to be built around this farm ruining the history of the building along with the fields and environment. Parking is also another issue in the area especially at school times. When St Davids Park was built we were told new facilities e.g. doctors, schools, car parks would be built and as of yet nothing has been done please can you show me the plans for all these new facilities, the expected completion date as well where the extra funding to cover it all would come from.	Removal of Ash Lane allocation.
538	HN1.8 Ash Lane, Hawarden	Object	Please find this as my refusal to accept Ash lane as a good site to plan a proposed development of possibly 288 houses. I have lived in Mancot 24 years and before that my childhood home was in Hawarden . We have not enough school places, hard to find doctors appointments, flooding locally and increasing traffic problems . How are we suppose to just get by with an already insufficient infrastructure to support is and our families locally ??? The green belt you plan to pass as an appropriate site is between Hawarden and Mancot and will join the two villages together ? I didn't think you could do this ?	Removal of Ash Lane allocation.

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
542	HN1.8 Ash Lane, Hawarden	Object	We wish to strongly object to the proposed development for Ash Lane/Park Avenue on the following grounds: • The size of the development will have a serious negative impact on the infrastructure and will cause problems with provision of essential services in the local area. • The local schools are oversubscribed and the sites do not have the space to increase the size of their buildings. • It is very difficult to get an appointment with a doctor at the surgeries that cover the proposed development area. This has been the case for a long while for which there is no resolution so the situation will worsen if the proposed development plan goes ahead. • Local transport services have been cut substantially and are already inadequate for the number of local residents. • The road traffic bottle necks at the top of Gladstone Way and Cross Tree lane, especially at peak times. There is no space to widen the road so a large development increasing traffic significantly should be avoided. There are already concerns about the high air pollutants in the area. An increase in traffic and traffic jams resulting from the proposed development will exacerbate this problem. • There are traffic and safety problems outside both Sandycroft Primary School and Hawarden Village School. The proposed development will significantly worsen these problems. • The drainage system is antiquated and overloaded. Mancot and Gladstone Way already have problems with flooding and bursts and previous developments in the area have made this worse. The development will further add to this problem. • The national policy is that Green belts are not built on and this proposed development plan uses Green Belt land. Problems such as those mentioned above would be alleviated if smaller sites throughout Flintshire were considered, thereby sharing the increase on essential services and lessening the impact to small villages such as Hawarden and Mancot. In summary we consider the proposed development to be inappropriate in this location and for the reasons mentioned above we submit our objections for your consideration	Removal of Ash Lane allocation.
556	HN1.8 Ash Lane, Hawarden	Object	Objection to allocated site at Ash Lane, Mancot Local schools are full to capacity The parking on the road outside the primary school is horrendous at peak times Doctor's surgery is already full. The proposed development will stretch this further The roads are very busy, the proposed development would further add to stress, noise and pollution. The air quality is being monitored in a bid to reduce pollution and the Council are already taking precautions by reducing the speed limit on the A494 so allowing further traffic in the area will compound this existing problem. Building such a large estate will contribute to disruption on the roads I believe there are still brownfield sites that could be developed and the unique characteristics of the two communities would be swallowed up in a conglomeration of a non-specific community. Socially there are no opportunities to engage young people, which could increase potential for anti-social behavior and crime. I currently take my children outside of the area to participate in social activities. St Deniol's Ash Farm is a Grade 1 listed building, development plan should strive to protect this unique attraction. This development would have a negative impact on the locality, which would outweigh the supposed opportunities for work and local businesses, if this development goes ahead it would have a negative impact on my family life.	removal of allocated site at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
576	HN1.8 Ash Lane, Hawarden	Object	I wish to put in an objection to the proposed housing development at Ash Lane. Mancot as detailed below The Welsh Government Document Planning Wales Policy Edition 10 clearly states that rural spaces should be protected and no settlements should coalesce. In my opinion the village of Mancot would clearly be merging with Hawarden forming one mass of housing on Green Belt land. As you should be aware Mancot has very poor access to the surrounding main traffic routes. Both Cottage Lane and Colliery Lane have no footpaths or adequate lighting and are widely used by cars and pedestrians to get to the A494 and Queensferry where the main shopping centre is. Cross Tree Lane is already infamous as a “Rat Run” and with parking totally unacceptable at school times, despite what ever measures you have planned for it. I do not think that with the influx of so much extra traffic the road system could cope, not to mention the lack of schools, medical facilities and air quality deterioration. There may be a need for limited housing in the area but such large scale development will certainly damage the village of Mancot and it just will not survive with the pressure of so many cars, carbon emissions and pressure on services and schools. With the present situation of flooding and high river water levels it would appear to me that any extra housing development putting extra surface water into the system, and curtailing natural drainage, into what is already inadequate, would be a disaster just waiting to happen especially with us being daily warned about climate changes, and the Welsh Government “Adopting to Climate Change” clearly warns us of this. Pentre has flooding problems and at times even Airbus seems to be on alert. I am sure that when you have a detailed look at these proposals you will agree with the residents of Mancot and Pentre that the Ash Lane development are a non starter	Removal of Ash Lane allocation.
578	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot I am seriously opposed to the development as having lived here for 15 years and calling this home, bringing my children up to explore and experience a relatively safe place I believe this development would have a negative impact on the community and environment. Increasing the number of homes will have a negative impact on the already straining resources, schools, Doctors, roads, and it would change the dynamics of the two separate communities. By building around the Grade 1 listed building it will spoil the uniqueness of each community. At the moment we are privileged to see nature on our doorstep, watching buzzards overhead, observing sheep as they lamb. The insect population is diminishing as green fields and hedges are lost to development. The number one priority to protect our children's future is to recognise the environmental impact these building projects have. I recognise that we need new homes for an increasing population but not at the expense of our environment. I know many are objecting because they argue the schools, doctors surgeries, roads and services cannot cope with the influx of a huge estate and again my concerns are for the welfare of my children. There will be no increase in social opportunities for youngsters and Mancot has very poor opportunities for youngsters to engage in social activities so I worry what an extra 400-500 children will do and these is a potential for an increase in anti social behaviour and even crime rates may go up. I'm writing from a personal angle to protect my environment and family's future and I thank you for giving me the opportunity to voice my concerns.	Removal of allocated site Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
592	HN1.8 Ash Lane, Hawarden	Object	Reference; Ash Lane development (HWN005) After examining the plans for this development and knowing the area so well, I wish to object strongly to the development of these houses in this location. I believe developing on this piece of land will cause more issues in our local area. We are already experiencing high traffic levels in this area especially during the school pick up and drop of times. My daughter attends Sandycroft CP and many parents have already expressed concerns over the traffic and concerns for the safety of the children walking to school. Due to all the parked cars on Leaches lane, Hawarden Way and Mancot lane the two way traffic is unable to flow safely. The size of this development will massively increase the traffic and put children at further risk of harm. Secondly I am concerned about overcrowding in the schools, since John Summers High school has closed down it has been identified that Hawarden High school and Connah`s Quay high school have become over populated, if the development goes ahead then this will increase schools capacity and have a big impact on the children`s education. Thirdly I want to raise the issue about increased surface water flooding, our area is well known for flooding. The officer at the initial meeting said they can put flood prevention measures in place and make sure the run off is the same as the green belt run off but I would like to know who is responsible for ensuring this happens? I believe it is easy to say you can do this but it's another thing making sure it works. Therefore, I ask that Flintshire County Council refuse this Planning Application and encourage the development to be resubmit in a more suitable location.	Removal of allocation
610	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane, Mancot I have several objections to these plans, as follows; 1. Lack of infrastructure to support extra homes. No consideration has been given to where these new inhabitants are going to go to school, visit the doctors, and how they are going to drive into the village. a. The local primary schools and high school are at capacity. Building new homes within their catchment area has a detrimental affect on the quality of education as resources are stretched and we do not want bigger schools. b. The Stables Medical Centre in Hawarden which covers both Hawarden and Mancot is already failing the residents it currently serves. It is not acceptable to bring more people into a surgery that it is already nearly impossible to get an appointment at. c. Local roads are simply not big enough to carry any more traffic. At peak times, the roads into the area in question are only effectively single track. 2. Merging of two built up areas. a. The area for proposed development is currently green space providing a separation of two villages. Building on this plot would effectively join up Hawarden and Mancot, there would be no separation the two. Hawarden is already joined to Ewloe and Drury and Mancot is already joined to Sandycroft, and to Pentre which is joined to Queensferry, then Aston and Connah's Quay. Merging Hawarden and Mancot will make what is currently a semi rural environment into one built up area like suburbia. b. Hawarden and Mancot are two separate communities both with their own history and character and should be kept as such. c. The green space between Hawarden and Mancot provides an ecosystem for which is essential for wildlife. Building upon it will cause destruction of habitats for badgers, foxes, hedgehogs etc. Please accept this letter as a formal complaint and objection to the LDP plans for this area. I await your reply.	Removal of allocation

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
612	HN1.8 Ash Lane, Hawarden	Object	I am writing to object to this proposed development in the strongest possible terms. The number of cars using the proposed entrance/exit on Ash Lane will significantly increase traffic to an unprecedented level. This coupled, with the already notoriously dangerous junction on Cross Tree Lane will potentially make the area even more unsafe for road users and pedestrians alike especially for children using this route to walk to school. If this proposal for 288 houses goes ahead, the resultant increase in residents will put untold strain on an already struggling infrastructure. It is already increasingly difficult to get an appointment in our local doctors surgery & in addition there is insufficient parking available to support a substantial increase in patients. The local bus service has already been significantly reduced providing no service at all at certain times of the day forcing residents to use cars instead for the daily commute to work etc. We are very proud of our local community & we would like our village to retain its own identify rather than be 'swallowed up' and become an extension of the neighbouring ward of Hawarden. Finally, this area of green belt land is of vital importance to the local residents providing a much needed green space in an area that is in danger of becoming overpopulated. I strongly beseech the powers that be to seriously consider the potential disruption & negative impact that this development would have on our village and to look at other brown field sites in the area as a viable alternative. Thank you for taking the time to read this objection & I look forward to your response.	Removal of allocation
651	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot I believe that, if it is approved, this development will go against Flintshire county Council's policy to not coalesce settlements. If houses are built on this land there will be no distinction between Hawarden and Mancot. At present the two villages are disparate settlements with a narrow lane, only allowing one vehicle access at a time, connecting the two. Due to houses on both sides there is no way to increase the width of this lane. At present the residents of Mancot and Hawarden have great difficulty in accessing Doctor's and Dentist appointments, due to the deficiency of such professionals at local surgeries. Should hundreds more people live in the area there will be greater waits for appointments.	Removal of allocation at Ash lane, Mancot
672	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. As a resident in this area for over 8 years I am more than aware of the difficulty in securing an appointment to see a doctor, an extra 280 new homes will only make this even more difficult. Parking facilities are not sufficient to facilitate extra appointments. The local Primary School will also struggle to accommodate more pupils. Planning Policy Wales also states that green belt land should not be built.	Removal of allocation at Ash Lane, Mancot
676	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. At present the residents of Mancot and Hawarden have great difficulty in accessing Doctor's and Dentist appointments. Should hundreds more people live in the area, there will be greater waits for appointments. I am concerned that if this development gets approved, properties in Lower Mancot and Pentre will suffer more frequent flooding events. Already in 2019 properties in Pentre were flooded. I have tried to find the report into this on FCC website but it does not appear to have been completed. Should the development go ahead and a massive swathe of green belt land be concreted over less flood water will be absorbed by the land and will flow down the hillside to	Removal of allocation at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			properties at the bottom of the village. Should hundreds more vehicles use Ash Lane to access and egress the proposed development I am concerned for the safety of pedestrians. Ash Lane and Cross Tree Lane have been designated as a safe route for students to walk to school, they have to cross busy roads and with more congestion and traffic this will be an accident waiting to happen.	
700	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Because so many areas of Flintshire have been developed this is one of very few green areas still remaining and therefore must not be destroyed. The land in question is prime agricultural land. In addition it is supporting a haven of wildlife with badgers, bats and birds. Within this land there are a number of magnificent trees, some of which are subject to preservation orders. Concerns regarding flooding as a result of the loss of natural drainage. Dis-used mine shafts underneath land, which was resulted in a number of nearby properties suffering subsidence. Increase in the volume of traffic. No frequent bus service for Mancot. No infrastructure to accommodate increase in traffic. No capacity in local schools No capacity in local medical services Insufficient police presence in the area This site was dismissed as part of the UDP for the same reasons raised today, all of which still exist. The protection of this green barrier will serve to prevent coalescence of the Hawarden and Mancot communities, whilst the proposed housing would bring this about.	Removal of allocation at Ash Lane, Mancot
710	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. This site was removed from the UDP 10 years ago, why has it been allocated again? Surrounding road network will not be able to support this development. Roads narrow, issues with parking, congestion. Concerns for children's safety walking to and from school. Lack of capacity in local schools to accommodate additional pupils. Lack of capacity in doctor's surgery Coalescence of Mancot and Hawarden.	Removal of allocation at Ash Lane, Mancot
724	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ewloe Found the FCC Objective portal difficult. Found the language in the Deposit LDP difficult. Object to the proposal to invade a designated UDP green barrier area. The community has struggled for decades to live with the remnant poor design of dangerously congested "B" roads and junctions, connecting the A494 (A55) bottleneck, skirting this site. The scope of this LDP proposal therefore does nothing to alleviate but simply aggravates the situation, and is not fit for purpose. The roads are way to congested anyway. There is no consideration for the extra volume of traffic so close to a school. Doctor's surgery cannot cope with patients now so this will make it worse.	Removal of allocated site at Ewloe
1092	HN1.8 Ash Lane, Hawarden	Object	HN1 (8) Ash Lane Hawarden. The plans seems to fly in direct opposition to the Welsh Assembly reduction in carbon emissions, the building of this number of new houses will increase the number of cars by at the very least one per household. Has the concept of green belt/barrier between settlements been abandoned, in these cases the separation of settlements aim will cease. The construction of large scale housing developments requires a large number of new residents. These will become 'dormitories' for English cities as there appears to be insufficient work opportunities in North East Wales to support such large developments.	Removal of allocation

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
1096	HN1.8 Ash Lane, Hawarden	Object	HN1(8) Ash Lane Hawarden It is on green belt land which should never be built on. It would mean joining two villages which have always been separate. There has been mining in the area since 1800 which were not registered and I would draw your attention to the sink hole in Witton Road which a few years ago almost killing the lady who lived New housing in Mancot has caused flooding and increased traffic. There is a blind corner in Ash Lane. The schools do not have capacity nor do the doctors or dentists. Hawarden and Mancot are joined if this goes ahead then Mancot, Pentre Queensferry will also be joined. St Deniols Ash Farm is beautiful and full of history, surrounding it with houses will diminish it's status. Cottage Lane is a single track and is used as a rat run.	Removal of allocation
1098	HN1.8 Ash Lane, Hawarden	Object	HN1(8) Ash Lane Hawarden Petition signed by 996 people, 243 physical signatures and the remainder on an online 'Change.org' petition. 1. Local schools are oversubscribed. 2. There are already significant traffic and safety issues outside local schools. 3. GP and Dental surgeries are limited in this area are oversubscribed and struggling to cope. 4. Building on land prone to flooding could have devastating implications for existing dwellings and the environment, lower Mancot and Sandycroft flooded earlier this year. 5. Loss of green belt. 6. Growth beyond what is sustainable for a village. 7. Inadequate local transport services. 8. Limited facilities in the village. 9 Increased traffic will lead to greater pollution. 10 loss of wildlife. 11. Coalescence of two settlements. 12. other brownfield sites are available. 13. loss of agricultural land. 14. the LDP Preferred Strategy amber categorisation said the site had constraints. 15. Glynne Way is already a subject to air quality monitoring. 16. Local cemeteries are overstretched.	Removal of allocation
1109	HN1.8 Ash Lane, Hawarden	Object	Highly object to the proposed Ash Lane development. this would be disastrous for our small Mancot village. Surely there are more suitable sites elsewhere for such a large scale development. Our schools are at full capacity at the moment, they don't always have room for the current children in the village. Adding more children is just not doable. trying to get a doctors appointment at the moment as it stands without the extra houses is next to near impossible. Our small village is just not suitable for such a development.	Removal of allocation
1295	HN1.8 Ash Lane, Hawarden	Object	HN1.8 Ash Lane Mancot Objection to removal of the Green Barrier and the coalescence between Hawarden and Mancot. the site is too large, local services will not be able to cope land is currently used for agricultural uses already traffic issues within the area; congestion, air pollution and dangerous roads due to traffic Local schools are full	remove site
630	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. This land is green belt land and should be preserved as such. The impact that building on these houses in our already packed village would be devastating. Flooding has become a big problem in Mancot, Pentre and Sandycroft with the Primary School suffering last year and having to close for a few days. If 280 houses were built, that is potentially 560 extra cars coming in and out of our village, on an already extremely busy road. Ash Lane has recently been designated as part of the	Removal of allocation Ash Lane

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			safe walking route to Hawarden High School, how can this possibly remain so? Local schools are already full, with some being oversubscribed. Capacity issues at local GP Surgeries	
634	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. The proposal is alien to Welsh Government policy of not using green barrier land for housing development. There are many sites of brown lane available close by, which have not been referred to. The proposed development is less than a mile where a restriction on speeding has been imposed to aid air quality. As there is very limited transport arrangements in Mancot, this will be a thoroughly unsafe policy as proposed development would necessitate more cars and hence poorer air quality. Keep the green barrier green.	Removal of allocation Ash Lane, Mancot
652	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Green space is essential for the well-being of existing residents, especially children. Alternatives such as building on brown site land fulfils the need for new housing with minimum adverse impact. The quality of air, light and noise will be materially affected by the construction. Pollution is inevitable with harmful emissions, not just during the building phase, but in perpetuity. Green issues cannot and should not be ignored. Heavy traffic and lorries thunder along the roads, even before the traffic caused by 280 plus homes is factored in. Another great concern is the lack of infrastructure to support these houses. The local surgery is almost at breaking point as patients experience difficulty in making an appointment with a GP. The local schools are full to capacity. The suggestion to bus children to schools further afield is a breach of ecological and moral principles. Flood damage is an increasing danger, the construction of 300 houses would increase the risk significantly. Mancot, Hawarden and Pentre are in danger of losing their individual character and becoming an urban, polluted sprawl.	Removal of allocation at Ash Lane, Mancot
654	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot I am concerned that, if this development gets approved, properties in Lower mancot and Pentre will suffer more frequent flooding events. Already in 2019 properties in Pentre were flooded. I have tried to find the report into this on FCC's website but it does not appear to have been completed, against FCC's policy of investigating all such flooding events. Should the development go ahead and a massive swathe of green belt land be concreted over less flood water will be absorbed by the land and will flow down the hillside to properties at the bottom of the village. Should hundreds more vehicles use Ash Lane to access the proposed development I am concerned for the safety of pedestrians, particularly school students. Ash Lane and Cross Tree Lane have been designated as a safe route for students to walk to school, they have to cross busy roads at some point and with more and more congestion and traffic this will be an accident waiting to happen. The road from Queensferry to Sandycroft, Chester Road East is already congested at peak times and busy during the day, to add hundreds more vehicles to an already busy road will cause misery for motorists and residents in the affected areas.	Removal of allocation at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
657	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot The pollution and reduced air quality that will be caused by hundreds of additional vehicles in the vicinity of the proposed development. FCC has recently taken measures to increase air quality by reducing the speed limit, why then propose a development that will reduce air quality for the residents of Hawarden and Mancot? Should this development be approved it will be in direct contradiction to the Welsh Assembly's directive (PPW) of not building on Greenfield sites. It will also contravene the policy of building on brown field sites before Greenfield sites. There are brownfield sites available, one example is County Hall, Mold. On this lane is a grade 1 listed building which has been a fixture of the area for many years. Should this development go ahead it will completely destroy the historic character of St Deiniol's Ash Farm.	removal of allocated site at Ash Lane, Mancot
673	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. At present the residents of Mancot and Hawarden have great difficulty in accessing Doctor's and Dentist appointments. Should hundreds more people live in the area, there will be greater waits for appointments. Access to thr site is proposed to be from Ash Lane. This road and Cross Tree Lane already cause issues with weight of traffic. There is a school on Cross Tree Lane and parents park on the brow of the hill and force traffic on to the opposite side of the road, on a blind bend. Ash Lane is used as a "rat run" for Airbus, Sandycroft and Broughton Park workers attempting to avoid congestion on Chester Road East. It is believed that the traffic survey was undertaken during the period Ash Lane was closed to through traffic due to FCC resurfacing the road. It is my belief that the data collected is categorically incorrect and should not be used in the planning decision.	Removal of allocation at Ash Lane, Mancot
677	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. At present the residents of Mancot and Hawarden have great difficulty in accessing Doctor's and Dentist appointments. Should hundreds more people live in the area, there will be greater waits for appointments. Should hundreds more vehicles use Ash Lane to access and egress the proposed development I am concerned for the safety of pedestrians. Ash Lane and Cross Tree Lane have been designated as a safe route for students to walk to school, they have to cross busy roads and with more congestion and traffic this will be an accident waiting to happen. The road from Quensferry to Sandycroft, Chester Road East, is already congested at peak times and busy during the day, to add hundreds more vehicles to an already busy road will cause more misery for motorists and residents in the affected areas.	removal of allocation at Ash Lane, Mancot
703	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Because so many areas of Flintshire have been developed this is one of very few green areas still remaining and therefore must not be destroyed. The land in question is prime agricultural land. In addition it is supporting a haven of wildlife with badgers, bats and birds. Within this land there are a number of magnificent trees, some of which are subject to preservation orders. Concerns regarding flooding as a result of the loss of natural drainage. Dis-used mine shafts underneath land, which was resulted in a number of nearby properties suffering subsidence. Increase in the volume of traffic. No frequent bus service for Mancot. No infrastructure to accommodate increase in traffic. No capacity in local schools No capacity in local medical services Insufficient police presence in the area This site was dismissed as part of the UDP for the same reasons raised today, all of which still exist.	Removal of allocation at Ash Lane, Mancot

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			The protection of this green barrier will serve to prevent coalescence of the Hawarden and Mancot communities, whilst the proposed housing would bring this about.	
709	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot Removal of this green barrier would lead to the complete coalescence of Hawarden and Mancot, merging the two settlements and altering their character. The preferred strategy stipulates (1d) that community identity must be protected and safeguarded. The merging of the two settlements would contravene FCC own policies. It is also in contravention of PPW which states that green barriers should be reviewed in order to 912e) avoid coalescence and green belt boundaries should only be altered in exceptional circumstances (3.36) Proposed development is very large in relation to the present size of the village, resulting in a 20% increase. This is also a breach of FCC preferred strategy which outlines how any planning policy must “identify and deliver the right strategy sites – location, size, type to meet present/future needs a more informed view than the traditional approach of over allocation.” A large development such as this would stretch existing infrastructure beyond breaking point. Issues with traffic, congestion and pollution in the immediate local vicinity, particularly Cross Tree Lane and Glynne Way. This development would worsen a known air quality issue Local schools will be unable to cope with the additional pupils	Removal of allocation at Wrexham Road
711	HN1.8 Ash Lane, Hawarden	Object	Objection to allocation at Ash Lane, Mancot. Loss of green belt land – not compliant with PPW on not building on Greenfield land. What consideration has been given to brownfield sites? Infrastructure – Lack of capacity in local schools, doctors surgery. Lack of capacity in current road network, road at present cannot cope with the volume of traffic at school times. Road safety issues Historic impact – Ash Farm is a Grade 1 listed building. I strongly feel that the farm land around this historic building should be retained as part of the farms character. The merging of communities. This proposal will completely join the villages of Hawarden and Mancot with no definitive separation.	Removal of allocation at Ash Lane, Mancot
723	HN1.8 Ash Lane, Hawarden	Object	I would like to notify you of my objection to the proposed planning on the fields between Ash Lane in Mancot and Gladstone Way. I currently live on Hawarden Way in Mancot and have lived in Mancot for nearly 30 years. As you can imagine, I have seen many changes to my village in this time. Firstly, i have concerns of the impact that taking away more green land will have on the drainage in the area, after recently suffering a flood on our property. With no plans to address this, we could be facing more damage to our property and area in the future. 280 houses will of course add to the number of Mancot residents, and children attending local schools. I have two small children who I would like to attend a local primary school as I myself have done. After visiting, spaces are already limited and class sizes are rising. As a primary school teacher I know the detrimental effect that this can have on a child's education. Additionally, the strain this would have on the school and standards. With no intention to address this issue, I worry the impact this will have. This may also mean that children are forced to attend primary schools out of area and unable to socialise with their peers easily within the village.	Removal of allocation

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
729	HN1.8 Ash Lane, Hawarden	Object	It has been brought to my attention that land surrounding Ash Lane & Park Avenue has been placed on the local development plan. I strongly object to any development of this land. My five objections are detailed below: Historic Significance: Coalescence: Traffic and air pollution Greenbelt Land Local services	Removal of allocation
905	HN1.8 Ash Lane, Hawarden	Object	Green Belt Provision and Coalescence of Hawarden and Mancot The deletion of Green Belt land to make way for this proposed development is most problematic because of its dual role in breaching greenbelt policy and coalescing two distinctive settlements in Hawarden and Mancot. The Ash Lane / Park Avenue site is Green Belt land which acts as a Green Barrier between the settlements of Hawarden and Mancot. As such, the decision to include this site requires the moving, or deletion, of the Green Barrier and its constituent Green Belt land. This would lead to the total coalescence of the settlements of Hawarden and Mancot, completely eliminating the Green Barrier between the two settlements. This is in direct contravention of the Preferred Strategy Consultation Document which states that (12e) green barriers should be reviewed “against the criteria in PPW (Planning Policy Wales) in order to avoid coalescence”. Planning Policy Wales (PPW) explicitly states that Green Belt boundaries should (3.36) “only be altered in exceptional circumstances” and that (3.37) “to maintain openness, development within a Green Belt and a green wedge must be strictly controlled”. Further, PPW also states (3.69) “when considering applications for planning permission in Green Belts or green wedges, a presumption against inappropriate development will apply” adding that (3.71) “the construction of new buildings in a Green Belt or green wedge is inappropriate development” before listing a limited number of exclusions, none of which are pertinent to the proposals outlined for this site. In the document Qualitative Assessment of Ash Lane Site, reference is made to ‘Landscape/Townscape’, stating that (11) this development “would result in the loss of a greenfield site and has the potential to have a moderate adverse effect on landscape character”. It is our view that the classification of this as ‘moderate’ is a gross understatement – this is not simply a ‘greenfield site’. It is a Green Belt and as such, and as stated above, is not to be developed in normal circumstances. Failure to recognise this is a failure to (16a) ensure that the characteristics and features of the landscape are recognised and considered”. Road Networks and Environmental Impact Size of Proposed Site	Removal of allocation
1099	HN1.8 Ash Lane, Hawarden	Object	HN1(8) Ash Lane Hawarden. My objections to the development are 1. More pressure on the schools and doctors which are already struggling. 2. Pressure on the roads which are not fit for more traffic and safety of children going to local schools. 3. Drainage are already suffering from flooding.	Removal of Allocation
1110	HN1.8 Ash Lane, Hawarden	Object	Objection to Ash Lane Mancot To build on farm land where cattle and sheep are grazing now and have been for at least 100 years does not bode well. how can you justify this? To even consider building houses right next to St Deniols Ash Farm yard is of great concern to me and many others. animal feed is stored there so to have houses do close would be a huge hazard, hay and silage are very inflammable im sure you agree. St Deiniols Ash Farm is a grade I listed building and should not be in the middle of a housing estate The infrastructure is also a concern to Mancot residents, how will schools be able to cope with the influx of new children doctors are another concern, patients have to wait for weeks now so will doctors	Removal of allocation

ID	allocated site:	support or object	Summary of representation	Summary of changes being sought/proposed
			manage another 280+ houses in Hawarden only has one doctors surgery. Roads Ash lane, as stated ash lane is a lane and not a road and not suitable for extra traffic. increase in traffic will have a detrimental impact on the environment.	
655	HN1.8 Ash Lane, Hawarden	Support	These representations are made on behalf of the Hawarden Estate and support the allocation in Policy HN1 of site 8 (Ash Lane, Hawarden). A location plan and Anwyl Homes' Illustrative Masterplan for this site are attached. The Estate considers that the LDP meets the tests of soundness for the reasons set out in this representation. The Hawarden Estate agree that the proposal to allocate 10.9 hectares of land between Ash Lane and Gladstone Way is appropriate and supported by robust evidence. This site provides for large-scale infill that will widen the range and choice of housing in the local area and create new Environmental Networks including a new landscape buffer and area of public open space between Ash Lane and Gladstone Way that will improve pedestrian links and encourage healthy interaction with the natural environment. The site is sustainably located adjoining a hub of community facilities including the library, church, bowling green, children's play area and football pitch. The post office and public house are within 200 metres of the site. Hawarden provides a local service centre with schools, shops and local employment. The site is well connected to public transport, with a range of bus services nearby and located less than 800 metres from Hawarden train station. A highly sustainable development can be achieved in this location. Ash Lane is highly deliverable, being located on the edge of a popular area as shown by the house price 'heat map' below. Discussions with a local housebuilder, Anwyl Homes, are at an advanced stage and the estate is confident of the site's deliverability. Anwyl Homes have a track record of housing delivery in Flintshire and are working towards a planning application for the site.	
1244	HN1.8 Ash Lane, Hawarden	Support	Ash Lane, Hawarden, 288 units A water supply can be provided for this site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). The proposed growth being promoted for the Queensferry Wastewater Treatment Works (WwTW) catchment would require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.	

Council response
HN1.8 Ash Lane Mancot Not accepted. The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and

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prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Petition A petition on behalf of 996 individuals was submitted which raised the following points: • Schools • Traffic and safety issues • Doctors / dentists • Flooding • Green belt (barrier) • unsustainable growth • pollution and air quality monitoring • wildlife • coalescence • other brownfield sites • agricultural land • Preferred Strategy 'amber' • Local cemeteries are all responded to in the sections below. The Council has grouped all representations on this site, including those on the petition, into topic or issue based groupings using the following headings: • Procedural • General • Community identify • Brownfield land / alternatives / agricultural land • Suggested alternatives sites • Green barrier • Drainage / flooding • Amenity • Services / infrastructure • Traffic / transport • Environment – natural • Environment – historic

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• Mining • Supporting representations Procedural The Council refutes claims that its conduct is improper and addresses each point in detail: The Preferred Strategy consultation document was accompanied by a Background Paper which set out an initial broad brush assessment as to whether each candidate site complied with the Preferred Strategy. The actual wording used alongside HWN005 is 'The site complies with the Council's Preferred Strategy, however there are site constraints that would need to be overcome to allow the site to be developed'. It does not refer to 'significant' constraints and clearly references that the site complies with the Preferred Strategy subject to constraints being overcome. It is not clear what is meant by the 'speed' of the consultation. The preparation of the Plan has involved several stages of engagement and consultation and a mailing list has been added to at each successive stage to ensure that interested parties are notified of successive consultations. At each consultation stage advance notice has been given to Local Members and Town and Community Councils, including briefings to outline the purpose and broad content of the forthcoming stage in the plan process and what was expected in terms of responding to consultations. Each consultation has involved press notices, press releases, social media posts, consultation material on website and at consultation venues. The Deposit consultation stage is a formal stage and the Council has to work within legislative and other requirements. It is inevitable that the consultation will involve a considerable amount or background evidence and documentation to accompany the Plan itself. The Council summarised all the consultation and engagement stages undertaken with the preparation of the Plan in the Initial Consultation Report which was available for inspection during the Deposit consultation exercise. The Plan was made publicly available in the run up to being reported to Cabinet on 16/07/19 and Full Council on 23/07/19. It also remained available for public inspection on the Council's website until the start of the consultation on 29/09/19. The 'drop ins' were not an afterthought as suggested by objectors but part of a comprehensive consultation plan which included press notice, press release, social media posts, website, consultation documents at consultation venues, all documents at Ewloe and County Hall offices and a series of 9 permanent exhibitions. The details of the drop in sessions were publicized in advance of the start of the consultation including being part of the mail drop and on the website. Posters advertising the drop-ins were placed on noticeboards at each of the venues. An exhibition board was placed at the Mancot Community Library as well as key consultation documents. The drop in session at Mancot had the highest attendance of any of the sessions and in this context it is difficult to see how the consultation was 'minimal' or 'secretive'. The Council has used an industry leading specialist consultation portal which is used by a large and growing number of planning authorities in Wales and England. It is disappointing so many objectors found it difficult to use but the Council made it clear that the portal was not the only means of making representations as they could also be made via letter, representation form and e-mail. Of the 196 representations regarding the Ash Lane site 10 reps were via the portal, 73 by letter and 113 by e-mail, so there were clearly other means to objection than just the portal. It is disappointing that objectors have criticised the conduct of Officers at the drop in at Mancot Village Hall. Officers acted in a friendly and professional manner in the face of difficult circumstances involving a large number of residents where feelings were running high. In fact the Council received a complementary e-mail the next day from a member of the public who commented 'May I commend you on the professional manner in which your staff presented themselves'.

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Officers were not dismissive but, sought to undertake their jobs to the best of their ability in terms of explaining and justifying the Council's LDP. Part of explaining the context for the site is the Inspectors recommendation for the site to be allocated in the UDP. This is a matter of fact. The assessment of candidate and alternative sites has quite properly involved a desk based assessment using known data sources and has involved consultation with a wide range of internal and external consultees. The approach was set out in a 'Candidate Sites Assessment Methodology Background Paper' which was consulted on in 2015 to ensure that there was consensus as to the manner in which sites would be assessed. However, the choice of allocated sites is not solely based on technical assessments but 'planning judgement' having regard to the 'fit' with the Preferred Strategy, factual references from the UDP, site visits and local knowledge. The culmination of this process is set out in the Background Paper 8 which provides a conclusion for each site. It is accepted that the IIA includes an assessment of 'reasonable alternative' sites but it is evident that these sites are not as sustainable as the chosen allocations. The Council has conducted a thorough and robust assessment of 700 plus candidate sites and nearly 100 alternative sites and published the summary of the assessments in Background paper 8. The Council also published the sustainability appraisal of sites in the Integrated Impact Assessment (IIA). There is no formal objection from any statutory consultee to the allocation. The Council made the Candidate Site Register publicly available in 2015 and the Alternative Sites publicly available in 2018. The Preferred Strategy consultation in late 2017 was also accompanied by a Background paper which set out the initial broad brush assessment of each candidate site against the preferred Strategy. This background paper was one of the consultation documents and interested parties were able to, and did in fact comment on it. The Council is aware that there is brownfield land in Flintshire but this is primarily along the R. Dee and is constrained by flood risk, contamination and proximity to international nature conservation designations. Such land is not suitable for residential development. Officers have clearly visited sites as part of the candidate site assessment process outline above. The Council has considered a large number of candidate and alternative sites in the locality - 12 in Hawarden, 25 in Ewloe and 7 in Mancot. It is a matter of fact that the UDP Inspector recommended the allocation of land at Ash lane for housing but that this was not carried over into the final adopted Plan for non-planning reasons. This is an important context for the site in that an independent Planning Inspector has previously looked favourably on the principle of developing the site and having been reassessed there has been no material change from the assessment and conclusion of the previous Inspector, and relative to other site options considered. Following the examination of the Plan by a Planning Inspector, the subsequent Inspectors Report and recommendations will be binding on the Council. Guidance on High Court Challenges are set out in para 7.3 of the Welsh Government Edition 3 of the Development Plan Manual. General The site was put forward by an objector as an 'omission site' as part of the UDP. In the Deposit UDP a site had been allocated at Lower Ash Farm on Leaches Lane but this was not looked on favourably by the Inspector who considered it would harm the green barrier and the rural character of this part of the settlement. Instead, the Inspector recommended that land at Ash lane be included in the Plan as a housing allocation. Following consideration of the Inspectors Report, 'Proposed Modifications' to the Plan were published and this resulted in objections to the sites inclusion. Following consideration of objections the report to Full Council on 09/03/10 contained a recommendation in respect of Ash Lane which was 'That MOD 11/63 be carried forward to adoption on the basis that the objections raise no substantive new issues that warrant a re-opening of the public inquiry of Further Proposed Modifications'. However, the Council subsequently resolved to consult on Further Proposed Modifications

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involving 3 sites (including the non-allocation of Ash Lane). Following the consideration of consultation responses the Council resolved in Jan 2011 to adopt the UDP without the Ash Lane site. The rationale for the site's removal at the time was not based on evidenced planning related objections put forward by Members. At the time of receiving the Candidate Sites, this particular site was mapped as a Hawarden site. This is perfectly valid as the site adjoins the settlement boundary of both Hawarden and Mancot. This is has nothing to do with house prices. The omission site which the Inspector considered was some 13ha in size and the Inspector recommended the inclusion of a smaller 8ha parcel of land. The site recommended by the UDP Inspector would have had the whole site accessed off Ash lane and it was evident that there are concerns about Ash Lane and Cross Tree Lane. Therefore in assessing the candidate site, the allocation boundary was pushed further southwards in order to allow a vehicular access onto Gladstone Way, thereby enabling two vehicular access points. The allocated site therefore includes an additional field amounting to approx. 2.4ha. In the UDP the settlement of Hawarden had one housing allocation which was at 'Overlea Drive' whereas Mancot did not have an allocation. Over the 15 year UDP period Hawarden saw completions of 75 units which equated to a growth rate of 7.6% whereas Mancot saw completions of 58 units and a growth rate of 6.2%. Neither settlement reached the indicative 8-15% growth rate for a category B settlement. This does not represent a high level of growth. The LDP has moved away from a settlement growth rate approach and this came about as a result of earlier consultation on the Key Messages document, which informed the Strategic Options consultation. Similarly, neither Mancot nor Hawarden are a category B settlement in the LDP. Hawarden is a Tier 2 Local Service Centre whilst Mancot is a Tier 3 Sustainable Settlement. It is a normal occurrence of the housing market for properties to be for sale or to be empty. This is known as 'churn' and an allowance is made for this as part of preparing forecasts of population and household growth. When projected household growth is converted to dwellings an assumption is added about vacant properties and second homes in the stock of 3.1%. The 'Population and Housing Projections Technical Paper' in Nov 2017 which accompanied the Preferred Strategy explains that Welsh Government recommends a notional average allowance of about 4% with a range between 1.5% and 8% depending on local evidence. The UDP adopted a strategy of a larger number of smaller housing allocations spread across a larger number of settlements using a system of growth rates for settlements within each of the three tiers of the settlement hierarchy. Housing allocations therefore were made in all tiers of the settlement hierarchy and the UDP Inspector raised concerns about the sustainability of many smaller settlements. Smaller allocations also are not presently attractive to the main housebuilders who generally require larger sites to be sustainable, viable and deliverable. Therefore the LDP adopts a revised approach of only making allocations in the top three tiers of the settlement hierarchy and focusing on sustainable settlements and sites. It is not clear how having a larger number of small sites reduces impacts but why is clear is that smaller sites do not bring with them the same certainty of viability and deliverability. PPW does not specifically prevent the development of greenfield sites as it is clear in PPW that greenfield sites can be allocated as set out in para 3.40 'Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements'. The UDP Inspector commented 'PPW (MIPPS 01/2006) sets out a search sequence for identifying sites. The priority for development is brownfield land. In Flintshire because of various constraints brownfield sites are in short supply' and went on to comment 'PPW recognises that where there are no available brownfield sites and where there is no available land within built up areas, it may be necessary to accommodate growth in settlement extensions (9.2.8 MIPPS 01/2006)'. Using evidence from the LHMA and the Viability Study, the Plan requires 40% of houses on this allocation to be affordable as set out in policy HN3. Affordable housing must meet the definition set out within Welsh Government's Technical Advice Note 2 "Affordable Housing - housing provided to those whose needs are not met by the open market. Affordable housing should: meet the needs of eligible households, including availability at low enough cost for them to afford, determined with regard to local

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incomes and local house prices; and include provision for the home to remain affordable for future eligible households, or if a home ceases to be affordable or staircasing to full ownership takes place, any subsidy should generally be recycled to provide replacement affordable housing". The allocation of land for residential development within the LDP is not the only mechanism the Council uses to deliver more affordable housing across Flintshire, as explained in Background Paper LDP07 Affordable Housing. The Council have a successful track record of developing affordable housing via the SHARP (Strategic Housing and Regeneration Programme) and NEW Homes (North East Wales Homes and Property Management). These two schemes specialise in the delivery of social and intermediate rental homes, the SHARP programme has a commitment to deliver 500 new affordable dwellings by 2021, please see details of completed and forthcoming schemes on the Flintshire Council website: https://www.flintshire.gov.uk/en/Business/Strategic-Housing-and-Regeneration-Programme/Strategic-Housing-and-Regeneration-Programme-(SHARP).aspx In addition to this the Council will continue to work with its Registered Social Landlord partners to deliver more affordable housing in Flintshire as part of the Social Housing Grant (SHG) programme funded by Welsh Government. Collectively these mechanisms of delivery alongside the development of affordable housing by private developers has resulted in Flintshire achieving the highest average annual delivery rate in North Wales over the last ten years. The majority of this delivery comes from RSLs and schemes such as the SHARP programme rather than private developers, therefore we do not rely on allocated private sites such as Ash Lane to deliver all of the affordable housing that Flintshire needs. In terms of smaller dwellings being less profitable to the developer, the LHMA highlights that the need for new housing is centred around smaller properties with 1, 2 and 3 bedrooms. The LDP contains policy HN2 to ensure that the mix of housing on development sites are in line with the need identified within the LHMA. This prevents schemes coming forward that are weighted more towards larger 4 and 5 bedroom homes, if the balance of housing types and sizes are not in line with the housing need identified within the LHMA, and cannot be justified, then they will be refused planning permission as they will fail to comply with HN2. Policy HN2 seeks to ensure an appropriate mix of units on allocated and windfall housing sites. The LHMA identifies that there is a need for smaller 1-2 bedroom units across the County and that there is also an ageing population. The provision of smaller units of accommodation and bungalows will serve both the first time buyer and retirement sector of the population. Policy HN3 seeks to ensure affordable housing as set out above. Community Identity Development Plans utilise settlement boundaries as a tool to identify recognisable settlements by identifying the limits of their developed or urban form by drawing a settlement boundary on the proposals maps. The drawing of settlement boundaries is not based on community identify or community character as these are separate concepts. In the case of Hawarden and Mancot, the two settlements have already physically merged. The settlement boundary of Hawarden includes the village itself as well as the block of development to the west and east of Gladstone Way. The two settlement boundaries co-join between Cottage Lane and The Paddocks. It is this continuous belt of development which surrounds the site on three sides which provides the context for the allocation. The allocation of the site for housing is not intended to prevent each settlement from having its own character and identity and community spirit. However, when looking at the nature of development which surrounds the site, it is predominantly suburban estate type development of different ages. There does not appear to be any protected or specific character that is so special that new development on the allocated site cannot be designed and laid out to successfully integrate with the present suburban context.

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The bulk of the site, in its present form, is not green space as it is agricultural land and is private land. To the north of the allocation is the existing recreation ground comprising bowling green, playing field and playground and this will remain. A public footpath runs from Park Avenue past the end of The paddock and onto Ash lane, skirting alongside the playing field. However, there is no other public right of way through the allocated site or right of access as it is privately owned agricultural land. The development will include a green buffer alongside the listed building as well as well as green infrastructure through the site including play areas and a Multi Use Games Area (MUGA). There will also be suitable separation between new development and existing that borders the site and there is plenty of scope to design a scheme to protect this. The Council is not 'selling' the site and the issue of house prices is a matter for the house builder in the light of market conditions and the need to provide affordable housing as part of the wider development of the site. The site adjoins the settlement boundary of Hawarden and Mancot. Existing properties at Park Avenue, Kennedy Drive and streets on the western side of Gladstone Way all have a postal address of 'Hawarden'. It is not clear why Mancot will no longer be a village with the development in place. Given that only the existing properties between nos. 40 and 79 Ash lane will directly adjoin new housing, it is not explained by objectors how the character of the bulk of the village will be so affected by the development. It is the approach of existing communities to new residents that is the main determinant of the preservation of the ongoing character and spirit of a community. It is accepted that this site represents a large new development. However, given that the site sits between the two settlements it is not considered that it represents overdevelopment. Furthermore, the objection does not specify what the effects are of this overdevelopment. As previously explained the settlements of Hawarden and Mancot are already merged and the allocation is seeking a logical urban extension in the form infilling the wedge of land between existing development. Looking at the settlements listed, it is evident that there is a continuous belt of built development from Hawarden through Mancot and on to Pentre. However, each of these settlements sit within open countryside. Hawarden sits in an open countryside setting and the vast majority of its settlement boundary adjoins green barrier. The remainder is protected by the Hawarden Castle historic park / garden and its listed buildings and Scheduled Ancient Monuments. There will still be an open gap between Hawarden and the allocated site which is retained as green barrier. Mancot will still retain the open countryside setting along its eastern edge and between Sandycroft primary School and Pentre, and this remains as green barrier. Pentre will also retain its open countryside gap to development at Willow park and this remains as green barrier. A significant swathe of open countryside is also designated as open countryside to protect the gap between Ewloe, Hawarden, Pentre, Queensferry and Shotton / Aston. It is acknowledged that there is only a narrow gap between Ewloe and Hawarden in the immediate vicinity of The Highway. However, on the south side of The Highway there is still an undeveloped gap of 140m comprising school sports pitches set behind hedgerow and mature trees. On the north side there is a gap of 383m comprising the Gladstone Playing Fields. This gap is broken slightly by the day nursery and a bungalow but the overall impression is still of an open gap between the two settlements. The above analysis clearly shows that there is not a continuous urban form and that each settlement has its own open countryside context, as reflected by the green barrier which seeks to prevent coalescence. This must have been a consideration by the UDP Inspector who recommended the allocation of the site. It is agreed that Hawarden village centre has a particular character befitting of its historic nature. The village centre features a conservation area and has numerous listed buildings. Outside of the conservation area is Truemans Hill Motte which is a Scheduled Ancient Monument and to the south east of the conservation area is the Hawarden Castle historic park / garden, listed buildings and SAM's. One of the functions of the green barrier around Hawarden is to protect the setting to the settlement, as specified in

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PPW. However, the allocated site does not contribute to the setting of the historic part of the village as it sits between estate type housing developments. Its development will not harm the broader function on the green barrier nor harm the setting to the village centre as it retains open land alongside Gladstone Way. Brownfield / Alternatives / Agricultural Land As set out above the Council has considered fully a large number of Candidate Sites and Alternative Sites both in the County as a whole and in the Hawarden area. In the next section of Reponses, the Council has commented on 14 specific sites suggested by objectors. Sites which were allocated in the UDP but which i) hadn't been developed or ii) hadn't had a planning application or developer interest, have been included within the list of Candidate Sites to ensure that they are freshly assessed. Two of these namely Well Street, Buckley and Highmere Drive, Connah's Quay have been carried over as allocations in the LDP, but others were not considered appropriate and not been carried forward. It is acknowledged that Welsh Government policy in PPW encourages the use of brownfield and previously developed land. However, it does not specifically prevent the development of greenfield sites. Para 3.40 states 'Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements'. The specific example of County Hall, Mold is responded to in the next section of the Council's response. As explained elsewhere in this response there are large areas of brownfield land in the County but these are constrained by flood risk, contamination and proximity to international nature conservation designations and are not suitable for residential development. Welsh Government explains in para 3.51 of PPW that 'Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development' [The Council's emphasis in bold]. The paragraph goes on to say 'It is recognised, however, that that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats, or industrial heritage, or because it is highly contaminated'. More general responses on the suitability of brownfield land in the County is made elsewhere in the Council's response. The Council is not aware of the existence of any brownfield sites nearby in terms of submitted Candidate Sites or Alternative Sites. One of the supporting documents to the Plan was an Urban Capacity Study which sought to establish that the Plan's conservative allowance, as part of the Housing Balance Sheet, for small and large site windfalls, was robust. It identified and assessed brownfield or underused land in settlements within the top three tiers of the settlement hierarchy. This work did not identify brownfield sites in the locality that could be considered either individually or collectively as being an alternative to the allocated site. The Northern Gateway site is specifically commented on in the next section of the Council's response. Agricultural land - The issue of green belt / green barrier is addressed elsewhere in the Council's statement. The guidance referred to is in relation to 'Best and Most Versatile Agricultural Land'. Paras 3.54 – 3.55 of PPW emphasises that in preparing development plans, considerable weight needs to be given to protecting BMV from development. The Welsh Government advises that BMV should only be used if there is an overriding need for the development and either previously developed land or land in lower agricultural grades is unavailable. The Council has had regard to this advice from the outset of the preparation of the Plan. The Council worked closely with Welsh

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Governments agricultural unit in developing a system to assess the predictive loss of agricultural land on the 700 or so Candidate Sites. This process is now reflected in the present 'Predictive Maps' which are published on line by Welsh Government. An agricultural site – survey undertaken at the time that the UDP Inspector recommended allocation of the site showed that 0.2ha (5%) was grade 2, 3.0ha (49%) was grade 3a and 2.7ha (44%) was grade 3b. The Welsh Government Agricultural Unit confirmed that the Study findings were still soundly based and that the additional land allocated in the LDP would be likely to be a mosaic of grade 3a and 3b. Although the allocation does involve the loss of some Best and Most Versatile agricultural land this is not the case for the whole site as a large proportion is grade 3b. The Deposit Plan was accompanied by Background Paper 09 Agricultural Land which explained how the Council has sought to minimise the loss of BMV in preparing the Plan. The Welsh Government, in their formal response on the Plan, have supported in principle the approach taken and have not objected to the development of this site. Both the preparation of the UDP and the LDP has considered the suitability of brownfield land for housing development and this is commented on elsewhere. The Plan's strategy and allocations are not based on profit – the Council has no financial interest or involvement in the development of a site – this is a matter between the landowner, agent and developer. The Council is merely seeking to facilitate housing development by making sustainable, viable and deliverable allocations in the Plan. Objectors have identified / suggested a number of alternative sites and each of these are commented on in turn: i) Manor Lane, Hawarden – This site was put forward for housing at Preferred Strategy Stage as an alternative site (BROU020AS). Despite lying adjacent to employment development and historic housing, it does not relate to any existing settlement and has no facilities and services. Residents would have to travel to nearby settlements of Broughton, Hawarden or Sandycroft to access everyday facilities and services. The site would result in a block of free standing development which would harm a green barrier and is not a sustainable location or site for further housing development. ii) Airbus site, Drury – This site had been submitted as a candidate site (BUC021). During the candidate site assessments the site was still in employment use. A parcel of land to the north of the existing factory is allocated for employment use and both this and the existing unit are within a PEA. Although the southern part of the site is within the settlement boundary, the northern part of the site lies adjacent to SSSI/SAC. It is understood that the factory is presently empty and has been marketed and the site could be considered during the Plan period as a large 'windfall' development. iii) Mt Etna, Buckley – this area is predominantly a Country Park, managed by FCC Countryside Services. Much of the area is a SSSI and SAC and is neither available nor appropriate to be developed for housing. iv) RAF Sealand – this site forms part of the Northern Gateway allocation which is commented on in v) below. v) Northern Gateway – this is a mixed use allocation in both the adopted UDP and LDP. The site benefits from two outline planning permissions for employment and housing as well as community hub. It forms a key part of the Plans overall employment and housing provision over the Plan period. The key attribute of the site is that it is a sustainable mixed use site which is at the heart of regional growth initiatives. Approval of two phases of houses and one warehouse development is evidence that the site is now being delivered as demonstrated by Countryside Properties presently being on-site. To convert the employment element to housing, as sought by some objectors, would be to fundamentally harm the role of the site in delivering sustainable mixed use development and regional economic growth.

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vi) Shotton Steelworks – part of the site is still in use as a steelworks, run by Tata. The site is designated as a Principal Employment Area, alongside the Deeside Industrial Park and the Northern Gateway Strategic Site allocation. Much of the steelworks site is within C1 flood risk zone and is likely to suffer from contamination due to its previous industrial use. The site also sits adjacent to the Dee Estuary and R. Dee which is designated as SSSI, SAC, SPA and Ramsar site. This is not a realistic or appropriate site for housing in the LDP. The site is also one of 18 sites shortlisted as possible logistics hubs for the Heathrow expansion. vii) South of Bennetts Lane, Hawarden – This site was put forward as a candidate site (HWN004). The site comprises grade 2 agricultural land represents a wedge of open countryside between two arms of built development. The prominent, rising nature of the site helps it provide an open setting to the historic core of Hawarden. Development of the site would harm the function and openness of the green barrier at this location and harm the character and appearance of the settlement and open countryside. Highways Development Management Officers consider that the site is unsuitable as the only highway frontage is onto Bennett's Lane and this is considered unsuitable for any significant additional traffic due to its limited width, alignment and lack of adequate pedestrian provision. viii) land adjoining A494(T) / Lower Aston Hall Lane – The site comprises 15ha of land in a rectangular shape running parallel with the A494(T) Aston Hill and extends from the rear of properties on Lower Aston Hall Lane north eastwards to Clay Hill Lane. The site comprises two candidate sites MAN003 and HWN001 which were submitted by separate parties. With the exception of the 'outlier' of development at Lower Aston Hall Lane (which forms part of the settlement of Shotton and Aston), the site forms part of a large swathe of land which prevents the coalescence of Shotton / Aston and Hawarden and Ewloe. The development of such a large block of land would significantly erode the green barrier gap between Shotton / Aston and Hawarden. The site does not relate well to the form and character of built development and is rather divorced from Shotton / Aston by the A494(T). The development of site HWN001would also result in the predicted loss of 3ha of grade 2 and 15ha of 3a agricultural land, whilst the totality of site MAN003 would result in the predicted loss of 37ha of grade 3a agricultural land. ix) Land between Pentre and Willow Park – The site comprises a block of land of 8.5ha which sits on the south side Chester Road East. It is bounded by the Dyfed Drive residential development and the Willow Park residential caravan park to the west (both of which form part of Queensferry) and residential development at Mechanics lane to the east. The site forms part of a larger 21ha candidate site – MAN002. The intervening land forms a block of open countryside which separates two distinct settlements which are not otherwise coalesced. Development of the site would result in the direct coalescence of two separate settlements. x) Land on north side Glynne Way /B5125 (adj Hawarden Village School) – The site comprises 3.7ha of land on the north eastern edge of Hawarden, on the north side of Glynne Way. A differently configured candidate site (3.9ha) was submitted as HWN006. The site suggested differs from the candidate site in that it cuts across open land and does not follow an existing physical feature on the ground. The site relates poorly to the built form and pattern of development and is an integral part of the agricultural landscape to the east of the settlement. Given the sloping nature of the site, built development on it would be prominent and visually damaging. Given that the green barrier here seeks to prevent the eastwards encroachment of built development into open countryside, the development of the site would undermine the objectives of the green barrier in protecting the open character and appearance of this open countryside. Part of the site forms part of the Hawarden conservation area. The site also suffers from a highways constraint in that a vehicular access would be dangerous given the limited forward visibility around the bend. A small part of the site (to the east of 43 Glynne Way) was put forward by an objector as an omission site for consideration as part of the UDP and the Inspector commented 'This heavily wooded area provides a distinctive approach to the settlement from the east. It is more closely related in character and appearance to the countryside than the built up area. Extending the settlement boundary to include it would result in unacceptable encroachment into the countryside. I do not consider including this land within the settlement boundary would serve any useful planning purpose. The site is within the green barrier and this further reinforces my conclusions'. xi) Land between Moor Lane and Rake Lane, Hawarden – This comprises a very large swathe of land to the east of Hawarden adjoining Glynne Way (B5125). The land is bounded by Moor Lane to the west and Rake Lane to the east. The land extends north eastwards up to B5129 Chester Road. This block of land amounts to some 100ha (objectors do not specify what the extent of the site is) and is completely divorced from Hawarden or any other settlement. It would comprise of a large block of land in

Council response
prominent open countryside which rises up to the edge of Hawarden and would undermine the function and integrity of the green barrier. The whole of this block of land involves predictive loss of grade 3a agricultural land. xii) County Hall, Mold – This site was considered as a candidate site – MOL017. The site is brownfield but it sits within a parkland landscape which comprises significant areas of green space, mature trees and a listed building. Any redevelopment of the site would need to work around not just these constraints but also the topography and protected species as well as the need to retain the law courts, the theatre and some FCC Council offices. The site is not an easy site to develop and will involve considerable demolition and reclamation costs and is unlikely to deliver housing until the latter part of the Plan period. In this context it is seen more realistically as a large windfall opportunity, in the form of additional flexibility, rather than as a housing allocation xiii) Land off Aston Hall Lane, Queensferry – It is not clear whether this refers to Upper Aston Hall Lane or Lower Aston Hall lane. However, from the Candidate Site Register it is clear that a number of candidate sites in this locality have been assessed including HWN001, 012, 013 and MAN003 and all discounted. xiv) Land opposite Hawarden Farm Shop, Glynne Way – this is the same parcel of land as in xi) above Green Barrier There are presently no green belts in North Wales. The draft National Development Framework refers to a possible green belt in the Wrexham / Deeside area but this is something that will need to be considered as part of the preparation of Strategic Development Plans which will sit between the NDF and LDP's. Even if a green belt were to be designated at some point in the future, its designation would still need to ensure that long term provision is made for future development. It would not simply be a case of re-designating every existing green barrier as a green belt. Instead lpa's designate green barriers or wedges in their development plans, in line with Welsh Government advice in PPW. Para 3.64 of PPW makes it clear that 'Green wedges should be proposed and be subject to review as part of the LDP process'. The Council has set out its review of green barriers in Background Paper 01. Welsh Government has not objected to the approach taken in respect of green barriers other than to reference to the use of the term 'barrier' as the terminology used in PPW is 'wedge'. It is the case that Hawarden and Mancot are separate settlements in the LDP as reflected in the settlement hierarchy in policy STR2. Each has its own settlement boundary. However the two settlements and their respective settlement boundaries are not divorced from each other. The two settlements physically adjoin each other and are already effectively 'coalesced'. This is recognised by some objectors who refer to a continuous line of development from Hawarden through Mancot to Pentre. To the west of the allocated site, built development extends along Park Avenue and to the east of the allocated site built development extends part way along Ash Lane, whilst the remainder is bounded by Ash Lane. To the north of the site is the recreation ground and existing built development at The Paddock, the library and community centre and built development at Mancot Lane. The allocation seeks to infill this wedge shaped gap between existing development (on three sides) in the form of a logical and well defined urban extension. This is complemented by the retention of a green barrier on the prominent and sensitive rising land between the site and Gladstone Way and therefore retains a green barrier around both Hawarden and Mancot.

Council response
The Council set out its review of the existing green barrier (GEN4-14) in Background Paper 1. The green barrier as a whole was considered to warrant re-designation in the context of the 5 purposes of a green barrier set out in PPW (para 3.63) although 3 amendments were proposed, of which one was the removal of the allocated site from the green barrier. Each of the 5 purposes o in PPW will be commented on in terms of the allocated sites: • prevent the coalescence of large towns and cities with other settlements – given that the two settlements are already coalesced it is not considered that the site performs this purpose. • Manage urban form through controlled expansion of urban areas – this is exactly what the allocation is seeking to do, to recognise the existing urban form and to infill the wedge of intervening land. • Assist in safeguarding the countryside from encroachment - whilst it is true that development will be extended into open countryside, the particular land sits within existing arms of built development. The site therefore does not extend significantly beyond the line of existing built development into the wider open countryside. Instead it has a largely enclosed character. • Protect the setting of an urban area – the land does not contribute to protecting the setting of the historic village of Hawarden. The site sits between arms of estate type built development and green barrier designation is not justified on this purpose alone. • Assist in urban regeneration by encouraging the recycling of derelict and other urban land – the land does not perform this purpose. Based on the above it is not considered that the site has the necessary attributes nor performs the purposes necessary for it to remain in the green barrier. Welsh Government affords a high level of protection to green barriers (or wedges) that are designated in adopted development plans. In such circumstances new housing development within a green barrier would be 'inappropriate' development and there would need to be 'very exceptional circumstances' to warrant harm to a green barrier. However, that is not the circumstances within which this site is being considered. In para 3.54 of PPW, Welsh Government advise 'Green wedges should be proposed and be subject to review as part of the LDP process'. That is exactly what the Council is now doing, by undertaking a review of the green barrier and assessing submitted Candidate and Alternative Sites as to their suitability for allocation and housing. The Council's considered opinion is that the site is a sustainable, viable and deliverable allocation that will not undermine the fundamental role and purpose of the green barrier. It is necessary to also have regard to the planning history of the site and this is set out earlier in the Councils response. In essence, the UDP Inspector considered the site to be suitable for housing and recommended that the green barrier be amended and the site allocated for housing. In respect of the green barrier the Inspector commented 'The land although allocated as green barrier is to my mind so contained by the built up area that it is not strategically important in separating settlements'. The Inspector further commented 'To the south I agree that it is necessary to maintain a strategic gap between Mancot and the historic/built up area of Hawarden. But because of the location of the smaller omission site and the topography with rising ground to the south, I do not consider the loss of the openness of the objection site would seriously compromise the strategic gap or the historic setting of Hawarden'. The settlement of Hawarden is a historic village with its conservation area, listed buildings, scheduled ancient monument as well as nationally recognised facilities such as St Deiniols library. Successive development plans have sought to prevent coalescence of Hawarden with other settlements, prevent further encroachment of development into open countryside and to protect the setting of the settlement by designating a green barrier which encircles much of the village centre. The only part of the settlement edge which is not protected by green barrier is the south western edge of the settlement which comprises Hawarden Castle and its historic park / garden, listed buildings and scheduled ancient monument which all afford a high degree of protection. The land between Ash lane and Park Avenue, for the most part sits between arms of existing built development, and will not undermine the primary function of the green barrier. This was clearly referenced by the UDP Inspector and remains valid now.

Council response
The planning history of the site is explained earlier in the Councils response. The Council ignored the clear and well-reasoned recommendation of the Inspector and the advice of its professional officers and did not carry forward the allocation into the adopted UDP without a planning rationale for its late exclusion. Given that the site was put forward by the landowner as a candidate site, the Council is duty bound to consider it afresh and in doing so, must have regard to the previous reasoning and recommendation of the UDP Inspector. The Council considers that the site is sustainable, viable and deliverable. Drainage Flooding Flood risk in Wales is mapped in the Development Advice Map produced by Natural Resources Wales and which accompanies Technical Advice Note 15 Flood Risk. There is no fluvial or tidal flood risk in the vicinity of the site. The nearest flood risk zones are an extensive C1 zone along the B5129 at Sandycroft, Pentre and the northern part of Mancot, and a narrow belt of zone C2 to the south of Hawarden. Accompanying the Development Advice Map is a map showing surface water flood risk. This shows a band of 'low' surface water flood risk running parallel with Ash Lane (to the west of St Deiniols Ash Farm) and smaller pockets of 'low' surface water flood risk along extreme north east and north west parts of site. This does not prevent development taking place on the site but means that the detailed layout and the design of the Sustainable Urban Drainage Scheme will need to have regard to these linear areas and pockets of surface water flood risk. It is the case that the field, in its greenfield state, will act as a store for water but that there will still be a run off from the site. Traditionally, development has been designed with engineering based systems which pipe water away from the site and which can have impacts on other areas. The rationale behind SuDS is that a less engineered approach is taken whereby the run off from the site is restricted to the same rate as a greenfield site. This could be achieved through underground storage tanks or through swales and surface water lagoons. These have the advantage of being able to be designed so as to have ecological, landscape and green infrastructure benefits forming a key part of the design of the scheme. If run off is therefore restricted to no more than the current run off from the site then it is unclear how the development of this site would exacerbate existing problems elsewhere in the area and may actually lead to betterment for existing residents. There is no objection to the site from natural Resources Wales. These features are marked on OS maps and will be taken account of as part of the detailed layout of the site and the development of a SuDS scheme. The occurrence of water leaks along Gladstone Way is not a reason to prevent the development of the site. This reflects that there some existing problems with existing infrastructure which is a matter for Welsh Water. As explained above the issue of surface water run off from the site can be controlled through a SuDS scheme. There are clearly existing problems in the locality but these will not be made worse by the development. Neither NRW nor Welsh Water has objected to the allocation. The LDP is supported by and informed by a Strategic Flood Consequences Assessment which was prepared in accordance with national guidance. The methodology included an allowance for climate change and has regard to Catchment Management Plans. The only action point arising from the assessment of this site is that a detailed Flood Consequences Assessment is undertaken to take account of surface water flood risk. Amenity

Council response
The Council, through its Public Protection service, is responsible for monitoring air quality and the levels of pollution across the County. This is done through a network of monitoring stations throughout the County. All North Wales authorities contribute to an Annual Air Quality Progress Report in fulfilment of Part IV of the Environment Act 1995. The Reports for 2018 and 2019 show that within Flintshire and indeed across North Wales, there are no Air Quality Management Areas (AQMA) and in consequence has not published an Action Plan. In [Hawarden / Ewloe] there are monitoring stations at [Hawarden High School (4), 20/22 Glynne Way, Harden (12/13), Sandycroft CP School (14), 28 Chester Rd, Pentre (30) and several stations from Ewloe to Queensferry. The conclusion of this evidence is that are no air pollution issues within the County. In addition to this, Welsh Government installed their own continuous monitoring station at South Bank in Aston prior to the consultation for the red/blue route and the Aston Hill improvement scheme prior to that. At no time has the Governments action level of 40 µg/m3 NO2 been exceeded in any year so the Council have not had to make this stretch of road or any other area in Flintshire an Air Quality Management Area. Nevertheless, Welsh Government have introduced formalised speed restrictions along the A494(T) in order to reduce air pollution, whereby speed limits have been reduced to 50mph from the DIP junction to Ewloe. It is the case though that speed limits for much of the route (River Crossing to Ewloe) have been 50mph for several years anyway. Welsh Government published the report 'Tackling roadside nitrogen dioxide concentrations in Wales - Welsh Government supplemental plan to the UK plan for tackling roadside nitrogen dioxide concentrations 2017 – Interim Data on NO2 Concentrations for the Motorway and Trunk Road' in September 2019. The report highlights that since 2017 air pollution has reduced at roadside locations and will continue to reduce. A further consideration is that in the longer term, the implementation of the Red Route will have the effect of reducing traffic levels on the A494(T) and will be likely to lead to further reductions in pollution. Continued reductions in petrol / diesel emissions through tighter controls, combined with increasing levels of electric vehicles will also have the likely effect of reducing pollution further. This clearly points to a context of reducing levels of pollution in the area / County over time. The Council's Pollution Control Officer considers it is unlikely that the allocation alone would contribute enough additional pollution to push the levels currently being measured above the government action level of 40 µg/m3. However, the developer will be required to investigate and provide thorough Noise and Air Quality assessments to support any applications in order to protect amenity and improve air quality in line with WG legislation and Future Generations Act. The report concludes that Monitored concentrations are compared with Air Quality Objectives (AQO) as detailed in Appendix B. In 2018 there were no exceedances of the NO2 annual mean AQO of 40 µg/m3. Having considered each pollutant and reviewed the new developments approved in 2018, it can be concluded that there is no requirement for any of the six North Wales local authorities to undertake a detailed assessment. The objector is correct that there is a monitoring station at 20/22 Glynne Way, but also stations at Hawarden High School, Sandycroft CP School and 28 Chester Rd, Pentre. It is unclear whether the objector is concerned about the impact of existing noise levels on the occupants of the new development or the impact of noise associated with the new development on the residents of existing properties. It must be stressed that this a quiet residential area and there is unlikely to be any existing sources or levels of noise which would prevent or be a constraints to development on the site. Welsh Government Noise maps from 2017 show that that there are noise levels arising from traffic along the A494(T) and A55(T) corridors but that there are no records mapped in the vicinity of the site. In terms of the effect of the new development on existing residents, apart from the obvious construction phase, it is not clear why residential dwellings would create noise to the levels that it would pose long term harm to nearby living standards. In terms of light pollution, the site sits between existing blocks of residential development and roads where there is existing lighting. New development can be designed so as to incorporate lighting that reduces glare and light pollution. It is highly unlikely that a well designed residential development conforming to the latest standards and good

Council response
practice would result in levels of light that would detrimentally harm the living conditions of nearby residents. For instance new development would need to have regard to the guidance on lighting in section 6.8 of PPW. Welsh Government places a great deal of emphasis in PPW on placemaking and creating well designed, attractive and safe places within which to live. Para 3.11 of PPW specifically mentions the need for new development to have regard to crime and the fear of crime by creating safe environments that can help create cohesive communities. If the problems raised by objectors do exist then it is ultimately for enforcement by the respective agencies. The site is presently agricultural land which is in private ownership and which has no public rights of way over it or indeed, any rights of public access on to it. Those persons using it for recreation and dog walking are doing so potentially without the permission of the landowner. Welsh Government places increased emphasis in PPW10 on placemaking and design to create attractive residential environments. The Council has existing Supplementary Planning Guidance which seeks to ensure sufficient space around both existing and new dwellings in terms of separation distances between windows, private amenity garden space so as to avoid overlooking or loss of light. This will be a matter for detailed consideration at planning application and the earlier Pre-Application consultations stage. Services / Infrastructure The preparation of the Plan has had regard to the levels of facilities and services in the form of some 80 settlement audits which sought to assess the sustainability of each settlement. This work, which was part of the earlier key Messages consultation document, informed the review of the existing UDP settlement hierarchy. The revised settlement hierarchy split settlements into 5 tiers having regard to their location, character, role, accessibility and level of facilities and services. Hawarden is identified as a Tier 2 Local Service Centre and Mancot is a Tier 3 Sustainable Settlement. The facilities and services are set out for each settlement in the Settlement Audits. The two settlements also sit in close proximity to other settlements and employment areas with Ewloe to the west, Broughton to the east and Sandycroft, Pentre, Queensferry and Deeside Industrial Park to the north. It is clearly a highly sustainable location as recognised in the previous Wales Spatial Plan and now the draft National Development Framework. In terms of other infrastructure the Plan has been prepared in close consultation with key infrastructure providers whether it be schools, health, water supply, sewerage, power among others. These were all invited to sit on the Key Stakeholder Forum which was instrumental during the earlier engagement phase of the Plan's progress, and have been consulted at each stage of the Plan's preparation. There are no formal objections to the Plan in terms of lack of infrastructure, particularly when mechanisms exist for infrastructure to be improved or delivered as part of new development. The Council has set out information on this in the Infrastructure Plan. The Council has worked with the Local Education Authority and Betsi Cdwaladr University Health Board throughout the preparation of the Plan. For instance, the Health Board were a key member of the Key Stakeholder Forum which met regularly during the earlier stages of engagement and consultation. It is important to stress that neither has objected to the Plan in terms of health and education capacity. There is no requirement for the lpa to consult with every school, doctors surgery or dentist practice, as this is the remit of the relevant governing authorities. Whilst it is acknowledged that the schools in the area are popular and well subscribed, there is no objection from the Local Education Authority. It must be stressed that the Hawarden site will not deliver completed houses until 2023-24 with 18 completions forecast in the first year and 45 per year thereafter. The impact of development will therefore not be felt in 'one hit' and there is sufficient time for the Education Authority to support the delivery of growth that is identified in the Plan.

Council response
This was also commented on in the Wrexham LDP Inspector's Interim Findings letter where she stated 'The final reason for reducing the housing requirement was that the level of growth identified was considered to place too much strain on infrastructure such as highways, education, schools, council services and health providers. Again, we are not convinced that this is relevant to the assessment of need. Moreover, it is always a requirement for developers to make provision, through planning obligations, for infrastructure to be provided where existing capacity would not meet the additional demands and needs of new development. This would be commensurate with the scale of development'. Betsi Cadwaladr University Health Board were a member of the Key Stakeholder Forum and have been involved in the preparation of the Plan from the first stages. The lack of appointments and inability to register is a common problem the County and North Wales. This is generally not a lack of premises and facilities but a lack of staff. Whilst the planning system can help to deliver new or expanded facilities it cannot contribute to staffing levels. In respect of the Wrexham LDP examination, the Inspector commented in her interim findings ''We heard during the sessions of the shortcomings in the County Borough in the provision of health facilities. The local Health Board, which does not object to the LDP, states in its consultation responses that it is not the provision of buildings for additional services which is the issue but the availability of the required workforce. We have little evidence, therefore, that the availability of health services is a compelling reason to prevent or limit residential development'. There is a general lack of NHS dental services and recent years have seen the growth of private dental practices. However, this not a matter which in the remit of FCC as lpa and is the responsibility of the Health Board. The Health Board do not object to any aspect of the deposit LDP. The LDP is a land use plan and has to balance many different considerations. The LPA cannot directly provide infrastructure as this is the remit and responsibility of other service providers. Throughout the Plans preparation, the Council has sought to work with internal and external service and infrastructure providers, commencing with the Key Stakeholder Forum. Following a long period of financial austerity measures it is not surprising that there are infrastructure pressures and capacity considerations. Also, it is inevitable that new development, wherever it is located, will to some extent place a pressure on infrastructure. The question is whether this pressure is to the extent that the impacts of development are unacceptable i.e. that they cannot be mitigated. This is not the case with the Plan, as demonstrated through the Infrastructure Plan and the lack of formal objections to it at Deposit consultation stage from providers. The cemetery is run by FCC and the preparation of the Plan provided an opportunity to address any need for additional land. Where a need has been identified then provision for this in the Plan has been secure through the safeguarding of land for instance cemetery extensions at Greenfield and Treuddyn. No such requirement has made requested of the LPA at Hawarden cemetery. The allocated site does not adjoin the existing cemetery as there is intervening land. Whilst the loss of the post office is regretful it is pleasing to see that the library is continuing to operate on a voluntary basis. It is unclear why the proposed housing development would adversely impact on this situation. Rather, new housing development could result in improved facilities such as new convenience store as this has happened elsewhere in the County. The provision of policing is not a matter for the LPA and any issues or concerns with regard to policing should be made directly to North Wales Police. The representations of Welsh Water reflect the position set out in the Council's Infrastructure Plan which accompanied the Deposit Plan.

Council response
The location and specifications for a substation will be a matter to be considered as part of the detailed design stage for the development. Traffic / Transport Policy HN1 sets out the Plans housing allocations in a tabular form and includes summary notes on each allocation. For this allocation the notes clearly state 'Access onto Gladstone Way and Ash Lane'. It is not clear why there is such uncertainty about this when it is referenced in the Deposit Plan. The site has two proposed access points and it is likely that the main access will be on Gladstone Way and a further access onto Ash Lane. This enables traffic to be dispersed more efficiently onto the surrounding highway network and to prevent the whole site being served off Ash Lane / Cross Tree Lane. A Transport Assessment was undertaken for the site in 2018 by the site owner and involved traffic counts for a 7 day period from 9th July 2018 which was before schools closed for the summer holidays. The Transport Assessment makes no reference of roadworks or any other traffic management measures that would have invalidated or affected normal traffic flows and patterns. The conclusion of the TA is 'In summary, this TA has shown that the traffic associated with a residential allocation at the proposed development site can be accommodated on the highway network with no detriment to operation, or road safety. As such, there are no traffic or transport planning reasons why the site should not be included within the LDP'. The southernmost extent of the site on Ash Lane is some 600m from Hawarden Village School and the northernmost part of the site adjacent The Paddock is 1km from Sandycroft Primary School. Via Ash lane the site is 750m from the Stables medical centre and 900m from the village centre, although this can be shortened to 750m by using the path from Cross Tree Close. The site is some 800m from village centre. From the village centre the railway station is some 450m to the west. The site is well placed to encourage walking to local services and facilities. In terms of Active Travel there is a proposed route shown in the Council's 'Active Travel Integrated Network Map from Buckley through Ewloe and Hawarden and on to Sandycroft. Route MA2/13 passes along Park Avenue and Mancot Lane and runs adjacent to the site. There is clearly potential for residents of the development to use this Active Travel route as part of day to journeys on foot or by cycle. The TA advises that a review of the site, the local highway network has been presented along with a sustainable access audit which found that the site is well placed to encourage walking, cycling and travel by bus. The TA also included an Outline Travel Plan with the commentary 'An outline Travel Plan has been proposed which seeks to confirm the suitability of the site with regard to access to sustainable travel choices for residents of the proposed development. A number of initiatives have been identified for inclusion into a Full Travel Plan sufficient to support a formal planning application'. It is accepted that a section of Leaches Lane is devoid of footways and has the character of a rural lane. It is also accepted that this is the same for Colliery Lane and much of Cottage Lane. However, the bulk of the road network in Mancot have footways on one or both sides. With the main vehicular access from Gladstone Way and a further access onto Ash Lane, it is not clear why cars would seek to use Colliery Lane as a short cut. The cemetery has its own car park on the eastern side of Ash Lane and it is not considered traffic levels arising from the cemetery are prejudicial to the free and safe movement of traffic.

Council response
Whilst it may be the case that if there are accidents on the A494(T) or A55(T), traffic diverts up Gladstone Way this is not a day to day occurrence. It must also be borne in mind that in the longer term the Welsh Government Red Route should lead to a reduction in traffic along the A494(T). Service 11 run by Arriva is between Chester and Prestatyn / Rhyl, running along the coast. From Chester the service calls at Broughton Shopping park, Hawarden and then runs down Gladstone Way to Queensferry and runs every 30 mins. Service 9 runs from Connah's Quay to Broughton Park and runs through Mancot but this is infrequent with 3-4 services per day each way. The site is within walking distance of The Highway / Glynne Way where service 4 provides services every 30 mins between Chester and Mold. The site is also within walking distance of Hawarden Station which provides train services between Wrexham and Liverpool. Despite the regrettable loss of bus serives in Mancot, the locality is still accessible by key bus routes and the train service. Environment Natural An ecological survey of the site has been undertaken by Clwydian Ecology and the County Ecologist considers this to be acceptable as a preliminary ecological appraisal of the site and is in line with Cofnod information. The County Ecologist considers that the habitats present on site are not of high ecological value and any protected species likely to be associated with these habitats can be taken into account within the development, following further surveys/impact assessment together with relevant avoidance and mitigation. Natural Resources Wales (NRW) have been consulted throughout the Plans preparation. NRW made no objection to the allocation at Deposit consultation stage. There are no Tree Preservation Orders within or adjacent to the site. Clearly, trees and hedgerows will be retained (as mentioned in policy HN1) and incorporated into detailed layout of the site as part of a green infrastructure network approach. Given that site sits between two arms of development it is not considered to have a significant effect on the wider landscape. The site is already considered to have an urban context and in this context the UDP Inspector commented 'The land although allocated as green barrier is to my mind so contained by the built up area that it is not strategically important in separating settlements'. The retention of open land to the south of and above the site will serve to retain an open countryside context to existing and proposed development. This was recognised by the UDP Inspector 'To the south I agree that it is necessary to maintain a strategic gap between Mancot and the historic/built up area of Hawarden. But because of the location of the smaller omission site and the topography with rising ground to the south, I do not consider the loss of the openness of the objection site would seriously compromise the strategic gap or the historic setting of Hawarden'. The designation of land as a green barrier is not based on landscape 'character' or 'quality' but on its openness and whether it contributes to the 5 purposes of a green barrier in PPW. A piece of land need not be inherently 'attractive' in order to perform a green barrier function. The landscape impacts of the proposed development are commented on above. The issue of agricultural land is commented on above. The implications of the development of the site for the tenant farmer is a matter for Hawarden Estates as landowner. However, Hawarden Estates have produced an Agricultural Statement from which the key points are:

Council response
• The 10.9ha site comprises part of the holding of Hawarden Estates which extends to 1,618 acres. • The site is currently let to a tenant farmer as part of Deiniols Ash Farm which extends to approximately 32ha and is used for low intensity cattle and sheep grazing – the tenant also farms other land owned by the tenant. • Deiniols Ash Farm is relatively poorly equipped in terms of fixed equipment and is not a commercial unit and does not have a long term future as an agricultural holding. • The holding is bordered by development on three sides and can be very challenging to farm due to trespass from local residents and their animals in addition to increasing occurrences of fly-tipping. • The remaining farm holding could remain as a lifestyle farm for the tenant for the time being or it could be added to an adjacent commercial unit. The UK Government introduced the Environment Bill in October 2019 and one of its measures is to set up a new independent Office for Environmental Protection. This will scrutinize environmental policy and law, investigate complaints and take enforcement action against public authorities, if necessary, to uphold environmental standards. The Government website states 'While the Bill applies only to England, more than half of its measures - such as those designed to drive up recycling rates - are designed to apply across the UK, with the consent of devolved administrations, helping the nation deal with the major environmental challenges we face together'. The Environment (Wales) Act received Royal Assent in 2016 and addressed the following: • Sustainable management of natural resources • Climate change • Charges for carrier bags • Collection and disposal of waste • Fisheries for shellfish and marine licencing • Flood and coastal erosion and land drainage. It is not considered that the proposed is contrary to the OEP or the Environment Act particularly given the lack of objection from the NRW. Environment – Historic The Summary Guidance within policy HN1 for this site clearly references the need for 'strategic landscaping buffer to provide setting to listed building'. The allocation is not proposing built development up to the site boundary with St Deiniols Ash Farm. The site boundary wraps around the outbuildings associated with Deinols Ash Farm but the Farmhouse itself lies further to the south. The farm buildings themselves therefore provide a buffer between the farmhouse and the site. Turning to the north west aspect from the farmhouse, there is an intervening field between it and the site boundary. The distance between the farm and the site boundary is between approximately 60m and 90m and serves to provide a buffer. In addition to the buffer provided by the outbuildings and the intervening field, it is proposed that a further landscaped area is provided within the site boundary to provide an additional open buffer to the listed building. In combination, this will ensure that the farmhouse retains an open setting. The existing open setting to the south west, south and east remains unaffected. A Heritage Asset Setting Assessment has been undertaken by specialist conservation consultants whose overall conclusions are that whilst there will clearly be a change to the context and setting of the listed building, this is not so severe as to cause unacceptable harm and that development of the adjacent site can take place with suitable

Council response
mitigation. The Assessment states “The general character of the area will be altered, by customary and acceptable elements of a residential development introduced to an environment with substantial suburbanised form. Residential development would be an introduction to the landscape, but it would not be a sui generis introduction and its characteristics are commonplace and familiar”. It goes on to state that “Much of the back-clothing of the existing sightlines, it should be noted, is residential in character, providing hard-edge to the margins of the open fields. Development on the Site would add to this existing element of the built-environment, and so the change in the setting of the asset represented by development is matter of degree, not principle”. The historic map of 1869-1895 shows the line of a railway line from a colliery adjoining Scotch Row and crossing Ash lane to the south St Deiniols Ash Farm. The line of the railway is not within the boundary of the allocation. Consultation responses from CPAT identified ‘The western end of the plot impinges on the remains of mining (various buildings, shafts and an engine house). This area will need to be evaluated prior to any development and may require mitigation thereafter’. If there were tunnels between the Farmhouse and the Church and castle then the line of these would fall outside the allocated site boundary. Mining The bulk of the site is within a ‘Coal Authority Standing Advice Area’. A strip of land from St Deiniols Ash Farm northwards parallel with Ash Lane together with the northernmost part of the allocation falls within a ‘Coal Authority Referral Area’. At the time that the site was recommended for inclusion by the UDP Inspector British Coal advised i) there are surface coal resources across the Mancot and Connah’s Quay area and a legacy of previous mine workings. Ii) the site contains surface coal resources and been subject to past mining activity and is within the zone of influence of 8 recorded mine entries (shafts or adits) and the northern part of the site has been subject to underground mining at shallow depth iii) record do not show any recorded incidents of subsidence or other related hazards on the land at Ash lane and iv) former mining activities and related hazards are not a strict constraint to development. Indeed, in general terms it would be preferable for appropriate development to take place in order to remove these public liabilities. The Coal Authority would therefore not wish to suggest that the site be excluded from allocation on the grounds of mining legacy. The Coal Authority advised that mine entries and shallow underground workings need to be fully considered prior to any development in terms of a) give full consideration to mining information b) assess the risks to development and c) design and implement appropriate mitigation measures. The presence of mine shafts and shallow workings does not therefore prevent the site being allocated or development. But, further work is needed in order to fully address these risks as part of the detailed layout and design of the development. The Councils website provides guidance at https://www.flintshire.gov.uk/en/Business/Health-and-Safety/Radon.aspx on radon. This explains that Radon is a natural radioactive gas and that North Wales is one of the areas in the UK which has generally higher levels of radon. The Health and Safety Executive website https://www.hse.gov.uk/radiation/ionising/radon.htm advises that the Building Regulations in Wales describe where new buildings and dwellings might need to incorporate protective measures installed during construction. The Council’s Development Management Officers have confirmed that radon is dealt with by the Building Control team. Support

Council response
Support for the site is noted.

Policy HN1.9

Due to the large number of representations received to this allocation, and the fact that a number of common issues were raised by objectors, a collective response has been provided at the end of this table which covers all of the points raised within each of the individual representations.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
95	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	HCAC004/the settlement. The land is outside the settlement boundary. No housing on that side of the road. Adding 80 houses would add a 1/3 to the village - disproportionate. The land associates with open countryside. We've fought development before. Unfair to include it. Last time there was no developer on board which is a major consideration when choosing land that is appropriate, viable and deliverable. The land is green and a red in the Candidate Site Register it should be the last resort. The land is next to Abermorddu School which is outside the settlement boundary in line with the Flintshire Planning Department policy. This land use would put it in the boundary and surround it with housing. This land is needed for any future expansion. Development has already taken place on the Cymau Lane on the other side of the school and the settlement boundary altered. It's the only flat green land in Abermorddu especially useful for those with limitations. Land use would affect the green space - Cutting down trees, hedges and losing grass surface areas which all produces oxygen would be affected and impact of air quality. We are bordered by the railway on one side and the countryside on the other leading to hills to Hope Mountain. The public have used the land unencumbered for recreational purposes for over 40 years (via the legally/permitted stile on the Wrexham Road (now an unsecured gate) and also a stile on the land now built on Cymau Lane). The public regularly walk their dogs, play games and generally enjoy the open green space. We don't have other alternatives in the village and would need to travel to alternative sites (concerns re Willow which is under investigation). The A541 is an extremely busy main road. It is difficult to get into and out of our driveways. Also a lot of people park on the road outside their	Removal of allocated site

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				addresses which makes the road narrower. I am concerned about the impact of further housing/large development as it would make this dangerous situation worse. Any exits onto the road would also impact the flow of the main road. An increase in housing would add cars and add to pollution for residents and school children - affecting their wellbeing and health. The land and road are regularly liable to flooding. This would increase with development. Significant nature on the site - newts, bluebells, orchids. We have no shops, amenities, pubs or community centres. We have to travel for goods and services. Endorse HCC response and alternative sites. I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan.	
277	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I adopt and endorse the Hope Community Council response to the LDP draft plan and suggested alternative sites. I don't think that Flintshire Council's LDP plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. I also think that the other sites put forward as preferable by Hope Community Council using smaller developments which would limit the impact on the settlement and would be more deliverable, viable and appropriate for all the reasons outlined by them.	Remove site HCAC004 and I adopt and endorse the Hope Community Council response to the LDP draft plan and suggested alternative sites.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
305	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between 2 sites would lessen the impact on our Community and be more viable and deliverable.	Remove Site HCAC004
309	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between 2 sites would lessen the impact on our Community and be more viable and deliverable.	Remove Site at HCAC004
314	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between 2 sites would lessen the impact on our Community and be more viable and deliverable.	Remove Site HCAC004

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
380	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between 2 sites would lessen the impact on our Community and be more viable and deliverable.	Remove Site HCAC004
548	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	As joint owner of 31 Wrexham Road Abermorddu wish to object to inclusion of HCAC004 Wrexham Road development. We have seen changes in the locality during that time but Bluebell Fields against the backdrop of Hope Mountain have remained a constant scene of natural beauty, treasured by local residents. I would ask that you preserve these fields for future generations and not build on them for the following reasons: • Residents of Abermorddu and other members of the public have had access to these fields for generations. When I was a child in the 60s our school sports days were held on Bluebell Fields and my mother used to speak of football matches between local sides on the field when she grew up in Abermorddu in the 1930s. Residents continue to make regular use of the fields for recreational purposes. They offer a safe place for people to walk their dogs and to play. The loss of this recreational space would be huge for local people. • The proposed land is a greenfield location in open countryside full of well-established flora and fauna such as native bluebells and great crested newts. Development on this land would contravene FCC's commitment to promote biodiversity (STR4 vi). • Much of the land in Bluebell Fields is marshy with a stream flowing through it. Given the potential for flooding, this land is not suitable for development. • The traffic on the A541 in Abermorddu is very heavy, particularly at peak times. Residents are already concerned about the volume of traffic, the difficulty crossing the road and the pollution levels.	Removal of Wrexham Road Abermorddu,allocation.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				Development on Bluebell Fields would exacerbate the traffic problems. • Increased levels of traffic pollution will have an impact upon the health and well-being of the local residents and on the pupils of Abermorddu primary school who play on the adjacent field. • The locality is not equipped to deal with an increase in population: The local schools are over-subscribed and the already busy health centre would struggle with an increase in demand.	
1093	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	Objections to HN1(9) Wrexham Raod HCAC.1. there is no information of the types of housing to be built. 2.No pavement on the Castle side of Wrexham Road will mean increased traffic will lead to danger for pedestrians even with a pavement there is danger from many heavy good vehicles. New footpaths should be provided as part of any development. 3. Bus services are limited. 4. Landscape and visual impact assessment, there is a need to conserve and enhance the historic environment of Caergwrle Castle and Conservation area. 5. The fields are marshy grassland and act as a sponge, development will increase food risk in the area. 6. There are problems with the sewerage capacity in the village. 7. Effect on wildlife, there are native bluebells newts and butterflies on these fields. 8. There is a limited demand for new housing and large development are going ahead in Mold Buckley and Penyffordd. 9 Local schools are full and it is difficult to get a doctors appointment.	Removal of allocation
1245	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Support	Wrexham Road, HCAC, 80 units Welsh Water has made representations on this proposed site through planning application 058163. Welsh Water does not supply water to this area. The public sewerage network can accept potential foul flows from this development site. Hope Wastewater Treatment Works (WwTW) can accommodate foul flows from the proposed development site.	
1259	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	There are inconsistencies in the way the council has assessed potential sites, with reference to the assessment of our client's site. Background Paper 9 'Assessment of Candidate Sites and Alternative Sites' (2019), which forms part of the LDP evidence base, discusses the site (ref: BROU001) and states:	Need to allocate more sites.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				'The site is well defined by existing roads and wraps around existing residential development… Although the site is in close proximity to Bretton, the configuration of the site and its relationship with Bretton would ensure that development would not harm the present character and appearance of the settlement…' 'The site is considered suitable at present for consideration as an allocation.' [NJL Consulting emphasis] The evidence base is clear that the site is appropriate for residential development and should be considered for allocation, yet an allocation has not been taken forward. However, other less sustainable and less deliverable sites are allocated. For example, Northop Road (Flint) has no planning consent (two applications from September 2017 (ref: 057565) for 20 units and April 2018 (ref: 058314) for 145 units remain undetermined) and has identified constraints to delivery, yet the site is allocated. The same applies to the New Brighton (Cae Isa) site (Site 10), which is proposed to be allocated for 105 units but there is no clear evidence of delivery yet clear evidence of constraints. Two further sites are proposed for allocation despite previous planning applications being withdrawn or dismissed on Appeal. The Highmere Drive (Connah's Quay) allocation (Site 3) was promoted for 185 dwellings in 2005 (ref: 043873) but a subsequent Appeal was withdrawn in 2008 and there has been no progress on the site. The Wrexham Road (Hope) allocation (Site 9) was subject to a now withdrawn planning application from 2018 (ref: 058163), and there has been no further progress.	

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				Therefore, the council's assessment of sites is inconsistent. There is a need for additional sites to be allocated, such as Bloor's site BROU001.	
1283	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	There is genuine risk that proposed allocations cannot be delivered, either at all or in the timeframes envisaged. Several sites have been simply carried forward (rolled over) from the current LDP despite concerns with delivery. The Local Development Plan ('LDP') Manual (Edition 2) identifies the requirement for a new form of measuring the deliverability of sites, and whether they have a realistic chance of coming forward over the next 5 years. It states "When putting forward sites, developers and landowners should include sufficient data to allow a robust assessment to be made (see section 6.4.1&2) including affordable housing, community infrastructure and that the development is financially viable." The draft LPD Manual 3 (which was consulted on by Welsh Government in September 2019) then goes a step further. Table 18 in draft Manual 3 states that historic allocations should only be 'Rolled Forward' from previous plans where 'careful justification' is given that there has been a 'substantial change in circumstances to demonstrate sites can be delivered and justify being included again'. This is relevant as many of the proposed housing allocations have been simply 'Rolled Forward'. The table at Appendix 2 shows the housing allocations and our analysis of realistic deliverability. It identifies 6 of the 11 housing allocations are undeliverable in the next 5 years and a further 4 have questionable delivery over the plan period. This has significant implications for the 5-year supply position and overall delivery of the plan. For example, The Wrexham Road (Hope) allocation (Site 9) was subject to a now withdrawn planning application from 2018 (ref: 058163), and there has been no further	Allocation of additional sites.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				progress. Evidently the delivery of these sites is very questionable and certain sites have been rolled forward from previous plans, despite no evidence they can be delivered. This is clear evidence that several proposed allocations are at obvious risk of stagnating and thus remaining undelivered for a further plan period. Therefore, the council's assessment of sites is significantly inconsistent and there is a need for additional sites. Land at Quarry Farm is such a site.	
94	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	HCAC004/the settlement. The land is outside the settlement boundary. No housing on that side of the road. Adding 80 houses would add a 1/3 to the village - disproportionate. The land associates with open countryside. We've fought development before. Unfair to include it. Last time there was no developer on board which is a major consideration when choosing land that is appropriate, viable and deliverable. The land is green and a red in the Candidate Site Register it should be the last resort. The land is next to Abermorddu School which is outside the settlement boundary in line with the Flintshire Planning Department policy. This land use would put it in the boundary and surround it with housing. This land is needed for any future expansion. Development has already taken place on the Cymau Lane on the other side of the school and the settlement boundary altered. It's the only flat green land in Abermorddu especially useful for those with limitations. Land use would affect the green space - Cutting down trees, hedges and losing grass surface areas which all produces oxygen would be affected and impact of air quality. We are bordered by the railway on one side and the countryside on the other leading to hills to Hope Mountain. The public have used the land unencumbered for recreational purposes for over 40 years (via the legally/permitted stile on the Wrexham Road (now an unsecured gate) and also a stile on the land now built on Cymau Lane). The public regularly walk their dogs, play games and generally enjoy the open green space. We don't have other alternatives in the village and would need to travel to alternative sites (concerns re Willow which is under investigation). The A541	Removal of allocation

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				is an extremely busy main road. It is difficult to get into and out of our driveways. Also a lot of people park on the road outside their addresses which makes the road narrower. I am concerned about the impact of further housing/large development as it would make this dangerous situation worse. Any exits onto the road would also impact the flow of the main road. An increase in housing would add cars and add to pollution for residents and school children - affecting their wellbeing and health. The land and road are regularly liable to flooding. This would increase with development. Significant nature on the site - newts, bluebells, orchids. We have no shops, amenities, pubs or community centres. We have to travel for goods and services. Endorse HCC response and alternative sites. I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan.	
185	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	We are responding, in an individual capacity only, to the current LDP consultation with specific reference to the inclusion of candidate site HCAC004 (Land off Wrexham Road, Abermorddu) as a site for housing development. If, and only if, HCAC004 is approved as a site for housing we would request that the following conditions be imposed on developers: 1. That the speed limit along Wrexham Road be reduced to 30m.p.h.; 2. That appropriate S106 payments be made for relevant projects at local primary and secondary schools; 3. That the Local Planning Authority insist on an allocation of 30% housing for affordable homes and gives consideration to their possible acquisition by the local authority considers options so that they can be rented out as social housing to meet local needs; 4. That the developers be asked to invite and	Removal of Wrexham Road Abermorddu allocation.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				pay for a heritage consultant to develop a project to present the heritage of Abermorddu on an interpretation panel.	
274	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I adopt and endorse the Hope Community Council response to the consultation in objecting to HCAC004 land use and also endorsing other more suitable, appropriate, viable and deliverable sites in our settlement. I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan.	objecting to HCAC004 land use and also endorsing other more suitable, appropriate, viable and deliverable sites in our settlement
302	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between 2 sites would lessen the impact on our Community and be more viable and deliverable.	Remove Site HCAC004
304	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between	Remove Site HCAC004

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				2 sites would lessen the impact on our Community and be more viable and deliverable.	
308	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between 2 sites would lessen the impact on our Community and be more viable and deliverable.	Remove Site HCAC004
310	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between 2 sites would lessen the impact on our Community and be more viable and deliverable.	Remove Site HCAC004
313	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	I don't think that the plan is a sound one for the reasons stated above. Re policy the land use offends policy regarding settlement boundaries and schools outside settlement boundaries. There are other sites that would proportionately distribute development in areas of the settlement better placed to accommodate it and with amenities, shops etc. This land use is disproportionate in the village of Abermorddu. Smaller developments in the settlement would form a more appropriate, viable and deliverable plan. The proposal to split the number of houses for the settlement between	Remove Site HCAC004

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				2 sites would lessen the impact on our Community and be more viable and deliverable.	
376	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	RE: HN1.9 Proposed New Housing Development off Wrexham Road, Abermorddu I object to the proposed new housing development off Wrexham Road beside Abermorddu CP School. My objection is based on the increase traffic use that this will cause on the already busy road. The footpath on Wrexham Road is used by pupils going to the primary school in Abermorddu and the secondary school in Hope. The inevitable increase in traffic will I fear increase the lightly hood of an accident between Abermorddu and Caergwrle as already the cars and lorries routinely break the speed limit, which we observe on the flashing speed indicator outside our property. Additionally in the mornings we frequently have traffic backed up from the traffic lights at Abermorddu passed the entrance to Castle Grange on Wrexham Road. A new entrance feeding directly onto the road can only increase the frequency of these traffic delays. The increase in traffic on this road will inevitably increase the amount of air pollution. As the proposed location is very close to the primary school it will cause increased health risks to the children from the local area. Based on the increase in traffic use on Wrexham Road outlined above I object to the proposed new housing development. Yours sincerely, James Keegan	Leave the HN1.9 area as a recreational area for the local community which will increase peoples health instead of increasing air pollution and potential accidents on Wrexham Road.
438	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	Bluebell fields, Wrexham Road, Abermorddu. My husband, son and I would like to object very strongly to any development of the above they should be preserved and not never built on. 1. The council's own development plan states that new housing should not join two settlements together, there should be green barrier between Caergwrle and Abermorddu. The amount of houses will make it feel claustrophobic..2. Welsh Government says this area should not be developed as a dormitory for Chester. 3. The law of supply and demand suggests that there is no shortage of houses locally as the prices are so much lower that elsewhere. 4. The bluebell fields are outside the settlement boundary and should not	Removal of allocated site at Wrexham Rad Abermorddu

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				be considered nor should the boundaries change. Permission has been refused before, this decision should stand and local people should not have to live under this constant the threat of the planning dept changing its mind. 5. The fields have been used for many years by dogwalking and provides a flat area for such use. 6.The fields are home to a great many plants and animals, great crested newts, badgers, toads and native bluebells. 7. The area is prone to flooding. Smaller sites wlil be developed more quickly and better received, especially in areas are not used regularly by the public. 8.There is a lack of infrastructure in terms of schoolplaces. 9.Pollution is a factor Flintshire is already Wales' most polluted county. Mold road is very busy and this development will make a severe addition to the load on local roads. 10. The Council have stated that land adjacent to a school should not be used for development. There are many trees which help with pollution and should not be removed. Medical provision in the village is already stretched.	
708	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	Objection to allocation at Wrexham Road, Abermorddu Proposed land use is inappropriate as it is outside the settlement boundary The Land is adjacent to Abermorddu School. This land would allow for expansion if necessary in the future, with adequate outdoor space, that being the only remaining direction of expansion. The public have used the land unencumbered for recreational purposes for over forty years. It is used regularly for people to walk their dogs, play games and generally enjoy the open space. Wrexham Road is an extremely busy main road which is already dangerous for residents. Further housing would exacerbate that. Any exits onto that road would also cause issues and affect the flow of the main road. Such land use contravenes SR4 protecting recreational space green spaces agenda, health and well-being agenda, community agenda and the well-being of future generations Wales Act 2015.	Removal of allocation at Wrexham Road

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
1086	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	Objection to the HN1 (9) Wrexham Road Abermorddu Housing Allocation This LDP flies in the face of the 'Future Generations in Wales Act 2015' which highlights the need for open space for recreation for all. This development would destroy The Blue Bell fields which are used for recreation by all ages, especially the elderly as it is flat safe route for walking and recreation. The development would lead to an additional road a junction to the A541 which is already a busy road and would put children in danger. It would increase 'car to school' trips when Welsh Government are encouraging 'Walk to school' initiative. It is claimed in the LDP that there is a need for new housing but there is no one on the Council House wasting list for HCAC. There have been large housing developments in Penyffordd, Mold, Buckley, Llay, Wrexham and Chester. Infrastructure does not keep pace with these developments. There is a shortage of doctors, school places, no longer a full time post office, library or bank in Caergwrle. Building on Blue Bell fields will create further pressure on existing facilities. Nature struggles everywhere and destroying an area known to have newts and native blue bells with rare low lying marshland will be a detriment to the local community. The fields are right under the foothills of Hope Mountain and act as a natural sump for water coming down off the hills, so that the area is liable to flooding. If the fields are included in the LDP there will be unbroken ''ribbon development'' from Cefn Y Bedd to Kinnerton Road Hope and it is the only flat area of recreational land between Hope and Caergwrle.	Removal of allocation.
1111	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	HN1(9) Wrexham Road Abermorddu I object to this development because, 1. it is the only accessible open space left in our community and has been accessible for as long as I can remember . 2 the land is a wildlife habitat, with various species spotted. 3.Parts of this land could be used for the school expansion. 4.the site is outside the settlement boundary, why is this land targeted when there are other suitable sites available, there is a brownfield site in Cefn y Bedd. 5.The Bluebell field have flooded recently. There is a large man made pond nearby which	Removal of allocation

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				could breach and would lead to much damage and possible loss of life. I fully support the objections raised by the ACCH Community Group.	
1191	HN1: New Housing Development Proposals	HN1.9 Wrexham Road, HCAC	Object	Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please refer to attached document	Removal of allocation

Council response
HN1.9 Wrexham Road HCAC Not accepted. The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General The site was allocated by the Council as a Proposed Change to the Deposit UDP. Following a public Inquiry into the Plan the UDP Inspector recommended that the site be allocated in the Plan for housing. Following consideration of the Inspectors Report, 'Proposed Modifications' to the Plan were published and this resulted in objections to the sites inclusion. Following consideration of objections the report to Full Council on 09/03/10 contained a recommendation in respect of Wrexham Rd which was 'That MOD 11/60 be carried forward to adoption on the basis that the objections raise no substantive new issues that warrant a re-opening of the public inquiry of Further Proposed Modifications'. However, and contrary to this recommendation, the Council subsequently resolved to consult on Further Proposed Modifications involving 3 sites (including the non-allocation of Wrexham Rd). Following the consideration of consultation responses the Council resolved in Jan 2011 to adopt the UDP without the Wrexham Rd site. In preparing the Plan the Council undertook a Call for Candidate Sites and this site was submitted by the owner for housing development (HCAC04) and the site was also submitted as a candidate site (HCAC011) seeking its protection as open space. The Council fully assessed each of the submissions and the outcome of this process is set out in Background Paper 08 'Candidate / Alternative Sites' which provides a

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summary conclusion on the assessment of each candidate site. The assessment process concluded that the site was still considered to be a sustainable site and that the Council's previous allocation of the site and the Inspectors recommendation were both material considerations. There is no guidance in either PPW10, the Wales Spatial Plan or the draft National Development Framework which specifically references Chester. The Plan is seeking to meets its own needs for housing but is also seeking to embrace a regional growth agenda and this is an integral part of the draft NDF which clearly recognises Wrexham and Deeside as a growth areas. There is clearly a stock of existing houses in HCAC and development has taken place on the two allocated sites in the UDP. At any point in time it is to be expected that houses will be for sale and also vacant and this is part of the normal 'churn' in the operation of the housing market. However, the Council is preparing a development plan for a new plan period (2015-2030) and has to meet a new need for housing which needs to be delivered through new housing allocations. Within the Plan's spatial strategy and settlement hierarchy HCAC is considered to be a sustainable location for further development over the Plan period. The allocated site has been promoted for development in both the UDP and now the LDP and a planning application was also submitted which was withdrawn at the time that para 6.2 of TAN 1 was temporarily revoked by TAN1. The planning application was accompanied by a comprehensive set of background documents aimed at demonstrating its deliverability, which included: • Design and Access Statement • Ecology Report • Flood Consequence Assessment • Further Ecological Assessments • Hydraulic Modelling Report • Landscape and Visual Impact Assessment • Masterplan • Planning Statement • Pre-Application Appendix • Pre-Application Consultation Report

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• Surface Water Drainage Strategy • Topographic Survey • Transport Assessment • Transport Technical Note • Tree Survey and Arboricultural Impact Assessment The comprehensive set of background papers demonstrates a commitment from the site promoters to its availability and deliverability. The objection has provided no evidence that smaller sites can be developed more quickly, or which smaller sites cumulatively could provide the equivalent level of housing provision. The experience from the UDP is that the allocation of a greater number of smaller sites is less certain in terms of delivery to meet the overall housing requirement, and the LDP has therefore sought to allocate larger sites which are viable and deliverable. The site is viable and deliverable and the Council understands that developers are in discussion with the landowners and their agents, who in turn have sought to discuss with the council options for the best site layout. It is also considered to be rather naïve to suggest that smaller sites will be better received by the community particularly if they are simply anywhere else bar this location. Experience shows that wherever housing proposals are proposed, of whatever scale, there will be objections from local residents. The Council has assessed all the Candidate Sites and Alternative Sites and considers that the Wrexham Rd site is the most suitable and sustainable. It is also of note that the site does not directly adjoin existing residential development as it is separated from existing houses by the adopted highway. Whereas most of the suggested alternative sites directly adjoin existing residential development. The settlements of Hope, Caergwrle, Abermorddu and Cefn y Bedd have been grouped together as a single settlement with a single settlement boundary in successive development plans. In the UDP settlement hierarchy the settlement was included as a Category B settlement and in the LDP a revised settlement hierarchy has been identified wherein the settlement is identified as a Tier 2 Local Service Centre. This was informed by the Settlement Audits which accompanied an earlier consultation exercise on the Key Messages document. The categorization of settlements in a hierarchy and the delineation of settlement boundaries are both planning ‘tools’ whereby the Plan’s strategy can be expressed spatially ‘on the ground’. Neither of these tools takes away the individual identity of settlements or communities which remains intact. The UDP Inspector commented on this in para 11.73.4 of the Inspectors Report ‘A settlement boundary is a planning tool and does not necessarily define a community. In this case it encompasses 4 different areas/communities and parts of different community council areas. For planning purposes it defines an area considered as a single contiguous urban area in planning terms. This a reasonable approach and it is on that basis that I consider this and all other allocations within this settlement boundary’. In January 2020 Welsh Government published a series of explanatory notes on the NDF, including a note on housing need. This states that “The national and regional estimates do not reflect the impact of future policies or events and are not a Housing Requirement for Wales or the Regions. However, the estimates do provide part of the evidence and context on which Housing Requirements can be based. While it is

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expected that there will be a clear alignment between the estimates of housing need and the Housing Requirements set out in LDPs and SDPs, they are not the same and therefore are not expected to match" As stated above the Council needs to consider a wider evidence base to determine the housing requirement within the LDP, and it would be contrary to Welsh Government advice to simply revise the LDPs housing requirement in line with the NDF and projections data. In their formal representations on the Deposit Plan, Welsh Government have supported in principle the level of growth in the Plan and confirmed that the Plan is broadly in conformity with the draft NDF. The site adjoins the settlement boundary of a Tier 2 Local Service Centre. It sits opposite existing residential development and adjacent to a school and recent new residential development. It is within walking distance of facilities and services in Caergwrle and two railway stations, with a further railway station at Hope. Further facilities and services, including a proposed new Coop and a secondary school are available in Hope. It lies at the junction of two key A roads which provide key communications between Wrexham and Mold and Wrexham and Buckley / Deeside. It lies in a sustainable and appropriate location. The site is considered to be one of a limited number of readily identifiable sites without overriding constraints to development such as flood risk and rising topography of the Alyn Valley within which the settlement is located. The Human Rights Act 1998 (the Act) brought the conventions set out in the European Convention on Human Rights (the Convention) into UK domestic law and, amongst other matters, introduced specific powers to certain prescribed UK courts to make declarations of incompatibility, where necessary, between UK law and the Convention rights. The Schedule to the Act sets out the Convention rights. The objector references Article 4 of the Act, which may be a reference to Articles contained in the Convention, but Article 4 is concerned with freedom from slavery and forced labour. In terms of the objection therefore, it appears more likely that the objector is concerned with Article 8 of the Convention, which protects a person's rights to a private life, family life and home and correspondence. It refers to the right of a person to enjoy their home peacefully. Further, Article 1 of the First Protocol to the Convention protects a person's right to enjoy their property peacefully, whereby a public authority cannot take away that property, or place restrictions on its use, without good reason in the general public interest. In this context the Council is not seeking to interfere with the peaceful enjoyment of existing properties by residents. Rather, the Council is preparing a development plan in the context of relevant legislation and procedures and is consulting on its Plan. The assessment of candidate sites and the allocation of the site in a Deposit Plan is a legitimate action in terms of the function of the planning system. The Planning Inspector will be the ultimate arbiter in terms of whether the Plan and this allocation is 'sound' and this will include any impacts on the living standards of existing residents in the area. It is not considered that the Plan is in any way in breach of the Human Rights Act or the Convention. Environmental The Council has reviewed existing green barriers and also assessed suggested green barriers proposed as part of candidate site submissions. No proposal for a green barrier was submitted here during the Call for Candidate Sites. The allocated site only extends part way along the western side of Wrexham Road and there remains a further field which would ensure a gap of some 200m between the site and the property 'Kimberley Lodge' on the edge of Caergwrle. On the eastern side of Wrexham Rd there is a substantial gap of some 400m from Hillcrest Bungalow to the Old Police Station. This gap is notable in that it contains Caergwrle Castle and is within the Caergwrle conservation area and partly designated as a Scheduled Ancient Monument. The UDP Inspector commented 'Whilst development of the land would reduce the area of undeveloped land between Abermorddu and Caergwrle, it would not result in the two merging into one another'. Even with the development of

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the site there would be a sizeable gap between Caergwrle and Abermorddu and it is not necessary for or appropriate for such a small green barrier to be designated. Visually the site is strongly contained by virtue of a belt of mature trees along its western boundary, beyond which there is steeply rising ground leading up to Hope Mountain. The proposal includes the retention of hedgerows/creation of an attractive development frontage/layout to be sensitive to wildlife and break slope along western edge of site. Despite being greenfield, the site is not considered to be of any significant landscape quality. The loss of grade 2 agricultural land it is not considered to be significant in terms of the amount, nor in terms of its relationship with adjoining agricultural land given the topography of the area. Furthermore the land is not used for arable crop production but rather appears to be used periodically for grazing land and there has been no objection to is loss by Welsh Government in the context of the approach taken in the Background Paper on agricultural land. The site is bounded to the west by the Caeau Abermorddu wildlife site. Considerable attention has been paid to the ecology of the site and the adjacent wildlife site. The previous planning application included a Preliminary Ecological Appraisal and a further Ecological Assessment. The Council's Ecologist notes that the site features semi-improved and unimproved grassland of ecological value with overgrown, ancient, species rich hedges, and has two streams which flow across the site from the eastern boundary merging at the south western corner of the wet woodland. The agent for the site promoter has continued to work with the Council's Ecologist to establish a layout which is acceptable. Ecology surveys were carried out in 2016 and 2019, the surveys illustrated that there are no protected species on the site. The reptile survey illustrated that there are no reptiles at the site. Habitats at the site are not considered to be of optimal value for reptiles. The bulk of the site comprises of open, closely grazed pasture however suitable refuge habitat is offered within scrub habitats around the fringes of the site with suitable basking location offered near the scrub/grassland interfaces. No evidence of badger has been recorded at the site during either the 2016 or 2019 surveys. Nevertheless, badgers are known to be present in the surrounding countryside. It is recommended that further badger sett surveys are conducted immediately in advance of any development of the site. Birds recorded at the site were generally commonly occurring woodland and garden bird species however some birds listed as Birds of Conservation Concern (BoCC) were recorded at the site. This included house sparrow, starling and song thrush on the BoCC Red List; plus dunnock, mallard, swift and tree creeper recorded from the BoCC amber list. The grassland habitats are considered to be relatively species-rich albeit with some organic enrichment due to cattle grazing. The greatest species richness is considered to be within the northern half of the larger pasture field at the site (Target Note 1) where plant species present within the adjacent Local Wildlife Site extend into the study site itself. The recommendations within the Ecology surveys 2016 and 2019 include the provision of bat and bird boxes at the site, the timing of vegetation clearance works to avoid the nesting bird season, the

Council response
retention of appropriate buffers around boundary features, the production of a bat friendly lighting plan and a requirement to undertake further bat assessments of any mature trees should their removal be envisaged. With regards to air pollution, The North Wales Authorities Collaborative Project '2019 Air Quality Progress Report' states that 'The North Wales Authorities have not declared any Air Quality Management Areas (AQMAs) and as a result, have not published an Action Plan'. There is a monitoring point at Llys Alun, Wrexham Road, Cefn Y Bedd. The IIA discusses air pollution in great depth and makes the point that the longer term trend towards low emission vehicles can work towards bringing down pollution levels. The trees are all located along the field boundaries and are an important feature of the site and locality. The development will seek to retain these subject to their condition being assessed through an Arboricultural Study. It is accepted that the development will have some impact on landscape through the loss of open countryside. However, the site has an irregular boundary as it follows hedgerows. The undulating nature of the site plus the provision of landscaping and green infrastructure can help to soften the appearance of the development. The UDP Inspector commented 'I acknowledge that the allocation will result in encroachment into the countryside. However, I do not find the area to be of such ecological or landscape value to outweigh the need to allocate the land to meet the future housing needs of the County and this defined settlement'. Neither the site itself nor Hope Mountain is recognised as being of any particular landscape importance and the views of Hope Mountain will remain. An Agricultural Assessment was carried out and the findings concluded that at the time of the survey the land was under grass and not being grazed. There was evidence of dog walking on the land at the time of the survey. The land is classified as Grade 2 and Subgrade 3b, but no objection has been made to the loss of BMV by Welsh Government in their formal representations on the Plan. Additionally, the previous planning application included a Landscape and Visual Impact Assessment. The report identified that landscape and visual harm would occur with the development of housing at this location. It has however concluded mitigation measures such as landscaping, retention of boundaries and green infrastructure would reduce effects'. It is not known what the objector means as the 'green plan'. The issue of whether the site should be designated as a green barrier is addressed above. The Plan also designates 'green spaces' and there are several of these within HCAC but these are predominantly within settlement boundaries where particular parcels of green space warrant protection. Even if the site was not allocated in the Deposit Plan, it would not have been appropriate to have designated as i) it is outside the settlement boundary, ii) is agricultural land and iii) does not have the character, role of attributes to be recognized as a 'green space'. Additionally, the land is privately owned and does not have a public right of way. The use of the site for recreation is commented on elsewhere in this response. It is accepted that there may have been a stile on Wrexham Road, the gate referred to is as a result of planning permission (052895) being granted on 12/01/2015 for a vehicular access onto agricultural land. There is no public right of way across the site although it is understood that the public do walk across the site to gain access to the hillside, but the Council is unaware whether this is with the consent of the land owner. This link to the open countryside could be retained as part of the detailed layout of the site, along with the provision of a play area and open space as part of green infrastructure strategy for the site.

Council response
The site is not green space. It is presently agricultural land. The site is a relatively flat area of land used for grazing and is considered to be undistinguished in landscape terms, with the exception of an established hedgerow containing mature trees running across the southern part of the site. Development would seek to retain trees and hedgerows with the exception of loss of hedgerow to accommodate vehicular access. The previous outline planning 058163 suggested two vehicular access, however the Council considered the position and layout of the main access was appropriate however the secondary access appeared superfluous. The value of a secondary access cannot be defined at this stage, where the main concern is the principle of development and the knowledge that a safe and compliant access can be provided. Given that there is no air quality management areas in the County it is not considered that development of the site would harm air quality to the extent that it falls below acceptable levels. There is no objection to the site from the Council's public protection team. Flooding In terms of flood risk, Natural Resources Wales have been consulted as part of the allocation process and they have not raised any concerns and neither have they made a formal objection at Deposit stage to this allocation. Using the NRW online flood maps it is clear that the proposal is not located within a flood zone. Some surface water flooding exists however this does not cover the whole site and is mainly categorized as low risk. Mitigation measures can be put in place to ensure that any development will not flood or increase flooding in the surrounding area. The development of the site will also be required to embrace a SuDS scheme in order to ensure that surface water run-off from the development is no greater than the run off from greenfield land. This could for instance involve the use of lagoons to store surface water but the design of an appropriate drainage scheme is a matter for SAB approval at the time of a planning application. Sustainability / infrastructure The Health Board and Education Authority have been engaged with from the earliest stages of the Plan's preparation, with the Health Board being a member of the Key Stakeholder Forum, and the Education Authority key internal consultees. Each has been formally consulted to ensure that any future development would not have a negative impact on the health centres and schools and to ensure that all services could cope with an increase in demand. No objection to the Plan or allocation has been made by the Local Education Authority or by Betsi Cadwaladr University Health Board. The settlement of HCAC has a newly developed state of the art health centre. The issues experienced by residents is one of lack of staffing rather than lack of facilities. Whereas the planning system can assist with the provision of facilities through obligations placed on new developments, this is not the case for the funding of staff as this is the sole remit of the Health Board. There is ample time for the Health Board to consider how it intends to meet the health care needs of the Plan's growth levels, as the site is not projected to see completions until 2022/3 and will be developed over 3 years, as set out in the trajectory in Background Paper 10 Housing Land Supply. There will therefore not be one 'big hit' on health or education capacity in terms of new demand from the site, and there is time for capacity to be addressed through mitigation measures. The Council continues to work with the Health Board in assisting in securing a way forward. In relation to concerns regarding the

Council response
public footpath these has been addressed in a point above. It has been confirmed that there is sufficient external space to increase the capacity of the school should there be future demand for additional pupil places. The housing development site on Cymau Lane was developed by Anwyl and the completions from this development have taken place since 2015 and therefore contribute to meeting the Plan's housing requirement. Amenity The site is considered to be a logical urban extension being sequentially well related to the existing form of development of this part of the settlement. It is situated alongside an accessible and frequently serviced public transport corridor along the A541 Mold to Wrexham Road. The site is allocated for 80 dwellings which is the second smallest allocation in the LDP. It is not clear whether the objection is concerned that it will make existing residents feel claustrophobic or whether this is a concern for the residents of the new development. In terms of the former, the development will be separated from existing properties by the A541 Wrexham which is relatively wide and where the separation distances between existing and proposed houses will be well in excess of the Council's standards for separation distances. The new development will also be laid out and designed so as to meet the same standards and will also involve open space and green infrastructure and embrace the Welsh Governments emphasis on 'placemaking' in PPW10. It is not considered that the development will result in a feeling of claustrophobia either for existing or potential new residents. Although the site appears to have been used for walking etc. there is no evidence of express permission from the landowner to do so. The site is in private ownership and is agricultural land. It is also the case that other objectors have claimed that the site is waterlogged, that it is of ecological value yet other objectors claim is able to be used for recreation. It is difficult to reconcile such conflicting views from the community. The new development will be required to provide a play area and open space as part of a green infrastructure strategy for the site. The Plan has identified a housing requirement figure to meet the needs of the County and to support a regional growth agenda. Welsh Government, in their formal representations on the Plan, are generally comfortable with the amount of growth provided for in the Plan as well as the spatial strategy. It is the Council's view that given the relative modest levels of development experienced by this settlement during the UDP and in the early years of the LDP, it is not considered that this sustainable site will result in unsustainable levels of growth given the settlements position in the settlement hierarchy and the range of services available? Welsh Government through PPW10 and the draft NDF does not prescribe the housing requirement that each Local Planning Authority and their LDP should include. As set out in PPW10 para 4.2.15 it is a matter for each Local Planning Authority to determine the housing requirement figure using the Welsh Government population and household projections and a range of other considerations. As stated above Welsh Government have not objected to the Plans provision of housing in the County and also consider the plan to be in general conformity with the NDF.

Council response
The site does not have any recognized recreational status or designation. It is not laid out as open space and neither is it maintained as recreation space. It is agricultural land in private ownership. As explained above, it does not have the characteristics necessary for it to be designated in the Plan as a green space. PPW10 advises in para 1.11 that 'The Well-being of Future Generations Act places a duty on public bodies to carry out sustainable development'. The Well-being Act identifies seven goals which are: a globally responsive Wales; a prosperous Wales, A resilient Wales, a healthier Wales, A more equal Wales, A Wales of cohesive communities and A Wales of vibrant and thriving Welsh Language, and it is necessary to consider these as a whole, rather than in isolation. PPW10 recognises that the planning system and in particular the development plan system is central to achieving sustainable development in Wales and that 'It provides the legislative and policy framework to manage the use and development of land in the public interest so that it contributes positively to the achievement of the well-being goals'. The identification of a housing allocation on a site which does not result in the loss of recreation space, but which will provide play space, open space and green infrastructure as part of its layout to ensure an attractive and healthy environment, is clearly not in contravention of the Well-being goals. Traffic The planning application was accompanied by a Transport Assessment which demonstrates that the road network is capable of accommodating the development. As stated above, the previous planning application included two points of vehicular access but a single access is preferred. Further consideration will need to be given, as part of working up detailed layouts, to securing improved pedestrian and cycling. Development assurances Whilst all of these matters are more appropriately dealt with at the Planning Application stage there is nothing to say that these requirements could not be considered or provided as part of a sustainable detailed development scheme. Highways Development Management has stated that Frontage onto a 40 mph restricted area, 2.4x120 visibility splays will be required but appears achievable. There is potential for more than one point of access, direct access to properties opposite may prevent the provision of a ghost island and right turn lane. A footway fronting the site will be required. As part of wider speed review across the County, a reduction in speed limit to 30mph on the A541 at Abermorddu formed part of the Members' requests back in 2018. Due to development on only one side of the road, it was felt at that time that the current 40mph speed limit was appropriate. If this site is developed, it would be likely to qualify for a reduction in speed limit to 30mph and so the Council would request that a sum is secured through the development in order to carry out a speed limit review and introduce any subsequent changes. As a change in speed limit is subject to review, consultation and Member approval, it is recommend that visibility splays for 40mph rather than 30mph should be required until any change is confirmed.

Council response
• S106 agreements – Policy STR6 in the Deposit Plan explains that any impacts of new development on infrastructure will be mitigated and this includes education facilities. The Council has an existing SPG on Education Contributions which sets out the Councils approach to addressing school capacity issues, but this will be a matter for the Local Education Authority to advise on. • % affordable housing – Policy HN3, as supplemented by Background Paper 07 Affordable Housing, specifies an affordable housing requirement of 30% for this site which equates to 24 units. Consideration could be given with regards to include a heritage board including information of the history of Abermorddu. Alternative sites suggested: HCAC21: Despite the entire eastern boundary adjoining the settlement boundary the site relates better to the open countryside as the site slopes upwards to the heavily wooded steeply sloping Alyn Valley sides. It is crossed by a footpath which leads to an extensive network of footpaths in the wooded area beyond the site. Removal of trees on the fringes of the site to accommodate approximately 40 dwellings would have a significant visual adverse impact on this elevated and prominent site. In any event highways object to the development of this site due to there being no direct access to the adopted highway furthermore roads in the vicinity are generally inadequate to serve a development of this size. Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, the objectors' assertion that the owners are in a position to begin building, and that the site is viable and deliverable appears unfounded. The site is not a suitable replacement, either in whole or in part, for the allocated site. HCAC023: Due to is small size and likely maximum number of dwellings being 6 units, this site is classes as a small Site and is not appropriate to be allocated in the Plan- The site is located at the southern end of dwellings on Plas y Bwl. The site lies in an elevated location and rises up from the rear of no. 17. The site sits behind existing houses which lie at the head of Plas y Bwl and is in an elevated position with land running steeply downward to the east to the A542 Wrexham Road. The site has similar characteristics to the open countryside and is considered to have little relationship with the form and pattern of built development, given that there is housing only on its northern side. The inclusion of the site in the settlement boundary would result in a block of development in an elevated and prominent position which would be harmful to the character and appearance of open countryside and also relate poorly to existing built development.

Council response
Highways officers consider this site is unsuitable as there is no direct access to the adopted highway. Plas y Bwl is considered unsuitable to cater for any additional traffic due to its alignment, limited width and inadequate junction with Bryn Yorkin Lane. Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, is not considered to be a viable and deliverable site. The site is not a suitable replacement, either in whole or in part, for the allocated site. HCAC025: This site abuts the settlement boundary on two sides - to the west and to the south where there is existing residential development at The Beeches and Almond Way. The site is considered to relate well to the urban form of the settlement where there is a large area of residential development to the south and which is well contained by by Stryt Isa to the west and the A550 Wrexham Road to the east. Wat's Dyke and a footpath is situated within the eastern edge of the site which would require measures to safeguard these should the site be developed. Previously the site was allocated in the UDP but removed on account of access concerns, and the de-allocation of the site was also recommended by Inspector, who also expressed concerns about access constraints. Similarly the Highways Officer considers this site to be unsuitable as there is no direct access to a public highway and a transport assessment would be required in terms of access through The Beeches. At the time of writing no such Transport Assessment has been provided and the site has not been resubmitted by the landowner in the form of a representation at Deposit consultation stage. However, It could be considered further if a vehicular access could be secured through land to the southwest which has outline planning permission four housing (053445 – land at Ty Carreg for 19 dwellings). Although discussions have taken place to achieve this, no agreement has been made known to the LPA and the latest application for reserved matters approval on the site (060970) shows a layout which makes no provision for vehicular access through to HCAC025. Although the development of the site is considered appropriate in terms of relationship with settlement and open countryside, it is not appropriate to allocate land for housing when there is no certainty of securing a suitable vehicular access. The site is not considered suitable as a replacement for the Plan’s allocation either in whole or part. HCAC026: With the exception of the 4 bungalows to the south of the site the bulk of the settlement form at this location is on the opposite side of the A55O Wrexham Road. This long straight road marks a strong physical demarcation between the built up area and the open countryside. The site relates poorly to the main built form of the settlement and is better related to the open countryside to the north and east. Development of the site would result in urban encroachment extending beyond a well-defined and defensible edge. Highways consider access to be unsuitable as there is Inadequate junction visibility to the right on exit due to the horizontal and vertical profile of the road.

Council response
Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, is not considered to be a viable and deliverable site. The site is not a suitable replacement, either in whole or in part, for the allocated site. HCAC028: With the exception of the ribbon development to the south of the site the bulk of the settlement pattern and form at this location is on the opposite side of the B5373 Gresford Road. This together with the long straight A55O Wrexham Road to the north marks a strong physical demarcation between the built up area to the west and the open countryside to the east. The site relates poorly to the main built form of the settlement and is better related to the open countryside to the north and east. The eastern boundary of the proposed site follows no physical features on the ground and is not a firm and defensible boundary. Development of the site would result in urban encroachment in the form of a large block of development extending beyond a well-defined and defensible edge. Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, is not considered to be a viable and deliverable site. The site is not a suitable replacement, either in whole or in part, for the allocated site. HCAC029: Between the access track leading to the Hall is a tapering intervening gap of land before reaching the well-defined settlement boundary which is formed by the residential development at Edinburgh Avenue and alongside the A541 to the south of the site. This frontage development gives the appearance of ribbon development stretching out along the A541 in a northerly direction from the main patter of development to the south. Development of this prominent site would in effect continue this ribbon development and result in a fragmented and illogical development away from the centre of Caergwrle. It would be poorly related and visually damaging to an area of attractive open countryside. Highways have raised objections to development at this site on the basis that the site is in a relatively remote location and limited/substandard pedestrian connectivity. The horizontal alignment of the road and bounding hedges, restricts forward visibility along the road. It would be possible to provide an appropriate junction layout (right turn lane potentially required) however this would require the full removal of the hedgerow fronting the site. Delivery The Council have assessed the Wrexham Road site as part of the candidate site stage and have not identified any issues which would prevent the delivery of this site within the plan period.

Council response
An outline application (058163) for the site was withdrawn in 2018 around the time of changes to TAN1 when Welsh Government temporarily suspended paragraph 6.2 which gave significant weight to the lack of a five year housing land supply as a material consideration when determining speculative applications such as this one. The candidate site assessment process has involved significant scrutiny of the sustainability and deliverability of sites to ensure they are capable of delivery within the LDP period. Also the LDP takes a different approach to the UDP. Whereas the UDP had a more dispersed distribution of allocations with many smaller sites, the LDP has a more focused approach to distributing allocations to the most sustainable settlements. The aim of this strategy is to ensure that allocations are in the most sustainable locations and of a scale to be attractive to house builders so that they are likely to be more deliverable. The Wrexham Road site is located within a strong housing market area where there is significant demand for new homes, the objector does not provide any evidence to support their objection to the delivery of this allocation, and the Council have not identified any constraints as part of the candidate site assessment process that would prevent the delivery of the site. The Council have only allocated sites within the plan where they are confident of delivery within the lifetime of the LDP

HN1.10

Due to the large number of representations received to this allocation, and the fact that a number of common issues were raised by objectors, a collective response has been provided at the end of this table which covers all of the points raised within each of the individual representations.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
183	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	I write on behalf of Argoed Community Council who, having viewed the Deposit Plans and Maps, wish to make the following comments with regard to New Brighton. It is considered that the proposal to allow development on the area referred to as HSG48, to the south of New Brighton Road is without merit. If allowed, this would lead to a significant increase in development of the area, wholly out of proportion to the infrastructure available. It is noted that under the previous UDP (2010), a Welsh Inspector rejected the then proposal to develop part of this area on the grounds that there was a lack of facilities, drainage, water supply, schools and travel facilities for walking and cycling (Active Travel Network). None of these facilities have improved in the last 9 years and, in fact, the village is now significantly worse off as there is no longer any shop, post office or public house.	Removal of allocated site at Cae Isa, New Brighton.
353	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	The Cae Isa site, the majority of which is outside the settlement boundary, should not be considered for development. HN1 - New housing proposal Ref 10 Cae Isa A5119 New Brighton. This site is not appropriate for our village and should be deleted from the Plan. The Cae Isa site has been allocated 105 houses. Since 2015 New Brighton has had an 11% increase. If we now add 105 houses this would give an increase of 43%. Since the UDP New Brighton has lost facilities (Post Office, Store and Public House). We are therefore only left with a Church and Community Centre. This proposal would be a massive over development of New Brighton and is not sustainable. As mentioned above New Brighton has lost facilities, therefore we do not agree with it's classification as a Tier 3 sustainable village, it is debatable if we are even a Tier 4 Defined Village. We are not sustainable and new development should not be directed to our location. The proposed allocation for housing in New Brighton has no	The Cae Isa site should be deleted from the plan.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				services or facilities and is not part of the Flintshire Active Travel Network. It will not reduce the reliance on private cars as it cannot incorporate travel by walking and cycling. Indeed the site is flanked by New Brighton Road which has failed a Safe Walking Route to School assessment and is therefore deemed a hazardous route. From our own experiences of drainage concerns reported to and recorded by Welsh Water, we have no confidence or evidence that the site can be drained successfully. Indeed the Welsh Government UDP inspector stated, 'The area is liable to flood/has a marshy nature and is close to newt habitat'.	
1121	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	Objection to allocation at Cae Isa, New Brighton A report produced on behalf of developer Stewart Milne Homes, by Brownfields Solutions Geo-Environmental Engineering Excellence, identified candidate site reference number NEW013 being at moderate risk from coal mining subsidence. This is due to the coal seam, anticipated to be underlying this allocation being identified as likely to be locally worked. Additionally, it was calculated that there was likely an insufficient thickness of rock cover above the coal seam for subsidence not to affect the surface of this allocation. Therefore this site should be removed from the LDP as it is unsuitable for development and contradicts LDP policy EN17 and PPW. Risk of contamination from previous landfill use on the site. According to NRW the site is in a high risk surface water runoff area. The ground surrounding Cae isa is predominantly clay based, permanently wet and large deep ponds form regularly. The site cannot sustain the amount of water falling on it, hence the permanent ponds and marshy grounds. The foul water drains in Cae isa, in general, have the capacity to cope with flows under normal circumstances. However, the speed and volume of rainwater during times of intense or prolonged rainfall creates surface run off and according to Welsh Water a hydraulic overload occurs within the system resulting in sewage outflows. Therefore this site should be removed from the LDP	Removal of allocation at Cae Isa, New Brighton from LDP

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
321	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	Objection to HN1.10 Cae Isa, New Brighton. A report produced on behalf of developer Stewart Milne Homes, by Brownfields Solutions Geo-Environmental Engineering Excellence, identified a moderate risk from coal mining subsidence due to the coal seam anticipated to be underlying candidate site reference number NEW013 being identified as likely to be locally worked. Additionally, it was calculated that there was likely an insufficient thickness of rock cover above the coal seam for subsidence not to affect the surface of candidate site reference number NEW013. In addition the report produced on behalf of Stewart Milne Homes, by Brownfields Solutions Geo-Environmental Engineering Excellence, identified the possibility of candidate site reference number NEW013 being an historic landfill site. In addition Natural Resources Wales request Condition 3 - NLQ C 04: Unsuspected contamination if consulted on an application for full planning permission as given the history of the site it is considered possible that there may be unidentified areas of contamination at the site that could pose a risk to controlled waters if they are not remediated. A Flood Consequences Assessment (FCA) has been prepared in support of this statutory pre-application request by Sutcliffe (ref: LRD2994 dated May 2019). The report states that surface water flooding poses some risk to the site due to a low-lying section in the eastern portion of the site. The potential for the proposed development to affect other interests, including environmental interests of local importance. Therefore, site reference number HN1, Ref 10, Cae Isa, A5119, New Brighton (NEW013) should be removed from the Flintshire County Council Local Development Plan Deposit Draft September 2019 as it contradicts the following LDP policies; EN 16 a b c d e Site HN1, Ref 10, Cae Isa, A5119, New Brighton (NEW013) is a high surface water flood risk area according to Natural Resources Wales	Removal of allocation

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				and should be removed from the Flintshire County Council Local Development Plan	
544	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	Objection to the allocated site in New Brighton, on behalf of the steering committee of the New Brighton Residents Group. Deletion of allocated candidate site NEW013 from the Deposit LDP as a major part of the site is outside the current settlement boundary. A small part was proposed for housing in the UDP, in the Welsh Government Inspectors report this piece of land was deleted by the inspector: (Page 402, under 11.80.7) "Commitments and HSG1 (47) would amount to 9.5% growth in the settlement, add to that HSG1 (48), the level of growth would rise to almost 19%, which is above the indicative level. Given the range of facilities actually within the village, I do not consider development of this level should be encouraged unless it can be justified on the grounds of housing need in line with my recommendations to HSG3." The inspector on page 401 under 11.80.3 says of New Brighton: "It has a shop/post office, public house, hotel with leisure facilities and a community centre" the inspector deleted HSG1 (48) as it would give a growth rate of 19%, which is above the indicative level. And given the range of facilities within the village, development should not be encouraged. Since the inspectors report we have lost facilities, the shop/post office and public house have now gone, in the DP pages 150/151 – NEW013 has an allocation of 105 houses. The FCC 2014 Housing Land Study states that the number of dwellings in New Brighton is 328, since this date we have had 37 houses built this was the above mentioned HSG(47), this gives an 11% increase since 2015, if we now add 105 houses as allocated to NEW013 we have an increase of 43%. The inspector also says "HSG1(48) is liable to flood/has a marshy nature and is close to newt habitat" The statement in BP8 assessment of candidate sites is untrue, the UDP inspector did not recommend that land at Cae Isa should be withdrawn from the green barrier, the land was already removed in the UDP by FCC, what the inspector actually said was: (page 134, 4.84.3) "The lack of green barrier protection for this land should not be seen in any way sanctioning development. It is a matter which must be fully explored as part of the LDP. In the interim period the site forms part of	Deletion of allocated site Cae isa, New Brighton

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				the open countryside and is subject to the restrictive policies of GEN3 which would not permit further growth on this undeveloped land. In these circumstances the sites lack of green barrier recognition should not be seen as a precedent for development."	
596	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Support	Stewart Milne SUPPORTS Policy HN1 (10) which allocates land under its control at New Brighton for 105 dwellings. As noted in Chapter 1 Stewart Milne is committed to delivering this development site. 6.2 By way of background it is material to note that part of the site is located within the Settlement Boundary in the UDP and part is located outside of it in what is in effect the open countryside. However, the UDP Inspector drew back the Green Barrier to exclude the site (unlike all of the other undeveloped land around New Brighton). The site clearly has a close physical relationship with the settlement rather than the wider countryside and it does not perform the separation of settlements role that other Green Barrier land around New Brighton performs.	
1118	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	Objection to allocation at Cae Isa, New Brighton. The Cae Isa, New Brighton allocation is a high surface water flood risk area according to NRW and should be removed from the LDP as it is unsuitable for development and contradicts the following LDP policies EN14. The site will require SuDS. FCC state that development will not be allowed if expensive engineering projects, which have implications for the public purse will be required. PPW also sets out that government resources for flood alleviation works are only directed at existing development and not for areas of future development.	Removal of allocation at Cae Isa, New Brighton
1122	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	Objection to allocation at Cae Isa, New Brighton. A major part of the New Brighton allocation is outside the current settlement boundary (UDP). A small part of the site was proposed for housing in the UDP, it was termed HSG1(48). Welsh Government inspectors deleted it due to the level of growth. “Commitments and HSG (47) would amount to about 9.5% growth in the settlement, add to that HSG1(48), the level of growth would rise to almost 19%, which is above the indicative level. Given the range of facilities actually within the village, I do not consider development of this level should be encouraged unless it can be justified on the grounds of housing need in line with my	Removal of allocation at Cae isa, New Brighton

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				recommendations to HSG3." The inspector on page 401 under 11.80.3 says of New Brighton: "It has a shop/post office, public house, hotel with leisure facilities and a community center" the inspector deleted HSG1(48) as it would give a growth rate of 19%, which is above the indicative level, and given the range of facilities within the village, development should not be encouraged. Since the Inspectors Report we have lost facilities, the shop/Post Office and public house have now gone. The FCC November 2014 Housing Land Supply states the number of new dwellings in New Brighton is 328, since this date we have had 13 houses built behind Argoed View and 24 houses at the former Argoed Service Station this was above HSG1(47). This gives an increase of 11% since 2015, if we now add 105 as allocated in the LDP we have an increase of 43% The inspector deleted HSG1(48) with a level of growth of 19% and the facilities of New Brighton at that time. The LDP is proposing a level of growth of 43% with the facilities of New Brighton reduced to a Church and Community Centre, this would result in massive over development. The inspector also says on page 402 under 11.80.8 "HSG(48) is liable to flood/has a marshy nature and is close to newt habitat. This site is not part of the Flintshire Active Travel Network, I will not reduce the reliance on private cars as it cannot incorporate travel by walking or cycling, indeed the site is flanked by New Brighton Road which has failed a safe walking route to school assessment. The site would not conform to LDP policies PC4, PC5, PC6. Drainage issues – the site would not conform to LDP policy EN15. A report produced on behalf of Stewart Milne Homes identified the possibility of a historic landfill at the site.	
1247	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Support	Cae Isa, A5119, New Brighton, 105 units Welsh Water has made representations on this proposed site through planning application 060220. Potential developers need to be aware that this site is crossed by sewers and an easement width would be required which may impact upon the housing density achievable on site. A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary	

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				sewerage upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). Mold Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.	
1257	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	There are inconsistencies in the way the council has assessed potential sites, with reference to the assessment of our client's site. Background Paper 9 'Assessment of Candidate Sites and Alternative Sites' (2019), which forms part of the LDP evidence base, discusses the site (ref: BROU001) and states: 'The site is well defined by existing roads and wraps around existing residential development… Although the site is in close proximity to Bretton, the configuration of the site and its relationship with Bretton would ensure that development would not harm the present character and appearance of the settlement…' 'The site is considered suitable at present for consideration as an allocation.' [NJL Consulting emphasis] The evidence base is clear that the site is appropriate for residential development and should be considered for allocation, yet an allocation has not been taken forward. However, other less sustainable and less deliverable sites are allocated. For example, Northop Road (Flint) has no planning consent (two applications from September 2017 (ref: 057565) for 20 units and April 2018 (ref: 058314) for 145 units remain undetermined) and has identified constraints to delivery, yet the site is allocated. The same applies to the New Brighton (Cae Isa) site (Site 10), which is proposed to be allocated for 105 units but there is no clear evidence of delivery yet clear evidence of constraints.	Need to allocate more sites

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				Two further sites are proposed for allocation despite previous planning applications being withdrawn or dismissed on Appeal. The Highmere Drive (Connah's Quay) allocation (Site 3) was promoted for 185 dwellings in 2005 (ref: 043873) but a subsequent Appeal was withdrawn in 2008 and there has been no progress on the site. The Wrexham Road (Hope) allocation (Site 9) was subject to a now withdrawn planning application from 2018 (ref: 058163), and there has been no further progress. Therefore, the council's assessment of sites is inconsistent. There is a need for additional sites to be allocated, such as Bloor's site BROU001.	
1281	HN1: New Housing Development Proposals	HN1.10 Cae Isa, New Brighton	Object	There is genuine risk that proposed allocations cannot be delivered, either at all or in the timeframes envisaged. Several sites have been simply carried forward (rolled over) from the current LDP despite concerns with delivery. The Local Development Plan ('LDP') Manual (Edition 2) identifies the requirement for a new form of measuring the deliverability of sites, and whether they have a realistic chance of coming forward over the next 5 years. It states "When putting forward sites, developers and landowners should include sufficient data to allow a robust assessment to be made (see section 6.4.1&2) including affordable housing, community infrastructure and that the development is financially viable." The draft LPD Manual 3 (which was consulted on by Welsh Government in September 2019) then goes a step further. Table 18 in draft Manual 3 states that historic allocations should only be 'Rolled Forward' from previous plans where 'careful justification' is given that there has been a 'substantial change in circumstances to demonstrate sites can be delivered and justify being included again'. This is relevant	Allocate additional sites.

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed
				as many of the proposed housing allocations have been simply 'Rolled Forward'. The table at Appendix 2 shows the housing allocations and our analysis of realistic deliverability. It identifies 6 of the 11 housing allocations are undeliverable in the next 5 years and a further 4 have questionable delivery over the plan period. This has significant implications for the 5-year supply position and overall delivery of the plan. For example New Brighton (Cae Isa) site (Site 10), which is proposed to be allocated for 105 units but there is no clear evidence of delivery	

Council response
HN1.10 Cae Isa, New Brighton Not accepted. The Deposit LDP consultation has received over 1200 representations on various aspects of the plan strategy, allocations and individual policies. To ensure all points within this large volume of representations are answered the Council have grouped and summarised representations made on allocated sites together and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General The eastern part of the site was previously included as an allocation within the Deposit UDP, HSG1 (48) but was recommended for removal by the Planning Inspector following the inquiry into objections to the Flintshire UDP. The Planning Inspector concluded that HSG (48) should be removed from the UDP as the completions, commitments and the allocation of HSG1 (47) to the Rear of/and New Brighton Service Station would result in a level of growth of almost 19% within this category B settlement, which had an indicative growth band of between 8 and 15%. The Planning Inspector recommended that HSG1 (47) be retained as an allocation within the UDP ahead of HSG1 (48) as it scored higher against the criteria set out in PPW (9.2.8 and 9.2.9 MIPPS 01/2006) at the time. The inspector cited the potential for flooding and the proximity to a newt habitat amongst the reasons for preferring HSG1 (47), which was also a partially Brownfield site.

Council response
The Inspectors Report does not raise issues which would prevent the allocation of HSG1 (48) in future development plans, and it would have been left within the UDP if HSG1 (47) had not been available instead. The Inspector purposely left an area of white land on the proposals map by not drawing back the Green Barrier, however the settlement boundary was redrawn to exclude the majority of the allocation, leaving a small parcel of land as a potential windfall site. The Inspector states that "I do not consider the lack of green barrier recognition should be considered as a precedent for development in the LDP. Any changes to designations will need to be the subject of thorough review and consultation as part of that process." Notwithstanding this, the lack of a green barrier designation clearly allowed the consideration of this land for inclusion in the LDP. Objectors appear to have misinterpreted the Inspectors report, perceiving it to resist the allocation of this site in future development plans. An early stage in the preparation of the LDP involved a Call for Candidate Sites. A number of candidate sites were submitted including NEW013. Each site has been assessed on its merits against a candidate site assessment methodology which itself was previously the subject of consultation. The LDP has involved a thorough assessment of the site, including consultation with statutory consultees. As part of this assessment the fact that part of the site was already in the settlement boundary and not within the green barrier were material considerations. The site was considered to be a logical rounding off of the settlement within well-defined physical limits and was considered to be a sustainable, viable and deliverable allocation. A speculative planning application (060220) was submitted to develop 97 dwellings on this site in July 2019 in advance of the publication of the Deposit Plan. This application is still under consideration at the time of writing and has not been determined. Access to Facilities / Services All sites within the LDP have been assessed in terms of their access to local services and facilities. New Brighton has been categorised as a Tier 3 sustainable settlement within the settlement hierarchy under Policy STR2, using evidence from the earlier Settlement Audit. Sustainable settlements benefit from some services and facilities and are sustainably located in terms of access to these. It is noted that New Brighton has lost its shop / post office and public house. However, it still has a large hotel / bar / conference facility, village hall, place of worship, car sales and service and a nearby petrol filling station and convenience store. The settlement hierarchy is informed not just by the level of services and facilities but also by its character, role and location. In this context New Brighton is on a key communication route between Mold and Deeside and also sits close to settlements of Mynydd Isa and Buckley and Sychdyn. Its nucleated development pattern set around the crossroads and with the large hotel, gives it a distinct urban rather rural character and appearance. Despite the unfortunate loss of some facilities, it is still considered to be a Tier 3 Sustainable Settlement. The UDP inspector stated that 'New Brighton is a category B settlement with an indicative growth band of 8 - 15%. Since the start date of the plan there have been relatively few new houses either permitted or built. It has a shop/post office, public house, hotel with leisure facilities and a community centre whilst schools can be found nearby in Mynydd Isa, employment and leisure at the County Hall complex and in Mold generally, and shopping at Mold and Mynydd Isa. I am told the village is served by a regular bus service and I share the view of the Council that it has

Council response
capacity for some growth'. The Council are still of the view that New Brighton has sufficient access to services and facilities to be classed as a Tier 3 Sustainable Settlement, despite the loss of the shop/post office and pub, and can sustainably accommodate growth. The allocation at (HN1.10) Cae Isa New Brighton is within the recommended 800m of a single shop, the Shell Garage is located 470m of the site. There are a number of schools within close proximity to the site including Ysgol Mynydd Isa which is 1200m from the site, Argoed high school which is within 1500m and Sychdyn Primary school which is within 1500m, which is below the recommended 2000m distance. New Brighton also benefits from a Community Centre and recreational areas which are located within 500m walking distance of the allocation. The recreational areas include a Bowling Green, children's play equipment and a football pitch off Moel Famau Road. The Beaufort Park Hotel & Conference Centre is located just outside the UDP settlement boundary on Bryn Offa Lane but is easily accessible to the community and incorporates "The Orchard" restaurant and bar, there is also a coffee shop available. In addition S.M. Auto Car Sales and Services is located on the crossroads of Bryn Lane, New Brighton Road and the A5119. The larger 'Main Service Centers' of Mold and Buckley and the Local Service Centre of Mynydd Isa are also in close proximity to New Brighton, providing residents with access to other services and facilities unavailable within New Brighton. In addition to the existing facilities New Brighton benefits from a regular bus service, with bus stops on Mold Road and Bryn Lane. There is a direct bus service to Mold from 06:30 until 23:50 approximately every thirty minutes, in addition services run to Connah's Quay and Flint providing links to the rail network. Settlement growth The UDP used growth bands to distribute growth across the majority of settlements. The LDP has moved away from this approach, distributing growth spatially towards the most sustainable settlements in accordance with the settlement hierarchy in Policy STR2. The housing level within the LDP has been calculated based upon a range of evidence including the latest Welsh Government household projections, alongside the latest Local Housing Market Assessment (LHMA) as recommended by PPW10. These two pieces of evidence have formed the starting point for calculating the housing targets within the LDP, further considerations need to be taken into account including the appropriateness of the projections for the individual local authority area and any other relevant evidence including the job growth ambition for the County and the wider North Wales region. This evidence led to the selection of a growth option for the provision of 6,950 dwellings over the plan period, and when the contingency allowance is added to this it equates to an overall provision for 7,950 dwellings. The Welsh Government in their formal comments on the deposit Plan support the level of housing growth in the Plan and the spatial strategy, which therefore acknowledges that sites such as that allocated at Cae Isa, New Brighton (HN1.10) have been allocated to accommodate the Plan's strategic requirement within the most sustainable locations. The assessment of this site demonstrates that it would represent a logical rounding of the settlement form and would not represent an overdevelopment of New Brighton, given that there is sufficient access to facilities, services and public transport to support the development this site sustainably.

Council response
New Brighton saw only 3 housing units completed over the15 year UDP Plan period which amounted to a 0.9% growth (in the context of 8-15% growth band for a category B settlement) largely because the allocated site did not come forward for development before the end of the Plan period. In the first few years of the LDP Plan period completions have occurred at the allocated service station site (24 units) as well as a windfall site within the settlement at Rock Bank (13 units). Taken in conjunction with the allocated Cae Isa site it is acknowledged that cumulatively there appears to be a relatively high growth level. However, a high numerical growth level is not sufficient in itself to resist development as it is necessary to look at the specifics of the settlement and the site itself. The settlement has a range of services and facilities and is close to a number of nearby settlements and is seen as a sustainable location for growth. The site is physically well defined and will not harm open countryside nor green barrier, and site constraints relating to surface water flood risk and ecology are capable of being addressed and mitigated through the development management process. It is unclear as to the specific harm that the level of growth will result in as objectors have not set this out in relation to the perceived level of growth. Drainage / Flooding Issues The preparation of the Plan and the assessment of candidate sites has involved consultation with Natural Resources Wales. The publication of the Deposit LDP was also accompanied by a Strategic Flood Consequences Assessment which demonstrated that there is no tidal or fluvial flood risk to the site but that a Flood Consequences Assessment would be necessary to address surface water issues. At Deposit consultation stage there was no objection to the allocation by NRW. As part of the recent planning application on this site (060220) a Flood Consequence Assessment (FCA) has been undertaken by the developer. The FCA confirms that the site is not at risk of tidal or fluvial flooding, with a less than 1 in 1000 (0.1%) annual probability of flooding in any given year. The Development Advice Map shows that there is a slight risk of surface water flooding, with a low risk hazard from rainfall with a return period between 1 in 1000 and 1 in 100 chance of occurring in any given year, which is generally above the required parameters but the potential for flooding should be considered during the site design. Therefore the application on this site proposes raised finished floor levels and the inclusion of SUDs for the discharge of surface water runoff. The FCA concludes that the site is at low risk of flooding, and that through the management of surface water runoff there is no increased flood risk elsewhere (off site) as a consequence of the development. The site is not in a flood risk area according to the Development Advice Maps, and the Planning Authority is not required to impose conditions that draw attention to flood risk. Therefore the Authority are satisfied that there are no flood risk issues with the site that would prevent it from being allocated within the LDP. Any potential surface water flooding can be mitigated through SUDs as part of a detailed scheme of development for the site and by seeking advanced/in tandem SAB approval for such a scheme. Active Travel

Council response
The purpose of the Active Travel Act (Wales) 2013 is to enable more people to undertake active travel such as walking or cycling for short journeys instead of using motorized vehicles. Welsh Minsters designated fifteen Active Travel localities within Flintshire, including Mold, Buckley and Connah's Quay. New Brighton was not identified as an Active Travel locality due to its size. Section 2(5) of the Act provides that the Welsh Ministers may, in particular, specify a locality, or description of a locality, by reference to: a) density of the population, b) size, c) proximity to densely-populated localities above a particular size, d) position between such localities, e) proximity to community services and facilities, f) potential for other reasons to be a locality, or a description of locality, in which more travel is undertaken by walkers and cyclists by active travel journeys The fact that New Brighton has not been designated as an Active Travel area does not mean that's it is not suitable for development. Active Travel routes are proposed in close proximity to New Brighton, from Mold to Northop Hall and Mold to Ewloe. The Active Travel Integrated Route Map shows that New Brighton sits between two strategic 'connecting settlements' routes. Route F6 lies to the south of New Brighton and seeks to link, Mold, Mynydd Isa, Buckley and Ewloe. Route F5 lies to the north of New Brighton and provides a link from Mold to Northop Hall and Connah's Quay. A further route F4 links Mold with Sychdyn, Northop and Flint. Although there are presently no Active Proposals for New Brighton there is potential to link in with these other routes. Traffic There has been no official Safe Route to school assessment carried out on New Brighton Road, however it is a hazardous route in its current state due to the lack of a continuous footway. The Council's Highways Strategy Team have advised that mitigation measures can be implemented to make the route safe. This could involve the developer providing a footway and a pedestrian crossing at the traffic lights. The details of this would be more appropriately dealt with at the planning application stage, and the Council are therefore satisfied that this issue can be overcome and the allocation is suitable for residential development. Landfill Planning constraints information shows that there are small landfill sites to the north of New Brighton Rd adjacent to 2 Mynydd Bychan and that the bulk of the allocated site is within a 250m buffer. As part of the current planning application on this site the applicant has commissioned a

Council response
Geo-Environmental assessment, which concludes “No elevated contaminants are present within the shallow soils on-site. Evidence for the on-site historic landfill identified within the desk study was not encountered.” Coal Seam As part of the current planning application on this site the applicant has commissioned a Geo-Environmental assessment, which concludes that the overall risk from coal mining is considered low, “Due to the thickness of superficial strata the risk from unrecorded mine entries on site is considered low, particularly in light of the lack of evidence of mine workings from the rotary open holes. Therefore the overall risk from mining is considered low.” The Coal Authority have not objected to the allocation of Cae Isa in the deposit LDP. They have responded to the recent planning application on the site to confirm that it does not fall within the defined development high risk area so any historic mining/site stability issues are not considered to be applicable to this site. Infrastructure Welsh Water have not objected to the development of the Cae Isa site and have provided the following supporting representation on the Deposit LDP which demonstrates that the site can be connected to the public sewerage system. "A Hydraulic Modelling Assessment (HMA) will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages. The findings of the HMA would inform the extent of any necessary sewerage upgrades, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). Mold Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.” Delivery The Council have assessed Cae Isa as part of the candidate sites stage and have not identified any issues which would prevent the delivery of this site within the plan period. A planning application (060220) has already been submitted for this site which demonstrates the landowners and developers commitment to the delivery of this site. Although Cae Isa was originally included within the UDP, it was removed by the Inspector due to the level of growth already proposed within New Brighton at that time. This site has therefore not been simply rolled forward into the LDP. The candidate site assessment process has involved significant scrutiny of the sustainability and deliverability of sites, particularly sites that have previously been considered as part of the UDP process to ensure they are capable of delivery within the LDP period. Also the LDP takes a different approach to the UDP. Whereas the UDP had a more dispersed distribution of allocations with many smaller sites, the LDP has a more focused approach to distributing allocations to the most sustainable settlements. The aim of this strategy is to ensure that allocations are in the most sustainable locations and of a scale to be attractive to house builders so that they are likely to be more deliverable.

Council response
Cae Isa is located within a strong housing market area where there is significant demand for new homes, the objector does not provide any evidence to support their objection to the delivery of this allocation, and the Council have not identified any constraints as part of the candidate site assessment process that would prevent the delivery of the site. The Council have only allocated sites within the plan where they are confident of delivery within the lifetime of the LDP.

Policy HN1.11

ID	Title	allocated site - Allocation:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1246	HN1: New Housing Development Proposals	HN1.11 Chester Road, Penymynydd	Support	Chester Road, Penymynydd, 186 units This site has planning permission and we have no further comment to make. Welsh Water made representations on this site through planning application 055590.		Support noted.

Policy HN1 – Other Sites

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
3	HN1: New Housing Development Proposals		Object	Tan Y Felin fields proposed development. Objection to further development:- None, or very little, local social activities for teens/young adults. This would have the potential to create localised anti-social behaviour. Potentially life threatening access and egress to the upper reaches of the estate during inclement weather conditions. Previous poor weather conditions have resulted in residents vehicles having to be abandoned along the B5121. Poor access to local public transport, bus, train, to destinations outside the area. Lack of facilities, schools, doctor, dentist, shops. A possibility of adding an extra 2 cars per household to new builds, contributing further unwanted pollution. Probable violation of the Countryside and Wildlife Act 1981 - Section 1 Probable violation of the European		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				Habitats Directive 1992 - Nesting Birds Directive.		
18	HN1: New Housing Development Proposals	Bryn Glas, Flint	Object	These comments are made in relation to the site identified on the plan at appendix a of the attached PDF version of these comments. The comments are made on behalf of the land owner. See recent planning history of the site below: 2010 – Residential Development – Permitted – REF: 046250 2013 – Variation of condition to allow an extension of time for the submission of reserved matters for residential development – Permitted – REF: 050304 2015 – Variation of condition no1 attached to planning permission ref 050304 to allow further period for the submission of reserved matters – Permitted – REF: 053003 The site is an ideal site for housing and has historically been given permission on many separate occasions. The site is on the outskirt of Flint, and it has been noticed that it has not been included in the green barrier allocation in the Proposals Map, neither has it been included as	New allocation: We are of the view, that given the site's location in close proximity to the settlement of Flint and it's history as being deemed acceptable for housing development, that further thought should be given to its allocation for land that could add to the supply of housing.	Not accepted. The site was allocated in the Deposit UDP for housing under policy HSG1. It was the remnant of the Northop Rd, Flint housing site that was not recommended by the Inspector to be allocated. Despite the sites allocation in the Plan and having planning permission since 2010 no firm proposals have come forward for development. The site has therefore not been included in the settlement boundary in the Deposit Plan. The site first received outline consent (046250) on 06/01/10 for affordable housing. A variation of condition (050304) to allow further time for submission of reserved matters was approved on 07/03/13. A further variation of condition to allow further time for submission of reserved matters was approved on 09/01/15. This latest renewal required the submission of reserved matters planning application by 08/01/16.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				a housing allocation. Personal circumstances of the land owner have now changed and he is very keen to move the site forward – previous attempts to develop the site have been scuppered by personal circumstances that are no longer a problem. We are of the view, that given the site's location in close proximity to the settlement of Flint and it's history as being deemed acceptable for housing development, that further thought should be given to its allocation for land that could add to the supply of housing.		It is the Council's understanding that the site has been considered by a number of developers including housing associations but none have chosen to pursue their interest. It is not clear what the reasons for this are but it is evident that the steep topography of the site makes it a difficult site to develop. If there is a genuine renewed impetus to develop the site then the sites allocation within the adopted UDP provides the necessary context. However, the objection contains insufficient evidence to establish beyond doubt that the suite is available, viable and deliverable. In any event, Flint is considered to have sufficient land for housing with the Croes Atti development (commitment) and the allocation at Northop Rd. It is not considered that further flexibility in the form of an allocation or settlement boundary change is either necessary or appropriate.
19	HN1: New Housing Development Proposals		Support	As a resident of Greenfield and having studied the Flintshire LDP I wish to support your decision not to develop the surrounding land of Tan-y-Felin.		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				I wish to state that I do not want to see a housing development built on the existing fields surrounding Tan-y-Felin, Greenfield for the following reasons: An increase in population will place a strain on local services. There is already a current lack of doctor/NHS facilities and dentists in the area and this would overburden and be disproportionate to the existing resources in Holywell. There is no capacity in the existing school near Tan-y-Felin to cope with an influx of school age residents. Would the property developer or local education authority be prepared to build another school and would the council also be prepared to advertise and employ new teachers and ancillary staff ? The noise and safety impacts from construction would be detrimental to the existing community. There will be a great number of traffic movements everyday within our village. There will be more congestion at all the exits onto Greenfield Road. To facilitate building work, hg's machinery etc would have to be		Greenhill Farm, Bryn Celyn have not been allocated within the plan, your support is noted.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				driven through an established housing estate creating several environmental nuisances (noise, dust, mud etc) The wildlife of the area will be negatively affected thus leading to a decrease in badgers, bats, other mammals and insects which are crucial to the ecosystem. There is the question any proposed access road at the top of Tan-y-Felin which, I believe, is currently owned by 3 local residents. The area people live in often forms part of their identity. Residents' objections can be rooted in the anxiety that new development will change the character of the place they call home.		
23	HN1: New Housing Development Proposals		Support			Support Noted.
24	HN1: New Housing Development Proposals			I support the LDP which does NOT allow planning for the development of these fields for the following reasons :- 1. Increased traffic to any development would not be sustainable 2. Lack of infrastructure of Schools, dentists, doctors etc. 3. There are many 'brownfield'		Support noted.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				undeveloped sites without building on 'Greenfield' sites. 4. there is already major development underway which will meet any future requirements.		
28	HN1: New Housing Development Proposals		Support	Local development of tan y felin field's for housing development Further development on this site would overstretch resources already in place. There are many issues it would create, to name a few The main road through tan y felin which is also on a hill, more through traffic is unsafe to children as well as access for residents up and down this road. Other alternative routes locally would also have the same problem if traffic numbers significantly increased. Local services such as dentists, doctors and schools are already at great capacities so increasing the populations around greenfield would add extra strain on these services. Least we not forget that we have a duty to protect our Greenland and wildlife, at the moment we have protected species and areas of natural beauty. There are plenty of brown land sites which with proper investment could be potential areas to use.		Noted .The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan, your support is noted.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
31	HN1: New Housing Development Proposals		Support	I am against planning permission for the above fields Tan y Felin for the following reasons: 1. there are no facilities (schools, doctors, etc) 2. Increased traffic would be dangerous to housing already on the estate.		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan, therefore your objection will be noted as support to the exclusion of these sites from the LDP.
35	HN1: New Housing Development Proposals		Support	The LDP identifies Warren Hall (bordering on Higher Kinnerton - 300 homes). This will have a significant impact on Higher Kinnerton. I object to any future development to Higher Kinnerton itself in the foreseeable future and beyond the lifetime of this Local Development Plan. The LDP assessments and recommendations in respect of the candidate sites for Higher Kinnerton (HK003-013) I note that all of the sites (with the exception of HK008) have been recommended as not suitable for development. HK008 has been recommended as “not allocated”, which suggests that it is a possibility that development could take place after the end of the current plan (2015-30). I would ask that the LDP is amended to state that HK008 “is not suitable for development” as all the other		Noted. Candidate sites HK008, HK010 and HK011 have not been allocated within the LDP for development.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				Candidate Sites in Higher Kinnerton. Reasons are given below:- 1. HK008 is outside the Settlement Boundary. 2. I note that site HK011 is virtually the same as HK008 (fractionally smaller site) and that the same narrative is used for both HK008 and HK011, but the recommendation for HK011 is “not suitable for development” whereas that for HK008 is “not allocated”. This seems illogical to me. I would ask that the LDP be amended to state that HK008 is also “not suitable for development”. 3. In assessment HK010 issues regarding pedestrian links to the village centre are raised. These issues are also raised in assessment of HK008 and therefore suggest that the status for KH008 be amended to “not suitable for development”. 4. In the Higher Kinnerton Village Plan 2018-30 it states that the rural approach to the village is of great importance. This to me suggests that no building should be allowed on HK008 as the main approach to the village from Chester.		

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				5. HK008 is on the northen end of the village away from the centre of the village which means it would be isolated and become long and sprawled out if any future development where to be allowed here. The huge impact that Warren Hall will have on Higher Kinnerton. The school (overcrowding); the village hall which is far too small to accommodate events that are held there at present. Higher Kinnerton is a village which will lose its character as a village if any further housing development is allowed. Dodleston and Lower Kinnerton (Cheshire) have still managed to keep their charm with little housing development going on. How many villages can you say that about in Flintshire? We need to retain our village as a village before it becomes dominated by yet another sprawling housing development. There are many housing developments going on within the close proximity to Higher Kinnerton (Penyffordd, Penymynydd, Hope, Broughton, Buckley etc). Villages		

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				which have lost their charm as a village and now just become a long sprawled out housing development area. The people of Higher Kinnerton live here because it is a village. We still want Higher Kinnerton to be a self-contained village surrounded by green fields. The impact on the extra traffic that will be coming through the village. Flintshire is building all these houses but what about the amenities that also need to be built to support them. For example doctors surgeries, schools, hospitals etc. There is a great strain on all these amenities at present so how are we going to cope with the vast number of housing that is proposed.		
41	HN1: New Housing Development Proposals	TLD001(or part) on land opposite Erw Wen, London Rd, Trelawnyd	Object	HN1.Only two sites are allocated in Tier 3 settlements at New Brighton and Penymynydd(again in the east). Also all other allocated sites in the table are in the eastern half of the County. This imbalance should be tweaked by allowing more allocations in the west and amendments to settlement boundaries in Tier 4 settlements to provide more opportunities for cross	The settlement boundary in Trelawnyd should be changed to include part of site TLD001 and policies STR2,11 and HN1 amended accordingly to	Not accepted. Trelawnyd is a defined village located in the rural north west of the County. The settlement of Trelawnyd has a relatively compact shape with development to the north and south of the A5151 London Rd. The southern part of the settlement features a conservation area and to the west and north of the settlement is the Clwydian

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				subsidy. Specifically site TLD001(or part) on land opposite Erw Wen, London Rd, Trelawnyd could be included. Appendix 1 of Background Paper 8 should be reassessed as the site is already surrounded on two sides by existing development and has a road frontage at London Rd equating to existing development on the northern side. With good design the character of Trelawnyd or the countryside would not be Harmed if the site was developed. This could be facilitaed by tweaking the settlement boundary to include the site frontage allowing the potential for cross subsidy to the rear.	allow more flexibility of housing opportunities in Tier 3 and 4 settlements especially in the west of the County.	Range and Dee Valley AONB which is a landscape of national importance. The LDP does not seek to apportion development spatially in an even manner across the County. Rather, it seeks to distribute growth towards the most sustainable settlements and sites in accordance with the settlement hierarchy which is embodied in policy STR2. The site does not comply with the LDP Strategy as Trelawnyd is a 4th tier Defined Village where new allocations will not be made and where new housing development will only be permitted related to the scale, character and role of the settlement and which delivers local needs affordable housing. The LDP aims to steer development within the first three tiers, within a hierarchy system whereby the plan seeks to distribute development in a sustainable way having regards for the settlement hierarchy and by identifying the most sustainable settlements and sites. The Settlement Audits which were published as part of the earlier Council response Key Messages document alongside options in

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
						terms of categorizing settlements, established that the most sustainable settlements are generally those in the eastern part of the County. Further details can be found in response to Policy STR2, ID 39 and Policy STR11, ID 40. Although the site abuts the existing settlement boundary the site is an intrinsic part of the open countryside which lies within the Clwydian Range AONB and forms part of the attractive setting of Trelawnyd. The settlement is focused around its historic core which is designated as a Conservation Area. This is a statutory landscape of national significance where PPW states 'National Parks and AONBs are of equal status in terms of landscape and scenic beauty, and must both be afforded the highest status of protection from inappropriate developments'. There is a firm defensible edge to existing built development and the site forms an integral part of the wider agricultural landscape which affords far reaching views across the AONB.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
						Inclusion in the settlement boundary would result in harm the character and appearance of the locality. Development on any part of the site would have a detrimental impact on the surrounding area. The objector fails to identify what "part" of the site they feel could be developed, or how this could sensibly be delineated. Additionally the Council's highways development management team have been consulted on the proposed development and have stated that visibility to the west of the site is limited by the road alignment but a junction with 2.4x43m visibility should be available from the eastern portion of the site. The provision of a footway will be required across the full site frontage. Other constraints include that there is limited public transport within the area and limited facilities. Additionally the proposal is located within the Mineral safeguarding area. A key principle in PPW is that allocations are viable and

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
						deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. Development of this prominent site would result in residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site is an intrinsic part of the open countryside which lies within the Clwydian Range AONB and forms part of the attractive setting of Trelawnyd. Therefore, the site is not considered to be necessary or appropriate as an allocation.
46	HN1: New Housing Development Proposals		Support	Having looked at the LDP we are pleased to read that the Coppy Farm site is unsuitable for such a housing development in the village of Gwernaffield, and that the boundary therefore should not be extended to include it.		Support Noted.
88	HN1: New Housing Development Proposals	Candidate Site HCAC029 for inclusion as a housing allocation.	Object	Objection two (id88): Access issues can be resolved by design and detailed matters as all the frontage is within the ownership and control of the landowner. Additional land is owned to the North West if additional visibility is required. New hedgerows and	Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please	Not accepted. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. It should be noted that there is presently no pavement fronting the site, nor is there a pavement fronting the

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				enhanced indigenous planting would be carried out under the requirements of any planning permission granted to safeguard landscape character. Development would not constitute 'ribbon development' in the accepted sense of the term. Ribbon development refers to single frontage development whereas this site would accommodate a well-designed built form of new streets which is typical of the existing settlement pattern. It is therefore incorrect and misleading for the planning authority to describe the proposed candidate allocation as "ribbon development". All new development, by definition, has an impact and the whole area can be described as attractive countryside. The site is well located to the access public transport with a bus stop at Porch Lane within 100m and the Fagl Lane bus stop at 350m. Caergwrle railway station is 1.5km to the south There are local facilities in the centre of Caergwrle 0.6m to the south.	refer to attached document	lodge and adjoining stone constructed dwellings. This would necessitate pedestrians having to cross the road to reach the pavement opposite in order to walk into Caergwrle to access facilities and services. The access to Bryn Tirion is difficult as it is located just beyond a bed, in front of the adjacent lodge, and requires the provision of a 'mirror' on the lamppost opposite. It is accepted that the reference to 'ribbon development' in the Council's response on the candidate site assessment is not fully reflective of the proposal. As confirmed by the objector, the proposed site has 'depth' extending to the access track, and would result in 'estate type' development. However, this block of development would not represent a logical extension to the existing form and pattern of development in the settlement. Firstly, there is a gap comprising the land on the south side of the curved access track, which falls outside the boundary of the objection site. Secondly, the only built development linkage between the settlement and the site is the short ribbon of stone constructed dwellings to the south of the site.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				There are no known protected species on the land and there are no additional landscape value designations. Site would be a more suitable alternative to HCAC004. Other than some highways issues, which can be overcome, the authority has not identified any additional constraints that need to be overcome.		These form a distinct character break between the public sector housing and the open countryside to the north. The site does not therefore read as a logical urban extension but as a divorced block of development, poorly related to the settlement. The site is at the extreme northern edge of Hope. It is separated from the settlement boundary by a narrow access road leading to Bryntirion Hall and alongside which there is a belt of mature trees. To the north it is bounded by an access track which leads to Bryntirion Farm to the west. A well-established hedgerow, with trees, characterises the whole length of the eastern boundary which fronts the A541 Mold Road. The land rises up gently from the A541 to the Hall and Farm. The proposed site is located between the access track leading to the Hall is a tapering intervening gap of land before reaching the well-defined settlement boundary which is formed by the residential development at Edinburgh Avenue and alongside the A541 to the south of the site. The lodge located alongside the existing

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
						access track was clearly associated with and serving the former Bryn Tirion Hall and the tree lined curved access track gives a sense of a large country house with grounds. The proposed development does not sit comfortable with the character of the site and open countryside. The Council's Highways Development Management Team have raised objections to development at this site on the basis that the site is in a relatively remote location and limited/substandard pedestrian connectivity. This is commented on further above. The horizontal alignment of the road and bounding hedges, restricts forward visibility along the road. It would be possible to provide an appropriate junction layout (right turn lane potentially required) however this would require the full removal of the hedgerow fronting the site. Significantly impacting the character of the surrounding area. Although it is recognised that there are services and facilities within the settlement it is considered that there are negative factors which outweigh this, particularly the poor pedestrian linkages to and from

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						the site. The objector claims that there are no known protected species on the land at this present time, but has provided no ecological survey to establish whether this is the case or not. The proposed development is agricultural grazing land which Welsh Government has categorized as a predicted loss of 0.77ha grade 2 and 0.37ha grade 3a providing a total predicted loss of 1.14 BMV land. Again, the objector has submitted no site-survey to demonstrate what grade the land actually is. The Plans allocation at Wrexham Road, Abermorddu is backed up by and informed by a large number of background and technical studies which demonstrate that the site is viable and deliverable. Despite the objector's statement that the site is preferable to the allocated site, there is no submitted background / technical evidence to show that this is the case. Development of this prominent site would result in a detached block of residential development which

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						would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site is not considered to be necessary or appropriate as an allocation either to replace or be in addition to the Wrexham Rd allocation. In conclusion, the Plan has made provision for growth in HCAC with the allocated site. The objection site is not appropriate to be allocated as it relates poorly with the built form of the settlement and would harm open countryside, and also is not backed up by any evidence.
89	HN1: New Housing Development Proposals	land at Wood Green, Mold. Candidate site MOL004	Object	Candidate site MOL004 is a highly sustainable site. Identified constraints can be easily overcome without material harm to local amenity and landscape character. An amendment to the settlement boundary would not compromise or prejudice green barrier aims and purposes. It is acknowledged that the site access is restricted to the extent that it would not be suitable to maximise housing density. However, this could change at some point in the future and despite this the site could provide up to 5 dwellings using the existing access. There are some constraints on the site but these can	Land at Wood Green, Mold. Candidate site MOL004. Objection to HN1 new housing proposals and to green barrier EN11(10).	Not accepted. The site measures 0.86ha and was submitted by this agent as a candidate site for between 5 and 20 dwellings depending on access arrangements. The first option was for a development of 5 dwellings served off a private driveway and the second option referred to alternative access arrangements to serve 20 dwellings including a) existing properties (24 and 26 Wood Green and land alongside 2 Wood Green) or land to the west being promoted by others as a candidate site. At Preferred Strategy stage a different agent

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				be overcome and a modest, but valuable, contribution to housing land supply can be provided in a very sustainable location.		made 'supporting' representations that the site should be developed as a low density development of 5 dwellings off a private driveway. The Councils Highways Development Management Officers considered the site to be unsuitable as the access via a private drive had poor alignment and limited visibility that is considered unsuitable for any additional traffic. In this objection to the deposit plan the request is for the site to be allocated for housing. The Plan is quite clear that it will only be appropriate to allocate sites which could meet with the definition of a 'large' site ie for 10 or more units. Given the accesses constraints the site cannot be realistically be allocated for housing in the Plan. Despite earlier references to alternative access scenarios, no further evidence has been produced in terms of securing additional land. The objector is therefore asking for land to be allocated which presently has no means of being accessed. In terms of flood risk the northern part of the site is located within a

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						C1 flood risk on the Development Advice Map. In terms of the total site area some 16% is within the C1 zone. Given that the site is green field land it cannot pass the justification tests in TAN15 as the site is not brownfield. The agent seeks the allocation of land for a highly vulnerable use without any technical evidence that the site can be satisfactorily developed in terms of flood risk. The site also sits within the green barrier between Mold and the outlying villages. It forms part of a swathe of open countryside comprising fields and recreation land adjoining the edge of the built up area on the south side of the R. Alyn. The southern half of the field immediately to the west of the site was promoted for development in the form of an omission site as part of the UDP and the UDP Inspector commented 'The objection site forms part of a larger field and whilst it abuts development on 2 sides, by its character and appearance, is clearly part of the countryside which in this location is designated as green barrier in order to protect the open land around Mold and prevent the coalescence of

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						settlements. Given its value as, albeit a small part of the green barrier and the adequate supply of housing land both in the town and the County, I see no reason to either allocate the site for development or draw back the green barrier'. The UDP Inspectors comments sets a clear context for the consideration of this objection site. Given that Mold will achieve considerable growth in the Plan period as a result of completions (156 in first 3 years of Plan period), commitments (188 as at 2018) and the allocations at Maes Gwern (160 units - already under construction) and on land between Denbigh Rd and Gwernaffield Rd (246 units), none of which encroach into green barriers, there is considered to be no need to draw back the green barrier in this instance. Given the combination of uncertainty over flood risk, the provision of a suitable vehicular access and the green barrier, it is not considered appropriate to include the land in the settlement boundary. The consideration of the site as, in effect' a 'small' site

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						of 5 units on a site of 0.86ha would represent a density of just 17 dwellings per hectare which is not making the most efficient use of land. In conclusion, the site is not necessary or appropriate to be allocated or included in the settlement boundary of Mold having regard to its green barrier location and uncertainty over flood risk and access and in the light of provision for growth in Mold.
90	HN1: New Housing Development Proposals	NAN001	Object	Support for Candidate Site NAN001 and objection to Policy STR2. Adjustment of the settlement boundary would allow much needed housing in the local community. Detailed matters can be resolved through design and the benefits significantly outweigh any identified harm. There are no other sites in the village which could provide open market and affordable housing for the benefit of the local community. Adjustment of the settlement boundary would allow much needed housing in the local community. Detailed matters can be resolved through design and the benefits significantly outweigh any identified harm. There are no other sites in the village which could provide open	Adjustment of the settlement boundary would allow much needed housing in the local community. Detailed matters can be resolved through design and the benefits significantly outweigh any identified harm. There are no other sites in the village which could provide open market and affordable housing for the	Not accepted. The LDP has focused growth towards the higher tier settlements of the plan (Tiers 1, 2 and 3) where it is more sustainable to allocate sites close to existing services and facilities, and reduce the need to travel in line with national planning policy (PPW10). Nannerch is a Tier 4 'Defined Village' which benefits from some services and facilities to sustain local needs. Policies within the plan enable small scale local needs housing within rural areas such as Nannerch, either as windfall sites within the settlement boundaries or as small exception sites on the edge of settlement boundaries for affordable housing. Windfall

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				market and affordable housing for the benefit of the local community. The Plan follows the failed policies of the UDP in relation to delivering housing, including affordable housing, in the rural villages. Despite clear evidence having been put to the Council it has failed to monitor the effectiveness of these policies and by repeating them it will not be able to meet local housing needs. It ignores local evidence of need and is contrary to Welsh Government's clear goals as set out in PPW10 and the Well-being of Future Generations Act.	benefit of the local community.	market housing will only be permitted on sites when it is essential to delivering affordable housing. Policies STR2 and HN4-D specifically provide the opportunity to develop local needs housing within Tier 4 Defined Villages such as Nannerch therefore it is not necessary to allocate a site to meet future needs. The Council's Highways Development Management Officer has commented on this site that it is 'Not suitable for development – access is not adopted and is of insufficient width to serve the site'. The presence of highways constraints was clearly referenced in the assessment for this site in Background Paper LDP08. Despite this the objector / agent has produced no technical evidence to demonstrate how a satisfactory vehicular access can be provided. It would be entirely inappropriate to include land within a settlement boundary when vehicular access is not possible. In addition to this there are concerns over the impact of built development on the character and appearance of the location, given its location within the AONB and

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						also the relationship with existing built form which is single storey.
96	HN1: New Housing Development Proposals		Support	In summary, I support the LDP's recommendations in respect of the candidate sites in Higher Kinnerton, with the exception of that for HK008. Given the level of infrastructure that would be needed (as identified by the LDP in its assessment of the site), together with other points raised in my response, I would ask that the LDP be amended to state that HK008 be 'not suitable to be allocated' and this would eliminate possible future development speculation.		Support Noted. HK008 has not been allocated within the plan.
104	HN1: New Housing Development Proposals		Support	The fields at the top of Tan-y-Felin, Greenfield, Holywell. I am against the development of the fields at the top of Tan-Y-Felin, Greenfield for a number of reasons. Firstly, I do not feel further housing here would create a sustainable community due to the already limited resources in Greenfield. There are no medical provisions and so residents must already register in Holywell. Also, the closure of the vet means petcare must also be sourced further afield - more residents in the area would mean more pets. It is also not sustainable economically in my opinion, particularly in terms of		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				retail. Neither Greenfield nor Holywell provides opportunity for shopping and there is little to attract either small, local business or larger, national companies. I believe that issues concerning the local economy need to be resolved before further housing is considered for the area. Then there is the suggestion that access would be likely from Ffordd Dwyfor, which would be unsuitable. We moved here last year due to the family oriented neighbourhood, where children can play happily and safely in the street and the play area (recently updated). Ffordd Dwyfor is already crowded with parked cars and is narrow enough as a cul-de-sac without the prospect of becoming a busy thoroughfare for residents of a potential new estate. The construction of a new estate in the area would also cause disruption to current residents of Tan-Y-Felin, Woodland Drive, Cae Dderwen and other surrounding roads due to increased traffic and noise levels, construction vehicles and delivery of materials. Well Hill is not suitable for its current usage with oversize lorries and speeding cars causing accidents on what is a narrow and steep road. Adding new homes the suggested site in Greenfield would increase risks on Well Hill as more traffic, congestion and construction vehicles		

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				utilised it to get to the site initially, and then to new residences upon completion. I also believe it would be a shame to lose more of our green space, especially one such as the Tan-Y-Felin fields which is home to a number of protected species. Please do not allow for the planning bid for the fields at the Tan-Y-Felin, Greenfield to be passed!		
120	HN1: New Housing Development Proposals		Support	Reference:- The fields at the top of Tan Y Felin, Greenfield, Holywell. The plan to develop the fields up Tan Y Felin in my opinion, should NOT be approved!!!!!!! I've lived here for 8 years now and love it here. It is a very quiet estate and one myself and my daughter feel very safe in. We never have trouble and the road itself is pretty quiet apart from residents vehicles. I have a major issue with this residential development taking place as all the things stated above, will cease to exist! I will no longer feel safe allowing my daughter to play out in the street with her friends, for fear of the amount of traffic that will be passing my house. Not only that but we will be linked up to other housing estates in Greenfield which will not help with the anti social behaviour they have in the likes of school lane and other areas attached to the field.		Noted .The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				We live in a lovely quiet road and I want it to stay that way. We dont have very many amenities in Greenfield as it is and yet you want to take what we do have away from us! Because that is what is going to happen if the houses get built. We will have to fight for every school and doctor place we currently already struggle to get! Why should new people coming into the area cause the already stable tenants of Greenfield to lose out! We are not big enough to hold extra people and extra traffic! Not to mention the lack of greenery we will be losing! I love that I am Welsh and I love our countryside but money grabbing developers are happy to see me lose that just so they can make a few quid! Wales is a beautiful country, please dont let greedy developers ruin what we have. The wildlife prosper around here and the kids love to see all the badgers, foxes and other wildlife. It helps teach them about nature and living habitats. I urge you to reject the plans for development. There are other sites being used for housing in holywell, where sustainability of amenities can be upheld. For the sake of our children and the future generation, please dont turn our countryside into a residential area		

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				full of houses with no way to support the people inside of them.		
131	HN1: New Housing Development Proposals		Support	The fields at the top of Tan-Y-Felin, Greenfield, Holywell I don't want a new estate being built behind my house as I enjoy the green space that we have & it's home to bats, badgers, owls etc. My daughter attends Greenfield School which is almost full & I do not want to be competing for a primary school in the future for our 10 month old as well the roads are busy as they are an increase in traffic means increased congestion & pollution.		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.
134	HN1: New Housing Development Proposals		Support	We are writing in support of the Deposit LDP, and would like to specifically mention the following: 1. We support the LDP Objectives (Page 17) specifically 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”. We also support the LDP’s purpose to protect the open countryside from inappropriate housing development. 2. We agree with the Spatial Strategy previously consulted upon and the sustainable and flexible approach to distributing growth in the upper three tiers of the		Support Noted

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				sustainable settlement hierarchy. Specifically we support the assessment of the village of Gwernaffield as a Tier 4 Defined Village and believe this to be an accurate assessment. 3. We support the comments in Background Paper 8 (Assessment of Candidate Sites and Alternative sites - September 2019) specifically in relation to the speculative planning application for land at Coppy Farm, Gwernaffield (GFD001) in that the site does not comply with the Council's Preferred Strategy wherein housing allocations are NOT made in Tier 4 settlements, and that the site is not considered to be suitable to be allocated or included in the settlement boundary. 4. We are pleased to note that housing completions in the first three years of the Plan period are on track in terms of enabling delivery and the the Council plan to bring forward the significant land bank of undelivered permissions, although we do have some reservations about whether this is achievable. Specifically we trust this will enable the Council to resist speculative planning applications by developers who believe that every settlement in every tier must contribute towards growth through having a housing allocation. 5. We agree that development should take place in		

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				sustainable locations whereby people can reduce private care usage and thereby reduce the harmful effects of carbon emissions. However, we would have preferred the LDP to contain a more positive and ambitious commitment to carbon neutral targets for housing development such as the inclusion of electric car charging points, solar panels and rain collection for toilet flushing, etc. in all new housing developments effective from the date the LDP is adopted.		
143	HN1: New Housing Development Proposals		Support	'Reference: The fields at the top of Tan-y-Felin, Greenfield, Holywell' Greenfield road is already extremely busy throughout the day and an extension to the estae would cause a greater deal of pollution both through noise as well as through emissions. The Increased building activity would cause potential damage to the roads and would limit the ease to access places of work. Increased activity and traffic would also present a great danager to children especially after the new park had been built which will be on one of the roads effected. The increased housing would also have a detrimental impact on both the valuation of current property as well as resources such as school places and access to health care.		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				The roads are also impacted severely by poor weather so further transport would lead to increased risks and potential further damage to property. Increased housing would add pressure to already stressed services. Greenfield would also lose an area of significant natural beauty and a large amount of natural habitats will be destroyed. Tan y felin fields are designated as green barrier spaces by the council and a change to this would have a negative impact upon the environment. Increased housing could potentially lead to a significant rise of current occupied houses being up for market having an overal decline in the local housing market There is also limited shop infrastructure in greenfield to support the development There would be increased congestion on the coastal road as well as that into and around holywell The Impact of increased housing also creates a greater risk to school children due to the locality of the primary school in greenfield Local residents would have lesser chance of accessing local education for their children due to further stretches to resources		
144	HN1: New Housing Development Proposals		Support	The fields at the top of Tan-y-Felin, Greenfield, Holywell'		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002

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				Firstly, I cannot believe that it has been suggested to build houses on the Greenfield fields. This estate is a safe and comfortable area in which children play out in the park and people walk in the fields. With the success of house building on the fields, children will not be able to play outside, people will not be able to walk on the fields, it will be busy and will disrupt the quietness and safety of this estate (one of the main reasons I decided to live here). Greenfield road can be very busy in the mornings, especially with road works and children waiting for the busses. Also there have been some terrible tragedies on well hill in past years and more traffic would mean more congestion and more importantly increased danger. Greenfield school is nearly full, adding more houses would mean that they would be full and the current residents of this estate would not get their first choice of school. Residents of this estate already have to go to doctors and dentists in Holywell or further away- as we don't have any in greenfield. Increased houses would put so much pressure on other services even those in Holywell. One of the most beautiful things with greenfield is the fact you can walk and see natural beauty everywhere. There are so much		land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				wildlife that lives on our hill- why disturb them who have been here longer than the houses here already? What I find disgraceful is that there is already so many houses being built around the area - more than double the required new housing. Building more is very greedy and profit driven. There is barely any shops in greenfield already without building more houses. Greenfield wouldn't be able to support the new housing. The estate can be hazardous in the snow, ice and Greenfield Road with flooding. Why increase the danger with adding more houses and cars to the equation? The new park is often busy with children enjoying themselves - it was only build recently. Why build a safe place for children to play to then add a busy junction next to it with more houses and cars passing? The house prices will decrease if you build more houses and I am certain some current residents will move away if this estate is built. This estate is a lovely place to live (I've lived here all of my life and decided to move to another house recently on the estate). So please don't destroy what it a safe, calm road to live on to a busy estate - clearly built to make profit.		

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166	HN1: New Housing Development Proposals	NEW002, in New Brighton	Object	I wish to submit a representation regarding our Candidate Site NEW002, in New Brighton village. In the current draft LDP, our field, which is between houses, is marked as outside the area for residential development. The land directly across the road, Candidate Site NEW004, is rapidly moving towards being built on. The developers are Stewart Milne Homes, and they imminently plan to build 98 new dwellings there. I therefore submit a representation that I consider that you should re-examine our site candidacy for the following reasons. 1. The land opposite (NEW004) has now been cleared for building, with an agreement to build 98 dwellings. 2. In view of this, it would seem that our site (NEW002) would now form part of the same natural extension of the village as NEW004. 3. A geographically natural boundary to the development on this side of the road would be Lake Offa and Wat's Dyke. 4. Both our site and NEW004 are within the existing street lit area and 30mph (built up area) speed limit area. 5. Our land lies at the head of a natural ditch / stream system, which is already used to drain surface water from Cae Isa. It would therefore have adequate surface water drainage.	Allocate Candidate Site NEW002, New Brighton for housing.	Not accepted. New Brighton lies to the North East of Mold and immediately to the North West of Mynydd Isa. The bulk of the village lies on the Southern side of the A5119 although small residential developments and commercial development lie on the North side of the A5119. The site is located on the Northern side of the village within the open countryside, it is detached from the main settlement form and to allocate the site would result in sporadic built development within the open countryside, and green barrier. The allocation immediately across the road from this candidate site will provide 105 new dwellings for New Brighton, in addition there is a commitment of 23 dwellings on the former New Brighton Service Station, and 13 dwellings have recently been completed at Rock Bank. This will provide sufficient growth for the settlement therefore an additional site in New Brighton is not needed. The allocated site is more favourable than candidate site NEW002 as the A5119 provides a definitive boundary to the village, therefore the site has not been allocated within the LDP as it would result in a harmful

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						intrusion into the open countryside. The allocated site is well defined by existing development to the west at Argoed View, to the south by the A5119, to the east by Cae Isa and to the north by the line of New Brighton Road. The development of the site represents a logical rounding off of the settlement. In contrast there is only a small amount of fragmented development on the north side of New Brighton Rd and the development of the objection site would result in a free standing small block of development which would harm both open countryside and the green barrier between New Brighton and Sychdyn. Watt's Dyke scheduled ancient monument (SAM) is approximately 60m north of the site set within a woodland corridor. The objector has not included a heritage impact statement as part of their submission, therefore the Council cannot fully assess the impact of the site on this SAM. In conclusion, adequate provision has been made for development within New Brighton without the

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						need to include land which would intrude into open countryside and the green barrier, therefore this site has not been allocated within the LDP or included in the settlement boundary.
174	HN1: New Housing Development Proposals		Support	I am emailing to raise my concern regarding proposed development plan the extend the Tan Y Felin estate. The Ffordd Dwyor road could not be used as an access point. This road is dangerous as it stands now with limited traffic going down. There is only single track due to cars parked which is sometimes only wide enough to just about fit a car through. Wider vehicles such as emergency services will struggle. This road has a hill creating a blind spot to people coming and if people approach at speed this can be dangerous and would cause chaos if any more cars were trying to squeeze along there. Alongside this the park is in bottom corner of this road and there is often children playing and crossing road by this area so higher level of traffic would not be good. There is no infrastructure for more houses in this area & no suitable access points		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.
192	HN1: New Housing	Leeswod SE site County Road, Leeswood	Object	Allocation of the site : Land SE of Leeswood: Policy STR1 and PC1 too restrictive on development	Policy STR1 and PC1 need to allow for looser	Not accepted. It is disappointing that the objector has sought to put forward the site at this late stage

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	Development Proposals			boundaries to allow for window fall development on tier 3 settlements - Leeswood	development boundaries around Tier 3 settlements to deliver windfall development, and the allocation of land South East of Leeswood.	in the Plan's preparation. An earlier submission at candidate site stage or at Alternative Sites (Preferred Strategy) stage would have enabled a full assessment and comparison alongside other sites. It is disappointing that the site is submitted without a Sustainability Appraisal as required by Welsh Government in the Development Plan Manual 3 in Diagram 8 'Any new sites proposed at Deposit stage will be required to submit an SA with their site submission'. The proposed site is located outside the settlement boundary of Leeswood and is therefore located within open countryside. The proposed is approximately 2.23ha and the objector is proposing between 40-60 dwellings. Leeswood is designated as a Tier 3 sustainable settlement where policy STR2 directs that housing development must be related to the scale, character and role of the settlement. Leeswood has seen completions of 15 units in the first three years of the plan period and at April 2018 (Housing Balance Sheet base date) there were commitments for 6 units. A

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						planning application (058946) on the former Laura Ashley units on Pontybodkin Hill, which is allocated in the UDP, is presently under consideration for 26 units. Leeswood must also be considered in the context of the adjoining settlement Coed Talon / Pontybodkin where there is provision for growth on the UDP allocation, the bulk of which now has detailed planning permission (49 units) and an undetermined application on the remaining part of the site. There is clearly scope for growth in the locality and the focus in this LDP should be on delivering existing brownfield sites, rather than allocating additional green field sites. This south eastern part of Leeswood has a ribbon of development extending along both side of County Road which has a well define end at Ty Lila. The development of the site would extend a narrow belt of development 250m from the edge of the settlement boundary along the northern edge of County Road. It is considered that the development would form an illogical extension to the existing settlement and would harm the

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						character and appearance of open countryside. Highways were consulted and have objected to the proposal on the following grounds. 'Due to limited width and restricted forward visibility, County Road and Constitution Hill are considered unsuitable to cater for significant levels of additional traffic. Whilst there are opportunities to improve the road fronting the site, these are limited by Cefn y Wern. It is important to note that no Preliminary Traffic or Transport Assessment was provided'. There is no continuous footway link between the site and village centre; there would appear little opportunity to provide one. Water Supply: With regards to water supply within the area, Welsh Water does not supply water to this area. The public sewerage network can accept potential foul flows from this site. The proposed growth being promoted for Buckley Wastewater Treatment Works (WwTW) catchment would require

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						improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions. Ecology: The Council's ecologist has been consulted and the following constraints have been identified. 'The site, itself, is Improved Agricultural land with hedgerows and trees and few species records other than hedgehog, but with potential for other species such as amphibians, badgers and nesting birds'. Any development would need to assess the Ecology of the site and provide an Ecological Impact Assessment with measures to avoid, mitigate, compensate, enhance and manage wildlife features. Additionally, the site is within 100m of Ancient Woodland and may affect priority or protected species, as it is agricultural (e.g. breeding birds) or contains existing structures (e.g. bats). Site is a large (>0.4ha) greenfield site. Development here could adversely

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						affect habitat connectivity. Development here could have an adverse effect on the character and result in the loss of important features such as Green Infrastructure. Environmental Protection were consulted and had some objections to the proposal. The proposed site would need a land contamination assessment due to Coal mining within the area. Traffic noise and air quality Pollution Control does not support this proposal. This site is accessed by a narrow lane and background levels of noise are particularly low. The development of this site for housing would certainly result in a significant and unacceptable increase in background noise for existing properties on County Road, as a result of an increase in traffic and vehicle movement. The development of this site would result in a significant reduction in air quality for County Road, as a result of an increase in traffic and vehicle movement. A land contamination assessment would be required.

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						Additionally, the Coal Authority identify that the proposal is located within a Development High Risk Area. Mine entry, recorded and probable unrecorded shallow coal workings. Welsh Government have commented stating that there is no detailed ALC survey information for this site. However, the Predictive ALC Map for Wales (Version 2 – 2019) notes the site to be mainly Subgrade 3b with some (approx. 0.5ha) Grade 2. The advice provided includes the recommendation that, if the site is to be considered further, a detailed ALC survey of the sits is undertaken to determine if the land is 'Best and Most Versatile' (BMV) agricultural land and the proportion of grades identified. Although some information has been provided: one Location Plan, SA and Site Assessment. There have been no background studies or technical reports provided to illustrate how the development may overcome the above mentioned constraints. It is disappointing that, having undertaken these background studies, the objector has not

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						provided an indicative layout or even a masterplan type outline for the site in order for the Council to properly assess impacts. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no evidence that the site can be adequately developed. Therefore, it is considered that development of this prominent site would result in residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site contains constraints, specifically vehicular access that has not been addressed. The site is not considered to be necessary or appropriate as an allocation.
193	HN1: New Housing Development Proposals	BUC047-AS Megs Lane, Buckley	Object	The site is well placed in relation to Buckley, a main service centre, and a principal location for new housing development which reinforces and contributes to sustainable settlements. An outline planning application for residential development (059387) was refused on the 11th March 2019. This application sought to address issues raised in a previous	Allocate the site for housing development	Not accepted. Buckley is a sustainable settlement and has been categorised in the settlement hierarchy as a Tier 1 Main Service Centre. During the UDP plan period Buckley grew by 17.4%, as a Category A settlement the aim for growth to be within 10% to 20% was therefore fulfilled. The LDP makes provision for growth in Buckley through the allocated site at Well Street and as a result of

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				application (057056) which was refused by Flintshire Council on the 19th July 2018 showing a potential development for up to 85 dwellings. The site is genuinely capable of being delivered and could be brought forward rapidly subject to planning approval. Notwithstanding the apparent over-supply of housing land within the County Council area that has now miraculously being identified in the Deposit Plan, it has been the case for some considerable time that the Council has not been able to demonstrate a 5 year housing land supply, nor produce any Joint Housing Land Availability Study to evidence any land supply. The historic shortfall in housing delivery does not appear to have been taken into account in assessing the current need and future supply. The Deposit Plan acknowledges there is a lack of suitable and appropriate brownfield land in the County (11.2). Greenfield sites are therefore required to fulfil future housing requirements.		175 completions in the first three years of the Plan period and commitments of 138 units as at the Plans Housing Balance Sheet date of April 2018. This shows that for the first 3 years of the LDP plan period there is an appropriate level of development for a Tier 1 settlement and a healthy number of commitments coming forward. The objector mentions recently refused planning permissions on this site, and these recent decisions are material to the assessment of this alternative site given it is the same site as refused twice, and where the policy context in the UDP used to refuse the site is the same as set out in the deposit LDP. As TAN1 has now been revoked and with it the requirement to demonstrate a 5 year land supply, the Council have clearly demonstrated via the deposit housing trajectory that there is sufficient housing provided by the plan and that it is being delivered in the first four years of the plan at the rate envisaged by the plan's trajectory. There is therefore nothing materially different to the two recent refusals

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				The uncertainty over actual potential housing land supply is evidenced by the inclusion of large windfall sites in the overall mix. Whilst some allowance for small windfall sites is to be expected - and arguably would not materially impact on overall supply levels – relying on a contribution from large windfall sites highlights the likelihood that allocated sites may be expected to incur delays or limitations in delivery; and also that other potentially allocate-able sites (given the apparent scale of available sites) are also constrained. The site is capable of fulfilling the various other development criteria set out in the Deposit Local Plan. The site does not materially harm or undermine the Green Barrier. The Green Barrier to the south of Buckley seeks to prevent coalescence of Buckley with built development at Padeswood and to prevent encroachment into open countryside, which provides a setting to the built form of this part of Buckley. However, the Padeswood Cement		that should warrant coming to a different view now. The majority of the site is within open countryside and green barrier. The only part of this site within the settlement boundary and not within the green barrier is a small gap between frontage ribbon development onto Megs Lane, but it is too small for an allocation. The area is characterised by a patchwork of varied sized fields bounded by mature hedgerows. The topography of the site is gentle sloping south towards Spon Green Farm. The site has an open aspect affording wider views of the surrounding countryside to Hope Mountain and Moel Fammau, contributing to an overall sense of openness. The frontage development along the southern side of Megs Lane forms a definite physical feature on the ground which creates a strong edge to the settlement boundary and to the green barrier designation. The site relates better to and forms an integral part of the open countryside and green barrier. The function of the green barrier designation is to retain the open

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				works is an isolated development within a much larger swath of countryside, over 1km distant from the site. The next nearest settlements to the south and south-east for which the barrier might conceivably be relevant are several kilometeres away. This part of Buckley is not as sensitive as other parts of the County where the need for a such a barrier is more evident. The substantial block of Green Barrier designated to the south of Buckley in considered excessive and the deposit plan makes no longer term provision for the managed expansion of this main service centre. The need for the Green Barrier in this location is therefore debateable over normal countryside policies. Even if the site is not to be treated as a formally allocated site, the Deposit Plan nevertheless requires a supply of large windfall sites in order to fulfil its housing requirement over the plan period. This is an appropriate site from which to achieve such a contribution. The Deposit Plan acknowledges there is a lack of suitable and appropriate brownfield land in the		nature of the countryside around Buckley to prevent urban encroachment and to prevent coalescence of Buckley with Penyffordd and Padeswood. Built development in this location would undermine the function and openness of the green barrier. The site is 3.8 ha and although the objector is suggesting that 85 dwellings could be built on the site, a density of 30 dwellings per hectare means up to 114 dwellings could be accommodated. Adjoining this site to the east there were Omission Sites considered at the UDP Inquiry. The Inspector considered that the land should not be developed and in referring to the land at Spon Green stated in paragraph 11.96.10 of the Inspectors report:- ‘’The objection site has a poor relationship with the settlement. It would be a significant encroachment onto an area of green barrier in a prominent area of countryside to the south of the settlement. It would be the first extension beyond the well defined existing line of built development,

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				County (para 11.2). Greenfield sites are therefore required to fulfil future housing requirements. By virtue of the extent of the Green Barrier surrounding Buckley, some release of Green Barrier land will be required.		result in the coalescence of Buckley and Padeswood/the cement works and effectively sever the strategic green barrier.'' It is also important to note that there is continued significant pressure for development on the area to the south of Buckley. This is demonstrated by the planning application adjoining this site to the east, submitted at Spon Green, for 435 dwellings and 450sqm of retail,(ref 058237) which was also refused permission in July 2018. The main reasons for refusal were the fact that the site was in the open countryside and green barrier and represents a consistent assessment of this location in line with the previous recent refusals on this site. As the objection references, another more recent application was refused on this Resubmitted site, on Land South of Megs Lane, Buckley (Ref 059387, March 2019) and again its location within the open countryside and green barrier were the main reasons for refusal and that planning context is the same in terms of the designation of the land in the LDP

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						as it is in the UDP. In this way the Green Barrier designation has been tested and has been found to be reasonable and justified in this location. It is also interesting to note that there has been no appeals lodged against these decisions. These decisions and the UDP Inspector's comments give added strength to the continued Green Barrier designation in this location. The Megs Lane planning application (the same site as BUC047-AS) was submitted by Leith Planning Consultancy, with no mention of developer involvement. There is no mention in the submission or in the extensive Planning Statement that there was a preferred developer or that a particular developer was involved in the scheme. The objector needs to do more than simply provide a lengthy planning statement at the stage reached, by providing clear evidence of the deliverability of this site in line with soundness test 3, but no such evidence has been provided.

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						The objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' or why it should be 'transferred' from one plan period to another. No reference is given to where in national planning guidance this provision is set out as government policy and there is no evidence of where else in a Welsh LDP context such an argument has been accepted. Also when the objector references an historic shortfall in housing delivery they seem, without explanation, to limit this to just the UDP where more logically such historic shortfall's may have occurred for other previous plan's. The flaw with such an argument therefore is how far back does one go to apply an apparent 'historic shortfall' and why should this just be limited to the UDP? This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. There is

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						no requirement by Welsh Government either in PPW10 or Development Plan Manual 3 to 'add on' part of a previous plan housing requirement to the housing requirement in a new development plan. Whilst the Council has been unable to undertake a formal JHLAS it has continued to produced yearly Housing Land Monitoring Studies which form part of the Plans evidence base and which also demonstrate that housing is being delivered in the early years of the Plan. The Council is not clear as to what is meant by the identification of an apparent "over-supply of housing land" in the deposit plan and rather than rely on 'miracles' the Council prefers to use clear facts and evidence. The objector is also now reminded that references to a lack of a five year supply and JHLAS are no longer relevant with the revocation of TAN1 in March 2020. The objector should also note that the system of monitoring supply against a housing trajectory now set out in Development Plans Manual 3 is the same approach taken in the deposit LDP where reference to this monitoring

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						system was used from the draft DPM3 available at the time. Rather than identify an over-provision against the plan's housing requirement which would be illogical, the plan identifies a housing requirement with a 14.4% flexibility allowance added in and as required by the DPM, and demonstrates via a housing trajectory how this will be met throughout the plan period. The trajectory also clearly demonstrates that housing delivery in the early years of the plan period is directly in line with the rate of housing provision identified in the plan. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's control. Paragraph 4.2.3 of PPW states

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						"As part of the development plan process planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that any alleged shortfall has been catered for by the LDP. It also needs to be stressed that Welsh Government have no

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						fundamental objections in their formal response on the Plan and comment 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect'. The Council does not accept that too much reliance is placed on the contribution of large and small windfall sites in the LDP housing land supply. BP10 (section 2.5) explains that an analysis of past trends has been carried out and this is detailed in Section 4.3 of the Flintshire Urban Capacity Study (June 2019) undertaken by Arcadis. This approach accords with the latest National guidance as contained in Development Plans Manual Edition 3 (March 2020). The Manual advises (para. 5.63) that 'an urban capacity study can inform the identification of site allocations and assist to demonstrate delivery of windfall allowance in the Plan'. Both the Arcadis Study and BP10 explain that large and small windfall site contributions used in

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						the Plan are significantly lower than the level of past completions achieved from these sources. It is also the case that the representative body of the development industry, the HBF, agree that the allowances are appropriate. Furthermore, no objection has been made to the level of windfall allowances by Welsh Government in their formal representations. This is a very broad statement which is not supported by any detailed assessment of relevant policy compliance. It is also the case that all development sites will have to adhere to the policies and requirements in the plan. The objector has submitted a separate objection to the Green barrier designation and a full response has been made to that (id195) in relation to Development Management policy EN11 Green Barrier. For completeness a brief summary of that response is included here. Clearly the two recent refusals of permission on this site also contain a green barrier assessment and reason for refusal and are materially relevant.

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						In relation to this site land South of Buckley / Padeswood, the green barrier seeks to prevent coalescence of Buckley with built development at Padeswood and seeks to prevent encroachment into open countryside which provides a setting to the built form of this part of Buckley. The land clearly fulfils the purposes for green barrier designation and should be retained. The settlement and Green Barrier boundary follows the line of the houses along Megs Lane and forms a significant physical feature on the ground making it very clear the extent of Buckley. Built development will breach this clearly defined southern limit of the settlement and affect the openness of the green barrier and will set a precedent for further pressure for development in an area where there is already significant pressure as has been as detailed above, but which would be difficult to resist if this site were included in the Plan. As the UDP Inquiry Inspector pointed out '' It would be the first extension beyond the well defined

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						existing line of built development, result in the coalescence of Buckley and Padeswood/the cement works and effectively sever the strategic green barrier.'' The conclusion of the UDP Inspector in supporting the retention of this barrier along the southern edge of Buckley is still considered to apply to the present situation and provides a strong context for continuing to resist harmful development in this location. The site is not necessary or appropriate to be allocated or included in the settlement boundary of Buckley having regard to its green barrier location access and in the light of provision for growth in Buckley. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement

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						in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility / contingency to ensure a sufficient housing supply and Welsh Government in their formal comments on the plan have no concerns about the housing growth provided. Given that the site is not considered to be suitable for allocation in the Plan for the clear reasons given, it would not be logical for the Council to consider it as a windfall site as it is simply not a suitable location for development on any basis. Some greenfield land has been allocated in the plan that avoids encroaching on green barriers which is sequentially preferable to considering green barrier land as a first principle, as advocated by the objector. Also as part of the Green Barrier Review land around Buckley has been removed from the green barrier designation in a less sensitive location to provide potentially more sustainable future growth opportunities beyond this

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						LDP timeframe. Land between Bannel Lane and Chester Road is enclosed on 3 sides by development and it was felt that it did not contribute to the purposes of the Green Barrier designation and the review therefore concluded it should be removed. There are therefore occasions when the boundary of the Green Barrier are drawn back and where development may be allowed in the future. In conclusion it is considered that the Plan makes sufficient provision for development as a whole and also within Buckley, and that it is not necessary or appropriate for a site to be allocated where it would cause clear harm to a green barrier. The site is not considered appropriate to be allocated in the Plan.
197	HN1: New Housing Development Proposals		Support	Greenfield: I am against the development plan in Greenfield. I live on Tan Y Felin and have raised numerous times about the volume of traffic the speed of vehicles and before long there will be a serious accident/danger to life. I cant believe you would be willing to add to the increased volume of traffic causing		Noted .The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the

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				more congestion and increasing the potential of accidents. We already experience a vast amount of accidents on Greenfield Road. Myself was in a near miss with cars parked by parents collecting children off the bus service where they park on both Greenfield Road / Tan y Felin & the speed of vehicles considering it's a 30 mph speed limit. We have so many HGVs using this route too. I think individuals need to come out and see first hand and not sit behind desks and just complete forms. Come and see the real life struggles with volumes of traffic, speeding & parking. We also will be losing our limited green land. You already have housing developments underway in Holywell with the old hospital and the big development near the old police station. This screams pure greed and not considering the health & safety for us your huge tax paying constituents. You cant even fix the leaks from the drains as there is always a wide stream between Tan y Felin & school lane which has been like that for years as the drains cannot cope with the volume. I hope you take onboard & make the right decision.The wrong decision will be down to you when the community have already highlighted the daily issues with an overstretched community, traffic &		LDP has been noted as a support to the exclusion of these sites.

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				near misses. Any injuries or fatalities will be down to pure greed!		
201	HN1: New Housing Development Proposals		Support	I am writing this e-mail with concerns to the proposed development Tan Y Felin Greenfield. Our 11 year old is crossed over the road every morning to catch the bus to Flint as the amount of traffic is dangerous and unfortunately there are a lot of idiots who drive recklessly which has led to injuries and loss of life unfortunately. The Tan Y Felin estate is unsafe with the amount of parked cars and vehicles travelling up and down this road meaning our children cannot safely walk to school. The few remaining fields that we do have are vital for us to walk our children with safety being our main priority and for them to enjoy the wildlife. The pollution will also be at an all time high.		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.
205	HN1: New Housing Development Proposals		Support	Candidate Site HCAC021 and HCAC022 I am pleased to see the recognition of site HCAC021 as, matching the prefered strategy for Hope and Caergwrle. It has all the benefits of transport and ease of access to all village facilities and minimises the loss of best and versatile agricultural land. HCAC022 - It is good to see this scheme finally omitted from the		Candidate site HCAC021 and HCAC022 have not been allocated within the LDP. Support noted.

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				LDP. All the residents who have been blighted by this proposal will be immensly relieved having lived under this particular cloud for more than fifty years.		
217	HN1: New Housing Development Proposals		Support	Proposed Development-Tan-Y-Felin Fields Greenfield GREENFIELD ROAD Greenfield Road, which would take all the traffic from this development, is already a very busy road including School Buses, Cars, Lorries and Vans and pedestrians walking to Holywell and takes a lot of the Traffic from the A55 going to Mostyn Dock Area. ACCESS TO THE NEW DEVELOPMENT SCHOOLING - As the current Primary School in Greenfield is almost full it is difficult to see where the children from the new development would go to school, HEALTH SERVICES - The pressure on health services in the area such as Doctors, Dentists and other Health Services are presently over-stretched and the increase of people requiring such services from this development would seriously affect the services that could be provided. GREEN AREA The immediate area surrounding the new development is already built up and the Tan-Y-Felin Fields are already designated as a Green Barrier Space by Flintshire County Council		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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221	HN1: New Housing Development Proposals	Candidate sites HK007	Object	During the 'Call for Sites' stage of the LDP, a number of candidate sites were put forward on the edge of the settlement of Higher Kinnerton. These sites proposed residential development in a sustainable location being a settlement that is closely located to the Cheshire and Wrexham borders. It is an area known to be occupied by commuters given its accessibility and some time ago, during the UDP examination, the Inspector recognised that there is a lack of constraints on these parcels of land. The candidate sites referenced above are HK007, HK008, HK011 and HK012. When assessed, HK007 and HK012 were considered to be 'green' sites under your traffic-light system, before being downgraded to 'amber'. HK008 and HK011 were considered to be 'amber' throughout this process. The 'amber' sites are categorised as 'The site complies with the Council's Preferred Strategy, however there are site constraints that would need to be overcome to allow the site to be developed'. It is, therefore, recognised that these sites are suitable for development subject to acceptable assessment of site constraints, i.e., Ecological Survey,	Allocate land at Higher Kinnerton. Candidate sites HK007, HK008, HK011 and HK012	Not accepted. The objector seeks the allocation of two candidate sites within the village of Higher Kinnerton, HK007/HK012 On land South of the Grange and HK008/ HK0011 also off Sandy Lane for approximately 100 dwellings. This response covers both sites. Higher Kinnerton is a tier 3 settlement in the LDP (STR2) and previously a category C settlement in the UDP. The UDP provided growth for the village through the allocation at HSG1(40) with a capacity for 40 units. The final 6 units were completed by 31st March 2015 according to the 2014/15 Land Availability Study. A speculative site on land at Kinnerton Lane has also been granted planning permission on appeal with capacity for 56 dwellings. According to the 2019/20 Land Availability Study 31 units have been completed, with 13 under construction and 12 not yet started. It is anticipated that these remaining units are due to be completed by April 2021. Given that Higher Kinnerton is a Tier 3 sustainable settlement where housing development must be

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				Transport Statement, Arboricultural Survey etc. My client is currently preparing a full planning application for these sites for residential development of approximately 100 no. dwellings and as such, will be assessing the site for any constraints and ensuring the commission of appropriate reports. The settlement of Higher Kinnerton has recently lost community amenities such as the Post Office and bus services, yet, residential development could have increased the population and therefore, made these services a viable option in the future to serve the whole community again. Strangely, the Authority chooses not to provide any opportunity to improve the offerings of an existing settlement and focusses all attention on a strategic site that, as discussed in the above section is considered difficult to deliver and would create an unsustainable development.		related to the scale, character and role of the settlement, it is considered that the speculative site at Kinnerton Lane will provide sufficient growth for the village over the plan period, and no allocations are needed within the village. The allocation of both HK007/HK012 and HK008/ HK0011 would amount to an additional 100 dwellings, Higher Kinnerton is a Tier 3 Settlement and does not have sufficient facilities to sustainably accommodate the level of growth proposed by the objector. The objector refers to the loss of services in Higher Kinnerton such as the Post Office and bus services, and points to the need to increase the village's population to support these services. Higher Kinnerton has in fact seen the completion of 40 dwellings on UDP site HSG1(40) and 31 units on the speculative site at Kinnerton Lane, with a further 25 yet to be completed. Therefore residential development has taken place, yet services have continued to decline. This is the case in many rural and urban settlements

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						across the Country, and is not unique to Flintshire. It is a sign of the times as demand shifts towards more online shopping and services. Simply building more houses is clearly not guaranteed to safeguard services and the proposition that if more housing is provided then facilities will return is both naive and un-evidenced in terms of how and when such facilities would be provided. In addition HK007/012 and HK008/HK011 have not been allocated within the LDP as the Warren Hall strategic site has been identified as the focus for growth and is central to the North Wales Growth Deal, receiving considerable public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55. The site has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities.

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						UDP Inspector's comments; The two resubmitted candidate sites by Caulmert are also omission sites from the UDP. The UDP Inspector removed the site from the plan for the following reasons; "(11.119.4.) The objection site measures some 4.6 ha which would potentially produce growth in the region of 20%. Excluding HSG1(57), in total this would result in over 25% growth within the plan period which is well over the indicative growth for even category A settlements such as Mold and Flint. I have seen no substantive arguments which justify that level of growth in what is a relatively small rural village with limited facilities in comparison to the larger settlements. (11.119.5.) Should more growth be required and Higher Kinnerton was judged to be a suitable location to accommodate that growth then the lack of constraints on the site would no doubt mean development could take place. Similarly road improvements, recreational facilities and affordable housing above and

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						beyond the requirements of UDP policies would bring community benefits, but they are not good reasons to allocate greenfield land unnecessarily. To do so would be contrary to the sustainable objectives of the plan. (11.119.6.) The site consists of fields, is open in nature and forms an integral part of the countryside. It is not part of the built up area in either character or appearance. It follows from the above that I do not consider the land should be included within the settlement boundary where there would be a presumption in favour of development." HK008/ HK0011 HK008/ HK0011 is on the North Eastern edge of the village. It is outside but adjoining the settlement boundary along its Southern edge which is formed by the well-defined rear curtilages of properties on Deans Way. Of all the Candidate Sites submitted for Higher Kinnerton this relates relatively well to the settlement as opposed to the open countryside beyond Main Road to the north and Sandy Lane to the east. At

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						2.47 ha approximately 75 units could be accommodated. The Council's Highways Development Management Team stated that pedestrian facilities along the Main Road frontage are inadequate and there would not appear to be any opportunity to provide improvement. It would appear possible however to access the site from Sandy Lane; this would provide an opportunity to restrict pedestrian access from the site to the village, to the use of the bridleway. Development will necessitate a road improvement scheme on Sandy Lane to include road widening, improvements to the Main Road/Sandy Lane junction, the provision of pedestrian footways and improvements to the bridleway. Given the comprehensive highways improvements required it is not considered appropriate to allocate this site at the present time. Furthermore as a scheme for 56 dwellings has been allowed on appeal on land south of Kinnerton Lane this is considered to be sufficient as a commitment to meet the housing requirement for the village.

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						There are also other factors which make the site less favorable to develop including the predicted loss of 2.48ha of grade 3a agricultural land. HK007/012 This irregular shaped 3.1 ha of land is located outside of the settlement boundary, on the Eastern edge of the village comprising gently sloping grade 3a agricultural land. It incorporates and is bounded by the dismantled railway line to the South East, a rural lane (The Green) and a dwelling (The Grange) together with a barn conversion scheme to the North. Whilst the site is outside of the village confines the Western boundary lies adjacent to the settlement boundary which runs along Sandy Lane beyond which is residential development at Beeston Road, Deans Way and Greenfield Avenue. The rear curtilages of these properties back onto Sandy Lane. However development of this site would not relate well to the existing pattern and form of development of the

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						village the bulk of which is located to the West of Sandy Lane and the dismantled railway line. Sandy Lane is considered to be a logical and well defined boundary for this part of the settlement. Development of the site would create an illogical change to the boundary that does not constitute a rounding off of the village but rather would represent an unacceptable incursion into the countryside which would result in the predicted loss of 2.26ha of grade 3a agricultural land. Highways Development Control have stated that alterations would be required to improve the operation of the Sandy Lane/Main Road junction along with improvements to the bridleway link into the village. Provision of a footway along the site frontage would also be required. Given the comprehensive highways improvements required it is not considered appropriate to allocate this site at the present time. In conclusion, the two proposed sites would result in a level of growth that is not sustainable for this tier 3 settlement. Higher Kinnerton has already

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						experienced growth in the UDP and during the early years of the LDP. An additional 100 dwellings would not be appropriate for the scale, character and role of this settlement, particularly when there is a strategic allocation for 300 dwellings at Warren Hall in close proximity to Higher Kinnerton. The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area, rather than just taking housing only approach as with the two objection sites. Consequently there two candidate sites have not been allocated within the plan as it is not needed in addition to the residential units at Warren Hall and the existing commitments within the village. In conclusion, adequate development is provided for in Higher Kinnerton over the Plan period and the site is in close proximity to the Warren Hall Strategic Site where provision is made for mixed use development. It is not necessary or appropriate for an additional allocation.

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222	HN1: New Housing Development Proposals	BRYN003	Object	Objects to the non inclusion of Candidate Site BRYN003 within the settlement boundary. The land lies to the east of the Gables on the B5121 and I do not consider it a fair reflection to call it ribbon development when there is a natural boundary with the A55 expressway which hasd been there since the early 1990's, the opposite side of the road is fully developed. The plot should be included for future development which could include affordable development.	The plot should be included for future development which could include affordable development.	Not accepted. The site lies at the north eastern edge of Brynford at the end of a ribbon of development on the eastern side of the B5131. The inclusion of the site within the settlement boundary would result in the creation of further ribbon development extending outwards from the village centre, contrary to established national guidance. It would therefore be inappropriate to extend the settlement boundary to include this site. A larger omission site (incorporating this site) was considered by the UDP Inspector '… Even if development were to be confined to the B5121 frontage it would extend the ribbon of development and so be contrary to advice in PPW (9.3 MIPPS 01/2006). It follows I do not consider the site to be suitable for development within the plan period'. When approaching Brynford from the north east along the B5121 the present edge of built development (The Gables) is softened partly by the hedgerow set behind the roadside verge and also by the topography. The site is considered

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						to relate much more closely with open countryside than to the built development. . The proposed site would create ribbon development which would be visually prominent and damaging to the character and appearance of the locality. It could also set a precedent for further ribbon development extending out of Brynford. Additionally the land is underlain by lead bearing geology and in area of historical lead mining. Land contamination assessment required. Similarly, there may be land stability issues due to the site being located above mine shafts further assessments may be needed prior to any development. With regards to affordable housing, STR2 / HN3 allows for small scale affordable housing sites but this objection would qualify as it is not acceptable in planning terms. Additionally, planning permission has been granted to north of site at the former Llyn y Mawn Inn.

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						Developing this site would result in harm to the open countryside and have a detrimental impact upon the character of Brynford. Development also appears technically unacceptable in terms of land contamination and stability issues. The site is not considered necessary or appropriate to be allocated for housing, nor included within the settlement boundary. Therefore the site has not been allocated within the plan. In conclusion, the site is not considered appropriate to be allocated in the Plan.
223	HN1: New Housing Development Proposals	GYM003 Llys Newydd Gwernymynydd	Object	Proposed development to include site at Gwernymynydd Llys Newydd Wildbanks Conservation was instructed in May 2019 to undertake an Ecological Appraisal, in relation to the proposed residential development at Llys Newydd, Gwernymynydd., Mold, CH7 5LN. This Ecological Appraisal combines the results of various desk-top and field surveys undertaken in 2019 and provides recommendations for the mitigation measures required to enable the development to proceed with minimal impacts on protected species. The Site has been subject to ecology surveys in 2019. These revealed that the Site is used for	Allocate Candidate site GYM003 Llys Newydd Gwernymynydd.	Not accepted. The site has been the subject of a separate objection (id 15) from the same agent seeking the inclusion of the site within the settlement boundary under PC1. This objection seeks the allocation of the site for housing. It is noted that an outline planning application has been submitted (Feb 2020) under code 069696 and that discussions will take place between the applicant / agent and case officer, particularly

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				foraging and commuting by low numbers of bats and will highly likely be used by nesting birds. Bat Transect surveys are continuing into the autumn as per the request of NRW and these will be reported within this document upon completion. It must be noted that recommendations may change depending upon the results of the transect surveys.		in terms of background studies and evidence. Not accepted. The settlement boundary for Gwernymynydd in the vicinity of the site has not been previously incorrectly drawn. At the time of the UDP public inquiry there was sufficient land within the settlement boundary to deliver housing development and the Inspector did not recommend that the site be included in the settlement boundary. It must be borne in mind that in the UDP Gernymynydd was a category B settlement and that the spatial strategy allowed for planned growth through allocations in category A, B and C settlements. As part of the preparation of the LDP a review of the settlement hierarchy was undertaken and this was informed by a comprehensive set of settlement audits to assess the sustainability of settlements. This was set out in the Key Messages consultation document and this informed the subsequent Strategic Options and Preferred Strategy consultations. The Plan's spatial strategy is based on a 5 tier settlement hierarchy where planned growth is only directed to

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						the top three tiers. Gwernymyndd is designated as a Tier 4 Defined Village, on account of its general lack of facilities and services. Policy STR2 permits new development in the form of windfalls within the settlement boundary provided that it delivers local needs affordable housing or in the form of small scale exceptions affordable housing schemes on the edge of the settlement. The site adjoins the settlement boundary of a Tier 4 Defined Village where policy STR2 identifies that new allocations will not be made. Instead, policy STR2 permits windfall developments (where local needs housing is delivered) and small scale exceptions schemes for wholly affordable housing. The proposed development does not comply with the Preferred Strategy of the LDP. It is also not considered that there is any need for land to be included in the settlement boundary as there is already land in the settlement boundary in several locations which has permission or is under construction / complete. In the early years of the Plan

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						period the settlement is seeing growth through development at the former Rainbow Inn for 17 dwellings. Outline planning permission also exists for 10 dwellings at Siglen Uchaf and for 3 units on an adjacent site at Fernleigh. Growth clearly is and can be delivered within the Plan period within the settlement. The site is close to Mold, which is a category A settlement in the UDP and a Tier 1 Main Service Centre in the Deposit LDP. Mold saw actual growth of 10.1% over the UDP period and is presently seeing development at Broncoed (86 units) and Maes Gwern 160 dwellings. In the Deposit LDP a new allocation has been made on land between Denbigh Rd and Gwernaffield Rd for 246 units. The application site lies only 1.5km from the Maes Gwern site, which is under construction. In this wider context it is not considered necessary for additional provision for growth to be made at Gwernymynydd. Although the site adjoins the settlement boundary and has development to either side, the development of the site is not

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						considered to represent a logical rounding off or infill of the settlement. The estate type development at Minffordd Fields is separated from the site by a line of mature trees which is a distinct landscape feature and the lodge which also represents a character break. At the south western edge of the site the existing ribbon development is low density and set back from and above the A 494(T), being accessed from a private driveway. The frontage of the site and adjoining land has an undeveloped appearance and creates a green strip alongside the main road. The site adjoins Coed Fron Newydd Wildlife site The site has been considered as a Candidate site and has been rejected as a housing allocation or a settlement boundary change. It is considered that the site relates more closely to the open countryside than the built form of the settlement. In addition to this there is an earthwork which would need assessment and Environmental Health have advised that there is likely to be lead and heavy metals on the site from former mining

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						activities. In terms of access, the site would have to be accessed via the trunk road and this would require agreement from the Welsh Government. In conclusion, provision for growth exits within the settlement boundary of Gwernymyndd and in nearby Mold. It is not considered necessary or appropriate for an additional allocation in Gwernymynydd particularly on a site where there are concerns about its impact on the form and character of the settlement and in the light of concerns over ecology and topography and uncertainty over access. Despite acknowledging that the present planning application may address some of these concerns, the site is not considered to be appropriate to be allocated.
244	HN1: New Housing Development Proposals	FLI005 Manor Estate, Flint	Object	We ask that you reconsider the above site as being worthy of inclusion in the LDP for housing development. Having read the reasons given for " non inclusion " we wish to make the following comments: 1. This site cannot be said to be located in open countryside as it is	Allocate Land adjoining Manor Estate Flint for housing.	Not accepted. 1. The site adjoins a block of estate type development on its eastern edge and part of its southern edge. The remaining part of the southern boundary is bounded by a paddock and small outbuildings and greenhouses which appear to be associated with two dwellings. To the north of the site is a small group of residential properties but these are

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				surrounded on three sides by housing development. To the North East boundary there are three dwellings and their gardens. To the South East and half of the South West boundary is the Manor Estate, this comprises about 75 dwellings. To the remainder of the South West boundary there is a childrens playground and a loose development of eight or nine dwellings. These houses having a direct access, via Coleshill Road, to the A548 / Holywell Street. Coleshill Road forms the North West boundary to the site. 2. What is the relevance in your reasoning of the statement that '' the field parcel on the other side of Coleshill Road is associated with Bedol Farm'' ? 3. You further state '' Development of the site on its own would consolidate the free standing residential development....which is contrary to national planning guidance '' (planning guidance, not law !!) This site is not '' on its own '' it is , as stated above, surrounded on three sides by housing development. This		set within wooded grounds. Beyond the western boundary are fields extending up to the edge of Bagillt. Rather than having the appearance of being part of a built up area, the site has a rural character as part of the wider block of open countryside. In planning terms the site is outside of a settlement boundary and open countryside in both the Unitary Development Plan (UDP) and the Local Development Plan (LDP). The open countryside designation often 'washes over' existing built development. Development of the objection site, on its own, would result in enlarging an existing small 'outlier' block of built development which would be detached from the existing form and pattern of development at Bagillt. There is also a green barrier designation adjoining the site extending to the South towards Flint and Bagillt, the purpose of these designations is to maintain the break in development between the two settlements. There are parcels of development within that gap but it is not a continuous form of development. These designations are planning 'tools' to

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				site is therefore an infill site on poor quality agricultural land. 4. "Highways consider the site unsuitable as direct access is not available from Oak Grove." Even if there was direct access, the Oak Grove roadway is far too narrow for any additional traffic. However, with our initial submission for this site we included a suggested alteration, to realign Holywell Street and move it closer to the A 548. This will give the necessary visibility splay to both sides of the new access / junction to Hollywell Street. Our suggestion also shows Coleshill Road joining the proposed new access road within our site. This will greatly improve access to the highway system and make it much safer. (Copy of the proposal is attached.) Were Highways made aware of our suggestions ? 5. The number of houses surrounding the site is probably larger than many of the settlements within the county. 6. This site is poor agricultural grazing land. It is not an important landscape site nor a site of nature conservation. It has no historic or public amenity value. It is well		ensure controlled growth of settlements. In order to have sustainably allocated sites and sustainable growth of settlements, allocated sites should be sites which adjoin existing settlement boundaries to ensure the natural expansion of the built up areas and close proximity to facilities. In the UDP the area of land to the west of the site towards Bagillt was designated as Green Barrier, as part of the LDP all Green Barriers have been reviewed and this parcel of land has been removed from the green barrier. Background Paper 1: Green Barrier explains the changes to the designation in this area and states :- ''Modest (42.94ha) green barrier to south of A548 Coast Road between Bagillt (Bedol) and Flint to the east. This designation protects small but important open gaps between Bedol Farm and Coleshill Road and between Ash Grove and Bryn Farm. The objective of the green barrier is to prevent a continuous built up frontage between Bagillt and Flint alongside the A548.''

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				screened form the estuary area and other locations inland. It does not constitute or extend any ribbon development and does not create fragmented development. 7. You write about developments being contained within a settlement boundary, yet the Manor Park Industrial Estate practically joins together the towns of Flint and Bagillt. 8. The site is located adjacent to a Principal Employment Area - Manor Park Industrial Estate and therefore its workers could live on this site and easily walk or cycle to work , thus reducing vehicle pollution and traffic movements in accordance with Council Policies. 9. The site is adjacent to a regular bus service giving access to all the neighbouring towns, villages and employment areas. 10. Access from the site can also be easily gained to the Wales Coastal Path and many other scenic walks for the enjoyment and healthy exercise of the new occupants.		The paper goes on to say 'The settlement of Bagillt is somewhat constrained in terms of identifying potential future growth its by topography. Furthermore, existing allocations e.g. at Wern Farm have not come forward for development. An opportunity exists for longer term growth to the south east of the settlement in the vicinity of Coleshill Road. It is therefore considered that the green barrier should be drawn back to the eastern side of the existing block of development comprising Oak Grange and Manor Drive. This would allow for a possible urban extension from Tyddyn Messham south eastwards up to that existing block of development. However, an open gap would still be maintained between Bagillt and Flint, alongside the A548. It is also considered that the present green barrier extends further inland than is necessary to fulfil its primary function of preventing the coalescence of Bagillt and Flint. It is therefore considered that the green barrier should be drawn back slightly to focus on a more tightly defined gap along the A548 Coast Road. The green barrier should broadly follow a line following the southerly edge of

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				11. The community facilities of both Bagillt and Flint are easily accessed. 12. We consider that this site complies with the majority of the relevant parts of the "Tests of Soundness " We therefore hope you will be able to reconsider this site and allocate it for inclusion in the LDP.		Aber Park and a point just to the west of Trebor Avenue alongside Nant y Moch Farm. The land alongside the playground at Trebor Avenue is elevated and rising where development would be prominent in the landscape and harm urban form and the gap between the settlements.'' As this paper explains the green barrier has been drawn back to provide for a longer term development opportunity, that is beyond the remit of this LDP. The objection site and the adjoining field could be looked at together in terms of securing road improvements and an appropriate access arrangement for a logical extension of Bagillt in a future plan period. This objection site on its own cannot be easily developed due to access constraints. Also it is important to consider that the LDP does have enough allocated sites and includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a buffer to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify

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						specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply and Welsh Government in their formal comments on the plan have no concerns about the housing growth provided. 2. There is no particular relevance to the reference to the field parcel associated with Bedol Farm is merely a factual statement that there is an adjoining field which is part of the Bedol Farm 3. LDP's are required to be prepared in the context of Planning Policy Wales (PPW) which is the planning guidance produced by Welsh Government. This guidance clearly states that a search sequence approach should be taken when allocating new housing sites, choosing brownfield sites within settlements in the first

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						instance and then as stated in paragraph 3.40: 'Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be considered in exceptional circumstances and subject to the considerations above and paragraph 3.46 below'. Therefore in planning the growth of settlements, the focus is on the built up area of an existing settlement. The Manor estate and residential development around that are considered to be 'free standing' development within an open countryside setting rather than being an individual settlement itself and should therefore not be developed further because it is encroaching into the open countryside. The consideration of these issues against the above guidance also draws on the

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						various Planning Acts but ultimately the decisions taken and rationale for them are a matter of planning judgement. 4. The Councils Highway officer has been re consulted for more detailed comments and has stated, ‘’The proposed re-alignment of Holywell Street and Coleshill Road would address the issue of previously raised visibility concerns however this raises further concern in relation to the potential impact on the operation of the A548. Removal of the separation distance and natural obstruction to visibility has the potential to create an interaction between drivers travelling on the two roads. This could be a particular issue during the hours of darkness with drivers of westbound vehicles on the A548 being distracted by the headlights of the eastbound vehicles on Holywell Street. Without a reasonably detailed design exercise, fixing the levels and alignments of the re-alignment and the completion of a road safety audit, it is not possible to

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						determine the full extent of the impact of one road on the other. The cost of the re-alignment is likely to be significant and would be borne by any potential developer; I am not qualified to comment but these re-alignment costs may impact on the viability/deliverability of the site. The suggested re-alignment is onto land that is within the control of the highway authority however it would result in the loss of a significant number of trees; others may wish to comment on this aspect.'' The suggested highways solution is therefore not ideal as it creates other highway issues and the significant cost of the work may affect the viability of the proposal. The trees are a significant landscape feature and there loss would harm the character and appearance of the locality. 5. It is not doubted that there are houses adjoining the site. There are 83 houses surrounding the site and some of the smaller villages in the county do have this number or fewer houses. However these

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						houses do not make up a village or a settlement in its own right, it is simply a freestanding block of an estate type development without a village centre or focus and does not have the character or appearance of a village or settlement. In the first three years of the Plan period, Bagillt only saw one house completed but as at April 2018 there were commitments for 28 units. In addition to this there is also scope for development on the Wern Farm former UDP allocation (45 units) which remains within the settlement boundary. Clearly there is scope for growth in Bagillt in the Plan period. In the first three years of the Plan period Flint saw completions of 310 units and at the April 2018 base date had commitments for a further 404 units, mostly at the Croes Atti site. The Plan therefore provides sufficient growth at Flint, alongside the Northop Road allocation. In the context of the two settlements, sufficient growth is provided for in this Plan period, and a further allocation is not

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						considered necessary or appropriate. 6. According to the Agricultural Land Classification Post 1988 Survey over half of the site has been classified as Grade 2 Agricultural Land. Welsh Government Agricultural Unit worked closely with the Council in providing predictive agricultural land use loss on every candidate site. The spreadsheet shows in this case that the land quality on this site is 1.01ha based on actual survey results and 0.48ha based on predictive data. The site therefore represents the loss of BMV. Development of the site would consolidate a fragmented block development in the open countryside. 7. The whole point of open countryside and the green barrier designations is to control development to ensure that settlements do not coalesce. The Manor Estate is located between Flint and Bagillt but it does not join the two settlements together and this is why further development is not acceptable. The industrial estate comprises a physically well defined narrow strip of land

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						between the railway and A549 dual carriageway. The objection site is separated by trees and vegetation on the north side of the A548 and on the land between south side of A548 and Holywell Street. Given this visual separation the industrial estate does not set a precedent for the development of the objection site. 8. 9, 10. 11. It is not doubted that the site is within cycling distance of employment areas, close to a bus service, within walking distance of the coastal path. However, it would result in a detached block of residential development that is not well related to nearby settlements, services and facilities. 11. There are employment uses in close proximity to the site. In terms of community facilities the site is approximately 750m from the nearest small convenience shop in Bagillt and a mile /1700m to Flint retail park. The nearest school Merllyn primary school is approx. 1400m/0.88 mile and Flint High school is approx 3330m/2 miles away. Therefore there are community facilities in the vicinity of the site but not in close proximity. Nevertheless, the site

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						does not represent a logical extension to either settlement and will operate as a detached block of housing which relates poorly to settlements in terms of social cohesion. 12. The objector does not explain which Tests of Soundness are failed nor the reasons why. The objector does not explain why the Plan is sound by including this site within it. The site is within open countryside, does not adjoin an existing settlement boundary in terms of being a logical urban extension and would consolidate a detached block of development. Highways constraints mean that there is doubt that the site is viable and therefore deliverable. In conclusion, the site would add to a detached block of development in open countryside and would not represent a logical urban extension. There is also no evidence that the sites can be accessed. The site is not necessary or appropriate to be allocated in the Plan.
253	HN1: New Housing Development Proposals		Object	Objection to no development within Holywell -Lack of consultation at both initial preferred plan and LDP stage and non at deposit. - LDP	Allocate land for housing in Holywell.	Not accepted. Holywell is a Tier 1 Main Service Centre, on account of its size, character and level of services and facilities and

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				should have more development in the West of the county - Holywell has the infrastructure in place in terms of schools, doctors and community hospital to accommodate development.		represents a sustainable location for development. The LDP does not seek to apportion development spatially by the use of numerical methods or growth bands. The plan seeks to distribute growth in a sustainable manner having regard to the settlement hierarchy, this means that not all settlements will have allocated sites, including the Tier 1 Main Service Centres such as Holywell. As part of this approach it is necessary to have regard to the character and role of each settlement and the circumstances prevailing at the present time. In this context it does not mean that, in the absence of an allocation, Holywell will not experience growth during the plan period, as completions in the first three years of the Plan period of 36 units and committed sites which already have planning permission will provide sufficient growth for the town. The Lluesty Hospital site is committed for 89 dwellings, with permission for a further 69 units on the southern part of the former hospital site, the Ysgol Fabanod site at Perth Y Terfyn will provide 55 units and the land East of Halkyn Road will

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						provide 45 dwellings. This will provide a total of 294 dwellings over the plan period, which is sufficient growth for Holywell without the need for a further allocation. A further consideration is that the Lluesty Hospital site is an important listed building and gateway to the town. The refurbishment and conversion of the listed buildings and redevelopment of other parts of the site will not be aided by a further greenfield allocation which would only serve to divert market interest away from the hospital site.
270	HN1: New Housing Development Proposals		Support	I support the Planning Officer's refusal of development of the Tan y Felin fields in Greenfield. I support the refusal for the following reasons: • Greenfield Road is already very busy at key times throughout the day, especially when local children are waiting for or returning on school buses. There have been accidents on the narrow Well Hill which is used by enormous heavy lorries as well as domestic traffic., increased traffic here and on School Lane would mean increased congestion and pollution, increased danger and		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				decreased safety for our children. • Access: developers have suggested access near the new cemetery which would have a major impact on residents in School Lane and Woodland Drive. • Greenfield School is almost full. A significant increase in the population in Greenfield will mean overcrowding and greater competition for school places in the future with parents facing the possibility of not getting their first choice of primary school and having to sen their children to schools further afield in Holywell. • No doctors or dentists: residents are already forced to visit Holywell or elsewhere to access a surgery and getting an appointment is already often difficult. Increased housing would put even more pressure on services. • Insufficient shop infrastructure in Greenfield currently exists. Existing insufficient drainage issues on Greenfield Road leading to flooding and traffic hazard		

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				in heavy rain. • Existing insufficient drainage issues on Greenfield Road leading to flooding and traffic hazard in heavy rain. There is already passed development underway for more than DOUBLE the required new housing in Flintshire.		
271	HN1: New Housing Development Proposals		Support	The Fields at the top of Tan-y-Felin, Greenfield, Holywell I agree that the fields at the top of Tan-y-Felin in Greenfield, Holywell should NOT be considered for housing. This land is home to various protected species such as owls, bats and badgers. There are also kytes, badgers, foxes and numerous small mammals as well as various other birds, amphibians and insects which all rely on this green space. Greenfield is a village with limited amenities. There is no dentist or doctor's surgery and few shops. Greenfield school is also almost full as so many young families already live in this area. Access to this area is via a steep road which is already very busy with established housing. Many homes have multiple cars which are often parked in the road		Support Noted.

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				making it difficult to drive up and down the hill, especially when the road is icy. More housing would mean increased traffic with the increased potential for accidents. The sewers and drains struggle to cope and regularly have to be attended to by the Dwr Cymru. This village has reached saturation point so all further housing development in Greenfield should be suspended. Thank you!		
280	HN1: New Housing Development Proposals		Support	I support the Planning Officer's refusal of development of the Tan y Felin fields in Greenfield. I support the refusal for the following reasons: • Greenfield Road is already very busy at key times throughout the day, especially when local children are waiting for or returning on school buses. There have been accidents on the narrow Well Hill which is used by enormous heavy lorries as well as domestic traffic., increased traffic here and on School Lane would mean increased congestion and pollution, increased danger and decreased safety for our children. • Access: developers have suggested access near the new cemetery which would have a major impact on residents in School Lane and Woodland Drive.		Support Noted.

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				• Greenfield School is almost full. A significant increase in the population in Greenfield will mean overcrowding and greater competition for school places in the future with parents facing the possibility of not getting their first choice of primary school and having to sen their children to schools further afield in Holywell. • No doctors or dentists: residents are already forced to visit Holywell or elsewhere to access a surgery and getting an appointment is already often difficult. Increased housing would put even more pressure on services. • Insufficient shop infrastructure in Greenfield currently exists. Existing insufficient drainage issues on Greenfield Road leading to flooding and traffic hazard in heavy rain. • Existing insufficient drainage issues on Greenfield Road leading to flooding and traffic hazard in heavy rain.		

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				There is already passed development underway for more than DOUBLE the required new housing in Flintshire.		
291	HN1: New Housing Development Proposals		Support	The proposed LDP document would appear in my mind to be a balanced proposal and those involved in its creation should be commended. However there are a few observation I have made that I would like explanations for :- i) With regard to "Candidate site " maps on your web site, example being NH008 WELLFEILD FARM Northop hall (outlined in red) , NH017 WELLFEILD FARM Northop Hall (out lined in Green) and NW020 WELLFEILD FARM Northop Hall (out lined in red) . This I find very confusing as to what classification the council has give to any given candidate site , when so many near identical proposals are published with differing statuses . Could we not have a clearer system to show the councils stance on a given candidate site ? ii) Myself and other have read the proposal and fine that the proposed LDP does not appear to show how a given piece of land is allocated for developement. Could it be made		Candidate sites NH008, NH017 and NH020 have not been allocated within the plan, your support is noted.

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				clear the process the council go through to come to a conclusion as to whether or not a piece of land should be considered for developement .		
293	HN1: New Housing Development Proposals		Support	I would like to give my support to not developing the land adjacent to the Tan - Y - Felin estate in Greenfield, Flintshire. I understand an application has been made by developers to build new housing on this area of green space and I whole heartedly feel this would be a big mistake if this were approved. The fields in this area are home to wildlife such as badgers, bats, owls and red kites and offers green space for nature and the local residents to walk. Greenfield does not have the infrastructure to support additional housing. There is no doctor or dentist in Greenfield, the school is at capacity and the road system around Greenfield is not suitable for more traffic. There have already been tragic accidents on the main road into Greenfield and additional traffic would increase the dangers for local residents. There are several more appropriate sites in the area which could be developed for housing such as the old Lluesty Hospital site.		Support Noted.

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				Please bear these comments in mind when deciding whether to approve or decline any new building in this area. Many thanks		
296	HN1: New Housing Development Proposals		Support	I would like to give my support to the non- development of the fields adjacent to the Tan y Felin estate in Greenfield. I believe that the developers have resubmitted a plan to build on in this area of green belt, if this is passed this would not be good for the area or Greenfield as a whole. There is already a problem with the amount of traffic going up the well hill towards Holywell, if passed there needs to be work done modernising the road up to Holywell before any building starts.The road up to Holywell over the years has had accidents, with the extra volume of traffic this will unfortunately increase. There are no dentists , doctors or vets or mid sized supermarkets in the village, also the only school in the village is nearly full to capacity.There also are a lot of school children at the moment catching buses to High Schools, with the new houses built this would lead to extra pedestrian traffic on an already busy Tan - y Felin hill.		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan, your support is noted.

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				While the houses are being built there would be construction traffic on the Tan - y Felin hill, leaving mud on the road, which would be a safety hazard, at the moment the gritting of the Tan -y Felin hill in winter is poor, and there have been accidents on the hill, with the extra mud on the hill and not being gritted, this would make the hill lethal. The area itself is an area of great natural beauty, witch is home to a number of protected species, and is also used by ramblers. The area has also been designated by the council as a green barrier space. Are the Developers willing to pay for the above improvements ? Please can you take my comments into consideration before making a decision.		
317	HN1: New Housing Development Proposals		Support	Reference: Tan-y-felin/Cae-Y-Dderwen Fields, Greenfield, Holywell,CH8 I fully support the Planning Officer's decision against the proposed building development for the following reasons:		Support noted.

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				TRAFFIC:Tan-Y-Felin has inadequate parking spaces for existing households,many have to resort to parking on the road and/or the pathways outside their homes.The traffic narrows to single lane in many places as a result with some vehicles parked on blind bends.It greatly increases the danger for both pedestrians and other motorists alike.Lots of children live on Tan-Y-Felin and it is down to luck that none have been seriously injured as a result of the existing traffic problems both near the playground and higher up the estate.The new development will bring an increase in vehicle pollution.There is considerable congestion on the main road through Greenfield in both directions already and another estate consisting of approx.184 houses and many 2 vehicle (or more) families will add to this and over the long term could potentially affect the health of local residents.Studies have shown the toxic effect on human health vehicle emissions have and not everyone can afford green vehicles that have things like 'stop,start' etc.ICE:When there is snow/ice on Tan-Y-Felin it's nigh on impossible to drive up there.In bad weather that would mean even more vehicles parking on the main Greenfield road as a		

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				result.AMENITIES:There are limited shops and amenities within Greenfield and no doctors or dentists surgeries.Greenfield school is also close to capacity.There is already tremendous pressure on local services within Holywell and the new development is clearly going to add to that.WILDLIFE:The fields and surrounding woodland have many kinds of wildlife that are a joy to see.Our family have seen bats, buzzards, foxes, badgers and squirrels to name but a few they would surely suffer at the hands of any development.The local community should be able to enjoy such a lovely environment as do the many ramblers and other groups.DRAINAGE:I do not feel that the drainage on Tan-Y-Felyn is capable of handling another 184 homes.Last year Welsh Water came out to fix an issue with the drains next door and that involved digging up their front garden to fix a broken pipe.EXISTING PLANS:There is a sufficient number of developments already passed by planning in Flintshire, so why do we need another 184 homes?There is an incomplete development on Greenfield road already,it would be better to complete that first.I do not believe there is any motive other than profit for this		

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				development.There are many more reasons to strongly oppose this than I can fit within the 2500 character limit here.		
328	HN1: New Housing Development Proposals	CAR001 Carmel, Land at Halfway Field	Object	The plan should identify for development Land at Halfway Field Carmel. The site comprising 2.17ha of land should be brought forward for housing. The site is suitable for development. The landowner is willing and able to bring the site forward for development.	Allocation of land for housing at Halfway Field Carmel	Not accepted. Whilst Carmel is identified as a Sustainable Village the site relates poorly to the main built form of the settlement which apart from development on Mertyn Lane is confined between the A5026 along the northern edge and Carmel Road along the southern edge of the settlement. The site is better related to the open countryside to the west and beyond Golch Farm to the north. It is considered that the land is generally open in character and it is not necessary to include this area within the settlement boundary. With the exception of the housing on Mertyn Lane and the sporadic dwellings north of the A5026, development in Carmel is to the south of the main road. This long straight road marks a strong physical demarcation between the built up area and the countryside and forms the logical limit for the settlement boundary.

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						Development of the site would result in significant and unacceptable urban encroachment extending beyond a well-defined edge. The site may not be actively used at present but Welsh Government has provided information which identifies the site is in agricultural use as grazing land, with a predicted loss of 2.17ha categorised grade 3a Best and Most Versatile land. In the absence of a site specific survey to determine the actual quality of the agricultural and whether it represents BMV it is not considered appropriate to allocate the site. The site is located outside the settlement boundary and is therefore designated as Open Countryside. The candidate site was ranked as 'amber'. Potential constraints on the site include that there are relatively high levels of lead contaminants within the area, further investigation would be required. Additionally, the site is located 500m of Ancient Woodland and this may have a negative impact on local species, this is discussed in more detail

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						below. The site is also crossed by the hypothetical line of a Roman road. It may require assessment prior to development. The submission is lacking in terms of detail as to how various constraints including noise, air pollution, vehicular access, ecology and trees would impact on the suitability and capacity of the site for residential development. Site would result in the loss of a greenfield site. Development here could have an adverse effect on character and result in the loss of important features such as GI. The site was proposed for housing in the deposit UDP but was rejected by the UDP Inspector who commented "The land is in agricultural use and is a greenfield site. Although the area to the east of the field is urban in character that is not true of the land to the north and west. The adjacent farm complex is not so visually dominant that it separates the field from the adjacent countryside. Development on the allocated site would further consolidate the existing development to the north of the A5026 thereby extending

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						the urban form into the countryside". Although it is noted that there are no tree preservation orders on the site. No landscape or visual impacts reports have been provided to illustrate that the development would not have a negative impact on the surrounding area. The UDP Inspector considered that the development of the site would 'result in an unacceptable intrusion into the countryside which would be incongruous and poorly related to the built form of the settlement'. The submission provides no detail as to the proposed access arrangements including indicative maps. The site is within 500m of Ancient Woodland. This may affect priority or protected species, as it is agricultural (e.g. breeding birds) land. Site is a large greenfield site (>0.4 ha). Development at this location would reduce habitat connectivity by increasing distances between habitats or agricultural areas.

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						Further work would be required to investigate whether there are any presence of newts in the vicinity and to what extent the proposed development would impact the local ecology. A key principle in PPW is that allocations are viable and deliverable and free from constraint, yet the objection provides no assurances or evidence that a satisfactory access can be provided or that the other issues covered above can be successfully addressed or mitigated. Site is adjacent to a working farm. The UDP Inspector noted that this may lead to conflict but the two uses would not be entirely incompatible provided appropriate measures such as adequate separation distances and screening are provided. However there has been a lack of detail regarding the proposal in this submission. It is considered that no further work has been submitted to address and overcome the inspector's initial concerns regarding the site.

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						Despite the objector's statement that the site is deliverable no background and technical studies have been submitted which demonstrate that the site is viable and deliverable. In conclusion, this prominent site would result in residential development which would be poorly related to existing development and visually damaging to open countryside. The site does not therefore read as a logical urban extension. Additionally, in the context of uncertainty as to a number of constraints which might affect the site. The site is not considered to be necessary or appropriate as an allocation.
329	HN1: New Housing Development Proposals	CAR001 Carmel, Land at Halfway Field	Object	The plan should identify for development Land at Halfway Field Carmel. The site comprising 2.17ha of land should be brought forward for housing. The site is suitiable for development. The landowner is willing and able to bring the site forward for development	Allocation of land for housing at Halfway Field Carmel	Not accepted. Whilst Carmel is identified as a Sustainable Village the site relates poorly to the main built form of the settlement which apart from development on Mertyn Lane is confined between the A5026 along the northern edge and Carmel Road along the southern edge of the settlement. The site is better related to the open countryside to the west and beyond Golch Farm to the north. It is considered that the land is

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						generally open in character and it is not necessary to include this area within the settlement boundary. With the exception of the housing on Mertyn Lane and the sporadic dwellings north of the A5026, development in Carmel is to the south of the main road. This long straight road marks a strong physical demarcation between the built up area and the countryside and forms the logical limit for the settlement boundary. Development of the site would result in significant and unacceptable urban encroachment extending beyond a well-defined edge. The site may not be actively used at present but Welsh Government has provided information which identifies the site is in agricultural use as grazing land, with a predicted loss of 2.17ha categorised grade 3a Best and Most Versatile land. In the absence of a site specific survey to determine the actual quality of the agricultural and whether it represents BMV it is not

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						considered appropriate to allocate the site. The site is located outside the settlement boundary and is therefore designated as Open Countryside. The candidate site was ranked as 'amber'. Potential constraints on the site include that there are relatively high levels of lead contaminants within the area, further investigation would be required. Additionally, the site is located 500m of Ancient Woodland and this may have a negative impact on local species, this is discussed in more detail below. The site is also crossed by the hypothetical line of a Roman road. It may require assessment prior to development. There are inconsistencies within the representation report to how many dwellings are being proposed. The report mentions both up to 50 and up to 60 units. The submission is lacking in terms of detail as to how various constraints including noise, air pollution, vehicular access, ecology and trees would impact on the suitability and capacity of the site for residential development. The submission also lacks an

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						indicative or schematic layout to indicate the broad principle of how 50/60 units would be accommodated on the site. Additionally, the details submitted in regards to a concept style masterplan appears to have all the open space away from the residential part of the site. This doesn't represent good planning. Site would result in the loss of a greenfield site. Development here could have an adverse effect on character and result in the loss of important features such as GI. The site was proposed for housing in the deposit UDP but was rejected by the UDP Inspector who commented "The land is in agricultural use and is a greenfield site. Although the area to the east of the field is urban in character that is not true of the land to the north and west. The adjacent farm complex is not so visually dominant that it separates the field from the adjacent countryside. Development on the allocated site would further consolidate the existing development to the north of the A5026 thereby extending

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						the urban form into the countryside". Although it is noted that there are no tree preservation orders on the site. No landscape or visual impacts reports have been provided to illustrate that the development would not have a negative impact on the surrounding area. The UDP Inspector considered that the development of the site would 'result in an unacceptable intrusion into the countryside which would be incongruous and poorly related to the built form of the settlement'. From what the objector has said, the degree to which the site would need to be landscaped if developed clearly suggests its prominence as part of the open countryside and the clear difficulties of introducing an urban context to the present open, rural context. Highways were consulted and provided the following feedback stating that Holway Road past the site is subject to a 30mph speed restriction; the provision of appropriate visibility splays appears possible. Care needs to be taken with the location and

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						design of the site access especially in relation to Allt Y Goch, the Halfway House car park access and gradients. The submission provides no detail as to the proposed access arrangements including indicative maps. Although it is recognised that there are services and facilities within the settlement it is considered that there are negative factors which outweigh the few factors which meet the criteria. Noted, however the submission provides no detail as to the proposed access arrangements. Noted, the site is within EA Flood Zone A - low risk. Site is not at risk of surface water flooding. It is unclear the extent to which replacing greenfield at the site with hard standing would alter surface water flood risk. Further investigation would be required, as limited information has be provided. The objector claims that there are no potential adverse ecological, but has provided no ecological

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						survey to establish whether this is the case or not. The site is within 500m of Ancient Woodland. This may affect priority or protected species, as it is agricultural (e.g. breeding birds) land. Site is a large greenfield site (>0.4 ha). Development at this location would reduce habitat connectivity by increasing distances between habitats or agricultural areas. Further work would be required to investigate whether there are any presence of newts in the vicinity and to what extent the proposed development would impact the local ecology. A key principle in PPW is that allocations are viable and deliverable and free from constraint, yet the objection provides no assurances or evidence that a satisfactory access can be provided or that the other issues covered above can be successfully addressed or mitigated. Site is adjacent to a working farm. The UDP Inspector noted that this may lead to conflict but the two

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						uses would not be entirely incompatible provided appropriate measures such as adequate separation distances and screening are provided. However there has been a lack of detail regarding the proposal in this submission. It is considered that no further work has been submitted to address and overcome the inspector's initial concerns regarding the site. Despite the objector's statement that the site is deliverable no background and technical studies have been submitted which demonstrate that the site is viable and deliverable. In conclusion, development of this prominent site would result in residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site does not therefore read as a logical urban extension. Additionally, in the context of uncertainty as to a number of constraints which might affect the site. The site is not considered to be necessary or appropriate as an allocation.

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383	HN1: New Housing Development Proposals	SAL002	Object	Watersmeet in Context Watersmeet offers a strategic location of the scale and physical characteristics that can help to deliver identified housing and infrastructure needs of Flintshire. The site is uniquely positioned to accommodate a new residential-led community; well connected to major employment hubs in Deeside and Chester and the wider region; bounded by urban influences which physically and visually provide important context to the character of the site; accessible by a range of public transport providing future residents with opportunities for sustainable travel; and a deliverable site of a scale where significant social benefits can be secured such as new and improved infrastructure, including supporting the CBGC. 1. Safeguarded we request that FCC safeguard Watersmeet within the Plan for future residential-led development. This will ensure that in the event that identified sites do not come forward during the Plan Period, Watersmeet support the long-term growth of the County, meeting a wide range of housing needs to offset any shortfall. This will also strategically position the site to support the delivery of the CBGC,	Inclusion of candidate site SAL002	Not accepted. The objection appears not to be actively promoting the site for allocation in this Plan period, but is seeking: i) The site safeguarded in the Plan as a contingency site in the event that other allocations do not come forward ii) The site identified as a location for future growth iii) Deleted from the green barrier The Plan has sought to identify an aspirational yet realistic growth strategy in terms of employment and housing and has identified allocations to help deliver this based on a spatial strategy as set out in policy STR2. Watersmeet site comprises a patch work of flat agricultural fields covering a very large area of 159.8 ha. Adjoining the border with Chester and England the site actually extends into the other county and country. The site is in the open countryside and in a C1 Zone of flood risk. The area forms the south eastern end of an extensive green barrier between the River Dee and the Cheshire

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				via either contributions towards and/or land to deliver this important infrastructure priority 2. Broad Location for Growth If not to be safeguarded, we consider that the area to the north of Saltney and to the west of Chester (including the Watersmeet site) should be identified within the plan as a 'Broad Location for Growth' shown illustratively on the proposals maps and showing an indicative alignment of the CBGC. 3. It is recommended that the LDP better reflects the importance of the CBGC in the proposed infrastructure policies of the Plan, recognising the potential for the CBGC to be delivered during the next Plan Period (to 2030) and, importantly, recognising the importance of key strategic sites in delivering FCC and wider sub-regional infrastructure priorities. It is important that both FCC and CWaC engage as part of their respective Local Plan processes to ensure that strategic and cross-border opportunities are fully and consistently reflected in emerging Development Plans.		border. The land is a significant and important part of the green barrier and is best and most versatile agricultural land. Furthermore, because of its scale and location, the implications of developing it are of sub regional significance. The Plans Preferred Strategy seeks to direct growth to the most sustainable settlements in the top three tiers of the settlement hierarchy. The proposed site would in effect remove most if not all of the Plan's housing allocations and focus development on the edge of industrial development at Chester. It would have a poor relationship with Saltney being separated by the River Dee. To develop such a large site would also take a long period of time to be started and delivered and would do little to assist the Plan in achieving its housing land supply and trajectory in the early years of the Plan period. The site is clearly contrary to the Plan's Strategy and is not appropriate or suitable to be allocated.

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				4. The Case for Amendment to the Green Barrier Boundary It is considered that the release of the site for development would have a limited impact on the purposes of the wider Green Barrier as set out in the PPW. It is not considered that Watersmeet is required to retain the openness of the Green Barrier and will not significantly impact the character of the countryside. The design response for Watersmeet provides the opportunity to create a new settlement that is a natural and logical extension to the urban form and that can support defensible and permanent boundaries on all sides. 5.Environmental and Technical Considerations Initial site investigations demonstrate that the site is deliverable and that there are no identified impediments to the development of the site that cannot be mitigated. The site sits within Flood Zone C1 and is served by significant infrastructure including flood defences; Whilst further mitigation is likely to be required, it is		The site has been promoted for development in previous development plans. Most recently it was submitted as an omission site as part of the UDP and considered by the Inspector who did not recommend allocation of the site or drawing back of the green barrier. The Inspector commented: 'The objection site measures about 25ha and lies to the north of the A548 Sealand Road. Its northern boundary is contiguous with the County's boundary with Chester. It is Grade 2 agricultural land within a C1 flood zone which forms an intrinsic part of the countryside between Chester and the Deeside conurbation. The Council's spatial strategy seeks to concentrate development within the defined towns and villages with their wider range of goods and services. I conclude in Chapter 3 of this report that such a strategy is satisfactory to guide development in a sustainable way. Whilst the objection site may be close to Chester and its amenities, it is only partly contiguous with

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				considered that this is feasible, given the flood defence measures put in place at Northern Gateway. 6. Illustrative Masterplan An illustrative masterplan has been prepared, the proposed area to be developed amounts to 45% of the overall site (74ha of 166ha). This enables 55% of the site to remain open and be devoted to green infrastructure. On this basis, the site can accommodate approximately 1,700 dwellings across 50 ha (43ha of residential land within Wales and 7ha within England), which equates to a density of 34 dwellings per hectare. Each neighbourhood within the development is designed to have easy access to greenspace The site is large enough to support a local centre which would provide a primary school, local shops, leisure and communities uses. The employment element at the site		and relates poorly to Blacon. Across the boundary in Cheshire the land abutting the site is for the most part green belt. Allocation of the site for development would therefore result in a satellite of new building within a strategic area of countryside whose openness is protected by green barrier/green belt designations in order to prevent the coalescence of settlements. It would result in an illogical boundary which would compromise the strategic function of the protected area. The objector has provided scant details of what development would be appropriate on the site. The UDP makes adequate provision for housing and employment growth. If there is no justification, which is the case in this instance, PPW does not support mixed use development of greenfield sites in the countryside. In addition given the sensitive border location where the objections indicate there is pressure, as opposed to need, for development it seems to me that should in the future it be determined there is a need for development in the locality it should be investigated as part of the LDP

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				would extend to approximately 18 ha.		process with cross border cooperation, not in an arbitrary way in response to an objection to the UDP. The SRSS does not support such a development at the present time'. The Inspector firmly resisted the site and considered it to be inappropriate and the Inspectors comments are still considered relevant to the present consideration of the site. Given the non-compliance with the LDP strategy, it would be illogical to designate the land in such a vague and imprecise manner as suggested by the objector. There is as yet no definitive outcome from the ongoing work relating to the Chester Broughton growth Corridor study to determine the transport infrastructure options that could be considered, let alone any development opportunities that may be related to this, either at this site or elsewhere. It would be premature to even broadly outline an intention to look at growth on this site at some future point, particularly in the context that the site has significant constraints that would count

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						against its sustainable development potential. It is evident that Chester West and Chester City Council is meeting its own housing needs, in particular through a large green belt release to the south of the city on Wrexham Rd. It is also evident that Flintshire is seeking to meet its own needs for housing. In this broader context there is no requirement to release a substantial part of a green barrier to accommodate development that is not required in either County. The LDP already recognises the importance of the two strategic sites allocated at Northern Gateway and Warren Hall, where there is clear direction of travel for the development of each site, and where they are positioned in a wider economic ambition context of taking forward the North Wales Growth Deal. The same cannot be said for this site. The green barrier in this location is an important designation. Following a review of all green barriers in the County it is proposed to make two minor changes to the extent of the

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						designation in this area. Results of the green barrier review are found in Background Paper 1: Green Barrier Review – September 2019. In summary this is the largest green barrier in the County and comprises a flat and open agricultural landscape on the north side of the River Dee. It mirrors the green belt mirrors the green belt in Cheshire and is essential in seeking to protect open countryside on both sides of the national boundary. The green barrier meets all of the functions set out in PPW and new development would be extremely prominent and conspicuous. The green barrier is justified given its open character and appearance and the level of development pressure in and around the city of Chester, and despite the overall scale and extent of the green barrier, the area covered by this site, and due to its relationship with Chester and its green belt, is a critical part of maintaining this relationship in terms of protecting the openness of the area from inappropriate development. There are number of key constraints affecting the objection site:

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						• Agricultural land – Welsh Government have undertaken on-site surveys and confirmed that the site represents grade 2 agricultural land. PPW clearly sets out to protect BMV agricultural land and specifies that it should only be developed where there is an overriding need. In the context of development plans on both side of the national boundary, there is no overriding need for this development. • Flood risk – the site sits within C1 flood risk zone. PPW10 seeks to direct development, particularly highly vulnerable development away from zone C1. TAN15 advises that residential development can only take place in zone C1 where it satisfies the justification tests. Given that one of the tests is that a site comprises brownfield or previously developed land, the proposed development cannot be justified. In any event, no FCA has been submitted by the objector. • Ecology – the site lies adjacent to the Afon Dyfrdwy (R. Dee) SSSI and the River Dee and Bala Lake SAC. No ecological surveys have been undertaken and submitted as

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						part of the objection in order to assess impacts on ecology • Transport – no Transport Assessment has been submitted as part of the objection to demonstrate that the site can be satisfactorily access. The Council's Highways Development Management Officer has highlighted the need for major road improvements and that the only access is cross-border, necessitating the involvement of Cheshire West and Chester City Council. There is no evidence that the site is technically deliverable nor evidence to demonstrate that it is a viable proposition. It would also be inappropriate for the site to be identified in the Plan as a future area of growth as requested by the objector. It will be necessary for the objector to put forward the site as a candidate site as part of the LDP review. The objection is accompanied by a Development Statement which includes an illustrative masterplan. It points to 50ha of residential development, a 6ha local centre

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						comprising schools, leisure and community uses as well as 18ha of commercial development. In effect the objector is portraying the site as, a new settlement. This also reflects the reality of its location being separated from existing residential areas in Chester by industrial development and being located adjacent to a sewage treatments works. PPW10 advises that new settlements must only be considered in exceptional circumstances and there are clearly no exceptional circumstances in this case. In conclusion, the Plan has provided for growth through the allocation of two strategic sites and a range of other employment and housing sites and a further strategic site is not necessary or appropriate particularly as it does not comply with the Plans spatial strategy. The site suffers from major constraints including grade 2 BMV, C1 flood risk, ecology and transport and no evidence has been provided to address these. The site is not necessary or appropriate to be allocated in the Plan, or excluded from the green barrier, or identified as an area for future growth.

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427	HN1: New Housing Development Proposals		Object	Whilst has no specific comments on the proposed allocations, we make some general points on a number of housing supply matters. the council should maximize housing supply to the widest possible range of sites. Supporting the 15% flexibility allowance however query whether given the uncertainties regarding the two key strategic sites and the reliance placed on the delivery of these whether this flexibility allowance should be increased.	15% Flexibility of housing land supply should be increased.	Not accepted. Representations on the Strategic Sites (STR3) have been dealt with under (id424 and id1271). The Council do not agree that the flexibility allowance needs to be increased, the LDP exceeds the flexibility allowance recommended by Welsh Government's Development Plan Manual 3.
454	HN1: New Housing Development Proposals	BUC018	Object	We wish to express our disappointment and submit this representation as an objection to your decision on the grounds of 1. The site BUC018 is on the edge of a sustainable settlement. 2. Developing this site would mirror development on the opposite side of the road and as such we do not believe that this does constitute ribbon development but a squaring off of the development to mirror that allowed on the opposite side of Bannel Lane. 3. Examples - There are examples of similar developments in the Buckley area where development has been given approval when it extends into the open country side (we are happy	Allocation Candidate Site BUC018 for housing.	Not accepted. Buckley is a sustainable settlement and has been categorised in the settlement hierarchy as a Tier 1 Main Service Centre. During the UDP plan period Buckley grew by 17.4%, therefore as a Category 'A' settlement, the aim for growth to be within 10% to 20% was fulfilled. The LDP makes provision for growth in Buckley as a result of the allocated site at Well Street and growth as a result of 175 completions in the first three years of the Plan period and commitments of 138 units as at the Plans Housing Balance Sheet date of April 2018. This shows that for the first 3 years of the LDP plan period there is an appropriate level of development for a Tier 1

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				to share our view of these and welcome a discussion about the sites) 4. Landscape – the building of the incinerator at Castle Cement has undoubtably had a detrimental effect to the views of the open countryside and undermines the green barrier classification of the area and it is our opinion that development on this site would actually enhance the views of open countryside by screening the unsightly view of Castle Cement (see App 1) 5. Under Flintshire County Councils Planning guidance you are able to approve limited infill for development outside of settlement boundaries where the land in question: • is not an important landscape, nature conservation, historic or other amenity feature which this site is not, and would provide a clearly identifiable small group of house within a continuously developed frontage to square of development as approved on the opposite side of Bannel Lane. • It does not constitute, or extend existing ribbon development. (see point 2)		settlement and a healthy number of commitments coming forward. Whilst it is acknowledged that the site proposed adjoins the settlement boundary of Buckley, the site has a narrow rectangular shape and extends away from the settlement boundary along the southern side of Bannel Lane. Beyond the properties 'Dovecote and Viandra' the land on the southern side of Bannel Lane features a sporadic, scattered pattern of development. Given the shape and configuration of the site, it relates poorly to the existing form and pattern of built development and forms an integral part of the open countryside and green barrier. The houses along the northern side of Bannel Lane opposite to the site are a clear example of historic ribbon development, with a row of properties facing on to the road with individual access points. The existence of ribbon development on one side of a road does not lead to a presumption that developing on the other side of the road is acceptable, as it is necessary to look at the individual characteristics of each. In this

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				• Any development on the land would respect adjacent properties.		case the proposal would result in a narrow block of development extending into open countryside away from and beyond the well defined settlement boundary along this part of Buckley i.e. to the south of Spon Green. It would harm an area of land which has an open aspect and which also provides a setting to urban edge and as such development of the site would consolation / perpetuate the existing ribbon development along Bannel Lane thereby confirming that further development is not sustainable in this location. The objector has not included any specific examples to consider. The site is still an important part of the green barrier regardless of the view from the site of the Cement works. All the Green Barriers in the UDP were reviewed as part of the Deposit LDP and the results of that review are found in Background Paper 1: Green Barrier Review – September 2019. The Green Barrier in this area is designated to form a break

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						between residential development at Buckley and the Padeswood / Castle Cement works which although is not a settlement, does comprise a large built up form in the landscape. The green barrier is not designated on the basis of protecting views or landscape quality per se, but in terms maintaining the openness of the land defined by it. Adding built development within the area as proposed, would reduce the openness and is therefore harmful in planning terms to the purpose and function of the green barrier in this location. The area has seen significant development pressure over successive development plans. The site was considered for development at the UDP Inquiry where the Inspector noted that ''By its character and appearance the site has more in common with the open countryside than the built up area and is included within the strategic green barrier which protects the rural area to the south of Buckley'' This conclusion is still relevant today.

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						It is also important to note that there is still significant pressure for development on the area to the south of Buckley. This is demonstrated by the planning application submitted at Spon Green, for 435 dwellings and 450sqm of retail,(ref 058237) which was refused permission in July 2018 and is located directly to the south east of this site. The main reasons for refusal were the fact that the site was in the open countryside and green barrier. Another more recent application was refused at Land South of Megs Lane Buckley (Ref 059387, March 2019) and again its location within the open countryside and green barrier were the main reasons for refusal. In this way the Green Barrier designation has been tested and has been found to be reasonable and justified in this location. It is also interesting to note that there has been no appeals lodged against these decisions. These decisions and the inspectors comment give added

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						strength to the continued Green Barrier designation in this location. The green barrier seeks to prevent coalescence of Buckley with built development at Padeswood and seeks to prevent encroachment into open countryside which provides a setting to the built form of this part of Buckley. The land fulfils the purposes for green barrier designation and should be retained. The objector is referring to policy HSG5 in the adopted UDP and Policy HN4 – C Infill Development in Groups of Houses in the LDP. It is inappropriate to use this policy with reference to this site and proposal since land does not need to be in the settlement boundary to be considered against the infill policy. This policy is specifically in relation to small scale infill development outside settlement boundaries in rural areas where there are clearly defined groups of houses. Only a single house or a semi-detached pair of houses would be permitted in a small gap between existing dwellings and the resultant house would also be for local housing need. This policy is to allow some development in rural areas where there is an

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						absence of housing allocations or the possibility of other sites coming forward within settlements. By contrast Buckley is a Tier 1 settlement where there are housing allocations, completions, brownfield sites and existing commitments yet to be built so there are many opportunities for development negating the need to use this policy. It is also not applicable to this case as there is not a clearly defined group of houses nor a small infill plot. In conclusion the Plan made provision for growth in Buckley and it is not necessary or appropriate for a further allocation to be made, particularly where it would harm a green barrier. The site is not appropriate to be allocated to be allocated in the Plan.
481	HN1: New Housing Development Proposals	Bryn Y Pys, Well Street, Buckley	Support	Support for the Well Street allocation, Buckley Including my land in the development would give easy road access from Well Street and into the development site which could be taken right around to the playing fields in Bod Offa, and this possibly would ease the proposed site access and exit. The playing fields would be moved and redeveloped into the new site and	Inclusion of additional site adjacent to Well Street allocation	Support for the Well Street allocation is noted. Not accepted. The additional site put forward by the objector, lies on the south western edge of Buckley to the south of the A549 Mold Road and is split into two distinct parts. The first part is at right angles to Well Street and is bounded to the north east by a

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				modernized. The utility services would be more accessible through the playing fields on Bod Offa. This would also decrease the costing of the development and the impact on the surrounding neighborhood to the minimum, at the same time the public footpath could be moved and enhanced making it more wheelchair and pushchair accessible, and making it more inviting for people to visit the Countryside. One of the paddocks at the moment has pigs. I am concerned for the safety of these rare breed pigs, with the increase and proximity of the population on the development and people feeding the pigs food which is not suitable for their consumption. I am willing to move and find another farm to carry on my conservation work with rare breed pigs and other animals.		public right of way and hedgerow beyond which are two agricultural fields comprising the Well Street housing allocation. The site is partly bounded to the north by residential development off Silverstone Drive and a detached property The Meadows. A vehicular access onto Well Street is located alongside the eastern boundary. To the west the site is bounded by open countryside. The second part of the site forms a strip of land along Well Street with a hedgerow and some mature trees along the frontage. A riding school with an extensive block of stabling and car parking runs along much of the northern boundary. In terms of the of the two distinct areas, the first is a narrow neck of land extending westwards along Well Street, where development would result in ribbon development which is not well related to the settlement form now and will not be even after the Well street allocation is built out. The second part of the site comprises several irregular shaped parcels of land either side of the farm complex, alongside the western edge of the allocation. From the public right of way

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						pleasant views are afforded across the site of the wider open countryside beyond. The allocation of the objection site would not represent a logical extension to the Well Street allocation, given the strong physical boundary represented by the hedgerow and public footpath. Development of the objection site would extend built development further into open countryside in a harmful manner and act as a precedent for further releases of land. The Highways DM officer has commented that the only feasible access would be through the proposed adjacent allocated site (HN1.1) given that the rural section of Well Street (beyond the allocated site) is considered unsuitable for additional traffic and protection of hedgerows prevents further improvements. Whilst it is acknowledged that the UDP Inspector allocated the Well Street site now reassessed and allocated in the LDP, there are limitations in terms of capacity on the local highway network and any extension to the allocated site would require a full Transport

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						Assessment which has not been provided. The objector suggests that the track leading to Bod Offa could be an access point however the highways officer comments ''The track, as described, is not recorded as public highway; I am not aware of any public access rights. Property boundaries either side of the track, at the junction onto Bod Offa, would prevent the provision of appropriate junction radii and will restrict the visibility available to drivers of vehicles exiting the track. The width of the track appears inadequate to accommodate a road and footways (or service margins) of appropriate width.'' The use of the track leading to Bod Offa Farm and The Meadows is not a suitable access point. The play area land is in third party ownership which means there is no guarantee that this land would be available for an access. Also the play area is a valuable community asset in close proximity to the housing estate, and unnecessarily moving it to a

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						location further away would not be acceptable. Footpath No 54 runs along the boundary of the site with the Well Street allocation. It is noted that footpaths can be re-routed to take account of new developments. Development of the allocated site will ensure that the footpath will remain the same and although there may be increased numbers of people using the path, steps can be taken to make sure people do not feed the pigs such as adequate fencing and signage provided by the farm owner. The site was promoted as an omission site as part of the UDP and the Inspectors comments from the UDP public Inquiry (to ref P1044 R1376 HSG1) are still valid, as follows: ''The site has two distinct parts. A ribbon of land fronting Well Street and a farmstead/land contiguous with the south western boundary of HSG1(3). The strip fronting Well Street would result in a narrow ribbon of development extending out into the open countryside and be contrary to UDP and national policies which seek to avoid such development. The larger portion could well prove a logical extension to HSG1(3) if

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						more housing was required and the local highway network could cater with the traffic, but that is not the case. There is no necessity to make further releases of greenfield land to meet housing need.'' The comments of the UDP Inspector are considered to be relevant to the present consideration of the site. It is not considered to represent a logical extension of the allocated site and would harm the character and appearance of open countryside. The Well Street allocation as it stands is a sustainable development which extends the settlement within an enclosed field up to a well defined physical boundary on the ground. The allocated site extends as far down Well Street as is reasonable to go and is contained along its southern boundary by mature hedges and public right of way, these provide a clear and distinct break point to the farm and countryside beyond. Further encroachment into the countryside is not necessary or required at this location.

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						Consultation Responses from Internal / External consultees: FCC Pollution Control There are objections from the Council Pollution Control on this site for a variety of reasons. 1. 'That the use of the narrow part Well Street as an access point to the site will lead to increased levels of noise and air pollution as a result of an increase in traffic and vehicle movement in an area where there are low levels at the present time'. However, highways comments on the allocated site adjoining this site makes it very clear that access to the objection site could only be taken from the Well Street allocation only, stating that ''whilst the principle of residential development has been accepted, a junction layout that will limit additional movements onto the rural section of Well Street will be required along with roads laid out to adoptable standard and appropriate cycle provision.'' Any access would have to be through the allocated site and arrangements would need to be put place to ensure that drivers

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						are discouraged from using the narrow part of Well Street. 2. 'That the site is also located immediately adjacent to a working livery (equine). Any new properties would likely suffer statutory nuisance from noise and odour as a result of their proximity to the stable blocks, manege and middens. Human health assessments and noise impact assessments would be required'. 3. 'That the ground conditions at the site make it very likely unsuitable for soakaways for either surface or foul water. There is no mains foul drainage to the site and the site is too small to accommodate septic systems'. 4. 'Surface water and groundwater drain from Well Street and the surrounding land into ditches along Well Street. Without this provision for drainage, properties are susceptible to flooding'. Developments are now required to incorporate SuDS. 5. 'The site has been used for agriculture and the grazing of pigs. Pig manure is very high in metals and can result in concentrations of metals in the soil capable of a

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						detrimental impact upon health. A land contamination assessment would be necessary'. Welsh Water/Dwr Cymru commented: ''A water supply can be provided for this site. The public sewerage network can accept potential foul flows from this development site. The proposed growth being promoted for Buckley Wastewater Treatment Works (WwTW) catchment would require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions.'' FCC ecologist: The site consists of various farm buildings, Improved Agricultural land with hedgerows, trees, ponds within and adjacent to the site. The pond within 60m to the west of the site has known GCN records, but the site has potential for amphibians, reptiles, badgers and nesting birds Hedgehog

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						records occur within the housing estate to the north. Any development would need to assess the Ecology of the site and provide an Ecological Impact Assessment with measures to avoid, mitigate, compensate, and enhance and manage wildlife features. FCC Minerals and Waste: The majority of the site is underlain by secondary shallow coal. PPW 10 states that safeguarding of coal is no longer required. In line with national policy, Policy EN23 of the Deposit Draft LDP does not intend to safeguard coal and therefore the site is not underlain by mineral of economic importance. Regardless of this, the mineral resource is already constrained/sterilised by other residential development. Furthermore, the site is too small to warrant prior extraction. Coal Authority: - Not in development high risk area. Welsh Government Agriculture:

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						The Department does not hold detailed ALC survey information for this site. The Predictive ALC Map for Wales (Version 2 – 2019) notes the site to be Subgrade 3b. In conclusion, the site is not considered to represent a logical extension to the Well Street housing allocation, would take development too far south along Well Street, and would result in development which would harm the character and appearance of the locality. The site is not appropriate to be allocated.
484	HN1: New Housing Development Proposals		Support	I wish to objected about the plans to build a massive estate of Tan-y-Felin and please see my comments below made in July 2014 which has never been acknowledged or replied to! My comments in that e-mail remained unchanged and I would like to add the following:- 1. Wildlife – We have frequent visits from badgers & foxes into our garden and cross Ffordd Dwyfor road between our property and the sub-station, the increase of traffic will result in these animals being killed! 2. Playground – this will become an accident waiting to happen with the increase of traffic, sat on a very busy junction into Fford Dwyfor & Tan-y-Felin. This area is ready a race track and cars speed		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				up & down these roads (video evidence can be provided if required) 3. Greenfield School – I understand this school is almost full now, so where will these new pupils go to school?		
486	HN1: New Housing Development Proposals		Support	I would like to register my concerns and objections to the proposed development of a housing estate off Tan Y Felin fields in Greenfield. I do not believe that the local area has the necessary infrastructure for such a development and I have major concerns about the increase in traffic on Tan Y Felin Road that this would bring. Such a development would put an increasing strain on local services such as schools, doctors, dentists and public transport which are already stretched.		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfield and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.
530	HN1: New Housing Development Proposals		Support	I am writing to express my concern on the recent planning application to extend the Tan y Felin estate in Greenfield. I have lived in or around Greenfield all of my life. I have 3 children under 8 with 2 attending Ysgol Maes Glas and my youngest attending the playgroup. I am a committee member for the local football team and assist with the youth set up as well as the general operations of the community club. The current highway network is already saturated with domestic		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfield and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				traffic, Busses and HGVs especially during peak times. Ysgol Maes Glas and playgroup - The school Has some of the highest class sizes in Flintshire already. Services - There is no Doctors surgery anymore and no Dentist. The residents currently have to travel to Holywell or Flint which again are already saturated with long waiting lists for both. Environment and Wildlife - Historically Greenfield has suffered with drainage issues and to add further stress to an already faltering system would again be hazardous to the environment. The disruption post heavy rainfall is ever present and is hazardous to the already heavy traffic flow. Increased volume of cars would also increase the air pollution. The proposed building site is currently home to Bats, Badgers, Foxes not to mention the numerous species of birds of pray such as Buzzards, Owls and Red kites.		
533	HN1: New Housing Development Proposals		Support	I'm a resident of the Tan Y Felin estate in Greenfield and I writing to express my concerns about the proposed new development. > > I have 3 children, 2 of which attend Ysgol Maes Glas (of which Im a Governor) and 1 attends Greenfield Playgroup (of which I'm a committee member and provide accounting support). > > Greenfield is already		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfield and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the

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				very densely populated and I cannot see how there is any scope for local services to cope with the demand associated with the increase in population. > Both the school and playgroup are regularly at full capacity. > There is already no Drs or Dentist in the village. > I drive my children to and from school everyday and the roads are already busy. > The area around the school is already dangerous as the school has no parking, therefore, the residential areas already sees cars parked on the no parking zig zags, blocking drives or on the pavement. All of which is a safety hazard to pupils and residents. > > The proposed plans mention access via Ffordd Dwyfor. This is extremely concerning as the Tan y Felin play area is on the corner of this junction. This is already a problem area, as cars drive at speed around this blind bend into Ffordd Dwyfor and children (mine included) must cross just before the junction just to access the playground. Any increase in traffic is an RTA with children waiting to happen. > Similarly, to get to this access, cars must drive up Tan y Felin. A road which already sees drivers speed up and down through the blind bends. > Children's safely must be considered before profit. > > The area proposed is such an area		LDP has been noted as a support to the exclusion of these sites.

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				of natural beauty and wildlife. Local children play in the fields and woods proposed for development because they cannot access Greenfield Valley without crossing the busy Well Hill (for which there is already insuffient crossing support provided to residents of Tan Y Felin wanting to access from the estate). > Building on this green area would leave local children and residents with no green area that had any safe access. > Greenfield needs investment and improvement for its existing community, not to damage existing services in order to profit developers. > > I absolutely oppose these plans due to concerns for the welfare and safety of the children already living in Greenfield.		
537	HN1: New Housing Development Proposals		Support	Many residents tell me that this area..FL1003 was rejected once by planning inspectorate..I seem to recall this.. so we object once again to this land being included in the LDP..talk about overdevelopment!!! If this land was to be included it would basically become another village WITHOUT any further infrastructure...and as you may be aware the current Croes atti development did include...shops...medical centre..community hall and a school..well Residents haven't had		Noted. Candidate site FLI003 has not been included within the LDP for development. The area of land remains outside of the settlement boundary therefore your objection to the LDP has been noted as a support to the exclusion of this site from the plan.

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				any of this yet and don't think any of this likely (maybe school..Welsh..) but we aren't holding our breath. The impact of the two roads which will soon be opened up..Prince of Wales and Coed onn are in our opinion a recipe for disaster and will just be a cheap bypass for the inadequate A548...I will say I told you so. This was given the ok by the planning inspectorate a few years ago after it was rejected by planning committee if you remember, but we hope the planning inspectorate will once again realise that this extra parcel of land is a step too far and not include it.		
551	HN1: New Housing Development Proposals	Candidate Site MOL040	Object	LAND BETWEEN UPPER BRYN COCH AND LLYS AMBROSE, OFF RUTHIN ROAD, MOLD - MOL040 I write on behalf of my client company, Llay Hall Investments, to object to the Council's decision not to include the above site as a housing allocation in the emerging Flintshire Local Development Plan and to register a concern that the Council's approach to meeting the projected housing requirement is not entirely 'sound'. It is considered that the current approach to the delivery of housing is not sound because of an over-reliance on small and windfall sites,	Allocate Candidate Site MOL040 for housing.	Not accepted. Welsh Government, in Development Plans Manual 3, advise that a Plan must include a flexibility allowance and that 10% is a starting point. In this context a flexibility allowance of 14.4% is considered to be sufficient particularly given that the Plan is on track in terms of completions in the first 4 years of the Plan period delivering the Plans requirement. The Plan's Housing Balance Sheet does not show all of the Northern Gateway housing as being delivered within the Plan period, with 331 units being discounted from the Plans supply. The two strategic sites are both

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				a small number of large allocations and two very large strategic sites (which do not relate to Tier 1 settlements), and insufficient allocations in Tier 1 settlements such as Mold. The flexibility allowance is also considered to be a conservative estimate. As a result, there is serious risk that the housing requirement will not be delivered within the plan period. Unclear why the allocated site on HN1-6 is deemed a more appropriate location for residential development as it is relatively remote from the town centre and the majority of local services and reliant on private car. MOL040, is well connected to the town centre the bypass and is a more sustainable location. In addition, the proposed allocation encroaches into open countryside and does not have such clear or defensible boundaries as Candidate Site MOL040, which is contained by a trunk road. You will be aware that in 1991, the Local Plan Inspector opined '3.116 Moreover, in the interests of proper and effective development of the land south of		previous UDP allocations which have planning permission and it is not considered necessary for them to relate to a Tier 1 settlement, as they represent mixed use developments. In focusing on allocations the objector fails to consider the Plan's total housing land supply as clearly within Tier 1 settlements there will be growth as a result of completions to date and commitments, as well as possible small and large site windfalls. In fact, in Mold there is part of the County Hall site which is highly likely to come forward as a windfall site later in the Plan period. As commented on above the Plan delivers housing from other sources of supply and not just new allocations. However, the Plan sought to move away from the UDP practice of a large number of small to medium sites dispersed across the County in favour of a new approach of larger sites which are more attractive to the development industry and more capable of being viable and deliverable.

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				Ruthin Road, and in the interests of the adjoining Green Barrier, it is clearly important that the boundary between the two should be obvious and defensible. I conclude that the most suitable boundary lies along Upper Bryn Coch Lane'. Aside from the Green Barrier designation (and the LDP proposes to remove other sites from the Green Barrier in order to be designated as housing allocations such as HN1-7), it is asserted that there is no logical reason as to why Site HN1-6 is preferred over and above sites at the south-western end of Mold such as Candidate Site MOL040. To this end, Candidate Site MOL040 offers the following benefits: • The site is well related to Mold Main Service Centre, which is one of the largest settlements within the County; • The site makes a very limited contribution to the purposes of including land within a Green Barrier, given its position on the inner side of the bypass. The bypass is considered to be the logical defensible barrier which clearly defines the end of the settlement of		The Plan has focused on housing allocations which are in sustainable locations and which are viable and deliverable, being supported by a significant amount of background studies and evidence. The objector offers no such evidence of the promoted site being viable or deliverable yet considers it preferable to the Plans allocations. It is of note that the HBF is supportive of the Plans approach to windfalls and commitments and there is also on objection from Welsh Government in terms of this aspect of the Plan. The allowance is conservative and realistic and the Urban Capacity Study findings demonstrates that the Plans figures of 60 per annum for small sites and 50 per annum for large sites is realistic. The early years of the Plan period is clearly demonstrating that the Plan's housing requirement is being achieved in terms of completions. The housing trajectory in Background Paper 10 demonstrates that the Plan can deliver its housing requirement figure.

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				Mold and the development of the site would amount to logical infilling. • The site has no insurmountable physical or technical constraints which would prevent residential development of up to 30 dwellings; and • There is no reason why the site could not be developed in the short term, thereby making an immediate impact on the 5 year housing supply.		As the objector states, Mold already has two allocated sites, one of which is already under construction (Wates at Maes Gwern) and only 300m the objection site. However, growth in Mold will also take place as a result of completions (156 completions in first 3 years of the Plan period) and commitments (177 commitments as at April 2018). The allocated site HN1.6 is sequentially preferable to the objection site as it does not lie within a green barrier in the adopted UDP. The allocated site is also not remote from the town centre and is actually closer to The Cross than is the objection site. The allocated site does enjoy access to a local bus service and is a short walk from the local shops on Elm Drive. Contrary to the objectors claim, it is considered that the allocation site is actually more sustainably located than the objection site The allocated site HN1.6 benefits from the creation of a new road and junction with Denbigh Road which is acceptable to Highways

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						Officers and also an access onto Gwernaffield Rd. By contrast the objection site is considered unsuitable for development as Highways Officers have identified that there is a lack of adequate junction visibility onto Ruthin Rd. Highways Officers consider that the site could only be reconsidered if the speed limit of Ruthin Road is amended. The objector has provided no technical evidence to demonstrate that a suitable vehicular access can be created. Contrary to the alleged benefits of the site diverting traffic away from the town centre, there is no evidence that the site can be satisfactorily accessed. The allocated site is clearly not in breach of PPW as it is in a sustainable location accessible to a range of services and facilities and the town centre. It has the potential to facilitate journeys on foot, by cycle and by public transport. The existing built development is considered to represent a firm and defensible settlement boundary in this part of Mold. The site sits at a significantly higher level than the

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						existing residential development at Llys Ambrose. When viewed from Upper Bryn Coch only the rooftops of properties at Llys Ambrose are visible. Built development on this elevated site would be prominent in the landscape. The creation of a vehicular access onto Upper Bryn Coch (even if technically possible) would require the removal of stone boundary wall and hedgerow and mature trees and harm the rural character and appearance of the locality. Similarly, even if a vehicular access were possible onto Ruthin Rd, it would require the removal of grass embankment and trees and harm the present rural approach into and out of Mold along the A5119. In both cases the creation of a vehicular access would have an urbanizing effect. The site relates more closely to the character and appearance of open countryside than it is does the existing form and pattern of development. It therefore forms an integral part of the wider open countryside wrapping around the south western edge of Mold which forms an integral part of the green barrier between Mold and Gwernymynydd. The development

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						of the objection site would clearly harm the openness of the green barrier and extend built development onto visually prominent land. It is noted that the objector refers to a quote from the Delyn Local Plan Inspector which is some considerable time ago now and planning policy at the national and local level has changed significantly since then. More recently the UDP Inspector considered the site as an omission site, alongside the [then] allocation of land at Llys Ambrose (HSG1-18 West of St Marys Park) in the Deposit LDP. The Inspector commented on the omission site 'Whilst this site lies to the south of HSG1(18), the change in levels marked by mature trees means that the site relates better to the open countryside than the allocation to the north and also provides a firm defensible settlement boundary. The higher ground levels makes the site more prominent than the allocation and it is seen in the context of Bryn Coch Hall to the east and Bryn Coch House to the south which are set in agricultural land. They have a different character to the

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						more tight knit housing in the settlement'. In respect of the green barrier the Inspector commented 'The site forms part of a narrow neck of prominent open countryside which serves to preserve the openness of the countryside between Mold and Gwernymynydd. Whilst, as part of the production of future plans, the green barrier will need to be reviewed (to accord with national policy), it seems to me that at present where there is no need to identify more greenfield sites for development, where the land by its character and appearance is better related to the countryside, and where the openness of that countryside is worthy of protection by a green barrier designation in order to prevent encroachment into the rural area/the coalescence of settlements, the objections do not justify any modification to the plan'. In the context of the Inspectors comments it is evident that the provision for allocated sites in the LDP has been made without the need to release land from green barriers. The site

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						remains an integral part of the green barrier between Mold and Gwernymynydd. As demonstrated above growth in Mold has been achieved and will be achieved as a result of completions, commitments and possible windfalls and it is not necessary or appropriate for a further site to be allocated, particularly when that site would fundamentally weaken the purpose of a green barrier, and harm the character and appearance of the locality. . The points within this summary section of the objection have been addressed above. However, in addition to the green barrier response above, it is evident that the objection site has the same character as the remainder of the green barrier which wraps around the south western edge of Mold. Development in this broad location would result in encroachment into countryside, weaken the gap between Mold and Gwernymynydd, and harm the setting to the settlement of Mold. This part of Mold is particularly sensitive given the presence of the former prison which contains

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
						several listed buildings and the listed walls. The agent acts for clients who promote land for development on the eastern side of the prison (MOL006) and argues that its development should be in conjunction with the adjoining site MOL052, with the result being that the former prison would be engulfed by development and losing entirely its present open setting. The Council disagree with the assertion that there are no insurmountable constraints to development given that there is no evidence that a satisfactory vehicular access can be provided. Furthermore, other than to say that the site can be developed within a 5 year period, there is no indication as to a timescale for development in terms of the Council's published housing trajectory. In conclusion, sufficient growth has been provided for in Mold over the Plan period and it is not necessary for a further site to be allocated, particularly when it would harm a green barrier and where there are constraints which have not been overcome.

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558	HN1: New Housing Development Proposals		Support	More houses needed in Flintshire.	Larger houses are needed for people to move up into, to free up smaller homes for others. 15% affordable housing is more acceptable.	Support noted. The LDP makes provision for the development of 7,950 dwellings over the plan period, to meet an identified need for 6,950 dwellings.
559	HN1: New Housing Development Proposals	FLI018 Land West of Leadbrook Drive, Flint	Object	The site at Quarry Farm, to the east of Flint, is being actively promoting for residential development and is subject of a live Outline planning application for 120 dwellings (ref: 052566) (the site referred to in the Local Development Plan ('LDP') Candidate Sites Paper as land west of Leadbrook Drive, Flint (Site FLI018)). As a means of seeking quick delivery (subject to planning permission) the owners are in discussions with a reputable housebuilder, having previously complied a shortlist of preferred bidders. As such, the site is suitable for housing and should be identified as such in the LDP. The 4.8ha site is to the south of Chester Road and west of Leadbrook Drive, Oakenholt (east of Flint). Immediate site boundaries include Leadbrook Drive and associated housing to the east, grassland to the south, Croes Atti housing development to the west	Allocate Candidate Site FLI018 for housing	Not accepted. The planning application 052566 which was submitted in 2014 is no longer live. Since the application was made CADW have designated the scheduled ancient monument within the site boundary. The Council approached the applicant's agent to request further information as the application would need to be amended in light of the CADW designation. The agent requested that the application remain live, however they were advised by the Council that they must submit further information within a set time period for the application to remain live. The agent failed to provide this information within the given timeframe therefore the case has been closed. The failure of the agent to provide further information demonstrates that there are significant issues with site deliverability, therefore it

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				and Chester Road north. The site is therefore effectively bound on 3 sides by existing and emerging development. It has multiple potential points of access, either through the adjacent housing development or a dedicated access off Leadbrook Drive. In terms of public transport, there bus stops (Buses 10A, 11, 11A, 11D, D1, D2 and D3) located on Chester Road and Flints railway station is 2km north-west. There site is not subject to any statutory designations (such as listed buildings or conservation designations) and there are no locally sensitive uses. The site is predominantly in Flood Zone A and therefore at the lowest risk of flooding, as shown on the Welsh Flood Map for planning. Flint is the third largest town in Flintshire and has a range of accessible amenities and facilities including employment, shopping, cultural and leisure offers. However, future growth of the town is significantly constrained. To the north, the Dee Estuary provides a physical constraint, while a Green Barrier designation is to the south. The west and north-west of the town is characterised by employment development. Consequently, the only		could not be considered suitable for allocation within the plan. The Council's assessment of the site also highlights that it is subject to a number of constraints which are likely to impact upon viability and delivery and the promoter has had more than sufficient time to provide a more than superficial case to support the site. There are allocated sites within the LDP with undetermined applications, these however are supported by strong evidence which demonstrate the sites deliverability during the plan period. The applications on the allocated sites referred to by the objector have been under consideration for a considerably shorter timescale than the objection site. The fact that a planning application was under consideration for over 5 years with no tangible progress or submission of substantiating evidence hardly demonstrates viability and deliverability in the context of being allocated in the LDP. Flint is a Tier 1 Settlement which is recognised as a sustainable location for growth in both the

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				logical areas of growth are to the south-east (in direction of the subject site). As such, Flint, as a town with accessible, established and wide ranging local facilities and amenities is a logical location for further growth. We therefore go on to identify inconsistencies in the way the council has assessed potential sites, with reference to the assessment of our client's site. Background Paper 9 'Assessment of Candidate Sites and Alternative Sites' (2019), forms the LDP evidence base, discusses the subject site (ref: FLI018) and states: 'A planning application (052566) for 120 dwellings was validated on 22/08/14 and is still under consideration and this must question the viability and deliverability of the site. In this context it is not considered suitable to be an allocation.' The evidence base therefore assumes that a site is undeliverable simply because a planning application remains undetermined. However, this conclusion is directly at odds with the conclusions made on similar sites which have been allocated. For example, Northop Road (Flint) technically has no		UDP and the LDP, Tier 1 settlements have a strategic role in the delivery of facilities and services across Flintshire. Flint has already seen growth in the earlier years of the plan period with 308 dwellings completed in the early years of the plan period (2015-2018). There are also committed sites in Flint which will provide further growth for the town including an additional 378 dwellings on the adjacent Croes Atti site, 73 units on the Earl Lea site, 19 units at Ystrad Goffa Court and 15 units on the Flint Working Men's Club site. In addition to these commitments the allocated site at Northop Road will provide 170 dwellings which is a logical extension in a sustainable location. Collectively the committed sites and Northop Road will deliver a further 655 dwellings in Flint over the plan period, this is sufficient growth for the town therefore candidate site FLI018 is not needed. Given the amount of land available with planning consent at Croes Atti, in close proximity to the site, there is no justification for extending built development

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				planning consent (two applications from September 2017 (ref: 057565) for 20 units and April 2018 (ref: 058314) for 145 units remain undetermined) yet is allocated. The same applies to the New Brighton (Cae Isa) site (Site 10), which is proposed to be allocated for 105 units but there is no clear evidence of delivery. Two further sites are proposed for allocation despite previous planning applications being withdrawn or dismissed on Appeal. The Highmere Drive (Connah's Quay) allocation (Site 3) was promoted for 185 dwellings in 2005 (ref: 043873) but a subsequent Appeal was withdrawn in 2008 and there has been no progress on the site. The Wrexham Road (Hope) allocation (Site 9) was subject to a now withdrawn planning application from 2018 (ref: 058163), and there has been no further progress. Evidently the delivery of these sites is very questionable and certain sites have been rolled forward from previous plans, despite no evidence they can be delivered. This is clear evidence that several proposed allocations are at obvious risk of stagnating and thus remaining undelivered for a further plan period. Therefore, the council's assessment		further to the south and east and into open countryside. This site forms part of a larger candidate site submission (FLI003 refers). Despite adjoining the settlement boundary to the north west, the site forms an integral part of the open countryside on the south eastern edge of the town and part of the wider open countryside to the south of the access track leading to Little Leadbrook Farm. Development would therefore result in an incursion which would be harmful to the character and appearance of the open countryside. The Council's Highways Development Management officer has stated that access to the site is potentially suitable subject to a transport assessment, and that it is assumed that this site would be accessed through the approved Croes Atti development. Leadbrook Drive is considered unsuitable as a means of vehicular access to the site but may be required as an emergency access point along with foot and cycleway provision.

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				of sites is significantly inconsistent and there is a need for additional sites. Land at Quarry Farm is such a site Highways and Accessibility An appropriate access can be achieved off Chester Road. The local highway network has the capacity to accommodate the proposed residential development of this site. The site is easily accessible by bus, rail, walking and cycle. The same modes of transport can be used to access the excellent amount of facilities and services in Flint. Ecology In ecological terms the site is considered to be suitable for residential development. Mitigation measures will be incorporated where possible to minimise any impact upon the ecological value of the site. There may be scope to enhance the ecological value of the site through careful planting and retaining of key features. Landscape & Visual Impact When considering the evolution of the surrounding area, in particular		It is noted that the site is well served by public transport. The site is located in close proximity to the Dee Estuary SAC, SPA, SSSI and RAMSAR all of which are within 160m of the site. In addition the development would result in the significant loss of the best and most versatile agricultural land contrary to national planning policy. The objectors submission identifies that the majority of the site is classified as grade 2. The site will have a significant visual impact on the landscape as it will result in the spread of development from the Croes Atti site across to the row of existing houses along Leadbrook Drive, filling in this important gap which is within the open countryside. This site formed part of a larger housing ommission site within the UDP, the Inspector made the following comments as to why it should not be included within the UDP. “This open field is part of the countryside around the edge of the Flint settlement boundary. Whilst it is adjacent to the Croes

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				the Croes Atti development, the landscape and visual impact of the site is diminished. It is considered a carefully designed scheme can integrate within the Arboricultural Impact Although the final layout of the scheme is yet to be prepared; this document highlights residential development which retains the most valuable trees on site can be delivered. Flood Risk The site is within Flood Zone A and therefore considered to be at little or no risk of fluvial or coastal/tidal flooding. An appropriate site layout can be achieved which prevents flooding both on and off the site. Archaeology Archaeological surveys on the site have found the remains of a Roman Road to the north of the site. In line with the Council's recommendation, this area will be excluded from development. This will ensure development can come forward		Atti commitment it does not follow that it should be allocated for housing development. To allocate it would extend the urban form into the countryside and result in consolidation with part of the ribbon development along Leadbrook Drive. I do not support the allocation or the suggested extension to the settlement boundary." Because of the archaeological need to retain the northern part of the site as public open space, the proposed development of the site does not relate well to the existing form and pattern of development and does not represent a logical urban extension. The access road appears convoluted and the development wraps around the outside of the southeast corner of development at Croes Atti and blurs the clear distinction between the modern estate type development and the historic ribbon development along the eastern edge of Leadbrook Drive. Noted. Noted. The site is located in close proximity to the Dee Estuary C1 & C2 zones, however it is located

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				without any detrimental impact in archaeological terms. The assessment identifies there are no significant technical constraints which would prevent delivery of this site. Any development would be designed in consideration of all the identified opportunities and constraints to deliver an efficient and appropriate scheme. It is considered the site is deliverable within the next 5 years.		outside of these. Noted. Because of the archaeological need to retain the northern part of the site as public open space, the proposed development of the site does not relate well to the existing form and pattern of development and does not represent a logical urban extension. The access road appears convoluted and the development wraps around the outside of the southeast corner of development at Croes Atti and blurs the clear distinction between the modern estate type development and the historic ribbon development along the eastern edge of Leadbrook Drive. The objector claims that the site is free from significant technical constraints, so it is unclear why a planning application has been unable to be determined for over five years. The objection contains little evidence to suggest that the site is viable, free from constraint and deliverable. There has been sufficient growth within the earlier years of the plan period with 478 dwellings already completed within Flint. There is

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						also sufficient growth planned for the town on existing commitments and the allocated site at Northop Road, which is considered to represent a more logical urban extension. Therefore candidate site FLI018 is not required, particularly when it would result in an illogical extension to the settlement and intrude awkwardly into open countryside, resulting in the loss of best and most versatile agricultural land. In conclusion, the LDP has provided for a substantial amount of development in Flint and it is not considered that an additional allocation is necessary or appropriate, particularly where there are clear concerns about its viability and deliverability.
561	HN1: New Housing Development Proposals	MOL004 Land North of Wood Lane, Mold	Object	In relation to the comments made for the land at Wood Green, Mold, please see my arguments in relation to the same. Modest in size - In relation to the comments that the land is modest in size, the close location of the site to the Town Centre of Mold does not appear to have been taken in to account in any way. In light of the close proximity to the Town Centre, this makes the site more appealable to family's that are required to live local to all Town	Allocate Candidate site MOL004 Land north of Wood Lane Mold for housing.	Not accepted. A separate detailed response has been provided to the representation (id663) by the site promoters agent. The site may well be modest in size but it lies outside a well defined settlement boundary, within a green barrier, partly within a C1 flood risk zone with no Flood Consequences Assessment and with no agreed means of creating a vehicular access to the

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				Centre amenities. Public Footpath - With a view to the public footpath and the comments that this would result in visual harm, there is currently a very well established hedgerow which already obscures the view from the land so therefore by leaving the hedgerow in situ any development would not interfere with the hedgerow at all and would therefore not cause any visual harm whatsoever. This can be further demonstrated in view of the fact that further down the footpath in question, planning permission has already been granted and properties have been built. Flooding - Agreeably, the Environmental Agency has categorised the part site as C1. However, in reality, as can be seen from the enclosed photograph taken on 13th June 2019 whilst the land to the right of the development site is quite clearly flooded, the site is in fact free from any flooding whatsoever. Further, if the site was to be the subject of inspection one could quite easily see that if the site was to flood then the whole of Mold would need to be under water, this owing to the fact that the development site is elevated above the Mold area. Restricted Access - Firstly, the access issue could be addressed by reference to fewer dwellings being built. Secondly, there		site. The site is bounded by a public right of way and despite the presence of a hedgerow, would harm the present open character and the Alyn Valley. The site is not appropriate to be allocated or included within the settlement boundary.

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				is the option to purchase the garden area at the end of Wood Green which would allow a greater access. Finally, there is a possibility of development on the adjoining site next to the rugby club. This would open up greater opportunities for access.		
571	HN1: New Housing Development Proposals	Candidate Site MOL006 Land South of Haven, Off Upper Bryn Coch, Mold	Object	LAND SOUTH OF THE HAVEN, OFF UPPER BRYN COCH, MOLD MOL006 I write on behalf of the landowner, to object to the Council's decision not to include the above site as a housing allocation in the emerging Flintshire Local Development Plan and to register a concern that the Council's approach to meeting the projected housing requirement is not entirely 'sound'. It is considered that the current approach to the delivery of housing is not sound because of an over-reliance on small and windfall sites, a small number of large allocations and two very large strategic sites (which do not relate to Tier 1 settlements), and insufficient allocations in Tier 1 settlements such as Mold. The flexibility allowance is also considered to be a conservative estimate. As a result, there is serious risk that the housing requirement will	Allocate Candidate Site MOL006 for housing.	Not accepted. Welsh Government, in Development Plans Manual 3, advise that a Plan must include a flexibility allowance and that 10% is a starting point. In this context a flexibility allowance of 14.4% is considered to be sufficient particularly given that the Plan is on track in terms of completions in the first 4 years of the Plan period delivering the Plans requirement. The Plans Housing Balance Sheet does not show all of the Northern Gateway housing as being delivered within the Plan period, with 331 units being discounted from the Plans supply. The two strategic sites are both previous UDP allocations which have planning permission and it is not considered necessary for them to relate to a Tier 1 settlement, as they represent mixed use developments.

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				not be delivered within the plan period. Unclear why allocated site HN1.6 is deemed a more appropriate location for residential development as it is relatively remote from town centre and majority of services and reliant on private car. MOL006 is well connected to the town centre and the bypass and is a more sustainable location. Aside from the green barrier there is no logical reason why HN1.6 is preferable over MOL006 particularly when considered alongside MOL052 which together amount to a logical rounding off, leaving a significant and distinctive separation between Mold and Gwernymynydd. To this end, Candidate Site MOL005 offers the following benefits: • The site is well related to Mold Main Service Centre, which is one of the largest settlements within the County; • When considered alongside Candidate Site MOL052, it amounts to a logical infilling of the settlement within the defensible boundary of the trunk road;		In focusing on allocations the objector fails to consider the Plans total housing land supply as clearly within Tier 1 settlements there will be growth as a result of completions to date and commitments, as well as possible small and large site windfalls. In fact, in Mold there is part of the County Hall site which is highly likely to come forward as a windfall site later in the Plan period. As commented on above the Plan deliver housing from other sources of supply and not just new allocations. However, the Plan sought to move away from the UDP of a large number of small to medium sites dispersed across the County in favour of a new approach of larger sites which are more attractive to the development industry and more capable of being viable and deliverable. The Plan has focused on housing allocations which are in sustainable locations and which are viable and deliverable, being supported by a significant amount of background studies and evidence. The objector offers no such evidence of the promoted

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				• A significant and distinctive separation would remain between the extended settlement of Mold and the settlement of Gwernymynydd, thereby ensuring that no coalescence would take place; • The site has no insurmountable physical or technical constraints which would prevent residential development; and • There is no reason why the site could not be developed in the short term, thereby making an immediate impact on the 5 year housing supply. The Council is respectfully requested to reconsider its approach to housing supply and also reconsider the merits of designating Candidate Site MOL006 as a housing site.		site being viable or deliverable yet considers it preferable to the Plans allocations. It is of note that the HBF is supportive of the Plans approach to windfalls and commitments and there is also on objection from Welsh Government in terms of this aspect of the Plan. The allowance is conservative and realistic and the Urban Capacity Study findings demonstrates that the Plans figures of 60 per annum for small sites and 50 per annum for large sites is realistic. The early years of the Plan period is clearly demonstrating that the Plans housing requirement is being achieved in terms of completions. The housing trajectory in Background Paper 10 demonstrates that the Plan can deliver its housing requirement figure. As the objector states, Mold already has two allocated sites, one of which is already under construction (Wates at Maes Gwern) and only 200m the objection site. However, growth in Mold will also take place as a result of completions (156

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						completions in first 3 years of the Plan period) and commitments (177 commitments as at April 2018). The allocated site HN1.6 is sequentially preferable to the objection site as it does not lie within a green barrier in the adopted UDP. The allocated site is also not remote from the town centre and is actually closer to The Cross than is the objection site. The allocated site does enjoy access to a local bus service and is a short walk from the local shops on Elm Drive. Contrary to the objectors claim, it is considered that the allocation site is actually more sustainably located than the objection site The allocated site HN1.6 benefits from the creation of a new road and junction with Denbigh Road which is acceptable to Highways Officers and also an access onto Gwernaffield Rd. By contrast the objection site is considered unsuitable for development as Highways Officers consider the lane leading up to Upper Bryn Coch to be unsuitable to carry any additional traffic. Highways Officers would require a Transport

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						Assessment in order to comment further. The land between the site and the public highway Upper Bryn Coch is outside the boundary of the objection site. In the absence of an access through the adjoining candidate site MOL052 to the west, there appears to be no means of securing a vehicular access. Contrary, to the alleged benefits of the site diverting traffic away from the town centre, there is no evidence that the site can be satisfactorily accessed. The allocated site is clearly not in breach of PPW as it is in a sustainable location accessible to a range of services and facilities and the town centre. It has the potential to facilitate journeys on foot, by cycle and by public transport. The objection site is presently poorly related to existing residential development as it sits back from and above the built development at Upper Bryn Coch and Maes Gwern, being separated by an intervening field. The objector has provided no evidence as to how a technically feasible vehicular access can be

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						provided and the development of the site appears reliant on adjoining land to the west MOL052 which is much larger at 4.4ha. The two sites together would remove a large proportion of the open green barrier alongside the A494 leaving only the 1.7ha of land directly alongside the roundabout as being green barrier. However, this isn't the only land being promoted for housing development in this south western corner of Mold as land to the north of Upper Bryn Coch was also submitted as a candidate site (MOL040 – 1.6ha). The three sites together would virtually remove the whole of the green barrier to the east of Ruthin Road and the north of the A494(T). On its own it represents an 'outlier' block of development divorced from the existing form and pattern of development. The sites destiny is therefore not in its own hands and is dependent on another landowner / developer to be implemented. The site immediately adjoins the western boundary of the former prison, as defined by the stone walls which are a grade II listed building. The former prison

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						gatehouse and governor's residence and the former prison workshop are also grade II listed buildings. The objector has provided no assessment of the impact of development on the setting of the prison walls. This is of particular concern As the objector promotes the development of the objection site in conjunction with MOL052 which would wrap built development around the former prison. Despite sitting within the line of the A494(T) bypass, the site has a distinct feeling of open countryside with the narrow hedge lined lane, mature trees and hedgerows and does not feel part of the built form the settlement. As demonstrated above growth in Mold has been achieved and will be achieved as a result of completions, commitments and possible windfalls and it is not necessary or appropriate for a further site to be allocated, particularly when that site would fundamentally weaken the purpose of a green barrier, and potentially harm the setting of the listed prison. The points within this summary

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						section of the objection have been addressed above. The Council disagree with the assertion that there are no insurmountable constraints to development given that there is no evidence that a satisfactory vehicular access can be provided, and lack of an assessment of the impact of development on the setting of the former prison. Furthermore, other than to say that the site can be developed within a 5 year period, there is no indication as to a timescale for development in terms of the Council's published housing trajectory. In conclusion, sufficient growth has been provided for in Mold over the Plan period and it is not necessary for a further site to be allocated, particularly when it would harm a green barrier and where there are constraints which have not been overcome.
574	HN1: New Housing Development Proposals	Candiate Site MOL05, Land North of Junction of A494 and Ruthin Road, Mold	Object	I write on behalf of the landowner, to object to the Council's decision not to include the above site as a housing allocation in the emerging Flintshire Local Development Plan and to register a concern that the Council's approach to meeting the	Allocate Candiate Site MOL05 for housing	Not accepted. Welsh Government in Development Plans Manual 3 advise that a Plan must include a flexibility allowance and that 10% is a starting point. In this context a flexibility allowance of 14.4% is considered to be sufficient particularly given that the Plan is on track in terms of completions in

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				projected housing requirement is not entirely 'sound'. It is considered that the current approach to the delivery of housing is not sound because of an over-reliance on small and windfall sites, a small number of large allocations and two very large strategic sites (which do not relate to Tier 1 settlements), and insufficient allocations in Tier 1 settlements such as Mold. The flexibility allowance is also considered to be a conservative estimate. As a result, there is serious risk that the housing requirement will not be delivered within the plan period. Unclear why allocated site HN1.6 is deemed a more3 appropriate location for residential development as it is relatively remote from town centre and majority of services and reliant on private car. MOL005 is well connected to the town centre and the bypass and is a more sustainable location. Aside from the green barrier there is no logical reason why HN1.6 is preferable over MOL005 particularly when considered alongside MOL002 which together amount to a logical rounding off, leaving a significant and distinctive		the first 4 years of the Plan period delivering the Plans requirement. The Plan's Housing Balance Sheet does not show all of the Northern Gateway housing as being delivered within the Plan period, with 331 units being discounted from the Plans supply. The two strategic sites are both previous UDP allocations and the Northern Gateway site has planning permission and development has commenced. The Warren Hall site has outline planning permission for a business park and although the housing element is new, this is for 300 dwellings and is not excessive in size. Both sites are strategic mixed use developments in sustainable locations and it is not considered necessary for them to relate to a Tier 1 settlement as they represent mixed use developments. In focusing on allocations the objector fails to consider the Plan's total housing land supply as clearly within Tier 1 settlements there will be growth as a result of completions to date and commitments, as well as possible small and large site windfalls. In

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				separation between Mold and Gwernymynydd. To this end, Candidate Site MOL005 offers the following benefits: • The site is well related to Mold Main Service Centre, which is one of the largest settlements within the County; • A significant and distinctive separation would remain between the extended settlement of Mold and the settlement of Gwernymynydd, thereby ensuring that no coalescence would take place; • The site has no insurmountable physical or technical constraints which would prevent residential development; and • There is no reason why the site could not be developed in the short term, thereby making an immediate impact on the 5 year housing supply. The Council is respectfully requested to reconsider its approach to housing supply and also reconsider the merits of designating Candidate Site MOL005 as a housing site.		fact, in Mold there is part of the County Hall site which is highly likely to come forward as a windfall site later in the Plan period. As commented on above the Plan delivers housing from other sources of supply and not just new allocations. However, the Plan sought to move away from the UDP approach of a large number of small to medium sites dispersed across the County in favour of a new approach of larger sites which are more attractive to the development industry and more capable of being viable and deliverable. It is unclear though why the objector is objecting to the Plan's identification of 'large' allocations when the site being promoted by the objector is 8.3ha and capable of accommodating well over 200 units. This is larger than many of the allocations criticized by the objector. The objector appears to be promoting the objection in the context of it being a 'small' site of less than 100 units but this would represent a poor use of land given its size. The Plan has focused on housing allocations which are in

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						sustainable locations and which are viable and deliverable, being supported by a significant amount of background studies and evidence. The objector offers no such evidence of the promoted site being viable or deliverable yet considers it preferable to the Plan's allocations. It is of note that the HBF is supportive of the Plan's approach to windfalls and commitments and there is also no objection from Welsh Government in terms of this aspect of the Plan. The allowance is conservative and realistic and the Urban Capacity Study findings demonstrates that the Plan's figures of 60 per annum for small sites and 50 per annum for large sites is realistic. The early years of the Plan period is clearly demonstrating that the Plan's housing requirement is being achieved in terms of completions. The housing trajectory in Background Paper 10 demonstrates that the Plan can deliver its housing requirement figure. As the objector states, Mold already has two allocated sites,

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						one of which is already under construction (Wates at Maes Gwern) and within 500m of the objection site. However, growth in Mold will also take place as a result of completions (156 completions in first 3 years of the Plan period) and commitments (177 commitments as at April 2018). The allocated site HN1.6 is sequentially preferable to the objection site as it does not lie within a green barrier in the adopted UDP. The allocated site is also not remote from the town centre and is actually closer to The Cross than is the objection site. The allocated site does enjoy access to a local bus service and is a short walk from the local shops on Elm Drive. Contrary to the objectors claim, it is considered that the allocation site is actually more sustainably located than the objection site. The allocated site HN1.6 benefits from the creation of a new road and junction with Denbigh Road which is acceptable to Highways Officers and also an access onto Gwernaffield Rd. By contrast the objection site is only considered

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						suitable for limited development unless linked to the adjacent MOL002 site. Highways Development Management Officers note that there is no direct connection to the trunk road boundary and that a capacity assessment will be required for an access onto the A5119. Highways Officers would require a Transport Assessment in order to comment further. Contrary, to the alleged benefits of the site diverting traffic away from the town centre, there is no evidence that the site can be satisfactorily accessed. The allocated site is clearly not in breach of PPW as it is in a sustainable location accessible to a range of services and facilities and the town centre. It has the potential to facilitate journeys on foot, by cycle and by public transport. The objection site is presently divorced from the settlement boundary of Mold and is dependent on the delivery of the intervening site (MOL002) in order for it to represent a logical extension to the settlement. On its own it represents an 'outlier' block of development divorced from the

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						existing form and pattern of development. The site's destiny is therefore not in its own hands and is dependent on another landowner / developer to be implemented. Whatever scenario, the site would represent a significant weakening of the green barrier between Mold and Gwernymyndd. To the west of the site boundary it would leave a green barrier gap of only 290m. If, as the objector argues, the site should be developed in conjunction with MOL002, then only a third of the green barrier gap alongside the road would remain, which would significantly undermine its function and purpose. As demonstrated above growth in Mold has been achieved and will be achieved as a result of completions, commitments and possible windfalls and it is not necessary or appropriate for a further site to be allocated, particularly when that site would fundamentally weaken the purpose of a green barrier. The points within this summary section of the objection have been addressed above. The Council

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						disagree with the assertion that there are no insurmountable constraints to development given that there is no evidence that a satisfactory vehicular access can be provided and there is a lack of supporting documentation in respect of ecology. Furthermore, other than to say that the site can be developed within a 5 year period, there is no indication as to a timescale for development in terms of the Council's published housing trajectory. In conclusion, the Plan has made sufficient provision for growth in Mold and it is not necessary for appropriate for a further allocation to be made, particularly when it relates poorly to the settlement and would harm a green barrier.
575	HN1: New Housing Development Proposals	Green Space EN2.89 GRO001	Object	I write on behalf of my client company, who owns the land which is allocated as a Green Space within the Tier 3 'Sustainable Settlement' of Gronant as defined by the emerging Local Development Plan (LDP) (Site EN2.89). The site is designated as a Green Space - L3(82): 'Land at east end of village' within the adopted but time expired Flintshire Unitary Development Plan (UDP).	Removal of Green Space - EN2.89: 'Land at east end of village' designation, and allocate for housing.	Not accepted. The site is located within the settlement boundary at the eastern edge of the village. Generally new development may be acceptable in principle, however there are site specific considerations in this case which made development unacceptable. Although in principle, the site could be allocated for and accommodate 30 dwellings the whole site is a designated green

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				Supporting this representation is a Landscape and Visual Impact Assessment, an Arboricultural Pre-Planning Feasibility Study, a Bat Activity Survey and a Preliminary Ecological Appraisal. Summary of findings The LVIA observes that whilst the site is identified as Green Space in the UDP it would be more appropriate to re-designate the site as a Housing Allocation, with confidence that development would be brought forward within the plan period. The LVIA observes that whilst the site is identified as Green Space in the UDP, the majority of the site comprises bare ground which would not be sensitive to development and it performs badly against the associated criteria used to identify such Green Spaces. The LVIA concludes that the site does not perform well against any of the associated criteria; whilst it does not meet some of the criteria of policy L3 at all. Re-designate land from Green space to allow for residential development. Propose of up to 34 units, could be delivered, which would include some		space L3 (82) in the UDP and is therefore protected by virtue of Policy L3 and the site also contains landscape features whereby it is not a typical development site. No objections were made in relation to this designation as part of preparing the UDP. An outline planning application (044858) was refused in 2008 on the basis of loss of greenspace/lack of information regarding impact upon on site wildlife habitats and lack of provision of affordable housing as required by UDP Policy HSG10. In addition from the candidate site assessment the Council's highways development management team stated that Llanasa Road is subject to a 30mph speed restriction but it does not appear possible to provide appropriate (2.4x43m) visibility splays from the site. Due to the limited width and lack of pedestrian facilities, Llanasa Road is considered unsuitable for a significant increase in vehicular traffic. No technical evidence has been produced to demonstrate that a suitable vehicular access

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				affordable housing for local people with an identified need, as required. Landscape quality: Most of the Site is bare ground. The majority of trees within the Site have been surveyed as being Category B 'moderate' quality, with some Category C 'low' quality. The landscape quality of the Site is not of note Value as a character feature in a locality: The Site does not have any wider value beyond its immediate surroundings. It is not distinct in terms of aesthetic qualities, nor does it contain any features within it that are distinct. The Site cannot reasonably be described as a character feature. Visual break in a developed area: The Site is not widely visible, and as such it does not provide any obvious function as a visual break. Surrounding properties tend to have large gardens, which in themselves		can be provided. In this context it is considered that the site should remain within the settlement boundary as a green space. Landscape quality: The objector has sought to assess the site against the five criteria specified in policy L3 of the adopted UDP in terms of green space designation: With regards to landscape quality, the green space contains a number of mature trees within the site. The two belts of trees form a distinct character feature in the local landscape. The site was previously 'green' in appearance, as confirmed by aerial photographs, and the Council is aware from phone calls from the public that clearance works were undertaken at the site. This has clearly had the effect of changing the appearance of the site and without further maintenance the site is likely to naturally regenerate once again. This however does not harm the role of the land as a green space.

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				provide separation from neighbouring plots. Buffer between incompatible uses: The Site is small in extent and is surrounded by residential development, and does not therefore perform a buffer function between different land uses Importance as part of an existing or proposed network of open areas, or as a link to open countryside: The Site is crossed by two footpaths, but is otherwise not accessible and does not form part of a wider network, or in itself provide a link to the open countryside. Since the Site does not form part of a wider network or provide a link to the countryside, this criterion would be unaffected. The public footpaths would be retained, and hence their link function would be unaffected. Supporting Documents: Supporting this representation is a Landscape and Visual Impact Assessment, an Arboricultural Pre-Planning Feasibility Study, a Bat		Value as a character feature in a locality: The objection site sits within two arms of ribbon development comprising Abbey Drive along the northern edge of the site and Llanasa Road to the south, whilst to the east is a looser pattern of built development. The open character of the site and the trees do form an important character break between the historic pattern of development in this part of the settlement. Visual break in a developed area: The value of the site is not that it is highly visible although the site has an open frontage onto Llanasa Rd and glimpses of the trees from other vantage points in the locality. However the public rights of way passing through the site enhance its value as a character break in accessing the wider open countryside to the east. Buffer between incompatible uses: It is considered that every bit of green infrastructure provides multiple benefits and can reduce the risk of flooding, keep towns

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				Activity Survey and a Preliminary Ecological Appraisal.		cool during heat waves and aid the reduction of air pollution. As well as providing many physical and mental health benefits to members of the public who use the space. It is accepted that the site does not perform this function but it is not necessary for a piece of land to meet every criteria in order for it to be appropriate to designate as green space. Clearly the proposer is suggesting that over 30 units could be built on this site which means the site is not 'small' as described, and development at that density would certainly radically alter the character of the site, and the interaction with neighbouring existing land uses. Importance as part of an existing or proposed network of open areas, or as a link to open countryside: Two footpaths cross the site that enable members of the public to use and provide local residents with access to the natural environment and a quick egress from the built up area. The first (no.85) runs diagonally north east from Llanasa Rd across the site to Abbey Drive. A shorter path

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						(no.49) runs northwards from llanasa Rd to join path 85. The value of these paths is that they provide a link from the village to the open countryside to the east of the village and the network of paths: • Byway open to all traffic (no48) which runs along the westerern edge of the grounds of Talacre Abbey • Bridleway 47 which leads to three further footpaths (no. 42, 43 and 44) The open and undeveloped nature of the site provides an attractive link between the developed are and the open countryside. This network of paths is also important as it leads to the Talacre Abbey Conservation Area and the Talacre Valley Historic Park and Garden which lie only a few metres to the east of the objection site, clearly demonstrating that these and the land are part of a wider network of green infrastructure. The Council would also note that planning permission exits (058304) for 41 units at Nant y

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						Gro which forms part of the Council's SHARP scheme and all units will be affordable housing. In this context the Plan will clearly see development over the Plan period which is considered to be appropriate given the scale and character of this Tier 3 settlement. It is not considered that an additional site is either necessary or appropriate. Supporting Documents: Although supporting documents were received illustrating limited visual impacts and ecological effects on the site. There is a lack of consistency in the background documents. The represents mentions 25 units, the landscape appraisal mentions 34 units and the ecology appraisal mentions 20 units. Additionally, It is disappointing that, having undertaken these background studies, the objector has not provided an indicative layout or even a masterplan type outline for the site in order for the Council to properly assess impacts on trees, ecology and trees and the public rights of way.

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						With regards to the trees located on the site, we are awaiting a response from the Forestry Officer. The Council's in-house ecologist reviewed the relevant backgrounds studies and stated that: 'The Talacre Abbey and Woods Wildlife Site occurs approx. 100m to the north east of the site – not referenced in the report. Until relatively recently (Feb 19), the site was well vegetated. The adjacent Parkfield bungalow has a recorded Soprano and Common Pipistrelle maternity roost and this development includes a mitigation bat roost located adjacent to the northern boundary hedgerow & PROW. The retention and protection of the existing hedge boundaries and their connectivity are considered key to the success of the proposed bat mitigation. The Preliminary Ecological Appraisal (03.19) and Bat Activity report (05&06.19) both concluded that the key features were the remaining habitats namely: • the hedgerows on the western

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						boundary; • mature trees on the eastern boundary • scrub adjacent to the PROW; • Mature trees dividing the northern fields and • Woodland in NW corner The reports recommend the retention of the above features with suitable mitigation for any losses. The bat flight path plan illustrates the importance of the western and eastern natural boundaries in the south of the site, the scrub habitat adjacent to the PROW crossing the site and the field to the north west sheltered by the woodland and trees. While there is no layout, the retention of all these features particularly the scrub adjacent to the PROW is unlikely. Appropriate mitigation depends on suitable space to provide new hedgerows and trees and then whether they will be retained by householders in the long term – secure fencing is usually preferred.

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						Lesser horseshoe bats and Brown long eared bats are canopy feeders and may be using the dark site boundaries enroute to the larger woodlands at Talacre Abbey. To continue using the site they will require dark natural corridors. However the main concern, is the combined impact of the Parkfield development with this proposal on the Soprano Pipistrelle maternity roost. As referenced in the Bat Activity report, the long term impact through the loss of flight lines/direct links to foraging habitat may well be significant. The most likely impact is that it will cause the roost to disperse. Increased lighting will compound this issue'. Ecology Conclusion 'Development of this site will impact foraging bats, how much will depend on the retention of those features listed above and especially retention as unlit habitats. However while foraging sites are not protected, individual bats and their roosts are. So the main concern is that this proposal will have a significant impact on the adjacent Pipistrelle maternity

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						roost due to the loss of local foraging habitat and connecting flight lines. Monitoring of the Parkfield bat mitigation post development should demonstrate whether that mitigation is successful and if so where the majority of bats fly to feed. Development of this proposed LDP site may need to consider relocation of the bat mitigation and associated corridor planting.' Additionally, the Site is within 500m of Dee Estuary SSSI and SPA. Site is also within 500 m of Ancient Woodland. Development at this location may reduce habitat connectivity by increasing distances between habitats or agricultural areas. The site could affect priority or protected species as it contains woodland and agricultural (e.g. breeding birds) land. It is considered that when assessing the proposal for the re-designation of the Green Space to allow for residential units, given that the proposal is likely to cause significant harm to the favourable conservation status of protected species, there is no overriding case to change the designation of

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						this land from a green space. Additionally, there are significant highways access constraints coupled with concerns regarding the loss of greenspace from a general amenity perspective, which together lead to the conclusion that the site should be retained as a green space rather than considered as a housing allocation in the LDP. The Council's in-house Tree Officer reviewed the relevant backgrounds studies and stated that: 'It is important to note that the trees on and adjoining the site do not preclude the development of it however the density of trees, which are mainly Category B, severely restrict the site's scope for residential development. Whilst, a BS5837 tree survey and other surveys have been commissioned no layout plan has been provided to demonstrate how the site could be developed and ensure adequate tree retention in accordance with planning policies. The LVIA carried out on behalf of the site's owner mentions a layout of up to 34 two storey houses. It is

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						very difficult to foresee how a development at this density could be achieved without resulting in the unacceptable loss of trees and hedgerows. In the absence of a layout plan to demonstrate how a potential development would be sympathetically designed around the trees the allocation of the site for residential use should be resisted and its status as Green Space unchanged, especially because the trees are a principle element of the Green Space designation'. In conclusion, growth has been provided for in Gronant with the Nant y Gro planning permission which will deliver affordable housing during the LDP plan period. It is not considered that it is necessary or appropriate to include land which has a green space value, has ecological value and where there are additional concerns about the impact of development on the local highway network. The site is not considered appropriate to be allocated.
579	HN1: New Housing Development Proposals	PEN050-AS Land East of Vounog Hill, Penyffordd	Object	Land-Use and Description The land is currently in agricultural use, primarily for grazing. It extends	Allocate Lane at Vounog Hill Penyffordd, PEN050-AS	Land-Use and Description Not accepted. The Welsh Government Predictive

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				to 4.35 hectares across three fields, the smallest of which borders Vounog Hill to the west. Existing trees and vegetation on the land are limited to the field boundaries which border and run through it. The high point to the land is along Vounog Hill to the west and on open land to the south. From these points the land slopes broadly downhill to the north and east towards Black Brook. There is no existing laid out, formal vehicular access into the land from Vounog Hil, albeit there is an existing gated access with dropped kerbs which is used for agricultural purposes at present. A public right of way runs broadly west to east from Vounog Hill to Terrace Lane to the south. Location The land is located to the east of Penyffordd close to the central part of the village. It is bounded by Vounog Hill to the west, with existing dwellings and Station Way to the north, and agricultural land to the east and south. The southern boundary is demarked by two further dwellings. A further recent residential development at Min Y Ddol is located approx. 240m to the south of the southern boundary of the land.		Agricultural land Classification Map shows the site as being grade 3a which represents BMV. However, the objection is not accompanied by an on-site survey to determine the exact quality of the land. Location Only the smaller front (western) part of the site adjoins the settlement boundary for approximately 40m along the site frontage and approximately 100m alongside development at The Pastures. The remainder of the site is 'backland', being separated from the settlement boundary at Cambrian House by an intervening field and with an awkward 'pinch point' almost dividing the proposed site into two separate entities. The site would not represent a logical extension to the settlement as it would result in a disjointed pattern of development which is not well related to exiting built form. The site was promoted for development in the form of an omission site as part of the UDP. The Inspector commented in respect of the front part of the site '4835 Vounog Hill provides a

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				The location of the land in relation to Penyffordd is shown on Figure 1 above; the development of the land would provide for a logical and natural extension to the eastern edge of the settlement. Designation The land is located outwith the adopted settlement boundary of Penyffordd and is within the open countryside. It is not subject to any formal ecological, landscape, recreational, or historical designation. It is located within an area of low probability for flood risk, with part of the land experiencing a low probability of surface water flooding. Potential Uses and Capacity The land has the potential to accommodate a mix of market and affordable housing together with associated landscaping and public open space. Assuming a net developable area of 80% and a density of 30 dwellings per hectares, the land could accommodate in the region of 105 - 120 dwellings split across the three fields. The allocation of the land for housing is considered by our Client to be		strong physical boundary between the built up area to the west and the countryside to the east. This extensive elongated site along the eastern side of Vounog Hill disregards the existing field boundaries and would result in an illogical incursion into the countryside. Furthermore, it would result in an unacceptable ribbon of development that would be poorly related to the existing urban form'. Turning to the rear part of the site the Inspector commented '1924 - This land is part of the countryside on the edge of the settlement and is rural in character. Allocating this site would result in a significant incursion into the countryside. Furthermore, given the shape of the objection site it would isolate undeveloped land to the north and result in an incongruous settlement boundary.' Designation Although the site may not fall within any designated areas the submission has not included ecological survey information to establish ecological interests in the site. The Development Advice Map shows a wide band of low risk of surface water flood risk running north south across the site

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				responsive to Penyffordd's identification as a Sustainable Village within the settlement hierarchy, and the scope provided within the Deposit Plan for new housing development to be delivered in the settlement during the Plan period. As a minimum, the land immediately fronting onto Vounog Hill (i.e. field 1) could be allocated in isolation should it considered that the release of the wider land parcel is not required as part of the proposed LDP period. The three fields which make up the land have the potential to come forward as part of a comprehensive scheme, or alternatively on a phased basis. Collectively and separately, any development is capable of meeting spacing standards, high quality design, a mix of house types, and delivering new public open space and landscaping (including a landscape buffer). The scale of development and potential to phase delivery would ensure that the village is not overwhelmed by new development and residents. The scale of development which can be accommodated on the land is proportionate to the wider settlement, ensuring that the settlement is not subject to		and is notable because it covers the narrow 20m 'link' between the two parts of the site. No information has been provided to demonstrate whether this constraint can be overcome to enable development. Potential Uses and Capacity The Plan has a spatial strategy which seeks to direct sites to the most sustainable settlements and sites and is not based on each settlement having a housing allocation. It must be noted that there are two sets of more sustainable settlements above the Tier 3 settlements and also that there are another 21 Tier 3 Sustainable Settlements. The settlement of Penyffordd / Penymynydd has already taken a significant level of the growth apportioned in the Deposit Plan to Tier 3 settlements as a result of two commitments at Rhos Road South (40 dwellings) and Hawarden Rd (32 dwellings) and the allocated site at Chester Road (186 dwellings). In addition a further planning permission for 36 no, over 55's retirement apartments was granted on appeal on 27/04/20. This represents some 296 dwellings in the

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				overdevelopment over the duration of the Plan period. The development of this land would contribute towards the sustainable distribution of development, whilst also supporting the vitality of Penyffordd's services and facilities. Accessibility The land lies within 800m walk of the local primary school, village shop, playground, community hall, post office, and pharmacy, promoting access via foot and bicycle and limiting car journeys by car. Its proximity to the existing public footpath network will also help promote access of the countryside beneficial for the health and recreation of new residents. In terms of bus and rail linkages, the nearest bus stop is located within 200m of the land which is served by the hourly no.28 bus service to Mold, Holywell and Wrexham. Travel to Mold and Wrexham is possible via bus during rush hour, providing a suitable alternative to the car in accessing employment from the Site in these nearby larger centres. The journey to Mold takes approximately 17 minutes, whilst to Wrexham it is approximately 23 minutes.		settlement which is on top of the completions during the first few years of the Plan period arising from UDP allocations. Although the LDP has moved away from settlement growth rates for different tiers of the settlement hierarchy, it is useful to look back at the context in the UDP which identified a growth band of 8-15% for category B settlements. Over the UDP period the settlement saw actual growth of 21% as a result of 282 completions which was well in excess of the growth band. In the first 4 years of the LDP period the completions of 77 units equated to a 5.7% growth. As at April 2019 there were commitments of 267 units on the three earlier appeal sites which increases growth over the Plan period to 21%. The recent appeal decision for the over 55's apartments increased growth to 23.4% and the inclusion of say 100 units on the objection site would increase growth further to 31%. This settlement has more than made a reasonable contribution of housing in the LDP Plan period. The references to various

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				Penyffordd railway station is within 1km of the land and is within walking distance. From here, hourly services are available to Wrexham and Bidston. Highways/Traffic The land could be served by a single access point from Vounog Hill along its western boundary. Any access road from Vounog Hill would provide for a 5.5m wide carriageway, with 2m footways on both sides. Visibility standards at the junction would be consistent with Manual for Streets. The impact of any development on the land would be minimal. Flood-Risk and Drainage The land is located wholly within Flood Zone A as defined on the Development Advice Map. The majority of the land is considered to have a “very low” risk from surface water flooding, though an area of “low” surface water flooding extends north to south across the land. Infiltration may provide a viable surface water treatment. Should infiltration not be feasible then water could instead be discharged in to Black Brook to the north of the land.		background studies are noted as is the reference to the developer, but this does not change the fundamental concerns about the level and pace of development which this settlement is and will experience and disproportionate amount of development having regard to the Plans spatial strategy. Policy STR2 sets out the hierarchy of growth to the tiers in the settlement boundary. Tie 1 Main Service Centres are the ‘main’ locations for new development, Tier 2 Local Service Centres are the locations for more modest levels of development whilst Tier 3 Sustainable Settlements will be the locations for ‘housing development related to the scale, character and role of the settlement’. The policy clearly adopts a sliding scale of growth appropriate to each tier and the level of growth proposed by the objector in this settlement is not considered acceptable. Accessibility It is acknowledged that the site is well related in terms of proximity to

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				Welsh Water sewer records identify public sewer infrastructure crossing the land. A 150mm diameter public combined sewer is located adjacent to the northern boundary. Investigations will be necessary to consider whether connection will be possible by way of a gravity solution. If not, then a pumped solution may be required. Ecology The land is not subject to any formal international, national or local ecology designation which might prevent or limit its suitability for housing. It is distant from designations in the wider area, with only the potential for indirect effects (as with any location). The land holds limited ecological value, albeit a detailed Habitat Survey would need to be undertaken. The key ecological features of the land are the hedgerows and trees within and bordering it; the majority of these features should be capable of retention as part of any development. Where removal of any features is required, this loss could		facilities and services and public transport. Highways/Traffic The Highways Development management Officer has advised that a Transport Assessment is required in order to fully consider the site and proposal. However, it is questioned whether an appropriate access road junction design can be developed given the location of Wats Dyke Road opposite. Flood-Risk and Drainage The issue of flood risk and drainage is commented on above. Ecology Ecology is commented on above. Landscape and Visual Impact The site does not relate well to the existing form and pattern of development and would appear as a block of built development largely detached from the settlement and having an impact

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				be compensated for by replacement planting. Landscape and Visual Impact The land does not sit within a designated landscape area. The land is considered to have a moderate impact taking into account the relationship of its built surroundings and potential for mitigation once planting matures within any landscape buffers, particularly along the southern edge of the Site. Any adverse effects on visual receptors would likely be limited to those nearest to the land. Deliverability Our Client's land interests have been subject to previous promotion through the LDP process, as demonstrated by its inclusion as a Candidate Site. The land is in single ownership, and is immediately available and deliverable within the Plan period (over a phased basis), or indeed within a five-year period in its entirety. There are no overriding technical or land assembly constraints which would preclude its		on landscape and open countryside, particularly given the public rights of way bordering the site. Deliverability The objector has provided no indication as to the timescales for the site to be delivered in terms of the Council's housing trajectory as set out in the Background Paper LDP10 Housing Land Supply. In view of the settlements position in the hierarchy, the level of development already permitted and the poor relationship of the site it is not considered necessary or appropriate for either the whole or smaller part of the site to be allocated in the Plan. Soundness: The Plan has formulated its housing requirement figure in line with advice in PPW and subsequent versions of PPW and the Development Plan Manual and objections relating to historical unmet need have been comprehensively dealt with in responses to representations to policy STR1. There is no

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				development. In view of the above, it is our Client's consideration that their land interests should be allocated for housing in the LDP for up to 120 dwellings. In the event that the Council considers that only the single field fronting on Vounog Hill should be allocated, this could deliver up to 30 dwellings. Soundness: PPW10 is clear in Section 4.2 as to how local planning authorities should plan to meet their housing needs through Local Development Plans. This includes the identification of a robust housing requirement which can be met in full during the LDP period by ensuring that a sufficient supply of deliverable housing land is available to bring forward development which is sustainable in line with the overarching aspirations of national planning policy. For the reasons set out in this Representation, our Client is concerned that the Deposit Plan evidence base is lacking in detail in terms of whether it is planning to address any housing shortfall from the UDP period, whilst continuing to place reliance on some previous UDP housing allocations which have		requirement either in PPW or DPM for the unmet housing requirement from a previous development plan to be merely added on to the next development plan. Welsh Government submitted formal representations on the Deposit LDP and have not commented on any shortfall from the UDP. Welsh Government state 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect'. The Plan's housing requirement is considerably in excess of the Welsh Government base population and household projections as the Plan seeks to support regional growth strategies. The Plan is clearly aspirational and the objector has identified no challenge in respect which would question the Plans soundness. The objector ignores the fact that the LHMA methodology produces an inflated need as it assesses the backlog of need but only has a lifespan of 5 years. It is therefore incorrect to transpose the annual need over the Plan period. It is also the case that affordable housing will be delivered through

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				historically failed to come forward and deliver as expected. The LDP needs to be sufficiently aspirational to meet the needs of the County for current and future generations; recent rates of housing delivery in the County since 2015 demonstrate a strong demand for housing in Flintshire and provide confidence that any previous shortfall can be met during the LDP period if sufficient land is made available. Test 2: The housing requirement should take account of the identified affordability needs across the County as set out in the LHMA such that they are provided for in full during the LDP period; Any historic housing delivery shortfall from the UDP period should be planned for and met during the LDP period; this would justify a housing requirement of at least 7,350 dwellings as per the upper figure set out under Option 6 of the Preferred Strategy Growth Options; Whilst the Council is continuing to rely on windfall sites moving forward, it should be noted that historic windfall trends have taken account of		other initiatives and strategies and not just through the planning system. The point about UDP shortfall has been commented on in the previous section. The Plan has a conservative and realistic allowance for small and large site windfalls, having regard to previous trends. The allowances have also been informed by an Urban Capacity Study which demonstrates that the Plans allowance figures are realistic. It is of note that the HBF is supportive of the approach taken regarding windfalls. Also, Welsh Government in their formal representations on the Plan have made no comments about an over-reliance on windfalls. The Plans vision is meant to encapsulate the whole Plan strategy and purpose and is not meant to focus in detail on housing only. The Plan has identified a robust but aspirational housing requirement figure, well in excess of forecasts. In the absence of a formal objection from Welsh Government it is not

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				the fact that a large number of speculative housing applications have been granted planning permission in the absence of a five-year housing land supply. This would not be the Council's intention once the LDP is adopted, and this duly could impact on windfall delivery rates owing to the lack of available brownfield development opportunities within the settlement boundaries of a number of the Tier 1, 2 and 3 locations in the settlement hierarchy; And The LDP Vision is lacking in detail, with no commitment to meeting the full minimum housing and employment needs of the County during the LDP period. test 3: The proposed housing allocations contain two sites which were previous allocations in the UDP, and which have failed to come forward. There is no evidence to offer any certainty that they will come forward		considered that the Plan fails soundness test 2. The objector fails to explain why smaller sites in Tier 3 settlements are more capable of early delivery than the Plan's allocations, particularly given that the Plans allocations are backed up by a considerable amount of background studies and work. By contrast, the objector has submitted not a single background study or piece of technical evidence to show that it is capable of early delivery. The two sites carried forward from the UDP were reassessed by the Council by putting them through the candidate site assessment process. The Highmere Drive allocation is backed up by a number of background studies by the owners and a renewed commitment to deliver the site and the Well Street allocation is in the process of being sold by Welsh Government to Clwyd Alyn Housing Association who are intending to submit an early planning application. On both of these sites, planning applications can come forward ahead of LDP

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				in the future. Accordingly, our Client is concerned that by continuing to rely on these sites and extant commitments in the short-term (given the timescales for delivery of the larger allocations), the Council may be unable to demonstrate a five-year housing land supply given the lack of any smaller site allocations in the Sustainable Villages which would be capable of early delivery;		examination as they are already allocated and within the settlement boundary. It is not accepted that the Plan is unsound in terms of test 3. In conclusion, the settlement of Penyffordd/ Penmymynydd will significant growth as a result of four speculative appeal decisions. It is not necessary or appropriate for a further allocation to be made, particularly where it would not represent a logical extension to the settlement.
581	HN1: New Housing Development Proposals	Land to the north east of Issa Farm, MYN015-AS	Object	Proposed Additional Site Allocation The site to the north east of Issa Farm (MYN015-AS) should be allocated as a housing site to meet the additional need identified. In the alternative, it should be identified as a contingency site which could be brought forward for development should the LDP fail to deliver appropriately against its trajectory or should the Council fail to be able to substantiate a 5 year housing land supply. The Council's initial assessment against the Preferred Strategy was that the site was coded "amber" against their traffic light system. This category indicated that the site complies with the Council's Preferred	Allocation of additional sites to meet housing demand. The site to the north east of Issa Farm (MYN015-AS) should be allocated as a housing site to meet the additional need identified. In the alternative, it should be identified as a contingency site which could be brought forward	Not accepted. In response to the objector's other objections the Council does not consider that there is a need for the Plan's housing requirement to be increased, nor is there a need for further allocations to be made. There is no provision or requirement within PPW or Development Plan Manual 3 for the Plan to include contingency sites. Rather, the Plan has made provision for a 14.4% flexibility allowance to allow for sites not coming forward as quickly as anticipated in the trajectory. The objection site was not submitted as a candidate site and therefore the Council didn't

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				Strategy but that there may be constraints which need to be overcome to allow sites to be developed. The Council's Background Paper 8 (Assessment of Candidate and Alternative Sites) acknowledged that the site adjoins an existing development which was allowed on appeal and that this confirms that the acceptability of development in this location has now been established in principle. However, the Council rule out allocation of the site until the speculative site to the south west has been developed as, in the absence of the development of that site, the development of site MYN015-AS would be major incursion into the open countryside. We understand that the site which was subject to the appeal is now being developed by MacBryde Homes and that the site sales office is now open and phase 1 is progressing. Completion of this site is therefore likely in the early part of the plan period. The Council's only reason for resisting the allocation of this site (i.e. that there should be no further extension of the settlement until the site allowed on appeal has been developed) will therefore be	for development should the LDP fail to deliver appropriately against its trajectory or should the Council fail to be able to substantiate a 5 year housing land supply.	undertake an initial assessment of this site as part of the Preferred Strategy. The objection site was submitted as an Alternative Site as part of the Preferred Strategy consultation/ In preparing Background paper 8 as part of the Deposit consultation documentation, a colour coded 'assessment' against the Preferred Strategy was undertaken to ensure that alternative sites were treated similar to candidate sites. The Background Paper acknowledged that the appeal decision established the broad principle of development in this location. However, it also referenced that sufficient provision existed in Mynydd Isa in the form of commitments. The site is a large rectangular shaped parcel of land which adjoins the settlement boundary at the Parc Issa housing estate off Bryn Road to the north of Mynydd Isa. The site comprises open fields bounded by mature trees and hedgerows. The site adjoins an existing development site which was put forward as a housing allocation as

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				removed in the early part of the plan period as the site is completed. In such circumstances, the Council have raised no other reasons why this site should not be allocated. There are no technical reasons why it would be unsuitable for development. Indeed, Mynydd Isa is identified as a Local Service Centre in the Draft LDP. Local Service Centres are the second tier of settlements (out of 5) in the LDP. Mynydd Isa is therefore considered to be a sustainable location for residential development to accommodate between 35% and 40% of housing growth over the plan period. The site represents a logical extension to the settlement following the completion of the Phase 1 site allowed on appeal. Mynydd Isa contains a range of services and facilities and benefits from regular bus services to nearby towns. It includes two primary schools and a secondary school as well as a range of shops, employment opportunities, pubs, a doctors surgery, a pharmacy and a library.		part of the UDP which was not included by the inspector but was later allowed on appeal. Despite the fact that the principle of development in this location has now been established, this does not automatically mean that candidate site MYN015AS is suitable for development. The UDP Inspector removed this site from the UDP stating “I find because of its location, shape, landscape and the surrounding topography, it would be poorly related to the existing pattern of development and a significant unnecessary incursion into the rural area.” Part of the site has now been allowed on appeal, however this does not mean that the remaining site is favorable for development at this time. Mynydd Isa is a Tier 2 Local Service Centre settlement and is considered to have adequate housing commitments, negating the need for further greenfield allocations. The appeal site was allowed at the scale it was on the basis of making an exception to policy under TAN1 that has now been revoked in recognition by the Minister that it was promoting unplanned speculative

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				The Council's own Settlement Service Audit, which was produced as part of the previous Preferred Options Consultation, identified that there had been a slight decline in population between 2001 and 2011 with a very modest increase in the number of dwellings between 2000 and 2014 from 1920 to 1992. This is an increase of only 72 dwellings over a 14 year period (or only 5 dwellings per year). Indeed, it is of note that in the previous UDP covering the period from 2000 to 2015, Mynydd Isa was identified as a category B settlement which was intended to provide growth up to 15% over the plan period. The Council's own settlement growth schedule for the UDP plan period indicates that Mynydd Isa only provided a 7.2% growth rate against the 15%. Mynydd Isa has therefore provided significantly less development than was expected over the previous plan period despite being a sustainable location for residential development. The settlement clearly therefore has capacity to accommodate additional development over the next plan period.		development that was harmful to communities such as Mynydd Isa. The objection now in effect seeks an exception to the exception which is disingenuous and seems to simply be an exercise in adding value to land, rather than seeking sustainable development. Development of this candidate site will create a major incursion into the open countryside, at a time when Mynydd Isa has two sites which have been allowed on appeal, land North of Issa Farm for 59 dwellings and at Rose lane for 58 dwellings. Both of these sites have yet to be completed, but will provide 117 dwellings for Mynydd Isa over the plan period. The site has an area of 2.2Ha and has the potential for over 60 dwellings (at 30 per Ha). The site has no direct access to the adopted highway however it is presumed that the proposal is for it to be accessed via Llys Gwynant and the development that is currently under construction. Highways have raised concerns regarding candidate site MYN015AS. The current development site adjacent to the

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						candidate site includes 59 dwellings; the addition of a further 60 dwellings from the candidate site is considered to be a cause for concern, related to the joint impact on the safe operation of Llys Gwynant and the Bryn Road junction. The close proximity of the Argoed High School impacts on the operation of the Llys Gwynant/Bryn Road junction which becomes congested during the periods at either end of the school day. Highways therefore require the submission of a Transport Statement in order to enable any further consideration of this site. Candidate site MYN015AS has not been allocated within the LDP due to concerns raised by Highways and the Council's view that the development of this site would result in harm to the open countryside. The two appeal sites within Mynydd Isa will provide sufficient growth for the settlement over the plan period, with 117 dwellings committed, representing a further 6% growth of Mynydd Isa since 2014. There are also sites allocated in nearby settlements including New Brighton, Mold and

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						Buckley which will provide growth to support the wider area. In conclusion, the Plan will provide sufficient growth in Mynydd Isa and a further allocation is not necessary or appropriate at present.
586	HN1: New Housing Development Proposals	PEN037	Object	We have set out under policy STR1 our views as to why the housing requirement figure in the LDP will not adequately meet housing needs over the plan period and should therefore be increased. This therefore leads to the need to allocate additional sites for residential development to meet identified housing needs over the plan period. In order to meet the test of soundness (particularly Tests 2 and 3 that the Plan must meet assessed needs, must deliver and be viable and flexible), additional allocated sites are therefore required. In the context of PPW10 it is of note that, other than the 2 strategic sites set out in policy STR3, the Council rely on only 11 allocated sites in policy HN1. These 11 sites in total amount to 1874 new dwellings. When the contributions from the 2 strategic sites in policy STR3 are added this gives a total number of units on allocated sites of 3499	Proposed Changes a. Site PEN037 should be allocated for housing over the plan period; b. If the site is not allocated it should be identified as a contingency site to provide additional flexibility should the Councils delivery against the LDP fall short; or c. In the alternative if the site is not allocated or identified as a contingency site,	Not accepted. The objectors concerns in relation to the Plans housing requirement figure are fully addressed in respect of responses made to Policy STR1. The conclusion is that the Plan has provided an appropriate level of housing and it must be stressed that Welsh Government in their formal submissions to the deposit plan are “generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect’. The Plan’s total housing supply, as set out in the Housing Balance Sheet comprises a number of elements including completions to date, commitments, allowances for small and large site windfalls and allocations. The Plan therefore incorporates sufficient flexibility in terms of size and type of site and different types of builders. There has previously been criticism of

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				dwellings against the requirement of 7950. Only 44% of the housing requirement over the LDP period is therefore proposed to be delivered through allocated sites. This does not amount to a "plan led approach" as required by PPW. Additionally, of those 11 sites, all but 1 are over 3.5 hectares in area with only 3 sites being below 5 hectares. This does not meet the requirements of PPW 4.2.12 in relation to providing a range of sites for all sectors. Additionally, it fails to meet the soundness Test 3 from Background Paper 11 in that the Plan is not sufficiently flexible to meet this requirement of PPW. In Background Paper 10 (Housing Land Supply and Delivery) the Council acknowledge that not all allocated sites will be delivered in the time scales anticipated and they have sought to build in an element of flexibility in the overall housing figure. However, they have not sought to allocate any additional sites or even allocate any contingency sites to deal with such a situation. It is of note that (excluding the 2 strategic sites) 2 of the 11 sites	it should be included within the settlement boundary of Penyffordd to be consistent with the change on the adjoining site (PEN036).	the large number of sites allocated in the UDP and non-delivery and the LDP has sought to take a more focussed approach by identifying sites that are viable and deliverable. The objector is also incorrect in saying that the housing requirement is 7,950 as the published requirement set out in policy STR1 is 6,950. Whilst their case focused on the need for more sites to achieve the housing figure, they have also failed to acknowledge that there is already 14.4% flexibility in the amount of provision made for housing in the plan, over and above the housing requirement figure. In their terms, "additional land" has already been made available. Completions achieved to date, which accord with the Plans proposed overall provision, are a matter of fact. The commitments have been reviewed to include only sites which are considered to be deliverable. The small and large site windfall allowances are a conservative estimate having regard to past trends and the Urban Capacity Study. It is of note that it is established practice for a housing balance sheet to include all these elements. It should also

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				allocated in policy HN1 are sites which have been carried over from the UDP. Together these amount to 309 units. These sites have therefore already been allocated for development for over 19 years yet they have delivered no dwellings whatsoever. Whilst the Council say they are "confident" that they will deliver housing over the plan period, they give no evidence to test this other than reference to "information obtained from developers and land owners". None of the allocated sites, as far as we can see, have been subject to viability testing (as required by National Policy). On this basis there must at least be significant doubt that these sites that have been allocated for more than 20 years and have delivered nothing will deliver over this current plan period. In this regard it is of note that the Council have not undertaken any Viability Appraisals of the allocated sites. Indeed, even in assessing the level of affordable housing proposed for the Plan, the Viability Study made no allowances for ecological factors or other potential site remediation costs even though the Report acknowledged that many sites are greenfield so such issues could be		be noted that HBF are comfortable with the approach regarding commitments and level of windfall allowances. As referenced above the objector only considers provision through 'allocations' and not the total provision in the Housing Balance Sheet which includes other sources of supply. Also, the Council finds the objector's point about site size somewhat contradictory as whilst the objector complains that many LDP sites are above 3.5 hectares, they themselves are promoting a site which is very close to this threshold at 3.48ha and cannot be considered 'small'. Welsh Government advice in para 5.59 of Development Plans manual 3 requires that 'a flexibility allowance must be embedded into the plan'. WG advises that the starting point could be 10% flexibility with any variation robustly evidenced. Experience shows that flexibility allowances are typically between 10 and 20% and the Plan has incorporated a 14.4% flexibility allowance. However, there is no reference or requirement from WG for Plans to incorporate contingency or reserve

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				expected to arise. These were excluded on the basis that they would be "very site specific issues". The Report suggests that any such matters on specific sites, coming forward for development, would need to be taken account of the specific viability test at application stage. However, this is contrary to national advice in PPW. This indicates at paragraph 4.2.21 that, where up to date Development Plan Policies have set out the community benefits expected from development, planning applications which comply with them should be assumed to be viable and it should not be necessary for viability issues to be considered further. It is either for the applicant or the Local Planning Authority to demonstrate that particular exceptional circumstances justify the need for a Viability Assessment at the application stage. This indicates that assessment of viability is a factor which should be considered at Local Development Plan stage rather than being left to planning application stage. As the Council have carried out no Viability Assessments of the proposed allocated sites, this requirement of National Policy has not been met and the Plan is therefore unsound as		sites as that would be counter to the principle of producing a sound and deliverable plan in the first place. All undeveloped UDP sites have been included in the candidate site register to ensure that are assessed alongside submitted sites. Two of these i.e. Highmere Drive Connah's Quay and Well Street, Buckley have been re-allocated after careful consideration. The Highmere Drive site has not been developed as the owners had been unwilling to release the site to the market. However, as a result of discussions between the owner, agent and lpa, a number of background studies have been completed and the owners are in discussions with house builders. The site has no constraints and only a small level of objection and is considered to be viable and deliverable. The Well Street has not come forward due to delays with Welsh Government releasing the site to the market. However, Clwyd Alyn Housing Association are in the final stages of purchasing the site

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				it cannot demonstrate that sites are viable or that allocated sites can be delivered (Test 3 of soundness in Background Paper 11). Indeed, paragraph 4.2.21 of PPW indicates that the weight to be given to a Viability Assessment as part of a planning application is a matter for the decision maker and that in making such a decision, the decision maker will have to have regard to all circumstances in the case including whether the Development Plan and viability evidence underpinning it are up to date. Such an approach is also contrary to the emerging Development Plans Manual (Edition 3). This indicates at paragraph 5.8.1 that one of the key tests of "soundness" of a Plan is to demonstrate it is deliverable and viable. The hierarchy indicates that at deposit stage, key site specific viability appraisals should be undertaken. Paragraph 5.8.5 indicates that for the Development Plan Viability Testing includes high level testing required to give certainty that the Plan and its policies can be delivered, taking account of affordable housing policies, infrastructure and other policy requirements. The document indicates (in bold) that only in		with a view to submitting a planning application in the first half of 2020. The site has no constraints and only a modest level of objection and is considered to be viable and deliverable. Given that both sites are within the settlement boundary and allocated, a planning application can come forward at any time, and ahead of adoption. The Council has undertaken a comprehensive viability study via the District Valuation Service. The Study looks at a number of site typologies in terms of site size and looks at different submarket areas in the County. It is of note that Welsh Government has made no objections in respect of the Viability Study in terms of compliance with PPW or the Development Plans Manual. It is noted though that the objector has provided no viability evidence in respect of the objection site. Ecological mitigation measures are not applicable to all housing sites. They have not been identified on allocated sites to the extent that they would affect their

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				exceptional circumstances should further Viability Appraisals be undertaken at the planning application stage. In failing to undertake Viability Assessments (particularly when relying on so few allocated sites) the Development Plan currently fails to meet the Test of soundness as it fails to comply with advice in PPW and the Development Plans Manual and the requirement for viability testing as part of the Development Plan process. In summary therefore there is a need to allocate additional sites under policy HN1 for the following reasons:- 1. To meet the correctly identified need for housing over the plan period in policy STR1 (see our comments in relation to this policy); 2. To provide flexibility as required by National Policy; 3. To provide a range of sites not just to rely on a small number of large sites as to fail to do so would not comply with PPW;		viability or delivery. The objectors reference to 'site remediation' costs seems to indicate that there are fundamental issues associated with most sites and in particular the Council's allocated sites. The Council's allocated sites are not 'problem' or 'exceptional' sites and do not require 'abnormal' site remediation works. Clearly, the same matters apply to the objection site and the objector has failed to provide sufficient evidence to demonstrate that there are no constraints to the development of this site that affect viability and deliverability. In terms of the objectors reference to para 4.2.21 of PPW10, this clearly states 'It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage'. If unforeseen costs arise on an allocated site then there is the scope to adjust the percentage affordable housing requirement based on detailed viability evidence. But this is not the present scenario with the allocated sites.

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				4. To account for the small number of allocations which are predominantly on large sites and some of which have been allocated for a considerable period without delivering any units; 5. To avoid the situation where the Plan itself acknowledges that it will not be able to demonstrate a 5 year land supply towards the end of the plan period. In order to meet these requirements additional sites should be allocated. In the alternative, if additional sites are not allocated, there is clearly a requirement for the Council to identify contingency sites which would be brought forward should the Plan fail to deliver against its trajectory or against a 5 year housing land requirement (see our comments in relation to policies STR11 and Section 13 on Monitoring). 2. Proposed Additional Site Allocation Candidate site PEN037 (land north of Wood Lane Farm, Penyffordd) should be allocated for housing to assist in providing the additional		Despite criticising the Council for lack of detailed viability assessments on its allocations, the objector has not provided viability evidence for the proposed site. It is unclear whether the objector is arguing that the proposed site can or cannot meet the affordable housing requirements set out in policy HN3 for example. See above comment. Whilst not disagreeing with the broad principle in PPW, it is not always going to be the case that all viability issues are capable of being dealt with at the development plan stage, where detailed and final designs and layouts for sites are not required and unlikely to be available. The absence of any attempt at a viability assessment for the objection site seems to be totally at odds with the principle set out in PPW of dealing with the issue at the development plan stage. In their representations on the Plan, Welsh Government comment 'The Council has undertaken a significant amount of work in respect of place making, delivery and infrastructure to inform the Deposit Plan in line with

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				numbers and flexibility over the plan period. It is important to note, in this regard, that as part of the Council's earlier traffic light system in identifying sites which met with their settlement strategy and had no known development constraints, the site was identified as "green" indicating that, in the Council's view, the site complies with the Council's Preferred Strategy and is not considered to be affected by any fundamental constraint and has potential to meet the Plan's Growth Strategy subject to satisfactory technical assessments. The site is under option to a developer with experience of developing sites in the local area who have undertaken the appropriate technical assessments. Full copies of these assessments can be provided to the Local Planning Authority. However, they are summarised below:- • A full Tree Survey has been undertaken which identifies important trees. The important trees identified would not adversely affect the ability of the site to deliver housing overall. A full Tree Constraints Plan has been prepared by the consulting Arborist and will be		the DPM (Edition 3). This is supported' (Council's emphasis in bold). As referenced earlier, no objection has been made in respect of the Viability Study. In the context of preparing a development plan and evidencing 'allocations' the Council do not consider that it reasonable, in the absence of detailed layouts and the level of detail associated with a planning application, to be able to undertake detailed viability assessments of each allocated site. The Council has worked closely with the proposers of each allocated site in terms of viability and deliverability, within the framework provided by the Viability Study. Given the objectors focus on viability it is surprising that a viability study has not been provided as part of the objection and following the objector's own logic, the objection site cannot be found sound either in the absence of a study. The points have been commented on above. In respect of point 5 given that the minister has revoked the guidance in TAN1 there is no longer a requirement to

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				taken into account in the preparation of any residential layout. • An Ecological Assessment has been carried out by TEP which identifies no implications for designated wildlife sites and no protected or invasive flora species present within the site boundary. The Report identifies no implications for amphibians or reptiles, hares, hedgehogs, badgers or water voles and otters as a result of the proposals. A number of the trees are identified as having potential for bat roosting and the Report recommends reasonable avoidance measures. • A Ground Investigation Report has been prepared by Earth Environmental and Geotechnical which identifies low potential risk. • A Transport Statement has been prepared by Curtins which concludes that, from a traffic and transportation perspective, there are no reasons why the development of the site proposed should not be granted planning approval. • A Drainage Strategy has been prepared by Waterco which advises that surface water run off can be discharged to a watercourse subject		provide or maintain a 5 year housing land supply thereby totally negating this part of the objector's case. The objector is directed to the now adopted Development Plans Manual ed3 which sets out the basis to monitor housing land supply against a housing trajectory. A trajectory was produced and made available as part of the deposit LDP consultation which demonstrated how the provision in the plan would meet the plan's housing requirement throughout the plan period. Housing delivery, as per the DPM, is monitored against the trajectory and, post adoption, via an Annual Monitoring Report. Any consistent variation in provision away from the trajectory will be one of the indicators that may prompt the need for a plan review where, in terms of housing supply sites can be reviewed at that stage. With reference to the deposit trajectory and later update following the 2019 Housing Land Statement produced by the Council, it is a matter of fact that in the first 4 years of the plan period, the annual rate of housing delivery

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				to greenfield run off rate using sustainable drainage systems and that, subject to a surface water removal scheme, foul sewage can be connected to mains and that this solution has been agreed in principle with DCWW. • A Landscape Strategy has been prepared by Tirlun Barr Associates. This indicates that the LAND MAP identifies the site visually as being classified as "urban land" with the identified urban character including road noise, movement and loss of tranquillity as well as visible presence of street lighting and urban elements such as housing. The document sets out a strategy for landscape design which respects the presence of existing trees and hedgerows and recommends additional planting. • Agricultural Land Classification which identifies the site as being Grade 3B. The technical assessments referred to in relation to the Council's traffic light system have therefore been undertaken. There are no technical reasons why the site could not deliver housing over the plan period. Indeed, the fact that the site is		exceeds the average housing requirement, and very closely aligned to the average rate of plan provision indicating the plan is on track to meet its housing requirement and that there is no shortfall in supply that should warrant the need to add more sites to the plan. The updated Development Plan Manual contains no requirement for contingency sites to be allocated in the Plan. The Council accepts that in terms of comparison with the Preferred Strategy and based on the detailed assessment of candidate sites, this site scores well. It is potentially a logical urban extension for future consideration, between existing built development, the consented site to the north and roads forming strong physical boundaries to the east and west. However, the Plan has a spatial strategy which seeks to direct sites to the most sustainable settlements and sites and is not based on each settlement having a housing allocation. It must be noted that there are two tiers of

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				subject to an option agreement with a local developer means that, subject to being allocated, it would be likely to deliver in the early part of the plan period. It is of note in particular with regard to Penyffordd that this site was only 1 of 2 given the "green" notification in the traffic light system. The other site was more isolated from the settlement. This site was therefore effectively identified as the best site within Penyffordd to meet the Council's Preferred Strategy by the Council's own document. The Preferred Strategy Consultation Background Paper commented that:- "Delivering the Preferred Strategy is a critical purpose of the LDP and the Council needs to be confident that any allocated site has a realistic prospect of being developed for its intended use within the plan period up to 2030…. In the event that there are more candidate sites than needed, only those sites which would not undermine the Preferred Strategy and perform best following the planning and technical assessments will be allocated in the Deposit Plan".		more sustainable settlements above the Tier 3 settlements and also that there are another 21 Tier 3 Sustainable Settlements. The settlement of Penyffordd / Penymynydd has already received a significant level of the growth apportioned in the Deposit Plan to Tier 3 settlements as a result of two commitments at Rhos Road South (40 dwellings) and Hawarden Rd (32 dwellings) and the allocated site at Chester Road (186 dwellings). In addition a further planning permission for 36 no, over 55's retirement apartments was granted on appeal on 27/04/20. This represents some 296 dwellings in the settlement which is on top of the completions during the first few years of the Plan period arising from UDP allocations. Although the LDP has moved away from settlement growth rates for different tiers of the settlement hierarchy, it is useful to look back at the context in the UDP which identified a growth band of 8-15% for category B settlements. Over the UDP period the settlement saw actual growth of 21% as a result of 282 completions which was well in excess of the growth

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				This comment is important in relation to the evolution of sites within Penyffordd. Clearly, site PEN037 was considered suitable for development in accordance with the Council's Preferred Strategy by the Council. The appropriate technical assessments have been undertaken. The Council have given no technical reason for not allocating the site. The Council acknowledge in Local Development Plan 08 (Candidate Site Assessments) that "The site would represent a continuation of the principles embodied in the Wood Lane Farm scheme whereby, in this location, the A550 is considered to represent a firm and defensible outer edge to the settlement. A similar principle was also applied in the Rhos Road (north) site which was allowed on appeal. Development would not harm the wider open countryside nor would it harm the character and form of the settlement". The Council have given no technical reasons why the site could not come forward as an allocation. However, they have ruled it out on the basis of the level of commitments in the settlement of Penyffordd and on that basis they suggest that it would be		band. In the first 4 years of the LDP period the completions of 77 units equated to a 5.7% growth. As at April 2019 there were commitments of 267 units on the three earlier appeal sites which increases growth over the Plan period to 21%. The recent appeal decision for the over 55's apartments increased growth to 23.4% and the inclusion of say 100 units on the objection site would increase further to 29.5%. This settlement has more than provided a reasonable quantum of housing in the LDP Plan period. The references to various background studies are noted as is the reference to the developer, but this does not change the fundamental concerns about the level and pace of development which this settlement is and will experience and disproportionate amount of development having regard to the Plans spatial strategy. The approach taken to this site at this time by the objector, given the very clear context of considerable development having happened and planned to take place in this settlement via the UDP and LDP, is less aligned to making a

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				inappropriate to allocate this site in the current plan period. Community cohesion and the capacity of Penyffordd to accommodate additional development was recently addressed by an Inspector in relation to land at Chester Road (APP/A6835/17/3174699) (Site PEN038 referred to above). Indeed it was one of the reasons for refusal by the Council. The issue was addressed in paragraphs 205 to 227. The Inspector concluded on this issue that:- "No compelling evidence has been provided to demonstrate that the proposal would not be accessible to or accommodated by the existing facilities in Penyffordd, such that would render the scheme incompatible to the WBGA or PPW in terms of community cohesion" (paragraph 222). He went on to say that:- "I have found no compelling evidence to suggest that existing services and facilities in Penyffordd could not accommodate the proposal, which would also increase patronage to such services, facilities,		sustainable development proposition, and more in line with a further speculative approach that seeks to capitalise on previous recent developments and is more akin to simply adding value to land in that context, than planning sustainably for this community without causing further development harm. Policy STR2 sets out the hierarchy of growth to the tiers in the settlement boundary. Tie 1 Main Service Centres are the 'main' locations for new development, Tier 2 Local Service Centres are the locations for more modest levels of development whilst Tier 3 Sustainable Settlements will be the locations for 'housing development related to the scale, character and role of the settlement'. The policy clearly adopts a sliding scale of growth appropriate to each tier and the level of growth proposed by the objector in this settlement is not considered acceptable. The objection fails to identify

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				as well as to local clubs and associations. Whilst the proposal would be a material expansion of the village, the objections relating to social cohesion have not been made out. I conclude, therefore that the proposed development would not cause significant harm to the community or undermine the principle of the creation of cohesion communities, which forms the basis of the Welsh Government's Planning Policy" (paragraph 227). These conclusions addressed the concerns of the Local Authority and the community in this regard based on considerable evidence presented and cross examined at a Public Inquiry. The conclusions also relate to the immediate future (as it was a Section 78 Appeal) rather than a 15 year plan period. The Council have produced no new evidence on capacity to accommodate development over the plan period. The Council's only reason for ruling out the allocation of this site is therefore not borne out by full tested examination of the evidence. In terms of the requirement for a plan led approach it is also therefore necessary to examine how the 2 commitments have come about. The		where in the trajectory the site would be delivered in terms of start, finish and number of units per annum. The objector has misinterpreted the colour coded assessment of candidate sites, published alongside the Preferred Strategy. The background paper should not be interpreted as green sites being better than amber sites, green sites being allocated or amber sites not being allocated. It was a broad brush assessment as to whether each site accorded in principle with the Plans Preferred Strategy. It was clearly to be followed up by a more detailed site assessment and to be considered against a variety of other material planning considerations as part of a planning balance. Given that there were a large number of 'green' sites identified, it is a false logic to assume all green sites would then be allocated as clearly that hasn't happened. The Council has clearly explained in Background Paper LDP08 why candidate site PEN037 was not considered suitable or appropriate to be allocated or included in the settlement which was based on the level of development already

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				2 main commitments are the immediately adjoining site (PEN036) and also the site to the north west of Penyffordd (PEN038). Both these sites where classified as amber in the Council's initial Preferred Strategy Consultation. However, the owners/developers came forward with applications on the sites which were refused by the Council. Both were taken to appeal and were successful at appeal on the basis of the Council's lack of housing land supply. Therefore, by virtue of the Council's inability to provide a 5 year housing land supply through the previous UDP, these other two sites (which are clearly less suitable for development than site PEN037) now have planning permission and, on the basis of these planning permissions, the Council are now seeking to exclude site PEN037 as an allocation and indeed from the settlement boundary. The implications of this are threefold; 1. The "best" site in Penyffordd, as assessed by the Council in their traffic light system, is now excluded as an allocation as a result of the		committed in the settlement. The earlier appeal decisions in the settlement are premised on the [then] 'significant' weight to be attached to increasing housing land supply as set out in para 6.2 of PPW. The most recent appeal decision was for a specific type of development comprising over 55's apartments, for which a specific need had been identified locally by the community. Both sets of decisions are a different context than is now presented by the preparation of the development plan. Also TAN1 has now been revoked in recognition of the harm excessive unplanned growth was having on communities like Penyffordd and this principle is no more clearly applied than in this settlement and the LDP, in terms of not perpetuating such potential harm by further excessive growth in one plan period. The early years of the Plan period has demonstrated that housing land is being delivered at the rate envisaged in the Plans housing requirement and there is therefore no lack of supply. Welsh Government in its formal representations on the Plan have

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				Council's inability to demonstrate a 5 year supply; 2. As the Council are proposing no housing allocations within Penyffordd, residential development within the plan period will not have been plan led but will have resulted from the Council's failure to provide adequate housing land supply over the previous plan period and to date. The Council's approach in excluding site PEN037 only serves to perpetuate this trend. Residential development in Penyffordd over the period of the LDP will therefore not be plan led; 3. Should the Council's delivery against the LDP trajectory fall short, it is likely that additional sites will be required. As the site at PEN037 is acknowledged by the Council to be the most suitable this could potentially lead to a breach of the settlement boundary over the plan period.		no objections to the level of growth proposed. The development plan is also concerned with meeting the needs of the County in terms of its spatial strategy and housing distribution. The Plan apportions most growth to the top three tiers of the settlement hierarchy and within Tier 3 there are a large number of settlements, apart from Penyffordd / Penymynydd. The Plan is not concerned with just this one settlement and there are many other representations seeking the allocation of sites in other Tier 3 settlements. In terms of a balanced approach to the provision of new housing the Plan should provide an element of choice in terms of location. By contrast, the objectors case is premised on previous proposals have been "OK" so this proposal should be as well. See comment above. See comment above The Preferred Strategy was published for consultation between 09/11/17 and 21/12/17. The Rhos Rd site was allowed on appeal

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				As a result, without the allocation of this site, the Plan will fail to meet the Test of soundness in relation to the overall level of housing (as set out above) and specifically in relation to Penyffordd, will mean that there is no plan led development over the plan period contrary to PPW. The Plan would therefore fail to meet the tests of soundness as it would not be consistent with other Plans and would not meet assessed needs nor be sufficiently flexible. 3. Proposed Changes a. Site PEN037 should be allocated for housing over the plan period; b. If the site is not allocated it should be identified as a contingency site to provide additional flexibility should the Councils delivery against the LDP fall short; or		06/09/16, the Hawarden Road planning application was validated on 13/03/17 and the appeal was determined on 14/02/18 and the Chester Rd planning application was validated 30/06/16 and the appeal allowed on 23/02/18. All of the planning applications were submitted ahead of the publication of the colour coded assessment of the candidate sites. Clearly the applications were submitted on the basis of the Council's inability to demonstrate a 5 year housing land supply in the light of the [then] TAN1. This requirement no longer exists or the 'significant weight' that should apply to speculative sites. The objector has misinterpreted the colour coded assessment of candidate sites, published alongside the Preferred Strategy. The background paper should not be interpreted as green sites being better than amber sites, green sites being allocated or amber sites not being allocated. It was a broad brush assessment as to whether each site accorded with the Plans Preferred Strategy. It was clearly to be followed up by a more detailed site assessment and to be considered against a variety of other material planning

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				c. In the alternative if the site is not allocated or identified as a contingency site, it should be included within the settlement boundary of Penyffordd to be consistent with the change on the adjoining site (PEN036).		considerations as part of a planning balance. As commuted above the objector misinterprets the earlier colour coding of candidate sites in coming to the conclusion that the site is the 'best' in the settlement. As part of a plan led approach a development plan will need to consider all sources of housing supply as part of meeting the Plans housing requirement figure, as set out in the Housing Balance Sheet. The Plan therefore quite rightly includes completions, commitments and allowances for windfalls (large and small) as well as new allocations. The Council has demonstrated delivery in its housing trajectory and there is no objection from Welsh Government. The Plan does allocate land in Penyffordd / Penymynydd as the appeal decision on the Chester Rd site was after April 2018 base date for the Housing Balance Sheet and so it is perfectly acceptable to reflect this speculative decision as

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						part of planned provision in the way set out in the plan. The Council's trajectory establishes that additional sites will not be required. It is not accepted that the objector's site has been identified by the Council as the 'most' suitable site, or "best". Even if new sites were deemed necessary by the Inspector then, following the Plan's spatial strategy, Tier 1 and then Tier 2 settlements would be sequentially preferable. Furthermore, if the Inspector considers that there is a need for additional sites in Tier 3 settlements, then there are another 21 settlements to consider alongside Penyffordd / Penymynydd, where there is already a significant imbalance in the contribution this settlement makes (due to appeal decisions) as opposed to the remaining tier 3 settlements. In the light of Welsh Governments formal representations it is not considered that there fundamental soundness issues associated with the Plan. Given the level of provision through an allocation and commitments (and the recent

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						appeal decision) it is not accepted that the exclusion of the objection site results in the whole Plan being sound. In conclusion, the settlement of Penyffordd/ Penmymynydd will significant growth as a result of four speculative appeal decisions. It is not necessary or appropriate for a further allocation to be made.
602	HN1: New Housing Development Proposals	Land off Church Road, Northop	Object	We object to the proposal to retain green Barrier on land off Church Road Northop and therefore exclude it from the list of potential sites in Policy HN1. The site is unconstrained by other local or national designations that would rule out housing development. It is in an accessible location with services and facilities nearby plus access to public transport. Development can be achieved without harm to the landscape or biodiversity and there are no technical reasons to prevent development for housing. Retention of the Green Barrier is not supported by robust proportionate and credible evidence. If the plan is to meet assessed needs and contribute to the achievement of sustainable development it needs to take a more cautious approach to the designation of Green Barriers and add more housing sites to increase the scope	Amend green barrier to include site as allocation for residential development.	Not accepted. Northop has been categorized as a Tier 3 Sustainable Settlement in the LDP. Policy STR 2 sets out that Sustainable Settlements will be the locations for housing development related to the scale, character and role of the settlement. The plan also clearly states in paragraph 5.13 that ''The Plan intentionally avoids creating the perception that every settlement in every tier must contribute towards growth through having a housing allocation.'' Although there have been no development completions in Northop in the first three years of the LDP, during the UDP period Northop grew by 21.9%. (80 dwellings) This was a very significant level of growth considering Northop was a Category B settlement with an

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				for new residential development during the plan period. Unless this happens it cannot be described as positive and sufficiently aspirational. Hence it would fail the soundness test 2.		indicative growth rate of between 10% and 15%. There is some opportunity for development in the village, as a small parcel of undeveloped land has been included within the settlement boundary towards the end of Church Road. The site comprises 7 fields of varying sizes and adjoins the settlement boundary along the rear of properties on Church Road to the south and along A5119 Northop Rd to the west. The broadly triangular shaped wedge of land is bounded by the A55 to the north. Although the site has distinct physical boundaries it has the character and feel of open countryside which is important in providing an open setting to this part of the settlement of Northop. To the east the site is bounded by a sewage works and to the west by a cemetery and cricket ground so the whole area enclosed by the A55 is open land. To the south of the cricket ground is the boundary of the Northop Conservation Area and a number of listed buildings in the vicinity of and including St Eurgain and St Peters Church.

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						The site is a large area of land extending to the north of Northop and at 6.9 ha could accommodate 208 dwellings which is a significant level of development. Such a scale of development is considered to be out of keeping with the relatively small size, character and form of this tier 3 sustainable village. In particular, whereas the cricket ground presently has an open setting, it would be engulfed and encircled by built development if the site were developed. This would fundamentally alter in a harmful manner the character and appearance of this part of the settlement and the setting of the historic core. The site was submitted as an omission site for housing as part of the UDP. The Inspector did not recommend the inclusion of the site and commented 'Although the site is well contained by existing development, the A55 and the A5119, it is an area of countryside which contributes to the rural setting of Northop. Moreover because of its open nature it is designated as part of the green barrier in order to protect a major road junction from visually

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						intrusive development. In a situation where there is no need to release more greenfield sites to meet housing need, where the land meets the purposes of green barrier designation and contributes to the rural setting of Northop, I see no reason to allocate all or part of the site for housing purposes or to include the land within the settlement boundary where all things being equal there would be a presumption in favour of development'. The Inspector also noted that 'The objection site is over 7ha in extent and could accommodate a significant level of development'. In the context of the LDP where the provision for growth has been made in other sustainable locations, as demonstrated in the Housing Balance Sheet and policy STR3 and HN1, it is considered that the comments of the Inspector are still relevant and applicable. The objection refers to there being no technical reasons to prevent development yet there are a number of constraints yet to be resolved as no further background

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						evidence has been submitted with the evidence. On the original candidate site, Highways Development Management Officers considered that the site was suitable subject to a Transport Assessment. Further comments were that 'Additional vehicular traffic generation onto Church Road should be limited due to the nature of the road and the limited available visibility from the existing access road. A ghost Island and right turning lane is likely to be required on Northop Road, the A5119'. In a subsequent planning application (055807) which was refused on 21/03/17 one of the reasons for refusal related to a lack of evidence leading to uncertainty relating to the impact of development upon the A55(T). Dwr Cymru/Welsh Water requested clarification of surface water drainage details and the submission of an Odour Assessment given the site's proximity to the Northop Waste Water Treatment Works and the need to assess impact on occupiers of proposed development. Natural Resources

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						Wales also requested the submission of a Revised Flood Consequences Assessment in order to assess whether the consequences of flooding can be acceptably managed. A reason for refusal on the application related to concerns about surface water drainage scheme, FCA, and odour assessment being unresolved. Despite these clearly being in the public domain, no further technical information has been provided as part of the objection to demonstrate that these concerns can be overcome. Green barrier designations have all been reviewed as part of the LDP Deposit Plan the results of which is contained in the Background Paper 1: Green Barrier Review. This objector has submitted a separate objection to the Green Barrier and this is dealt with in full under objection ID 603 to policy EN11 Green Barrier. In the context of the purposes of a green barrier in PPW, the justification for this green barrier is: to manage urban form through controlled expansion of urban areas, assist in safeguarding the

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						countryside from encroachment and to protect the setting of an urban area. The countryside setting for the historic village of Northop is important as it protects the setting of the conservation area and various listed buildings. It is a very important function of the green barrier in this location. The green barrier will therefore be an important planning tool in managing urban form, and protecting the open countryside setting of this settlement. It will also assist in resisting the inevitable future pressure for development associated with the Red Route although the timescale is presently unclear. The LDP review provides the opportunity to re-assess this once the route and implications of the Red Route are more fully understood. Rather than taking a cautious approach to the designation of green barriers, the objector's stance to allocating housing seems cavalier and not based on sound sustainability principles, the allocation of land for housing for housing's sake, to

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						simply add value to land. In conclusion, Northop is a relatively small Tier 3 settlement where the scale of development proposed is too great for Northop and the location of the site is in a very sensitive area of Green barrier. Protection of the green barrier is vitally important to retain the open setting for the historic character of the village. A number of unresolved constraints also question the viability and deliverability of the site. All these matters make this site unsuitable for a housing allocation in the LDP.
607	HN1: New Housing Development Proposals		Support	It has been brought to my attention that yet again I see Developers have submitted a bid for planning in the Tan-Y-Felin fields area. The reasons against this development 5 years ago have not changed in any way. Please find my objections below. I have lived here for 27 years, during the winter months this road becomes impassable, the gradient of this estate has made it unfriendly for the majority who live here, unfortunately for us who live here selling our homes in an area not desired is extremely difficult. The road is a dangerous now before any extra traffic is added. Adding more homes		Noted. The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				to an already bleak and impassable area is the most illogical idea I know. Whatever one does the gradient of Tan Y Felin will always remain the same. I feel that adding more houses to this area will eventually cost lives during the winter months. The water pressure in this area has always been extremely bad, and the sewers to not cope with the houses that are already here. There is other useable land in the area that is not at the top of a hill, why make life difficult during the winter for more families! Apart from the obvious in the area regarding schools, doctors, shops, recreational facilities, if these aren't sufficient for the people in the area then adding more houses/homes will not solve those problems. For an area that doesn't have an abundance of employment available why build here, when people will have an increased carbon footprint caused by commuting to work. Climate change is happening now, we are supposed to be addressing this situation not adding to the problem!		
616	HN1: New Housing Development Proposals		Support	I am a resident of Tan Y Felin in Greenfield. I have lived on this estate since it was first constructed back in 1990. Over the years we have see the estate grow from a quiet estate to a busy one. I am concerned about		Noted.The LDP does not include an extension to the Tan Y Felin estate as an allocation within the plan. Candidate sites GRE002 land at Tan Y Felin, Greenfiled and GRE008 Land west of

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				the possibility of the development at the fields at the top for the reasons listed below. • Access to the top of the estate has become very busy and congested with cars needed to be parked in the road outside properties on both sides. This causes blind spots, for both drivers and pedestrians and often makes negotiating the hill difficult for homeowners and emergency services. • The main access road, Greenfield road is already busy without extra traffic and whilst there is already a 30 mph speed limit this road can be difficult to pull out on. The same applies to the coast road if access was to be gained from there. • Local amenities are not fit for more residents. Yes we have plenty of supermarkets but the local Doctors are difficult to get appointments in. Fortunately I have not had to register with a GP for a while but believe finding a new surgery is difficult. Holywell town centre is going through a period of change but still has a long way to go for providing for the town. Leisure and Library facilities are no longer Council run and despite being run well would need to extend which isn't financially viable. • The local primary school is practically full and would certainly not be able to cater for the amount of children extending this estate would		Greenhill Farm, Bryn Celyn have not been allocated within the plan therefore your objection to the LDP has been noted as a support to the exclusion of these sites.

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				bring which would result in parents being forced to take their children to schools not in their catchment area. • There have been new developments (Tir Glas on the coast road), construction on Greenfield road opposite Mae Y Dyffryn (although remaining half built) and plans for the old LLeusty hospital, Workhouse and Natwest Bank being earmarked for residential development. • The fields at the top of Tan Y Felin are home to various forms of wildlife such as bats which would be lost if development went ahead. I would appreciate my comments and objections being taken into account during the public consultation. Holywell and the surrounding area has been through a period of decline over recent years and it is finally beginning to feel as though positive action is taking place, I feel that to build more houses in the area would knock the regeneration of the town back. Please let us get Greenfield and Holywell back to it's former glory without further pressures.		
618	HN1: New Housing Development Proposals	BUC047 (AS) Megs Lane, Buckley	Object	The site is well placed in relation to Buckley, a main service centre, and a principal location for new housing development which reinforces and contributes to sustainable settlements.	• The site should be allocated for residential development in Policy HN1. Consequential	Not accepted. Buckley is a sustainable settlement and has been categorised in the settlement hierarchy as a Tier 1 Main Service Centre. During the UDP plan period Buckley grew by 17.4%, as a Category A settlement the aim

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				An outline planning application for residential development (059387) was refused on the 11th March 2019. This application sought to address issues raised in a previous application (057056) which was refused by Flintshire Council on the 19th July 2018 showing a potential development for up to 85 dwellings. The site is genuinely capable of being delivered and could be brought forward rapidly subject to planning approval. Notwithstanding the apparent over-supply of housing land within the County Council area that has now miraculously being identified in the Deposit Plan, it has been the case for some considerable time that the Council has not been able to demonstrate a 5 year housing land supply, nor produce any Joint Housing Land Availability Study to evidence any land supply. The historic shortfall in housing delivery does not appear to have been taken into account in assessing the current need and future supply.	Changes Required • The settlement boundary for Buckley should be adjusted to encompass this site (Policy PC1). • The Green Barrier policy boundary should be amended to exclude this site (Policy EN11). • The Proposals Map(s) should be adjusted accordingly. SUMMARY OF REASONS • The site is well placed in relation to Buckley, a main service centre, and a principal	for growth to be within 10% to 20% was therefore fulfilled. The LDP makes provision for growth in Buckley through the allocated site at Well Street and as a result of 175 completions in the first three years of the Plan period and commitments of 138 units as at the Plans Housing Balance Sheet date of April 2018. This shows that for the first 3 years of the LDP plan period there is an appropriate level of development for a Tier 1 settlement and a healthy number of commitments coming forward. The objector mentions recently refused planning permissions on this site, and these recent decisions are material to the assessment of this alternative site given it is the same site as refused twice, and where the policy context in the UDP used to refuse the site is the same as set out in the deposit LDP. As TAN1 has now been revoked and with it the requirement to demonstrate a 5 year land supply, the Council have clearly demonstrated via the deposit housing trajectory that there is sufficient housing provided by the plan and that it is being delivered in the first four years of the plan at the rate envisaged by

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				The Deposit Plan acknowledges there is a lack of suitable and appropriate brownfield land in the County (11.2). Greenfield sites are therefore required to fulfill future housing requirements. The uncertainty over actual potential housing land supply is evidenced by the inclusion of large windfall sites in the overall mix. Whilst some allowance for small windfall sites is to be expected - and arguably would not materially impact on overall supply levels – relying on a contribution from large windfall sites highlights the likelihood that allocated sites may be expected to incur delays or limitations in delivery; and also that other potentially allocate-able sites (given the apparent scale of available sites) are also constrained. The site is capable of fulfilling the various other development criteria set out in the Deposit Local Plan. The site does not materially harm or undermine the Green Barrier. The Green Barrier to the south of Buckley seeks to prevent coalescence of Buckley with built development at Padeswood and to	location for new housing development which reinforces and contributes to sustainable settlements. • The site is genuinely capable of being delivered and could be brought forward rapidly subject to planning approval. • The site is capable of fulfilling the various other development criteria set out in the Deposit Local Plan. • The site does not materially harm or undermine the Green Barrier.	the plan's trajectory. There is therefore nothing materially different to the two recent refusals that should warrant coming to a different view now. The majority of the site is within open countryside and green barrier. The only part of this site within the settlement boundary and not within the green barrier is a small gap between frontage ribbon development onto Megs Lane, but it is too small for an allocation. The area is characterised by a patchwork of varied sized fields bounded by mature hedgerows. The topography of the site is gentle sloping south towards Spon Green Farm. The site has an open aspect affording wider views of the surrounding countryside to Hope Mountain and Moel Fammau, contributing to an overall sense of openness. The frontage development along the southern side of Megs Lane forms a definite physical feature on the ground which creates a strong edge to the settlement boundary and to the green barrier designation. The site relates better to and forms an integral part of the open

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				prevent encroachment into open countryside, which provides a setting to the built form of this part of Buckley. However, the Padeswood Cement works is an isolated development within a much larger swath of countryside, over 1km distant from the site. The next nearest settlements to the south and south-east for which the barrier might conceivably be relevant are several kilometeres away. This part of Buckley is not as sensitive as other parts of the County where the need for a such a barrier is more evident. The substantial block of Green Barrier designated to the south of Buckley in considered excessive and the deposit plan makes no longer term provision for the managed expansion of this main service centre. The need for the Green Barrier in this location is therefore debateable over normal countryside policies. Even if the site is not to be treated as a formally allocated site, the Deposit Plan nevertheless requires a supply of large windfall sites in order to fulfill its housing requirement over the plan period. This is an appropriate site from which to achieve such a contribution.	• Even if the site is not to be treated as a formally allocated site, the Deposit Plan nevertheless requires a supply of large windfall sites in order to fulfil its housing requirement over the plan period. This is an appropriate site from which to achieve such a contribution. • The Deposit Plan acknowledges there is a lack of suitable and appropriate brownfield land in the County (para 11.2). Greenfield sites are therefore required	countryside and green barrier. The function of the green barrier designation is to retain the open nature of the countryside around Buckley to prevent urban encroachment and to prevent coalescence of Buckley with Penyffordd and Padeswood. Built development in this location would undermine the function and openness of the green barrier. The site is 3.8 ha and although the objector is suggesting that 85 dwellings could be built on the site, a density of 30 dwellings per hectare means up to 114 dwellings could be accommodated. Adjoining this site to the east there were Omission Sites considered at the UDP Inquiry. The Inspector considered that the land should not be developed and in referring to the land at Spon Green stated in paragraph 11.96.10 of the Inspectors report:- ‘’The objection site has a poor relationship with the settlement. It would be a significant encroachment onto an area of green barrier in a prominent area of countryside to the south of the

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				The Deposit Plan acknowledges there is a lack of suitable and appropriate brownfield land in the County (para 11.2). Greenfield sites are therefore required to fulfill future housing requirements. By virtue of the extent of the Green Barrier surrounding Buckley, some release of Green Barrier land will be required.	to fulfil future housing requirements. By virtue of the extent of the Green Barrier surrounding Buckley, some release of Green Barrier land will be required.	settlement. It would be the first extension beyond the well defined existing line of built development, result in the coalescence of Buckley and Padeswood/the cement works and effectively sever the strategic green barrier.'' It is also important to note that there is continued significant pressure for development on the area to the south of Buckley. This is demonstrated by the planning application adjoining this site to the east, submitted at Spon Green, for 435 dwellings and 450sqm of retail,(ref 058237) which was also refused permission in July 2018. The main reasons for refusal were the fact that the site was in the open countryside and green barrier and represents a consistent assessment of this location in line with the previous recent refusals on this site. As the objection references, another more recent application was refused on this Resubmitted site, on Land South of Megs Lane, Buckley (Ref 059387, March 2019) and again its location within the open countryside and green barrier were the main reasons for

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						refusal and that planning context is the same in terms of the designation of the land in the LDP as it is in the UDP. In this way the Green Barrier designation has been tested and has been found to be reasonable and justified in this location. It is also interesting to note that there has been no appeals lodged against these decisions. These decisions and the UDP Inspector's comments give added strength to the continued Green Barrier designation in this location. The Megs Lane planning application (the same site as BUC047-AS) was submitted by Leith Planning Consultancy, with no mention of developer involvement. There is no mention in the submission or in the extensive Planning Statement that there was a preferred developer or that a particular developer was involved in the scheme. The objector needs to do more than simply provide a lengthy planning statement at the stage reached, by providing clear evidence of the deliverability of this site in line with

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						soundness test 3, but no such evidence has been provided. The objector looks backwards to the UDP to make the point that in their view the under-delivery from that plan should be added to the requirement for the LDP, notwithstanding its different time period. Whilst the Council do not accept this proposition, the objector provides no evidence to justify or quantify this apparent 'shortfall' or why it should be 'transferred' from one plan period to another. No reference is given to where in national planning guidance this provision is set out as government policy and there is no evidence of where else in a Welsh LDP context such an argument has been accepted. Also when the objector references an historic shortfall in housing delivery they seem, without explanation, to limit this to just the UDP where more logically such historic shortfall's may have occurred for other previous plan's. The flaw with such an argument therefore is how far back does one go to apply an apparent 'historic shortfall' and why should this just be limited to

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						the UDP? This unsubstantiated information cannot be considered in any other way by the Council and carries little weight. There is no requirement by Welsh Government either in PPW10 or Development Plan Manual 3 to 'add on' part of a previous plan housing requirement to the housing requirement in a new development plan. Whilst the Council has been unable to undertake a formal JHLAS it has continued to produced yearly Housing Land Monitoring Studies which form part of the Plans evidence base and which also demonstrate that housing is being delivered in the early years of the Plan. The Council is not clear as to what is meant by the identification of an apparent "over-supply of housing land" in the deposit plan and rather than rely on 'miracles' the Council prefers to use clear facts and evidence. The objector is also now reminded that references to a lack of a five year supply and JHLAS are no longer relevant with the revocation of TAN1 in March 2020. The objector should also note that the system of monitoring supply against a housing trajectory

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						now set out in Development Plans Manual 3 is the same approach taken in the deposit LDP where reference to this monitoring system was used from the draft DPM3 available at the time. Rather than identify an over-provision against the plan's housing requirement which would be illogical, the plan identifies a housing requirement with a 14.4% flexibility allowance added in and as required by the DPM, and demonstrates via a housing trajectory how this will be met throughout the plan period. The trajectory also clearly demonstrates that housing delivery in the early years of the plan period is directly in line with the rate of housing provision identified in the plan. They also fail to acknowledge that a development plan does not actually deliver housing, it makes provision for the housing requirement to be built. Missing from the objector's argument is the interaction of the market, economic conditions, the capacity of developers to build, and the actual level of demand coming forward. These are all factors that are outside of the Council's

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						control. Paragraph 4.2.3 of PPW states "As part of the development plan process planning authorities need to understand their local housing market and the factors influencing housing requirements in their area over the plan period [the Council's emphasis in bold]". The operative phrase would appear to the Council to be that highlighted – over the plan period. The plan period for the UDP was 2000-2015 whereas the LDP period is 2015-2030 and there is no overlap. Equally the LDP evidence base is logically based at 2015 including the Local Housing Market Assessment, as the plan aims to cater for needs during its 'plan period'. Also, even if it is accepted that there was a UDP 'shortfall' that should somehow be incorporated, which the Council do not, and given that the UDP housing requirement adopted the projected amount of household growth at the time from Welsh Government projections, as the LDP provision is two to three times the present level of projected growth, then it can be said that

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						any alleged shortfall has been catered for by the LDP. It also needs to be stressed that Welsh Government have no fundamental objections in their formal response on the Plan and comment 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect'. The Council does not accept that too much reliance is placed on the contribution of large and small windfall sites in the LDP housing land supply. BP10 (section 2.5) explains that an analysis of past trends has been carried out and this is detailed in Section 4.3 of the Flintshire Urban Capacity Study (June 2019) undertaken by Arcadis. This approach accords with the latest National guidance as contained in Development Plans Manual Edition 3 (March 2020). The Manual advises (para. 5.63) that 'an urban capacity study can inform the identification of site allocations and assist to

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						demonstrate delivery of windfall allowance in the Plan'. Both the Arcadis Study and BP10 explain that large and small windfall site contributions used in the Plan are significantly lower than the level of past completions achieved from these sources. It is also the case that the representative body of the development industry, the HBF, agree that the allowances are appropriate. Furthermore, no objection has been made to the level of windfall allowances by Welsh Government in their formal representations. This is a very broad statement which is not supported by any detailed assessment of relevant policy compliance. It is also the case that all development sites will have to adhere to the policies and requirements in the plan. The objector has submitted a separate objection to the Green barrier designation and a full response has been made to that (id195) in relation to Development Management policy EN11 Green Barrier. For completeness a brief summary of that response is

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						included here. Clearly the two recent refusals of permission on this site also contain a green barrier assessment and reason for refusal and are materially relevant. In relation to this site land South of Buckley / Padeswood, the green barrier seeks to prevent coalescence of Buckley with built development at Padeswood and seeks to prevent encroachment into open countryside which provides a setting to the built form of this part of Buckley. The land clearly fulfils the purposes for green barrier designation and should be retained. The settlement and Green Barrier boundary follows the line of the houses along Megs Lane and forms a significant physical feature on the ground making it very clear the extent of Buckley. Built development will breach this clearly defined southern limit of the settlement and affect the openness of the green barrier and will set a precedent for further pressure for development in an area where there is already significant pressure as has been as detailed above, but which

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						would be difficult to resist if this site were included in the Plan. As the UDP Inquiry Inspector pointed out '' It would be the first extension beyond the well defined existing line of built development, result in the coalescence of Buckley and Padeswood/the cement works and effectively sever the strategic green barrier.'' The conclusion of the UDP Inspector in supporting the retention of this barrier along the southern edge of Buckley is still considered to apply to the present situation and provides a strong context for continuing to resist harmful development in this location. The site is not necessary or appropriate to be allocated or included in the settlement boundary of Buckley having regard to its green barrier location access and in the light of provision for growth in Buckley. The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable

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						the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility / contingency to ensure a sufficient housing supply and Welsh Government in their formal comments on the plan have no concerns about the housing growth provided. Given that the site is not considered to be suitable for allocation in the Plan for the clear reasons given, it would not be logical for the Council to consider it as a windfall site as it is simply not a suitable location for development on any basis. Some greenfield land has been allocated in the plan that avoids encroaching on green barriers which is sequentially preferable to considering green barrier land as a first principle, as advocated by the objector. Also as part of the

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						Green Barrier Review land around Buckley has been removed from the green barrier designation in a less sensitive location to provide potentially more sustainable future growth opportunities beyond this LDP timeframe. Land between Bannel Lane and Chester Road is enclosed on 3 sides by development and it was felt that it did not contribute to the purposes of the Green Barrier designation and the review therefore concluded it should be removed. There are therefore occasions when the boundary of the Green Barrier are drawn back and where development may be allowed in the future. In conclusion it is considered that the Plan makes sufficient provision for development as a whole and also within Buckley, and that it is not necessary or appropriate for a site to be allocated where it would cause clear harm to a green barrier. The site is not considered appropriate to be allocated in the Plan.
626	HN1: New Housing	land adjacent to Maes Celyn, Holywell Road,	Object	The whole site is assessed under reference NOR37 in the Candidate Alternative Sites report (LDP08).	We therefore consider that additional	Not accepted. The original candidate site submission NOR037 covered an extensive

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	Development Proposals	Northop NOR037		8.10 In response, we have set out our objections on the distribution of development to Policy STR2. We consider that the Tier 3 Sustainable Settlements, and in particular Northop, should accommodate a significantly higher level of development. There are unique economic opportunities available at Northop which justify a higher than proportionate level of growth. Notwithstanding this, we have previously made clear that the site could be allocated in part to a scale that the Council considers is appropriate for the village. We have addressed the points in relation to Green Barrier in our response to Policy STR11.	flexibility should be provided within the supply, by increasing the proportion of development to be distributed to the rural areas, and specifically the Tier 3 Sustainable Settlements. We have proposed an omission site as an allocation for development. Submission of additional site at Land adjacent to Maes Celyn, Holywell Road, Northop. The site comprises approximately 21.44 hectares of agricultural land which is predominately used for haylage. It is situated to the rear of the former pig farm at Maes Celyn, which has been developed	area of land of 22.88 ha for a mixed use development. However in a subsequent representation in relation to the Preferred Strategy, it was suggested by the representor that a much smaller part of the site, land between Maes Celyn and edge of settlement could be considered for development. This smaller part of the site was also put forward by another representor as Candidate Site NOR027 but for protection as Green Barrier rather than for development. This response will consider both the whole and the smaller site. The objection site comprises a patchwork of large fields to the west of Northop, which surrounds and extends beyond Maes Celyn to the South and North to link up to Coleg Cambria. The sites covers a large area of open countryside and part of the site is within the Green Barrier. Development on this scale would surround Maes Celyn which relates better to the countryside and not to the village. It would change the rural character of that conversion scheme and result in an overdevelopment of Northop. Its topography is that of land rising

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					for housing. Access is achievable from Holywell Road. The site could accommodate a residential led mixed use development, which would represent a sustainable extension to the village.	from Holywell Road and development would be extremely prominent in the landscape. Development of the site would merge Coleg Cambia with Northop village and encompass Maes Celyn. It would be a significant encroachment into the countryside and would not represent a logical extension of the village. Although the southern part of the site is not within the green barrier it is important open countryside and agricultural land. A smaller parcel of land between Maes Celyn and The Bays/ Belgrave House has been suggested by the objector as an alternative site. This site is a large rectangular shape, of approximately 2.6 ha, and forms part of a larger field and as such there is no physical boundary along its southern edge. Holywell Road forms the northern edge, Maes Celyn to the west and the properties The Bays/ Belgrave House to the east. The site is an open field at a higher level than the road in an elevated prominent position, Northop has been categorized as a Tier 3 Sustainable Settlement in

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						the LDP. Policy STR 2 sets out that Sustainable settlements will be the locations for housing development related to the scale, character and role of the settlement. The plan also clearly states in paragraph 5.13 that ''The Plan intentionally avoids creating the perception that every settlement in every tier must contribute towards growth through having a housing allocation.'' Although there have been no development completions in Northop in the first three years of the LDP, during the UDP period Northop grew by 21.9%. (80 dwellings) This is a very significant level of growth considering Northop was a Category B settlement with an indicative growth rate of between 10% and 15%. There is some opportunity for development in the village, as a small parcel of undeveloped land has been included within the settlement boundary at the end of Church Road. The objector explains that the unique economic opportunities for Northop are i) the Coleg Cambria Campus and ii) the proximity to the A55 and the proposed New link road to the A494(T). In respect

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						of i) the College Cambria campus has its own adjoining land holdings should it wish to bring forward development proposals. In respect of ii) proximity to the A55(T) alone is not sufficient to warrant such a large scale of development. Despite the Red Route road scheme being protected within the Deposit LDP there is no certainty over timescales as the scheme still needs to be the subject of public inquiry. It is unlikely to be developed until the latter part of the Plan period and it is not understood how this provides any development 'hook' for the proposed scale of development. Furthermore, the objector refers to 'any development would be phased and it is likely that to come forward over a number of years' and it is queried how the site would therefore address the housing land supply shortages referenced at length by the objector, if it is proposed to be developed in phases. The submission makes reference to a variety of possible uses on the larger site. Some of these are questioned as set out below:

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						• Community building – given that there is already a village hall on High St it is unclear whether there is an expressed community need for a further facility • Allotments - given that there are already allotments within the St Peters Park Estate it is unclear whether there is an expressed community need for a further facility • Health Centre – the provision of health centres is a matter for the Betsi Cadwaladr University Health Board and the Council is unaware of any expressed need for a health centre in Northop • Small scape employment uses – The Employment Land Study has concluded that the County has a healthy portfolio of employment land in the Plan and that further additional allocations were not required. The objector has put forward no explanation why business units are appropriate in this location except for a possible link to the college, yet the college has its own land holdings. • Delivery of a significant proportion of affordable housing – Policy HN3 of the Deposit Plan

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						already requires 40% affordable housing in this location. It is unclear whether 'significant' means a level of affordable housing in excess of 40%. If so, it casts doubt over the viability and deliverability of the scheme. There is considerable uncertainty over the lack of evidence to justify the need for several proposed elements of the scheme, whether these are to be funded by the scheme itself or by others and ultimately cast doubt on whether the scheme is viable and deliverable. This contrasts sharply with the objector's view that the only constraint preventing delivery of the site is its current designation as green barrier. Green barrier designations have all been reviewed as part of the LDP Deposit Plan, the results of which is contained in the Background Paper 1: Green Barrier Review. This review has taken a robust approach to reconsider all the green barrier designations using the requirements of PPW 10. In this location, the Green Barrier designation seeks to prevent the coalescence of Northop with

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						Coleg Cambria and the isolated outlier of development at Maes Celyn and to prevent urban encroachment into the open countryside. In the context of the purposes of a green barrier in PPW, the justification for this green barrier is: to manage urban form through controlled expansion of urban areas, assist in safeguarding the countryside from encroachment and to protect the setting of an urban area. This particular part of the green barrier serves to prevent coalescence between Maes Celyn / Coleg Cambria and Northop. This is justified as there is continued pressure for development illustrated by the candidate sites which have been put forward on land adjoining Northop and Maes Celyn in both the UDP and LDP. A full response has been made in relation to this issue in respect of EN11 Green Barrier. The Council's Highways Development Management Officer comments on the larger site that such a development is likely to

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						require more than one point of access. Provision of a T junction with a ghost island and right turn lane appears practical to the west of Maes Celyn, a simple T junction could be provided to the east of Maes Celyn but a difference in ground levels and gradients make this location impractical. In respect of the smaller site area the Highways DM Officer comments that without the benefit of a transport statement and provision of access details, the site is presumed unsuitable for residential development. The Officer states 'It would appear possible to construct a T junction with adequate visibility to serve the site but significant earthworks would be required to provide an access road of appropriate gradient. Provision of visibility splays would require removal of the majority of hedgerows and trees along the highway boundary' and ' Existing footways are considered to be of inadequate width and site access provision does not conform to the requirements of Active Travel Wales legislation; there does not appear to be any

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						reasonable opportunity for improvement'. There are therefore objections to both the large and smaller site on highways grounds and the objector has not provided a Transport Assessment with which to demonstrate that suitable access can be provided. This site was promoted as an omission site as part of the UDP but the Inspector concluded that the site related better to the open countryside and should remain as green barrier. The inspector comments 'The site forms a small but effective gap designated as green barrier between the village and college. Its topography rising to the south means it does not relate well to the built up area. Allocation of and development on it would merge the 2 areas, be a significant encroachment into the countryside and to my mind result in an unacceptable extension of the village to the west.'' This conclusion is still relevant and applicable to the present consideration of the site. Originally, predictive data from the Welsh Government Land, Nature

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						and Forestry Division indicated that 10.39 ha of the 22.88 ha site is Grade 2 BMV agricultural Land. The objector references that a further more detailed study shows that the majority of the land is Grade 2 or 3a. Welsh Government Land, Nature and Forestry Division have carefully considered the study provided by the objectors carried out by Land Research Associates and have stated, 'The department has validated the October 2019 survey (Ref: 1623/1), and can confirm it has been undertaken in accordance with the 'Revised Guidelines and Criteria for Grading the Quality of Agricultural Land' (MAFF 1988). This survey can be accepted as an accurate reflection of land quality on the site. This confirms that the site, if allocated, would involve the loss of 18.6ha of BMV land (10.1ha of ALC Grade 2 and 8.5ha of Subgrade 3a).' The study can therefore be accepted as accurate and the

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						department goes on to say that the potential loss of BMV is unjustified because: • ' The applicant has not applied BMV agricultural policy (PPW3.54 and 3.55) in justifying overriding need and application of the sequential test. • The recent progress of developing the proposed LDP identifies sufficient land to deliver the required growth. • The proposed development is not allocated for development under the UDP or the proposed LDP. The allocation, if granted, would raise significant questions regarding the soundness of the proposed Flintshire LDP in terms of BMV agricultural land policy application (PPW 3.54 and 3.55). • The proposed LDP has considered the losses of BMV agricultural land in allocations for the whole plan, over the plan period (LDP Background Paper 9 – Minimising the Loss of BMV Agricultural Land). This site has not been considered for allocation and therefore has not been considered as part of that process. A number of non-BMV sites have

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						been put forward within the un-adopted LDP. Lower grade agricultural land is available and the planning statement conflicts with PPW.' The department concludes by stating, ''Under TAN 6 Annex B5, the Department objects to the proposal on the basis that it conflicts with BMV Planning Policy.'' PPW edition 10 states clearly that: '3.54 Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC)15 is the best and most versatile, and should be conserved as a finite resource for the future. 3.55 When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades

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						is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade'. The assessment of agricultural land quality as carried out by Land Research Associates on behalf of the objector shows that the majority of the larger site is Grade 2 and Subgrade 3a. This extended site also has Subgrade 3b and Grade 4. The smaller site comprises Grade 2, Subgrade 3a and Subgrade 3b with a large part of the site being Subgrade 3a. It is therefore clear from national guidance that BMV should be protected from development and only be considered when there is an overriding need for development. This is obviously not the case as Plan has provided for growth elsewhere in the County without the need to lose such large amounts of grade 2

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						agricultural land. The Council has demonstrated in its Background Paper on agricultural land how it has sought to minimise the loss of BMV land. In the context of Policy STR2 which directs that development in Tier 3 settlements will be 'related to the scale, character and role of the settlement', it cannot be the case that there is an overriding need for such a scale of development in this Tier 3 settlement. Comments from WG agricultural land quality advisors have supported this approach and have clarified that they would strongly object to the allocation of this land. In conclusion, the scale of the original site is totally out of character and is excessive for the size of Northop village, in terms of a Tier 3 Sustainable Settlement which specifies 'locations for housing development related to the scale, character and role of the settlement'. Presently there is a distinct gap between the college / Maes Celyn and the edge of the settlement. Maes Celyn has its own character and the development would not only join

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						but also engulf Maes Celyn within built development. Therefore such a scale of development is in excess of what is considered sustainable for a settlement the size of Northop. There are also highways objections to the scale of development and the feasibility of creating suitable vehicular access. As demonstrated by the objector themselves and clarified as accurate by WG, the development of the site would result in the significant loss of BMV versatile agricultural land. Although the objector has also proposed a much smaller site, it could accommodate 78 dwellings which would still represent a significant level of growth for Northop and would remove part of a green barrier which protects an important gap between Maes Celyn and Northop village. There is also uncertainty over the creation of a suitable vehicular access and development would again result in the loss of BMV. Given the extreme range of land originally put forward for development, this appears to be simply an exercise in adding value to land rather than proposing a

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						sustainable form of development that would in any way accord with the Plan's strategy. Neither site is considered necessary or appropriate to be allocated in the Plan.
636	HN1: New Housing Development Proposals	MYN018AS Ffordd Fer, Mynydd Isa	Object	Strategic Sites With reference to the comments made in Policy STR3, TW has concerns over the ability of the large strategic sites to deliver the required housing numbers within the plan period. As such, the allocation of additional non-strategic sites, such as TW's site at Mynydd Isa would assist in meeting the shortfall. TW is aware that there are a number of housing allocations that have been brought forward from the UDP. TW has concerns on the deliverability of some of these sites, particularly as they have not come forward since the last Plan was being prepared, before 2011. Windfall Sites TW also has concerns over the reliance on windfall sites (19% of housing requirement) as this is not appropriate. Windfall sites have not yet obtained planning permission	The Council should allocate additional sites for residential development to ensure that it can meet its full objectively assessed need. Additional sites should include TW's site at Mynydd Isa which is the subject of these representations.	Not accepted.The Council has responded separately in respect of objections to the two strategic sites and concluded that they are capable of delivering in line with the trajectory. It is surprising to see that the objector is objecting to the 'large' strategic sites in the Plan when the housing proposed at Mynydd Isa is almost double the 300 units proposed at the Warren Hall Strategic Site. In comparison with Warren Hall and the Plan's allocations in policy HN1 the objection site represents a 'strategic site'. The objector states that there is too much reliance on windfall sites. With reference to the background evidence provided to support the LDP, the allowances made for small and large windfall sites are set at 50% of the 18 year trend for development in these categories and therefore take a modest and conservative

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				and will take time to come forward through the planning process and progress to completion. They are an uncertain source of housing supply. TW considers that the Council should be planning positively to ensure that it is has adequate allocations to meet and sustain its housing need. Sustainable Location Ffordd Fer, Mynydd Isa would represent a sustainable location for new development because, in the absence of suitable local previously developed land, PPW states that appropriate greenfield sites on the edge of existing settlements represent the next best option for housing development. The site is supported by excellent local infrastructure and well located to access the existing services and public transport facilities in Mynydd Isa. The site also falls entirely within Flood Zone A so is not considered to be at risk from flooding as detailed in the supporting Delivery Statement. The development of this Site will form a sustainable urban extension to Mynydd		approach to the future delivery from these sources. This is considered to be sensible and realistic, a point fully supported by the Home Builders Federation in their comments on policy STR11 of the plan as follows “The HBF supports the Councils approach to windfall sites and commitments as identified with the Housing Balance sheet and the level of flexibility proposed. The HBF also supports the spatial strategy and the mix of both larger and smaller sites proposed”. The Council has also produced an Urban Capacity Study as part of the evidence to support the plan’s approach to the provision of housing, which confirms that there is a realistic future supply of both potential small and large windfall sites to support the assumptions made. The inclusion of windfall sites in the housing supply of the LDP is supported by advice contained within Welsh Government’s DPM3. The site is located in open countryside to the west of Mynydd Isa, adjoining the settlement boundary at the northern part of the site. The rest of the site

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				Isa, which has a wide variety of existing services and facilities. The settlement is located close to two Category A settlements, Mold and Buckley, both which provide an extensive range of services and employment opportunities. The Site and wider area are served by a good network of highways and public transportation infrastructure. The proposed development site is in a strategic location for access to key road networks across Flintshire and North Wales. The Site sits adjacent to the Mold Bypass which connects it to the A541, A494and A549. The A541 connects Mynydd Isa directly to Wrexham and the A494 connects the village to the North		appears disconnected from the existing settlement. The western edge of Mynydd Isa is presently well defined by a clear line of built development and this forms a firm and defensible settlement boundary. The site has not been allocated as the development of the site would create a detached form of built development within the open countryside, resulting in significant urban sprawl which would harm the character and appearance of the open countryside. From the well defined edge of development, the objection slopes downwards generally in a southerly direction towards the A494(T) and Wylfa roundabout. Development on the objection site would be visually prominent and harmful. The site is located within the green barrier which seeks to protect the open gap between Mold and the outlying settlements. At the eastern edge of Mold there is only a narrow gap between built development at Mold and Mynydd Isa. Development would cause significant harm to the function of the green barrier which is designated to protect the

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				Wales Expressway which provides a direct link to Chester and the north and east Welsh coastline. The City of Chester and town of Wrexham provide a more extensive range of services, amenities, employment and education opportunities. Access to Services The Site is well situated to take advantage of existing public transport infrastructure, which will reduce reliance on the car and help reduce carbon emissions in the long term. Mynydd Isa is served by several local bus routes connecting it to Mold, Chester and Ellesmere Port. The closest bus stop is located 50m to the east of the proposed northern site access on Bryn-Y-Baal R0ad. There is a further bus stop 100m to the south of the site on Mold Road. The closest railway station is Buckley (c.4km) which provides an		openness of this swathe of open countryside and prevent coalescence of settlements. Development in this location and of this size would fundamentally weaken the gap between Mynydd Isa and Mold/New Brighton, and would be an unacceptable extension of the settlement. There is a Grade II listed building on the Eastern edge of the site, Argoed hall. The objector proposes to develop to the immediate rear of Argoed Hall, but not to the North of the building. The objector has provided no Heritage Impact Assessment of the proposed development on the listed building. Mynydd Isa is a tier 2 settlement according to the LDP settlement hierarchy (STR2). Tier 1 settlements are seen as the main locations for development as they play a strategic role in the delivery of services and facilities for the County. Tier 2 settlements such as Mynydd Isa are the locations for more modest levels of new development. The scale of the development proposed on MYN018AS is far larger (580 dwellings) than the Strategic

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				hourly service to both Wrexham and West Liverpool. Argoed High School and Ysgol Mynydd Isa provide the future residents of the Site with good educational options within a walkable commute. A supermarket, free houses, sports club and a selection of cafés are located in the settlement and cater for the leisure needs of future residents across all age ranges, as well as providing further employment opportunities. The Site forms a sustainable extension to Mynydd Isa which supports pedestrian and cycle connectivity within the settlement, ensuring local amenities can be accessed without a need for motorised transportation.		allocation at Warren Hall (300 dwellings) and at any of the HN1 allocations. The site alone would result in Mynydd Isa increasing in size by a third, which is not considered to be related to the scale, character and role of the settlement. Given that provision for growth exists in Mynydd Isa in the form of the Rose Lane commitment which will provide 58 dwellings, and Isa Farm which will provide 59 dwellings, and the allocation nearby in New Brighton on a site which has previously been released from the green barrier for 105 dwellings, it is considered unnecessary and inappropriate to make a major incursion into a strategic green barrier when there is sufficient growth already planned within the area. Highways have also raised significant concerns with the site and advise that “Ffordd Fer/Heol Fammau are considered suitable to serve only limited additional development. Whilst this route would provide a useful emergency access, it must be assumed that

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						the primary access would be from Bryn Y Baal Road. The layout and provision of such an access would require detailed consideration; a simple T junction is unlikely to be adequate. A Transport Statement submitted with another site in the area highlighted significant capacity and operational deficiencies with the nearby Bryn Lane/A5119 traffic signal controlled junction. That TA identified potential opportunities to deliver improvements suitable to accommodate traffic generated by approximately 100 additional dwellings but I see no opportunity to deliver improvements adequate to cater for a development of 580 dwellings. Consideration would be required of the impact of generated traffic on the operation of the A5119/A494 junction and the capacity of the A494 between that junction and the A55. The A494 is a trunk road where Welsh Government are highway authority; their input into the scoping of any TA will be required.

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						Other studies have indicated that there is inadequate spare capacity in the local primary school; whilst this is not in itself a highway concern, the identification of safe routes to an appropriate school should be considered. The proposed allocation could be given further consideration following the submission of a detailed Transport Assessment but suitability for a development of this scale is considered unlikely." Despite the objector submitting a vision and delivery statement for the proposed site, they have not provided a transport assessment for a strategic site of almost 600 dwellings, yet maintain that it is a viable and deliverable site. There is considerable doubt as to whether the local highway network can accommodate this scale of development. The Objector's vision statement for the proposed site includes an area of the site for a 'community hub' which will include community facilities and amenities concentrated around a village green. The objector does not include any detail of what these

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						facilities will include, if this doesn't include a retail element for convenience shopping, then parts of the site will be approximately 1.3km from the nearest shop on Mercia Drive, which is considerably in excess of the recommended walking distances. It is acknowledged that Mynydd Isa is a Tier 2 settlement and would be a sustainable location for growth given its access to services, however the proposed site would not be a sustainable option given the size of the proposed site in relation to the character and role of the existing settlement, highway constraints and the undetermined impact on the Grade II listed building, Argoed Hall, together with the significant loss of green barrier and open countryside, therefore candidate site MYN018AS is not considered suitable for allocation. The objector previously submitted a smaller version of this site as an alternative candidate site. The site that the objector is now proposing at Deposit stage is much larger. Given the late submission of this larger site and the objector's lack of earlier engagement with the

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						plan process, as well as their request to extend the plan period, there is significant doubt about the ability to deliver such a large greenfield site from a standing start within the timeframe of the LDP, when so little due diligence work has been done to justify development or give expression to the needs that are to be met. This seems more akin to just a speculative exercise in adding value to land rather than genuinely proposing a sustainable form of development that will achieve positive place making. In conclusion, sufficient growth has been provided for in the Plan for Mynydd Isa. A further allocation of such a strategic scale is out of accord with the Plans spatial strategy for Tier 3 settlements and will significant undermine a key green barrier between Mold and Mynydd Isa. There are also concerns about the capability of the road network to accommodate a development of this size.

Policy HN1 – Other Sites

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653	HN1: New Housing Development Proposals	MOL056 Pen Y Bont Farm	Object	Welsh Government's Department of Economy, Skills and Natural Resources (ESNR), seek the allocation of land at Pen-Y-Bont Farm, Chester Road, Mold for housing. Consideration of LDP Housing Strategy The overallocation within policy STR1 which provides a 14.4% flexibility allowance is acknowledged. However, in light of the nature of the new allocations included in the plan which are generally of a small to medium scale (over and above the strategic sites), it is considered that the inclusion of a larger-scale (yet nonstrategic) site which is capable of delivering key place-making objectives will add a further degree of certainty to the delivery of the Plan's housing	It is considered that the Deposit LDP should allow for additional land (namely the Welsh Government's land at Pen-y-Bont Farm) to be allocated to allow for flexibility should the actual housing numbers delivered on allocated sites be reduced or the viability of sites altogether is called into question. allocation of site at Pen Y Bont Farm (MOL056)	Not accepted. The Plan has already provided a 14.4% flexibility allowance which is in excess of the minimum 10% required in Development Plans Manual 3. The Plan has made a range of viable and deliverable allocations in sustainable locations and there is not considered to be any justification for an additional allocation, and certainly not of the scale proposed. In the case of Mold, a significant amount of growth will take place over the Plan period. Based on the Housing Balance Sheet as at April 2018 there had been 156 completions in the first three years of the Plan period, commitments of 188 units and the allocations at Maes Gwern (160 units - already under construction) and on land between Denbigh Rd and Gwernaffield Rd (246 units), none of which encroach into green barriers. In this context there is considered to be adequate provision for growth in Mold and certainly no need to draw back the green barrier in this instance. It is accepted that in terms of proximity to services and facilities the Pen y Bont site is slightly close to the centre of the town at The Cross, than the HN1.6 allocation. However, the HN1.6 allocated site is closer to the community hospital than is the Peny Bont site. In the context of a town the size of Mold,

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				growth strategy. The land at Pen-Y-Bont Farm, which is confirmed as viable and deliverable by the Welsh Government, provides an opportunity to deliver up to 330 units (including up to 50% affordable units) on a highly sustainable site directly adjacent to the Tier 1 'Main Settlement' of Mold. Policy STR2 'Location of New Development' specifies that "Tier 1 – Main Service Centres will be the main locations for new housing development which reinforces and contributes to sustainable settlements". In the context of Plan objective 12, it is considered that the Pen-y-Bont Farm site represents one of the most suitable and sustainable sites available across the County Borough. It is considered that the site		both sites are considered to be in sustainable locations. In terms of the spatial distribution of growth this was first referenced in the Preferred Strategy document and confirmed in the Deposit Plan within policy STR2. The Plan has a five tier settlement hierarchy with planned growth through allocations being made in the top three tiers and all of these settlements are considered to be sustainable locations for development. However, the objectors approach appears to be that no allocations should be made in Tier 2 or Tier 3 settlements and that all growth should be within Tier 1 Main Service Centres such as Mold. This would not represent a balanced approach to distributing growth across the County. It is of note that there is no objection from Welsh Government who have stated 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect'. Given that the placemaking principles are fully embodied in PPW10 they will be applied to all allocated site in the LDP. This does not therefore set the Pen y Bont site apart from the allocated sites or any other site. It is also disappointing to see an arm of the Welsh Government targeting green barrier land for development when other land in their ownership that has been presented in development plans for some time now, has

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				at Pen-y-Bont Farm represents a more sustainable option for housing when compared with the significant number of units that have been allocated within the County's lower tier settlements i.e. a total of 666 units are allocated within Tier 2 Settlements, and furthermore, a total of 291 units are allocated within Tier 3 Settlements. The allocation of circa 330 units at land at Pen-Y-Bont Farm directly adjacent to a 'Main Settlement' represents a more sustainable option for the delivery of housing growth, and as such the inclusion of land at Pen-y-Bont Farm should be considered for inclusion in the Plan in advance of or in addition to allocations within less sustainable settlements. The allocation of Land at Pen Y Bont Farm presents an opportunity		not until recently been made available to the market. This unexplained landbanking does nothing to support the principle of sustainable development or set the right example for the delivery of land in private ownership. The objection site is referred by the objector as being able to deliver up to 330 units and appears to be no different to other Plan allocations, whereby a SuDS scheme has yet to be fully designed and may therefore impact on that capacity. The issue of SuDS has been considered in terms of the allocated sites. Scope exists for SuDS to be combined with open space and green infrastructure in the form of multi-purpose parts of the site. The provision of SuDS need not affect the number of units on allocated sites and it is inappropriate to make general assumptions for every site as each site must clearly be considered on its individual merits. In particular, the site between Denbigh Rd and Gwernaffield Rd does not include any built development (with the exception of new access road) on the part of the site to the north of Pool House Lane and this provides scope for SuDS without impacting on the number of units. Even if an allowance was made for 10% of the units on those allocations without planning permission in

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				to create a residential community of up to 330 units that achieves key placemaking objectives in line with PPW10. In light of the size of the site at Pen Y Bont Farm the site's sustainable and accessible location within walking and cycling distance of a significant number of local services, facilities, employment and open space, as demonstrated in the Sustainability Appraisal. Matters Regarding 'Deliverability' of Housing Numbers In regard to the independent assessment of each site, it is not clear whether the Plan's housing allocations have been thoroughly assessed to confirm that the proposed capacity of each site is in fact deliverable specifically in regard to the requirement to incorporate SuDS on-site. It is questionable as		HN1, this would amount to 150 units which is well below the 330 units promoted at Pen y Bont. See response in EN11 (id1285) The Council does not consider that additional housing allocations are required in order to deliver the Plans Housing Requirement Figure. The reasons put forward by the objector for the sites suitability to be allocated are commented on in turn below: The Highways Development Management Officer considers that the key consideration is the capacity on the A494(T) trunk road junctions i.e. the Wylfa roundabout and signalized Pinfold Lane crossroads at Alltami – the TA hasn't considered for instance the Alltami signalized crossroads. Further comments will require the input of Streetscene and also Welsh Government should be consulted. At the southern edge of the site the boundary alongside (and including) the line of the former railway does not extend as far as the junction of Woodlands Road and Bromfield Lane. Alongside the dwelling 'Crossing House' it falls short of the adopted highway by approximately 20-25m. The site boundary alongside Woodlands Road also falls short of the adopted highway by approximately 30m. In the absence of an agreement with adjoining landowners there appears to be no

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				to whether the Authority's assessment of housing sites has taken into consideration the implications of the incorporation of SuDS measures in terms of developable area and number of units. In light of the above, it is considered that the Deposit LDP should allow for additional land (Pen-y-Bont Farm) to be allocated to allow for flexibility should the actual housing numbers delivered on allocated sites be reduced or the viability of sites altogether is called into question. Matters Regarding Re-designation of 'Green Barrier' Land This is recorded under policy EN11 Overview of Suitability of Pen-y-Bont Farm Site for Residential Development In light of the overview of the Plan's housing		means of securing pedestrian or cycle access to the site, except at the north of the site off Chester Road. This does not aid the permeability of the site, nor its integration with the existing community, let alone set an exemplar for place-making following the Welsh Government's own planning policy. NRW have been consulted on the objector's FCA and have objected to the sites allocation on the basis that the site boundary includes land within flood zone C2 and is for highly vulnerable development. NRW also consider that the FCA fails to adequately demonstrate that the risks to, and arising from the development, can be adequately managed in accordance with TAN15. The Council's Ecologist considers the report has identified the habitats present with hedgerows, mature trees, woodland and wetland the key features together with existing records in the locality for Pipistrelle bats, badger, otter, GCN and associated amphibians and reptiles (sewage works pond) but the lesser horseshoe bat roost at the Pen y Bont pub was not referenced. The recommended management includes reference to Invasive species control of Japanese knotweed and Himalayan Balsam but not sure if this has been undertaken. There is no mention of the surveys that would be required to assess impacts from a planning application and the associated

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				strategy / settlement hierarchy / and housing allocations set out above, it is considered that in order to ensure a greater degree of certainty in terms of the delivery of the LDP's housing strategy, the Welsh Government's land at Pen-Y-Bont Farm, Mold should be given due consideration for inclusion as a highly suitable and sustainable allocation. A number of assessments have been commissioned to consider the viability and deliverability of a housing allocation at Pen-y-Bont Farm. A summary of the site's suitability for development from a technical perspective is provided below. Transport Assessment The key findings of the Transport Assessment are summarised as follows:		requirements e.g. open space plus the proposed active travel route along the disused railway, or mitigation required e.g. for GCN (sewage works pond) and the retention of dark corridors used by the lesser horseshoes from Pen y Bont as well as the provision of biodiversity enhancement. The site was the subject of two candidate site submissions MOL019 and MOL056. No submissions relating to this site were made at the Alternative Sites (Preferred Strategy) stage. MOL019 was submitted by a third party and included the strip of land alongside Woodlands Rd whereas MOL056 submitted by the objector excluded this strip of land. Countryside status: With the exception of the northern part of the site and the southern part alongside the railway line, the site boundary does not directly adjoin the settlement boundary along Woodlands Rd, being separated by a strip of land some 30m in width. The site has a slightly elevated position, sloping down to the bypass and Chester Road and affords far reaching views of the surrounding open countryside. The fields within the site are of a similar character to that wider agricultural landscape, being dissected only by the line of the A494(T) bypass. The site has the feel of open countryside and this was something recognized by the UDP

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				• the site provides opportunities to integrate into the local pedestrian / cycling network offering the opportunity for sustainable travel around the local area. • the sustainable location of the site will assist in encouraging future users to travel by sustainable modes, reducing the site's impact on the local road network. • Numerous services and facilities to support local residents are provided within the immediate vicinity of the site, including a number of employment opportunities, public transport links, local schools, leisure, healthcare and grocery facilities within convenient walking and cycling distance. • Nearest bus stops to the site are within just 350m and 390m west of the site along Chester Road.		Inspector who commented 'With regard to the objection site I accept the green barrier is severed by the bypass, but given the scale of the site and its rural appearance I do not agree that it is seen as an integral part of the built up area. It is clearly part of the countryside and contributes towards the gap between settlements. Despite its street lighting and petrol filling station my site visit confirmed that the roundabout is perceived as a being within the rural not urban area'. Although additional development has taken place with the conversion of the former farmhouse into a pub and additional development at the petrol filling station, this is not considered to be to the extent that it completely alters the context of the site in its surroundings. The site remains as open countryside in character and appearance with a visual link to the wider open countryside. The UDP Inspector went on to say 'I indicate above that at some time in the future the land may prove suitable for development, but that does not to my mind justify its deletion from the green barrier given the present circumstances where it forms an integral part of the gap between settlements and prevents encroachment into the rural area. Until such time as the situation is reviewed the development off Woodlands Road provides a firm defensible boundary'. The Council have reviewed the green barrier and consider that it still performs a green barrier function and that

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				• Vehicle access to the site will be gained via the existing access on Chester Road, with an entrance into the site provided off the existing access road. The proposed access is shown in Drawing A110576-SK01 (enclosed as part of the TA) where the layout provides priority to the site access, with the public house access proposed to give-way. There will be no material changes to the junction with Chester Road, with road marking improvements proposed. The detailed technical assessments undertaken as part of the Transport Assessment show that the residual cumulative impact of the development of up to 330 units at the site will not be severe and as such the development is considered acceptable from a traffic and highway perspective.		additional land for development has been in Mold which does not impinge on a green barrier. Land ownership issues: With the exception of the northern part of the site, the site boundary does not actually extend up to the settlement boundary. With an intervening 30m strip of land, the site does not represent a logical extension to the settlement as it would not relate well to the existing form and pattern of development. Also there appears to be limited opportunities for pedestrian and cycle links from the site, with the exception of the proposed access on Chester Road. The development of the site, in the absence of the adjoining strip of land, would represent poor planning as the design and layout options for the intervening strip of land would be limited. This would not represent positive place making. It is considered that developing the two sites together would be necessary to ensure a comprehensive approach to placemaking and proper integration with existing built development. Site constraints: Although it is considered unlikely that ecology will be a constraint to development, subject to further work been carried out, it has not been possible to response definitively in respect of

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				Flood Consequences Assessment The findings of the Flood Consequences Assessment are summarised as follows: • All sources of flood risk have been reviewed and further hydraulic modelling on the River Alyn and culverted tributary to the west of the site have been undertaken. • In summary, safe site access and egress is achievable during all modelled events. Ecology Appraisal The findings of the Ecological Appraisal and Site Management Plan (which includes an extended Phase 1 habitat survey) are summarised as follows: • Use of site by amphibians and reptiles		flood risk and access. Sequentially Preferable sites: In the event that additional land were required to be allocated in Mold, there is land on the north western edge of Mold which is not constrained by green barrier designation. The points within the site summary have been addressed in the response above. Whilst it is accepted that the site is in a sustainable location, the site is sequentially less preferable than the allocated site due to the green barrier. The site, in the absence of the strip of land adjoining Woodlands Rd is not considered to represent a logical urban extension and would not be well integrated with the existing form and pattern of development. The Plan sets out a spatial strategy in STR2 which is used to distribute development based on a sustainable settlement hierarchy. The Plan seeks to make a balanced approach to making allocations in sustainable settlements in line with that strategy. The removal of allocations from Tier 2 and Tier 3 settlements and replacement with allocations in Tier 1 would skew the Plans spatial strategy. Each allocation is considered to be sustainable in its own right and it is too simplistic to say that the Pen y Bont site is

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				is unlikely, especially due to the isolation of the site from suitable breeding habitat in the wider area by adjacent busy roads and residential areas. • The silage fields provide limiting nesting opportunities for ground nesting species such as skylark, however due to the small field size, this is unlikely. • Trees, woodland, hedgerows, tall ruderal vegetation and swamp provide foraging and commuting habitat for bats. • Badgers appear to use the site, although no badger setts were identified. • Woodland, hedgerows, tall ruderal vegetation and field margins will provide suitable habitat for hedgehogs to forage and shelter, albeit the adjacent busy roads and residential may deter		more sustainable than allocations in lower tier settlements. If reductions in site capacities arise through the development of SuDS then this is unlikely to be significant or of a scale necessary to warrant the allocation of such a large site. The Plan embodies a flexibility allowance of 14.4% which can absorb any lost units. In the context of the objector's assertions, and the responses above, the Plan is not considered to fail Test 2 nor Test 3.

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				hedgehogs from accessing the site to some extent. • In summary, there are no ecological issues which would prevent development, subject to appropriate mitigation and management. The technical survey/assessment work provides a detailed baseline against which the site's development potential (and thus the soundness if allocated) is assessed. In summary, it is confirmed that there are no known constraints to development and that the Welsh Government would be capable of bringing forward the delivery of up to 330 units (including up to 50% affordable housing) on the site over the Deposit Plan period. It is the case that the Welsh Government are committed to the delivery of the Pen-y-Bont Farm		

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				site and can provide certainty that the site will come forward for development if allocated. Council's Assessment of Development Potential of Land at Pen-Y-Bont Farm It is understood that land at Pen-y-Bont Farm has been put forward as a Candidate Site (Site Ref. MOL019, 13.4 ha for cattle market / hotel), and as an Alternative Site (Site Ref. MOL056, 11.66 ha for mixed use). The Council's assessment of the land is set out within LDP Background Paper Background – each point within their response is addressed below: 'Countryside' Status Our Response on the Council's commentary re 'countryside status: The site is located directly adjacent to the settlement boundary of		

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				the main settlement of Mold (a 'first tier' settlement). It does not appear or function as part of the 'open countryside' as such, with defensible boundaries located along the north and east in the form of existing highway (and the large urban settlement of Mold to the south and west). Furthermore, as the Council highlight, development focusing around the Wylfa roundabout has served to visually extend the urban/built form of Mold. The site cannot therefore be considered to have the appearance of open countryside, and its enclosure by existing built form/highway to the north and east fundamentally prevents encroachment towards Mynydd Isa – the development of this site will therefore not result in coalescence of settlements and the gap between Mold and Mynydd Isa will be		

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				retained. Furthermore, the LDP strategy recognises the need to identify greenfield allocations in light of the lack of appropriate brownfield opportunities, and specially states that such allocations should be located sustainably including at the edge of settlements. It is the case that the land at Pen-y-Bont Farm is located directly on the edge of Mold one of the County's most sustainable settlements in terms of its size, form, character, role and level of services and facilities. Land Ownership Issues Our Response to the Council's commentary on 'land ownership' issues: The Welsh Government's land (30.13 acres – see enclosed Site Location Plan) can come forward as a viable housing site		

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				without the necessity to include the strip of land alongside Woodlands Road. The Welsh Government confirm that the 30.13 acres is within their ownership and that there are no land ownership issues preventing the delivery of this area of land for development. Site Constraints Our Response to Council's commentary on site constraints: A number of studies have been carried out to investigate potential development constraints, as set out above. The FCA confirms that the site is deliverable from a flood risk perspective; the Ecology report suggests the site can be brought forward for housing without significant impact upon ecological interest		

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				subject to commonplace mitigation; and the results of the Transport Assessment confirms that the site can secure satisfactory vehicular access and is appropriate in all highways/transport regards. In regard to adjacent listed buildings, the development of the site for housing would have no direct impact on the Grade II Listed Pen-y- Bont Farmhouse (as the listed building is not included within the site boundary), and any indirect impact would be minimised through appropriate screening/buffers. Sequentially Preferable Sites Our Response to Council's commentary on 'sequentially preferable sites': It is acknowledged that there may be additional greenfield sites located		

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				within the Mold area which are not located within green barrier. However, it is the case that the Pen- Y-Bont Farm site (notwithstanding its green barrier designation) is unconstrained, viable, and deliverable, which in the context of the need to ensure certainty of deliverability, is a key consideration in favour of its allocation. In summary, the Welsh Government are able to demonstrate through technical assessment that the issues identified by the Council do not represent constraints to development, and that the site is suitable for inclusion in the plan as fully viable and deliverable, sustainable housing allocation adjacent to a Main Settlement. Site Summary A summary of the site's		

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				suitability for inclusion as a housing allocation in the LDP is set out below: • The development would provide a logical extension to the sustainable settlement of Mold, with the proposals providing homes which promote sustainable living and well-being in accordance with the key placemaking objectives set out within the plan (and stipulated within PPW v10). • Although currently indicated as being positioned within 'Green Barrier' within the Deposit LDP, the allocation of the site for housing would not result in the coalescence of settlements in light of its enclosure by existing built form/highway. • The site is located within a highly accessible and sustainable location within walking and cycling distance of		

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				numerous local facilities within the sustainable settlement of Mold. • The site is highly accessible by public transport, including bus stops within circa 350m. • The residual cumulative impact of the development of up to 330 units at the site will not be severe, and appropriate and safe vehicular access has been demonstrated as achievable onto Chester Road. • The size of the site results in no unacceptable impact on the capacity of services and infrastructure, in light of Mold's status as a Main Settlement. • No physical or environmental constraints which would constrain development are known to exist on the land. • There are no restrictive		

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				designations relating to the site (other than the Green Barrier status – discussed above). • Appropriate vehicular access and can be provided into the site, with no significant impact on the surrounding road network. • The site is deliverable and unconstrained – the site is within the Welsh Government's ownership and they are committed to the delivery of the site and confirm its viability. Conclusions & Tests of Soundness Summary It is considered that land at Pen-y-Bont Farm represents one of the most suitable and sustainable sites available across the County. The site at Pen-y-Bont Farm represents a more sustainable option for a housing allocation than the 957 units allocated within		

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				less sustainable Tier 2 and Tier 3 Settlements. The allocation of c.330 units at land at Pen-Y-Bont directly adjacent to a 'Main Settlement' represents a more sustainable option for the delivery of housing growth. In addition, in light of the potential (considerable) reductions in housing numbers that may in fact come forward on allocated sites in light of the implications of SuDS legislation, the available, viable and deliverable land at Pen-Y-Bont Farm provides certainty to bring forward circa 330 units (including up to 50% affordable units). In summary, in light of the above, it is considered that the Deposit LDP fails Soundness Test No. 3 ('Will it deliver?') in that it is questionable as to whether the housing numbers listed within Policy HN1 are		

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				deliverable in light of unassessed SuDS constraints on developable area and scheme viability. In addition, it is considered that the Deposit LDP fails Soundness Test No. 2 ('Is the Plan appropriate?') in that the plan includes a substantial number of housing allocations which are located within less sustainable locations/settlements in comparison to land available at Pen-y-Bont Farm.		
658	HN1: New Housing Development Proposals	HCAC021 Land west of Gwalia / Bryn Yorkin	Object	Land west of Gwalia / Bryn Yorkin - 40 houses. Our reasons for putting forward this site for development in the LDP are as outlined below: The owners are in a position to begin building, therefore making this site viable and deliverable having a builder on board.	Removal of allocation	Not accepted. Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, the objectors' assertion that the owners are in a position to begin building, and that the site is viable and deliverable appears unfounded. The site is not a suitable replacement, either in whole or in part, for the allocated site. Despite the objector's statement that the site is preferable to the allocated site, there is no submitted background / technical evidence to show that this is the case.

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				This land runs alongside the settlement boundary. It runs alongside existing dwellings. The owner has vehicular access to the site therefore there is a means of access that can be altered and utilised accordingly. The owners have looked into how to gain access to such a development on their site. There has been a dwelling on the site in the past. The family have used it for personal recreational purposes but now wish to develop the site. Therefore the public have not had lawful or permitted access to the site. This land runs alongside the settlement boundary. It runs alongside existing dwellings. The site is not wooded and is simply fields bounded on one		Despite the entire eastern boundary adjoining the settlement boundary the site relates better to the open countryside as the site slopes upwards to the heavily wooded steeply sloping Alyn Valley sides. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. In any event the Council's highways development management officer objects to the development of this site due to there being no direct access to the adopted highway, and furthermore roads in the vicinity are generally inadequate to serve a development of this size. Additionally, Gwalia is narrow in width with dwellings immediately abutting the highway, parked cars and the lack of footway illustrate this is unsuitable to accommodate additional traffic. The fact that there may have previously been a dwelling on site does not mean it is suitable to be allocated for housing, as it is necessary to look at a wide range of considerations relating to the site. The objector is comparing this proposed site with the Wrexham Rd Abermorddu allocation where there is an alleged permitted public access. This is not an appropriate way in which to be informing the suitability of sites. There is no public right of way across the site although it is understood that the public do

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				side by housing and on the other by woods leading steeply up to Hope Mountain. There are already dwellings around this location. The site would therefore associate with development on three sides. - Any development on this site would not exceed the boundary line of existing housing on Bryn Yorkin and Gwalia. It would in fact bring it into line and fill in the gap. It is submitted that this site is ideal and appropriate for housing. This site is for 40 houses which presents as a large development as but smaller than the 80 proposed on the Bluebell Fields in Abermorddu. It is submitted that this smaller development would therefore lessen the impact on the community with 2 smaller developments of 30-40 being utilised in two locations. This would		walk across the site to gain access to the hillside, but the Council is unaware whether this is with the consent of the land owner. The site may adjoin the settlement boundary along its eastern edge but the site does not relate well to the form and pattern of existing development. The fields are crossed by a footpath which leads to an extensive network of footpaths in the wooded area beyond the site. Removal of trees on the fringes of the north western part of the site to accommodate approximately 40 dwellings would have a significant visual adverse impact on this elevated and prominent site. Built development would not integrate well with the existing form and pattern of development in this part of the settlement. The proposed site is located within open country and does not form part of the settlement. The surrounding area is heavily wooded with numerous footpaths for public to enjoy the open countryside. The land is graded highly for agricultural use and there is a predicted loss of 0.18ha grade 3a. Additionally, due to the heavily wooded area there potentially may be bats in the area and further assessments would be required. The site, given its rising and prominent location, and the existing pattern of development would not represent a logical extension to the settlement. Instead, as outlined above, it harm the character and

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				also make these sites more appropriate, viable and deliverable. - Due to its location, this site would have a low/no impact on the surrounding area as it is behind existing development and a natural progression of existing and commitment housing. The general infrastructure for such a development is already in place and easy access to nearby shops and schools and other amenities and activities. - In relation to 40 houses on this site, there are 86 dwellings on Bryn Yorkin Lane, Conway Close, Plas Yn Bwl, 45 on Bryn Yorkin. At present a total of 130 houses using the entrance to the main road. This site would either be accessed at the top of Bryn Yorkin or from Bryn Yorkin Line via Conway Close.		appearance of the locality. It is too simplistic to a make an assertion that a site will have a lesser impact than another site just because it is smaller. It is necessary to look at the particular merits of each site and its particular surroundings. It is also not necessarily the case that two sites each of 40 will have any less impact on services, facilities, or the highway network overall, than one site for 80. Although it is recognised that there are services and facilities within the settlement and in close proximity to the site, it is considered that there are negative factors associated with the site which outweigh this. As commented above Highways Development Management Officers note that there is no direct access to the adopted highway and that the roads are generally inadequate to serve the development. The site is physically separated from both Bryn Yorkin and Conway Close by existing houses and intervening land. There is no clear means of securing an acceptable vehicular access. In conclusion, development of this prominent site would result in a detached block of residential development which would be

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				Therefore there is a good filter system for traffic rather than all coming out on one road before meeting the main road. If one were to add 40 on this site that would take the total to 170. Such an overall development is not excessive for the infrastructure particularly when you compare with other sites e.g. Chester Road, Penyffordd • 186 houses and one entrance; Silverbirch Way, Penyffordd • 200 houses and one entrance.		poorly related to existing development and visually damaging to an area of attractive open countryside. The site is not considered to be necessary or appropriate as an allocation either to replace or be in addition to the Wrexham Rd allocation.
675	HN1: New Housing Development Proposals	ALLT 006 Land adj Tavern Public House, Alltami	Object	We identify our development as of strategic importance to the sustainable growth of Flintshire. It's primary focus on General Needs Housing including affordable housing. Adjoining the site is the A494 (T) defined as a	Allocation of additional residential allocation at ALLT006 Land adjacent to Tavern Public House, alltami	Not accepted. As a Tier 3 Sustainable Settlement Alltami was designated due to its proximity to Mold and Buckley rather than because it was a self-contained settlement. This site is not a strategic location for growth and Policy STR2 makes it clear that Tier 3 settlements will be the location for housing which is related to the scale, character and role of the settlement, in this case it is important to recognize that only small scale development would be suitable in Alltami. This resubmitted site is considerably larger

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				Strategic Hub and Corridor, a key Strategic Road and a sustainable transport route. Both score positively on the housing and access objectives, and is also aligned with the Planning Policy Wales. Alltami is designated Sustainable Village in the Preferred Strategy given its context and functional relationships to Main Service Centre Buckley and Mold and adjacent settlement cluster. Most of the proposed ALLT006 will be contained within the Settlement Boundary further, the proposed allocation includes a Brownfield site soon to be vacated. The site will integrate well with the established pattern of development. Sustainable village status scores positively for growth to meet settlement and County needs. Spatial relationship to local and		than the original candidate site and is out of scale with the size of Alltami. Candidate Site ALLT006 is a small site of 0.27 ha the bulk of the site sat behind an existing property Woodbank on the north side of A494 and could accommodate up to 8 dwellings. This resubmitted site, includes the original Candidate site and is a much larger area of land extending along behind the Tavern pub car park to the west, the rear boundaries of the houses facing onto the A494 to the south and by the Cobblers and Stoneybeach wood along a valley to the north and the hedgerows along the field boundaries along its eastern edge. This sites is 1.76ha and could accommodate up to 50 dwellings. To the west of the site there is an existing gated vehicular field access off the minor side road. The road is narrow with grassed verges and trees with the canopy creating a rural character and appearance. The bulk of the site forms part of a larger paddock sitting between the ribbon frontage development along the A494 and StoneyBeach Wood. The site is considered to relate more closely to open countryside than it does to the form and pattern of built development. The representor states that most of the ALLT006 site is within the settlement boundary, this is incorrect. None of the original Candidate site is within the settlement boundary and only a small portion of the resubmitted site, the land

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				wider employment sites, and other larger settlement enables settlement to service to promote the economic growth and transport strategies. The site allows adjoining land within Settlement boundary to be accessed. Crime - The site is currently partly brownfield/greenfield so new developments could be a target for crime. Crime maybe mitigated via the Master planning Stage utilising the initiative "Secure by Design". Creation of safe and well designed Place of integration reviewed by initial and subsequent master planning exercises. With this level of mitigation including the detailed design and aspirations for the site, the IIA objectives on crime have been scored		around the property Woodlands, is within the settlement boundary. The majority of the site therefore is outside the settlement boundary. The extended site would result in a form of development which is poorly related to the settlement and would harm the rural character and appearance of the settlement. It is not considered that the site is appropriate for inclusion within the settlement boundary or as an allocated site. The objector has submitted the objection in the form of Sustainability Appraisal, as such each point will be addressed in turn. Noted but this is the case for all proposed allocations in the plan and does not therefore set the objection site above any of the allocated sites on the basis of this issue. There is no school in Alltami and in terms of walking distances to nearby schools, Mynydd Isa and Southdown Primary schools are approx 2500 m, the Argoed High School is 1850m and the Elfed High school is 2300m from the site however these cannot be reached along safe walking routes since the roads leading to these schools do not have footpaths. The location does not lend itself to active travel journeys to school as there is probably little opportunity to provide footway through developer contributions due to other third party ownership. It should not fall on the highway authority to come along after

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				relatively low. Education - Local Development Plan will forecast education needs during plan period and set out policy basis for mitigation on a site by site basis subject to viability. Potential for on site construction training opportunities. Education will benefit from LPG Education Contribution via Section 106. Health - Reduce reliance on car borne access modes. Provision of onsite play/ fitness equipment. Connectivity to major employment and retails zones. Potential noise receptors from A494 mitigation through active and passive acoustic measures. Location within 2km to new Buckley Healthcare Facility. Housing - Delivering General Needs and		development and either look at land acquisition for footway improvements and the cost of the scheme or to provide a bus service at the cost of the public purse. Also the ever increasing issue of parking and congestion around primary schools because parents are driving their children to schools is becoming a major issue. Unless there is an opportunity for the potential developer to be able to contribute to footway provision for access to schools then the development of the site will be a burden on the Authority in future years. Education, Supplementary Planning Guidance Note No 23. Developer Contributions to Education gives advice on contributions to education for any of the allocated sites in the plan. The site is within walking distance of employment areas. However in terms of community facilities the nearest shop is a convenience shop at the garage at New Brighton over 1km away, nearby schools are not along walkable routes and Buckley Health centre is 2.2km. The settlement is classed as a sustainable location due to its proximity to facilities in Buckley and not because it is a self contained settlement. It is for this reason that only small scale growth, in fitting with the size of Alltami would be considered suitable. The site is within 320m of green space designation in the UDP, also open space provision is a requirement for all development sites. Affordable housing contributions will be sought on development of 10 or more units.

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				Affordable Housing within a sustainable location. Capable of delivery in a location attractive to market and deliverers. No physical constraints to hinder delivery. Viable site and scores positively against the housing and access objectives. Allows access to undeveloped land both within and outside settlement boundary. Good use of Brownfield site. Access - Highways to adoptable standard, Active routes to and from site and adjacent public transport corridor. Proximity to Active Travel routes linking North Wales Metro offers significant off site enhancement benefits. Liaison with Arriva Transport for reduced		Alltami is within the Mold and Buckley Submarket area so a 40% affordable housing units would be expected. Only a very small part of the site is brownfield and within the settlement boundary. The Highways officer comments that there is no objection to the indicative layout (subject to minor amendment) and subject to an acceptable drainage solution we would be in position to adopt such a road layout. However, the Technical Note acknowledges the relatively remote location of the site, the lack of public transport provision, the limited pedestrian/cycle provision, the limited local employment opportunity and lack of accessible education facility (the availability of a safe route to school is unlikely). Based on this, the site is not considered to be in sustainable. Access is proposed directly onto the A494 trunk road for which Welsh Government are highway authority; their views should be sought. Welsh Government may have concerns related to access details. Visibility splays of 2.4x120m are indicated; Welsh Government tend to assume a minimum X distance of 4.5m for a development of this nature and will only accept a relaxation to 2.4m following a successful application for dispensation. 120m visibility is shown to be achievable in plan but the vertical alignment of the road may limit the

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				fares for affordable house occupancy. Social Cohesion - Growth over UDP period exceeds “crude” measure of percentage growth. Delivery of strategic site allows comprehensive and cohesive development, with strong urban design principles, that are viable, deliverable and meets community or County aspiration formality and diversity including high proportion of affordable homes. Reduces risk of smaller unviable development not delivering. Employment - Potential for on site construction training opportunities. Rural Life - Green Barrier in UDP. Located on edge of urbanised settlement area, contained within existing form of adjacent		extents of available visibility. The A494 in this location, close proximity to the Alltami Road junction, is subject to stationary queuing traffic during peak periods; this may also cause concern for Welsh Government. There are therefore obvious concerns over the access from the site onto the A494. It is considered that the addition of 50 houses to Alltami would be an excessive number of dwellings for the size to the settlement. Policy STR2 recognises that only small scale development is appropriate on the smaller settlements such as Alltami. The proposal would represent a block of development and appear incongruous in terms of built form. This may bring about concerns about ensuring cohesiveness between existing and proposed development and settlement which are separated by the A494. Noted. However, this could apply to the construction of any built development already allocated in the plan as part of gaining social value from the development allocated. The area is not within the green barrier in the UDP but is in open countryside. The site is an open field which is bounded by trees and mature hedgerows and gently slopes down to the adjoining Cobblers and Stoneybeach Ancient wood and wildlife site, which creates a wooded backdrop to the west of the site. To the east and south of the site the houses

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				development. Logical extension to settlement and of scale capable of integration and to assist in retaining existing village services with limited intrusion into settlement edge. Moderate but non strategic loss of agricultural land graded as 3b. Biodiversity - Tests of over-riding need can be demonstrated to meet social economic objective of plan whilst delivering environmental mitigation and management. Landscape - Detailed landscaping strategy to inform development of scheme. Heritage - No impacts on Heritage, Listed Buildings or Monuments. Water - Water conservation measures in design.		along the A494 are well screened by trees and hedges making the site well related to the open countryside rather than the urban form. Site is not designated but it is in close proximity to Deeside and Buckley Newt Sites SAC, 300m to the south and 600m to the north west. In addition it is adjacent to Cobbler's and Stonybeach Woods Wildlife Site, which is an Ancient semi-natural woodland and the adjacent woodland is in the process of being transferred to a Conservation Body as a Nature Reserve in compensation for other development within Alltami. The site itself is predominantly agricultural grassland but a native hedgerow with mature trees crosses the site and another forms the northern boundary. Any development would need to assess the Ecology of the site itself as well as impacts on the nearby designated SAC, Wildlife Site and ancient woodland, and provide an Ecological Impact Assessment with measures to avoid, mitigate, compensate, enhance and manage wildlife features. In addition the ancient woodland and nature reserve would need to be buffered from negative impacts in particular development edge effects eg 50m woodland buffers. These buffers can be planted and can be used for

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				Flooding - SW can be connected to Mains surface water discharged into local watercourse via attenuation. Energy - Can incorporate low/zero carbon technologies in design and reduced energy consumption by aligning places to live with school, facilities and place of work and access to high speed broadband. Reducing out commuting. Welsh Language - Local Schools with Welsh Language on the Curriculum. Positive measures to enhance through e.g. affordable housing to retain younger people and connect them to work, on site mitigation through street/development naming.		amenity purposes but should remain as dark corridors. There is no overriding need for development in this area, the allocated sites in the LDP are in more sustainable locations and provide for growth for the county without the need for this site. All development sites will need to incorporate a detailed landscaping strategy. Noted Noted A SUDS scheme will be required for all new development sites and cannot simply connect into the existing piped SW network Noted Noted although as set out above, the local schools cannot be reached along safe walking routes. In conclusion, the site is considered to represent a scale and form of development which does not accord with the Plans spatial strategy in STR2 in terms of a Tier 3 sustainable settlement and will harm the character and appearance of the locality. The site is not considered necessary or appropriate for allocation in the Plan.

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689	HN1: New Housing Development Proposals	NH024 Llys Ben Northop Hall	Object	The Llys Ben site is in close proximity to the community facilities at Northop Hall including education and recreational facilities and within walking distance of other facilities within the village. It is contained on three sides by the existing residential development of the village and its recreational and educational facilities. It is in the long-term ownership of an experience house builder, Morris Homes, and is therefore capable of delivery. An indicative layout for the site illustrates how it can be developed in a sustainable manner whilst retaining existing rights of way and trees that are protected by a Tree Preservation Order and forming a suitable green edge to the open countryside beyond. Its development for the reasons stated will not adversely impact upon	In order to meet the test of Soundness the following changes are required. (i) Increasing the overall level of housing provision to at least 10,500. (ii) Increase in the number of new allocated housing sites by at least 2500. (iii) The removal of Llys Ben site at Northop Hall from the Green Barrier (iv) The inclusion of Llys Ben site at Northop Hall within the settlement boundary of Northop Hall. (v) The allocation of Llys Ben site at Northop Hall for housing development.	Northop Hall is a tier 3 settlement where housing development should be related to the scale, character and role of the settlement. Allocations have not been made in all settlements as the LDP does not seek to apportion development spatially by the use of numerical methods or growth bands. The plan seeks to distribute growth in a sustainable manner having regard to the settlement hierarchy. As part of this approach it is necessary to have regard to the character and role of each settlement and the circumstances prevailing at the present time. In this context it does not mean that, in the absence of an allocation, Northop Hall will not experience growth during the plan period, the village has already seen the completion of 85 dwellings in the early years of the LDP (2015-2018) and further growth is planned on the committed site at Cae Eithin for a further 9 dwellings. This will provide sufficient growth for the settlement over the plan period. The site is located on the northern edge of Northop Hall. It is bounded by residential development off Gardd Eithin to the south and Cae Haf / Trum yr Hydref to the east. Llys Ben bounds the site to the west and provides vehicular access to the community centre and playing fields which are located to the north of Northop Hall CP School. A thick belt of vegetation and trees (Woodland TPO) marks the northern boundary of the site. A number of public rights of way cross the site which is

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				the wider purposes of the Green Barrier whatsoever. There is a need to allocate additional land for housing otherwise Northop Hall risks ceasing to be a sustainable tier settlement. There is only one housing commitment identified in Northop Hall and that is at Cae Eithin which is only for 9 units and has been available for some consideration time but has not been delivered. The plan therefore fails to meet local housing needs within Northop Hall. The allocation of the site at Llys Ben as Green Barrier and outside of the settlement boundary of Northop Hall is not appropriate and fails to accord with National Guidance and is therefore contrary to test 1 and test 2. The site is suitable and available for development and can be		relatively level and comprises an area of regenerating scrubland. The site has built development on its southern and eastern boundary. With the exception of the community centre building, the objection site has an open aspect to the north and west and forms part of an important swathe of open land. The site is open in character and affords views of the wider open countryside. Following a period of natural regeneration it has a scrubland appearance which is considered to relate more closely to open countryside and the other open land - playing fields to the west than it does to built development. The site forms part of a larger area of green barrier and in the case of land to the north and east of the village, there is a fundamental need to afford it additional protection through the retention of the green barrier designation as it acts as a strategic gap between Northop Hall and Connah's Quay. An appeal in relation to the refusal of a planning application for 36 dwellings was dismissed in 2015 with the Inspector commenting on the harm to the openness of the green barrier. A fuller response on the green barrier is given in policy EN11. The landscape and informal recreational value of the site would be lost if the site was to be developed. The UDP Inspector stated that the site "has recreational value from its network of public footpaths which link through

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				developed in a way which is consistent with the existing built form of Northop Hall and which helps support its sustainable future as a tier 3 settlement.		to the formal recreational area/community centre to the west and the countryside to the north. Whilst it has built development on 2 sides, because of the links through it and its open nature it relates well to the rural area. Visually the site is seen as part of the open land surrounding the settlement. It is not part of the built up area and it is not required for development during the plan period." The Council's Highways development Management Team have stated that access to the site is unsuitable as there is no connection to the adopted highway. There is a commitment at Cae Eithin, on Village Road for nine dwellings which will provide some growth for the village. Northop Hall has already seen development in the UDP, and during the early years of the LDP plan period with the completion of 85 dwellings between 2015 and 2018. There is also a further 9 dwellings planned at Cae Eithin. This is considered to be sufficient growth for the village at this time. There are also allocated sites nearby at both Connah's Quay and Ewloe which will provide further growth for the wider area. The objector considers that the Plan's housing requirement figure is too low and that the Plan's housing supply will not deliver the requirement, resulting in in the need to make further allocations. The Council has

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						responded to these points separately and considers that the Plan's housing requirement is sufficiently aspirational and that the Plans housing supply will deliver the requirement, particularly in view of the 14.4% flexibility allowance. The Council does not consider that further allocations are required. Even if further allocations were deemed necessary there are Tier 1 and Tier 2 settlements which would be sequentially preferable in terms of the Plans spatial strategy and also another 21 Tier 3 sustainable settlements. In this context it is not clear why it is necessary for further growth in Northop Hall and also on land which has been recommended against by two Planning Inspectors in terms of its contribution to the green barrier. In conclusion, growth will occur in Northop Hall and it is not necessary or appropriate to allocate a site particularly where it would have a green barrier and remove a valued green space resource.
693	HN1: New Housing Development Proposals	MOL004 Land at Wood Lane Mold	Object	Candidate site MOL004 (land at Wood Green, Mold) should be allocated for housing to assist in providing the additional numbers and flexibility over the plan period. The site was identified as amber in the Council's earlier traffic light system meaning it is capable of meeting the	Site MOL004 should be allocated for housing over the plan period; b. If the site is not allocated it should be identified as a contingency site to provide additional	Not accepted. The site measures 0.86ha and was submitted by this agent as a candidate site for between 5 and 20 dwellings depending on access arrangements. The first option was for a development of 5 dwellings served off a private driveway and the second option referred to alternative access arrangements to serve 20 dwellings including a) existing properties (24 and 26 Wood Green and land alongside 2 Wood Green) or land to the west being promoted by others as a candidate site. At Preferred Strategy stage a

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				Council's Preferred Strategy. Background Paper LDP08 confirms that it was ruled out as a suitable allocation due to impact on a public footpath and flood risk. Retention of the public footpath could be achieved at detailed design stage and is therefore not a reason for rejecting an allocation. Indeed many of the allocations suggested by the Council are also crossed by or bordered by public footpaths. The second reason is that part of the site is C1 Flood Risk. As set out in our initial submission, only a small part of the site lies within a Flood Risk Zone (the north eastern boundary). The bulk of the site is not identified as being subject to flood risk. If allocated the scheme would be able to avoid any development in the C1 Zone so this is not a legitimate reason for rejecting the allocation of the remainder of the site.	flexibility should the Councils delivery against the LDP fall short.	different agent made 'supporting' representations that the site should be developed as a low density development of 5 dwellings off a private driveway. The Councils Highways Development Management Officers considered the site to be unsuitable as the access via a private drive had poor alignment and limited visibility that is considered unsuitable for any additional traffic. In this objection to the deposit plan the request is for the site to be allocated for housing. The Plan is quite clear that it will only be appropriate to allocate sites which could meet with the definition of a 'large' site ie for 10 or more units. Given the accesses constraints the site cannot be realistically be allocated for housing in the Plan. Despite earlier references to alternative access scenarios, no further evidence has been produced in terms of securing additional land. The objector is therefore asking for land to be allocated which presently has no means of being accessed. In terms of flood risk the northern part of the site is located within a C1 flood risk on the Development Advice Map. In terms of the total site area some 16% is within the C1 zone. Given that the site is green field land it cannot pass the justification tests in TAN15 as the site is not brownfield. The agent seeks the allocation of land for a highly vulnerable

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				No other technical reasons have been given by the Council for not allocating this site. Site MOL004 should be allocated for housing over the plan period. If the site is not allocated it should be identified as a contingency site to provide additional flexibility should the Councils delivery against the LDP fall short.		use without any technical evidence that the site can be satisfactorily developed in terms of flood risk. The site also sits within the green barrier between Mold and the outlying villages. It forms part of a swathe of open countryside comprising fields and recreation land adjoining the edge of the built up area on the south side of the R. Alyn. The southern half of the field immediately to the west of the site was promoted for development in the form of an omission site as part of the UDP and the UDP Inspector commented 'The objection site forms part of a larger field and whilst it abuts development on 2 sides, by its character and appearance, is clearly part of the countryside which in this location is designated as green barrier in order to protect the open land around Mold and prevent the coalescence of settlements. Given its value as, albeit a small part of the green barrier and the adequate supply of housing land both in the town and the County, I see no reason to either allocate the site for development or draw back the green barrier'. The UDP Inspectors comments sets a clear context for the consideration of this objection site. Given that Mold will achieve considerable growth in the Plan period as a result of completions (156 in first 3 years of Plan period), commitments (188 as at 2018) and the allocations at Maes Gwern (160 units - already under construction) and on land

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						between Denbigh Rd and Gwernaffield Rd (246 units), none of which encroach into green barriers, there is considered to be no need to draw back the green barrier in this instance. Given the combination of uncertainty over flood risk, the provision of a suitable vehicular access and the green barrier, it is not considered appropriate to include the land in the settlement boundary. The consideration of the site as, in effect' a 'small' site of 5 units on a site of 0.86ha would represent a density of just 17 dwellings per hectare which is not making the most efficient use of land. In conclusion, the site is not necessary or appropriate to be allocated or included in the settlement boundary of Mold having regard to its green barrier location and uncertainty over flood risk and access and in the light of provision for growth in Mold.
698	HN1: New Housing Development Proposals	DRU011 Land North of Holmleigh/ Lower Farm	Object	We identify our development as of strategic importance to the sustainable growth of Flintshire. It's primary focus on General Needs Housing including, low level care bungalows (existing of which adjoin the site) and a possible Retail element close to the	Additional allocation at Drury (DRU011 candidate site)	Not accepted. This objection site for the most part covers the area of the original Candidate site DRU011, although at the Preferred Strategy stage of the plan that site area was increased by 1.9 ha to 11.5 ha to include land to the south east of the site. This objection submission includes a site assessment, The Foursite Report, where the size of the site is noted as approx. 11.36 ha, however another part of the submission incorporates a Masterplan which shows the plan area to

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				Main Service Centre of Buckley. Adjoining the site is the A55 (T) a sustainable transport route. Both score positively on the housing and access objectives and is also aligned with the Planning Policy Wales (2016). Crime - The site is currently greenfield so new developments could be a target for crime. Crime maybe mitigated via the Master planning Stage utilising the initiative "Secure by Design". Creation of safe and well designed Place of integration reviewed by initial and subsequent master planning exercises. With this level of mitigation including the detailed design and aspirations for the site, the IIA objectives on crime have been scored		include the Alternative Site DRU013-AS creating an area of 11.8ha. It would be useful if the objector had made it clear what is the exact size and extent of the site. As at the moment it is unclear and somewhat confusing as to what land the objector has control over and what is in third party ownership as this will affect the likely deliverability of the site. During the UDP plan period from 2000 to 2015 Drury/Burntwood, saw a 26.7% level of growth, which as a Category B settlement with a growth band of between 10% and 15 %, is a very significant level of growth. In terms of the LDP period a recent application (ref 058212) for the demolition of 1 and 2 Woodside Cottages and erection of 23 new dwellings, adjoining this site was allowed on appeal. The site cannot be included as a housing commitment as planning permission was granted after the base date of 01/04/18 for the Plans housing balance sheet. The site therefore represents a windfall site and will form part of the Plans overall housing land supply for the Plan period. Also, another adjoining site at Bank Lane has been subject to various applications in recent years (058489 – outline 66 dwellings refused, 090160 – outline 66 dwellings refused). At present a full planning application (060587) for the demolition of 81 Drury Lane and

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				relatively low. Education Education - Primary, High and Further education requirement likely to arise from increased population. Welsh, English and Faith schooling are within the catchment of the site. Health Health - Location, design and layout enhance health through promoting Active lifestyles and connectivity to nearly local employment zones. Potential to support walking & cycling to promote healthy lifestyles. Safe and high quality houses and living environment improve wellbeing and foster community integration across mix of housing types		construction of up to 56 dwellings has been refused and an appeal is ongoing at the present time (May 2020). Rather than devise a housing scheme which functions within the settlement boundary, as recommended by the UDP Inspector, the applicant has sought to extend the application site boundary beyond the settlement boundary in order to increase on-site housing density by siting open space to the east of the settlement boundary. Given that there are concerns about the manner in which the site was being proposed for development in the planning applications it was not considered appropriate for the site to be allocated in the Plan. Both these examples demonstrate that there are development opportunities within the settlement boundary of Drury/ Burntwood as a windfall sites, provided that appropriate development schemes are put forward. It is anticipated that these will provide for an adequate level of growth for Drury/ Burntwood over the Plan period. The masterplan layout which accompanies this submission shows the boundary of the site but also indicates various proposals outside that boundary, such as a nature reserve, car parking and play area on the wedge of land between the site and Bank lane. (It also shows the Bank lane Muller Ltd 66 houses pending site despite it not yet having planning permission). Although there are some open spaces shown within the

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				Housing Housing - Accords with search sequence at PPW Para 9.2.8 and 9.2.9. Deliverable, site free from significant constraints and accessible by a range of modes and connectivity. Capable of providing 200+ dwellings in a mix to achieve market and affordable needs across all types and age sectors. Allows access to undeveloped land within settlement Boundary on Bank Lane. Substantial initial appraisal undertaken. (Highways, Drainage, Ground Investigation and Ecology Surveys). On site constraints include - public footpaths, A55 and Overhead line however, no impediment to delivery. Capable of delivery in a location highly attractive to market and deliverers. Of scale and location essential to secure investment and		proposed site area, it is not clear how siting open space provision on a masterplan outside the proposed site area will help to show that it is a viable scheme, conversely it seems to demonstrate that the site is unable to accommodate enough open space and still be a viable proposal. The site comprises a large swathe of land between the A55(T) and the settlement of Drury /Burntwood. It comprises large fields dissected by a farm track which leads to a bridge over the A55 dual carriageway. The eastern part of the site includes Lower Farm and the associated buildings and extends beyond the farm to a line of a drain between Drury Lane and the A55. The site now also includes a field to the south of Vestalia (DRU013-AS). However the site barely adjoins the settlement boundary, only to the south of the site at the Lower Farm complex and to the rear of the properties Homeleigh, Nodffa and Holly house. The site does not extend up to the rear of the properties along Dinghouse Wood which forms a definite physical feature on the ground, creates a strong edge to the settlement boundary and to the green barrier designation. There is an abrupt change in character from the densely built up area within the settlement boundary to the open fields leading to the candidate site. The site is

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				confidence to deliver via national house builder. Viable site. Access Access - Sustainable village location with potential for one or more vehicles access points. Public footpath crosses. Links to bus route and Active Travel route from site edge to school and Buckley Railway Hub. Well located to maximise benefits of investment Regional Growth Bid and Welsh Government promotion of North Wales Metro. Liaison with Arriva Transport for reduced fares for affordable house occupancy. Potential to include and adopt positive measures to encourage non car modes including retention of footpaths and add new cycles links to existing pubic		therefore separated from the settlement boundary by a strip of land extending from Dinghouse Wood road accross an open paddock field with 4 houses located to the south end of the field. The alternative site area DRU013- AS is now part of this site however there is still an area of woodland and the rectangular parcel of land to the east of Bank Lane which means there is open countryside between the site and the settlement boundary. There are open fields between the site and the settlement boundary, the site is therefore not directly related to the existing pattern of development. Bank Lane forms a definite physical feature on the ground which creates a strong edge to the settlement boundary and to the green barrier designation. Taking into account the settlement boundary and the site boundary, the site appears poorly related to the existing form and pattern of development in this part of the settlement. The site has an open character and has the feel of open countryside, particularly given the presence of Lower Farm, and is considered to relate better to the open countryside and green barrier. The objective of the green barrier designation is to retain the open nature of the countryside around Drury/Burntwood to and to protect the open countryside between Drury/Burntwood

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				highways as exemplar development. Social Cohesion Social Cohesion - Community cohesion policies to be delivered by providing a managed and master planned extension to a sustainable settlement, well related to wider context and adjacent settlements. Physically well related to existing form and delivers growth to support existing services and retail activities. Iterative and open process of dialogue, liaison and consultation (from the Preferred Strategy stage) to inform community of purpose. Self contained settlement which currently meets its own needs and serving wider retail catchment area for adjacent settlements. Can deliver community integration, accessible		and Ewloe from further encroachment. Built development in this location would undermine the function and openness of the green barrier. The UDP Inspector noted the character break represented by Bank Lane and the difference in character of the land included in the settlement boundary from the open countryside beyond. There remains considerable uncertainty over what the proposed allocation seeks to deliver. The objectors IIA is headed as '190-250' houses plus retail and refers to a site area of 9.67ha (the site area of the original candidate site). However the masterplan shows up to 280 dwellings on the extended site. In the detail of the objectors IIA under section 4 reference is made to 200 plus dwellings. The accompanying 'Foursite Report' refers to 250 dwellings but in section 4 refers to 150, 200 and 250 dwellings. There is a clear disconnect between the various references and it is unclear exactly what the site area is and what the quantums of development are. In addition, the masterplan has the logo of Taylor Wimpey whereas the 'Foursite Report' refers to it being commissioned for Bellway Homes. The objector's submission does little to back up the claims that the promoted site is viable and deliverable. The scale of development proposed is considered inappropriate given the scale and character of this Tier 3 sustainable settlement, particularly when there are still

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				homes for life to encourage community integration, valuing difference and focusing on the shared values that join people together. Economy Economy - Residential development promotes economic development and increases employment opportunities, skills and supporting local trades. Co-locating homes and jobs scores positively against Preferred Strategy and SA. Benefits other local businesses and promotes investment in the local area and adjacent settlements such as Main Service Centre Buckley and Local Service Centre Broughton. Significant positive for the economy objective. Further, our development is located near to existing key		opportunities for housing development within the settlement boundary (land at Bank lane and recent planning permission at Woodside Cottages). It is acknowledged that the site adjoins the A55(T), but there is no direct access on to the dual carriageway. The nearest junction on to the A55(T) is at the Dobshill interchange 1 km (0.7 miles) to the south of the site which would necessitate vehicles travelling along Drury New Road, which Highways Officers have concerns about, as explained later in this response. The objector has submitted the objection in the form of Sustainability Appraisal, as such each relevant point will be addressed in turn: Crime Noted. However, this will apply to all development sites and is not unique to this proposals. Education Drury Primary school and the Elfed High school are within walking distance Whilst the Elfed High School currently have some unfilled places, projections indicate across the secondary sector that there is likely to be an increase in the overall pupil numbers. This and the fact that the primary school in Drury is currently oversubscribed will mean that

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				employers within Broughton Retail Park and Airbus UK and indeed Chester, this could reduce the necessity to travel long distances for employment and utilising Cycle and Public Transport. See also proposed local businesess within BUC006 Employment - Short term community benefit during construction phase and longer terms support and delivery against employment strategy including Retail Green Barrier rural Life - Green Barrier in UDP. Located on edge of urbanised settlement area, contained within existing form of adjacent development and A55 (T). Logical extension to settlement and of scale capable of integration and to assist		developers will be expected to provide S106 contributions to address any shortfalls. Health All new development will be required to achieve these design standards. The site is within walking distance of Active Travel Route BUC14 along Beech Road, Drury. The site is located adjacent to the A55 main traffic route through Flintshire, it is therefore possible that noise and particularly air pollution may have an effect on the health of future residents. Housing LDP's are required to be prepared in the context of Planning Policy Wales Edition 10 (PPW) which is the latest planning guidance produced by Welsh Government. This guidance states that a search sequence approach should be taken when allocating new housing sites, choosing brownfield sites within settlements in the first instance and then as stated in paragraph 3.40 '' Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. The identification of sites in the open countryside, including new settlements, must only be

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				in retaining existing village services with limited intrusion into settlement edge. Moderate but non strategic loss of agricultural land. Biodiversity - Initial assessments indicate limited likelihood of protected species. SSSI Buckley, Newts SAC proximate but no impact. Land/Townscape Land/Townscape - No statutory landscape designation. UDP policy designation as Green Barrier - a non permanent policy designation. PPW requires GB review as part of plan. Support given early review alongside Deposit LDP. UDP inspector indicated long term need to review GB to address		considered in exceptional circumstances and subject to the considerations above and paragraph 3.46 below.'' Applying the PPW search sequence guidance therefore, within the settlement boundary there are two possible development sites yet to be completed. One of the sites is at Woodside Cottages which has permission for 23 dwellings. Also there is an ongoing appeal for 56 dwellings at the Bank Lane site, which sits within the settlement boundary. The site is capable of being developed with an appropriate and suitably configured scheme. Relative to the size of Drury there are therefore sufficient development opportunities over the plan period for an adequate level of growth for the settlement without the need for further allocations. Access In terms of Active Travel route the site is close to route ref BUC14. Buckley railway station is 1.6km (1mile) from the site. However, it is important to note that Flintshire Council Highways Development Management officers considered the original candidate site to be unsuitable 'It would appear possible to create a vehicular access to the area from Drury Lane however this would require removal of farm buildings and Drury Lane is considered unsatisfactory to cater for significant levels of additional traffic. Access

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				future growth requirement. Site adjoins settlement and contained within built form and Strategic Transport Route A55 (T) as physical barriers. Predict nil-limited strategic openness loss. Predicted Grade 3a land subject to survey. Comparative impact to other candidates e.g. Warren Hall Heritage Heritage - No identified Heritage Assets on site or in context. Water Water - Mains water capacity and access to mains foul &SW sewer via attenuation to local watercourse. Flooding - Site lies outside any Development Advice Flood		onto Ding House Wood is considered unsuitable for an allocation site of this size'. Although the objector has submitted the 'Foursite Report' which includes additional information relating to access, but this does not represent a Transport Assessment. The Highways Officer has looked at this submission and commented that the sites is ''Presumed unsuitable for development of this magnitude due to limitations imposed by the width, alignment and nature of Drury Lane. Drury Lane has significant capacity limitations especially to the west of the Burntwood Road junction. The submitted highway statement fails to make any assessment of the scale of traffic generation associated with such a development or to consider the implications of this additional traffic. An indicative layout indicates both residential and retail uses served through a single point of access; it is unlikely that a single point of access would be appropriate to serve a development of this size. The provision of a mini roundabout is suggested however current design standards recommend against the use of mini roundabouts simply to serve new development. A potential emergency access is indicated on the submitted plan however dependent upon the location of any incident, the proposed location has the potential to exclude a large

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				Zone identified by NRW. The increased urbanisation of the area could increase the amount of surface run off in the area if not appropriately mitigated. Air - The site is located near a Strategic Transport Route at A55 (T), therefore potential for airborne noise and poor air quality, negatively impacting on the air quality objective. Energy Energy - The resulting development and associated increase in population is also likely to lead to an increase in water use, energy use, waste production and natural resource use. However, a comprehensive mitigation programme		proportion of any development. An emergency access should be capable of serving as a secondary access to the site in event of an emergency and not simply an access for emergency vehicles. In general, facilities in the vicinity of the site fail to conform to the requirements of Active Travel Wales. The submitted report identifies that a number of existing footways within the vicinity of the site are of substandard width; routing via Clydesdale Road is suggested. Although this could provide a suitable access to the primary school; the route links with few other destinations. The report fails to consider safe access between the site and local secondary school. There is no separate cycle provision in the area and the generation of additional traffic on roads in the vicinity of the site would have a detrimental impact on any current users. It is suggested that additional bus stop facilities should be provided closer to the site entrance however the existing bus route does not pass along Drury Lane past the site. The width and continuity of the pedestrian facility linking between the site and the rail station are considered to be inadequate when compared to the requirement of Active Travel Wales'. It is clear that Drury Lane is not suitable to serve a site of this scale.

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				would help to reduce this impact that promotes recycled material and innovative low carbon design and sustainable energy use should help. Natural Resources - No strategic impacts identified. Welsh Language Welsh Language - Current levels of Welsh Speaking can be maintained. Reducing risk of loss of welsh speakers to other locations through alignment of housing to schools, facilities and places of work.		Social Cohesion The size of the site varies from 9.66 ha to 11.8ha with a density of 30 dwelling per hectare this site could yield from between 290 to 354 dwellings which is a very large level of growth for the size of Drury/Burntwood. That level of growth is not justified in what is a relatively small village with limited facilities in comparison to the larger settlements. In terms of access to facilities, it is relevant to note that the proposed retail element is poorly located on the furthest eastern fringe of the site rather than in a central location. Also the same objector proposes retail activities on another resubmitted site (BUC006) only approximately 500m from this site, on the southern edge of Drury. The proposed site is totally out of scale with the size of Drury/ Burntwood. Economy Noted, however the site has highways constraints, is located in an area of important green barrier and there are adequate development sites within the settlement negating the need for any new housing allocations. It is unclear from the submission what jobs are to provided as part of the development (other than construction). The fact that the site is promoted as being near to Broughton and Chester does not represent the co-

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						location of homes and jobs. Green Barrier The site is located in an important area of Green Barrier, between Buckley - Little Mountain - Drury - Hawarden and Ewloe. All the Green Barriers in the UDP were reviewed as part of the Deposit LDP and the results of that review are found in Background Paper 1: Green Barrier Review – September 2019. The Green Barrier in this location is designated to prevent the coalescence of Hawarden with Ewloe, Buckley with Drury and Drury with Ewloe and Buckley with Penyffordd in the south. The Green Barrier in this location seeks to protect the land to the east of Drury, the land slopes gently down from Drury to the A55(T) is very prominent to passing traffic. In the case of Drury there are already opportunities for development within the existing settlement boundary in the vicinity of Bank Lane and Dinghouse Wood. The land between Drury and the A55 seeks to protect a prominent parcel of land alongside the A55.The green barrier therefore serves to prevent encroachment into prominent open countryside and the setting of this part of the settlement. Furthermore it seeks to facilitate the development of existing land, already within the settlement boundary.

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						Land/ Townscape See previous comments regarding the Green Barrier. The Plan has undertaken a review of all green barriers and has made amendments to green barriers where necessary and appropriate. The Plan has clearly provided a growth based strategy where the housing requirement is in excess of the Welsh Government population and household projections and has met this requirement through a variety of sources of supply as set out in the Housing Balance Sheet. It is not considered necessary or appropriate for further large scale 'strategic' releases of green barrier. Heritage Noted The site overlies the remains of a limekiln. It may require assessment prior to development prn name 103793, Hollins Limekiln Water Noted. Natural Resources Wales Maps show areas of surface water risk. The Foursite Assessment accompanying this submission notes in paragraph 3.5.15'' It is recommended that sustainable methods of attenuation are implemented where possible; this can be achieved using a combination of ponds, permeable paving with high voids sub-base/percolation pipes, swales, and filter strips. Other forms of attenuation that could

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						be utilised are oversized pipes, oversized manhole chambers and below ground tanks. 3.5.16 Additional methods of sustainability could be provided by use of rainwater harvesting tanks, rainwater butts or green roofs for the Building elements.'' As such, a suitable surface water attenuation scheme will need to be approved by Flintshire County Council as the SUDs Approving Body (SAB). Despite the objector recognising the potential for adverse effects given the sites location adjacent to the A55(T), no technical evidence has been submitted to demonstrate that this is not a constraint to development nor whether mitigation measures are possible. Energy The objector recognizes potential for noise and pollution from A55 but offers no evidence of proposed, only a short distance away on edge of Ewloe it is understood that Welsh Government have installed acoustic fencing due to the noise from the A55, Welsh Language See previous comment re Education In conclusion, the scale of development proposed is considered inappropriate given

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						the scale and character Drury/ Burntwood particularly when there are still opportunities for housing development within the settlement boundary The green barrier serves to prevent encroachment into prominent open countryside and the setting of this part of the settlement, it also seeks to facilitate the development of existing land, already within the settlement boundary. There are highways objections to the access arrangements. The objector has not put forward a well thought out convincing scheme and there are doubts over the viability of the proposal. The site should not therefore be allocated in the LDP or included in the settlement boundary for Drury/ Burntwood and should be retained as Green Barrier.
699	HN1: New Housing Development Proposals	BUC006 Land north of A 549	Object	BUC006 - Buckley Main Service Centre Land North of A549 Chester Road & Dirty Mile, Buckley. We identify our development as of strategic importance to the sustainable growth of Flintshire. It's primary focus on General Needs Housing to the North and Commercial Offices, Industrial and Retail close to the Main Service Centre of Buckley to the South. Adjoining the site is the Strategic Hub, Buckley Railway Station	Additional residential allocation on candidate site BUC006.	Not accepted. It is noted that the objection seeks a mixed use development with two elements. The south western part of the proposal is for commercial and employment development with an access off the A549 adjacent to Old Cross tree Farm and the larger remainder of the site being for housing with access from Drury Lane The size of the site is 14.5ha,and it is suggested by the objector that the site could accommodate 190 to 250 dwellings and although there is no indication on how much employment land is proposed it is suggested by the objector that 800 to 1000 new jobs could be created. Without the benefit of a masterplan it is difficult to determine how

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				and A549 leading to the A55 (T), a sustainable transport route. Both score positively on the housing and access objectives, and is also aligned with the Planning Policy Wales (2016). A strategic Rail link Hub for access to Flint, North & West Wales, Chester, Cheshire, Crewe and London. Crime Crime - The site is currently greenfield so new developments could be a target for crime. Crime maybe mitigated via the Master planning Stage utilising the initiative "Secure by Design". Creation of safe and well designed Place of integration reviewed by initial and subsequent master planning exercises. With this level of mitigation including the detailed design and aspirations for the site, the IIA objectives on		these quantums of development can be accommodated on the site. This size of development would amount to significant growth for Drury / Burntwood and Buckley. This site is a large area of open countryside, part of an important Green barrier designation and there are constraints in terms of highway objections and biodiversity. The site relates poorly to the form and pattern of built development in Drury Burntwood and forms an integral part of the open countryside which is designated as a green barrier between Drury and Buckley to the south and towards Dobshill to the east. Built development would undermine the important function and openness of the green barrier in this location, by contributing to the coalescence of two settlements thereby conflicting with the requirements of PPW10. This large site extends from the southern extent of the Drury settlement boundary to join up with the Buckley settlement boundary at Little Mountain and up to the railway line to the east. Only a very small part of the site adjoins any settlement boundary the majority of the site is some distance from Drury or Buckley. The area comprises 4 large field parcels in agricultural use and is poorly related to the built form of either of the

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				crime have been scored relatively low. Education Primary, Higher and Further education requirement likely to arise from increased population. Welsh, English and Faith schooling are within the Mold, Mynydd Isa, Buckley catchment areas. Employment Employment elements to support training and delivering against high quality workforce objectives. Employment - Potential for on site construction training opportunities. Proposed Commercial Premises, Industrial Units and Retail areas generate long term employment. Health Health - With Proximity to Buckley Railway		settlements and is more closely related to the surrounding open countryside. The extent of the site is also somewhat contrived, as it struggles to gain any suitable foothold on the highway network to achieve suitable access for the scale of development proposed. The objector has submitted the objection in the form of Sustainability Appraisal, as such each relevant point will be addressed in turn: Crime Noted but this applies to all new development and is not a unique preserve of this proposed site. Education In terms of walking distances to school Public Footpath No 31 adjoins the site and leads to Drury Primary school approx 215m from the site, although this may not be a safe route to school. At the closest point of the site to Buckley, Mountain Lane Primary school is 1500m and the Elfed High School is 2300m. The site is a linear shape extending away from the settlements so that at the far end of the site those distances increase to 2500m and 2950m. One of the criteria used to assess whether a site is in a sustainable location is whether there are range of facilities such as schools within 2000m of a site. Only

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				Station close-by layout should promote Active lifestyles and connectivity to nearly local employment zones. Potential to support walking and cycling to support healthy lifestyles. Safe and high quality houses and living environment improve wellbeing and foster community integration across mix of housing types and employment together with retail & commercial offices. Housing Housing - Accords with search sequence at PPW Para 9.2.8 and 9.2.9. Deliverable, site free from significant constraints and accessible by a range of modes and connectivity. Capable of providing of 200+ dwellings in a mix to achieve market and affordable needs across all types and age		part of the site is therefore within a reasonable walking distance of schools. Employment Noted Every development site could suggest there might be onsite construction training opportunities. Also the objector mentions employment, commercial and retail uses and vaguely indicates these maybe located to the south of the site but there are no details of how much land would be put aside for such uses. There is no indication that there are any firm proposals for such uses. Further comments on the employment part of the site are found below. Health The site is within walking distance of Buckley railway station, close to a bus route, some employment areas and is close to Active Travel Route No BUC7. The nearest shops are the Drury Farm Shop walking along public footpaths is 600m from the north of the site and the nearest small convenience store is on Chester Road Buckley approx 990m from the southern part of the site. Although the objector mentions the possibility of retail uses, there are no details of where this would be located or any firm proposals for a retail use. Depending upon the type and scale of retail development, these proposals may also be in direct conflict with the Town Centre First principle and the desire to sustain retail

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				sectors. No impediment to delivery. Capable of delivery in a location highly attractive to market and deliverers. Of scale essential to secure investment and confidence to deliver to national house builder model. Viable site. Access Access - Sustainable location with potential for one or more vehicles access points. Public footpath crossing with potential for enhancing and connecting to Rail, Bus and Active Travel routes from site edge to schools, offices and workplaces via Buckley Railway Station. Access to Flint and Chester via Railway Hub. Well located to maximise benefits of investment Regional Growth Bid and Welsh Government promotion of North Wales Metro. Potential to include and adopt positive measures to		provision within the existing Buckley Town Centre. Housing The site is not free from constraints being in an area of open countryside, Green Barrier, in close proximity to the SAC and SSSI designated sites and having inadequate access arrangements. The site is within the green barrier so sequentially this site is not more suitable than the allocated site in Buckley. No evidence has been presented as part of this submission to demonstrate which housing developers are due to develop the site or provide timescales. This is important evidence to prove viability and deliverability to comply with the Soundness Test 3. Access Highways officers comment that the site is unsuitable. There would appear to be insufficient frontage length onto Dirty Mile to construct an access. A single simple T junction is unlikely to be suitable to serve a development of this size and it would not appear possible to construct a roundabout or ghost island junction on Drury Lane. Given the size of the site it is disappointing that no Transport Assessment has been submitted to demonstrate that the local highway network can accommodate the development.

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				encourage non car modes including retention of footpath and cycles links to pubic highways as exemplar development. Social Cohesion Social Cohesion - Community cohesion policies to be delivered by providing a managed and master planned extension to a sustainable settlement, well related to wider context and adjacent settlements. Physically well related to existing form and delivers growth to support existing services and retail activities. Iterative and open process of dialogue, liaison and consultation (from the Preferred Strategy stage) to inform community of purpose. Self contained settlement of currently meeting own needs and serving wider retail		Social Cohesion Although in close proximity to both settlements, the site is not physically well related to the settlement form of Drury or Buckley. Where the site joins the settlement boundary of Drury, the site extends to the east leaving large areas of open countryside between it and the main built up area of Drury. The only potential linkage with Drury is the public footpath providing access to the school but which may not be a safe route to walk to school. Future residents of the north eastern part of the site would be faced with walking along Drury Lane, which has no streetlighting or pavements, to access Drury. In terms of Buckley the site barely adjoins the settlement boundary at Little Mountain and there is a gap of open fields between Buckley's eastern extent and the site. The site does not make a logical extension to either Buckley or Drury. The objector also mentions that the site will be as ''a self-contained settlement'' which seems counter-intuitive to community cohesion and successful integration of new development with the existing settlement. Also it is possible that potentially competing retail uses could detrimentally affect Buckley town centre. Economy A Joint Employment Land Review was

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				catchment area for adjacent settlements. Can deliver community integration, accessible homes for life to encourage community integration, valuing difference and focusing on the shared values that join people together. Economy Economy - An opportunity to Develop a Business Hub for the Main Service Centre of Buckley via the Strategic Rail Hub. With proposed Commercial Offices, Industrial Premises (to the South) and General Need Housing (to the North) delivering circa 800-1,000 jobs. Residential development promotes economic development and increase employment opportunities, skills and supporting local trades.		undertaken jointly for Wrexham County Borough Council and Flintshire County Council by consultants, BE Group, to help inform the Deposit LDP and was published as part of the consultation on the plan. This review showed that there is a surplus of employment land in Flintshire and therefore no need to allocate any additional employment land for the LDP plan period. The focus of the Plan is on the delivery of the two Strategic Mixed Use Sites and the Plan also has a number of other employment allocations as well as additional flexibility provided by a large number of PEA's. The objector has provided no evidence of a realistic need for additional offices and industrial premises in this location. Although the site is in close proximity to Buckley Railway Station it is not a Strategic Rail Hub. Existing Employers Noted. However, there is a major strategic allocation comprising mixed use development at Warren Hall which has public backing through the North Wales Growth Deal, which is closer to Broughton than is the objection site. The objector fails to evidence the need for additional employment land in addition to the plans existing provision. Construction Phase Noted. However, the benefits arising from the

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				Co-locating homes close to jobs of choices of living environment and scores positively against Preferred Strategy and SA. Development could be of scale to deliver local convenience retailing on site to meet local needs. Benefits to other local businesses and promote investment in the local area and adjacent. Significant positive for the economy objective. Existing Employers Further, our development is located near to existing key employers within Broughton Retail Park and Airbus UK and indeed Chester, this could reduce the necessity to travel long distances for employment and utilising Cycle and Public Transport. Construction Phase Employment - Short term community benefit during construction phase and		construction phase could apply to any site and is not unique to this proposed site. Green Barrier As part of the Deposit LDP a review of the Green Barrier was carried out, the results of which were published, as part of the consultation on the plan, in the Flintshire Local Development Plan 2015-2030 Background Paper 1: Green Barrier Review – September 2019,. One of the main functions of the green barrier in this area is to prevent to coalescence of Buckley and Drury. The gap between the two settlements is dissected by Drury New Road. The land on either side of Drury New Road is prominent and has a feeling of openness, despite the proximity of the two settlements. However, the removal of the green barrier would erode the openness of this swathe of land to the point where there would be only a very narrow or negligible gap between the two settlements. Drury is also a relatively small settlement when compared with Buckley and the green barrier helps in retaining its present scale, character and form. The green barrier is justified in terms of preventing the near coalescence of the two settlements and preventing urban encroachment into open countryside.

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				longer term via Retail, Office and Industrial Employment. Green Barrier Rural Life - Green Barrier in UDP. Located on edge of urbanised settlement area, contained within existing form of adjacent development and A549. Logical extension to settlement and of scale capable of integration existing village services within limited intrusion into settlement edge. Moderate but non strategic loss of agricultural land. Biodiversity Biodiversity - Initial assessments indicate limited likelihood of protected species. SSSI Buckley Newts SAC proximate. Land/Townscape		Development on the proposed site would also encircle the gap between Buckley and Drury, so that development extending from the rear boundaries of Oakwood Grove to the Old Cross Keys Farm will join the two settlements. As the site also spreads east into open countryside, it extends development away from the built form of Buckley and Drury and this would have a significant impact on the openness of the green barrier. The elongated shape of the development site in the open countryside does not relate at all to the existing form of development. In the case of Drury there are already opportunities for development within the existing settlement boundary in the vicinity of Bank Lane and Dinghouse Wood (the latter recently secured planning permission for housing).The green barrier therefore serves to prevent encroachment into prominent open countryside and the setting of this part of the settlement. Furthermore it seeks to facilitate the development of existing land, already within the settlement boundary. During the UDP Inquiry an omission site was submitted for the Old Cross Keys Farm to be included in the settlement boundary. At that time the inspector commented :- ‘’By its character and appearance the site relates better to the open countryside and is included within the green barrier which separates Buckley from Dobshill and Drury. Including the land within the settlement would result in

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				Land/Townscape - No statutory landscape designation. UDP policy designation as Green Barrier - a non permanent policy designation. PPW requires GB review as part of plan. Support given early review alongside Deposit LDP. UDP inspector indicated long term need to review GB to address future growth requirement. Site adjoins settlement and Railway as physical barriers. Predict nil-limited strategic openness loss. Predicted Grade 3a land subject to survey. Comparative impact to other candidates e.g. Warren Hall. Potential to retain gap to Drury Lane. Heritage		an illogical boundary as no other land on the eastern side of the road, apart from the developed area at the northern end in Drury, is included within the settlement.'' The situation now remains the same as then and this adds justification to the decision not to develop this site. Biodiversity Natural Resources Wales identifies that there are records of Great Crested Newts on the site and that the site is within approx. 100m of the Deeside and Buckley Newt Site SAC and Buckley Claypits and Commons SSSI. The objector has provided no ecological survey to establish what ecological importance the site has. Land/Townscape See comment above in relation to the Green Barrier. Whilst the site has a firm physical boundary along its southern edge formed by the railway line, the site as a whole relates poorly with adjoining settlements. Buckley is located to the west of Drury New Road and the Old Cross Keys Farm provides a distinct character break from the residential and employment land to the west. Drury expands outwards from the junction of Drury New Rd and Drury Lane and has a spur of

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				Heritage - No identified Heritage Assets on site or in context. Potential (non statutory) archaeology resource to be investigated. Water - Mains water capacity and access to mains foul & SW sewer via attenuation. Flooding Flooding - Site lies outside any Development Advice Flood Zone identified by NRW. The increased urbanisation of the area could increase the amount of surface run off in the area if not appropriately mitigated. Air pollution Air - Potential for airborne noise and air		development extending southwards to wrap around Drury Primary School. The proposed site does not represent a logical extension to Buckley and does not represent a logical extension to Drury as it adjoins only this small spur of development. Not only does it join up the two settlements but also extend built development into open countryside in a manner which is unrelated to the form and pattern of development. Built development would not relate well and would not be integrated with existing development in terms of social integration. Heritage There is a listed building, White Cottage, Drury Lane outside the site to the north of the site. Flooding Noted Air pollution Noted Energy Noted Natural Resources

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				pollutants from adjacent to railway line. Energy Energy - The resulting development and associated increase in population is also likely to lead to an increase in water use, energy use, waste production and natural resource use. However, a comprehensive mitigation programme would help to reduce this impact that promotes recycled material and innovative low carbon design and sustainable energy use should help. Natural Resources Natural Resources - No strategic impacts identified. Welsh Language Welsh Language - Current levels of Welsh Speaking can be maintained. Reducing		See NRW comments above. Welsh Language Noted Conclusion In conclusion therefore a development of this size would be out of scale with the size of Drury. There are highways objections and ecological concerns neither of which have been addressed by the objector. Employment, commercial and retail uses are all promoted but with no justification nor details of any firm proposals within this submission. Including the site within the settlement boundary would be illogical as the site extends away from the built form of Drury and Buckley and relates better to the open countryside. More significantly the site forms part of a crucial gap between the two settlements in an important area of green barrier. One of the functions of this designation is specifically to avoid the coalescence of the settlements and to protect the open countryside from development. The green barrier will also facilitate the development of existing land, within the settlement boundary of Drury. For all the above reasons therefore, the site is not suitable to be allocated for development or included within the settlement boundary.

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				risk of loss of welsh speakers to other locations through alignment of housing to schools, facilities and places of work.		
701	HN1: New Housing Development Proposals	NEW010 Land Adj Argoed View	Object	We identify our development as of strategic importance to the sustainable growth of Flintshire. It's primary focus on General Needs Housing close to the A494, a sustainable transport route, scores positively on the housing and access objectives, and is also aligned with the Planning Policy Wales (2016). New Brighton scored well in the LDP Settlement Audit (December 2015) with a mix of services and facilities. Third tier status as a sustainable village support growth to meet settlement and wider spatial needs.	Allocation of additional site at Argoed View New Brighton	Not accepted. New Brighton lies to the North East of Mold and immediately to the North West of Mynydd Isa. New Brighton has been categorised as a sustainable village on account of its size, accessibility and level of facilities and services and because of its proximity to larger settlements. The bulk of the village lies on the Southern side of the A5119 although small residential developments and commercial development lie on the North side of the A5119 along with this site. Candidate site NEW010 includes the western half of the allocated LDP site known as Cae Isa and an additional area of land North of the site known as land at Argoed View. The site effectively wrapped around the rear of the dwelling Crestlea (and included Crestlea), extending up to the recent Leason Homes development 'Oaklands'. In the objection to the Deposit LDP the objector has amended the boundary by excluding all land except that which adjoins the allocated site and extends alongside and

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				Accords with search sequence at PPW 9.2.8 and 9.2.9. Deliverable site free from significant constraints and accessible by a range of modes and connectivity. Capable of providing between 20-30 dwellings in a mix to achieve market and affordable needs. Viable site and scores positively against the housing and access objectives. Site is located next to existing key employers within Mold & Buckley and could reduce the necessity to travel long distance for employment and utilizing cycle and public transport. Edge of settlement site, but contained within existing form of adjacent development. Logical extension to settlement and of scale to assist retain existing village services within limited		to the rear of Crestlea. The site measures just under 1ha in area and could in theory accommodate 20-30 dwellings. In this context it is difficult to understand how the objector promotes the site as being of strategic importance to the sustainable growth of Flintshire. Highways Development Management have assessed the site and concluded that it would be unsuitable. Although access may be possible either off New Brighton Road or through the allocated site, the objector does not offer a preferred access arrangement or any evidence to support that it is acceptable. It is noted that the site lies outside of flood zones. The UDP Inspector recommended that land at Cae Isa should be withdrawn from the green barrier and that the southern part of the site be included within the settlement boundary. This is considered to represent a clear context and direction of travel for considering the sites potential as part of the LDP. The Cae Isa site performed well sequentially and provides a logical 'rounding off' development to New Brighton in keeping with the built form of the settlement. The revised additional area of land known as Argoed View extends from the Cae Isa site and intrudes into the Open Countryside and Green Barrier, wrapping partly around the

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				intrusion into settlement edge. No loss of BMV. Biodiversity – initial assessment indicate limited likelihood of protected species. Site lies outside any Development Advice Flood Zone. Our development is located near to existing key employers within Mold & Buckley and could reduce the necessity to travel long distance for employment and utilizing cycle and public transport.		dwelling Crestlea at the end of Argoed View. This proposed pattern of development would erode the Green Barrier between New Brighton and Sychdyn and create an illogical extension of the settlement that would be harmful to the open countryside. This appears more an exercise in simply adding value to land in attempting to capitalize on the sustainable allocation made in the Plan, but where the proposed 'extension' is clearly not sustainable. The allocation at Cae Isa will provide 105 new dwellings for New Brighton, in addition there is a commitment of 23 dwellings on the former New Brighton Service Station, which is nearing completion, as well as the 13 dwellings at Rockbank developed by Leason Homes. This will provide sufficient growth for the settlement therefore an additional site in New Brighton is not needed. The objector does not provide sufficient justification for the inclusion of this additional area of land to the allocated Cae Isa site, therefore the extended area should not be allocated within the LDP. In conclusion, the Plan has provided sufficient growth in New Brighton and a further allocation is not necessary or appropriate particularly when it would relate poorly to the pattern of development and harm a green barrier.
702	HN1: New Housing	BROU001 Bretton Road, Bretton	Object	BROU001 -Land between Retail Park, Bretton Road and A55,	Allocation of additional site on lane between	Not accepted. The objector's submission is in the form of a sustainability appraisal which

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	Development Proposals			Broughton Broughton scored well in the LDP Settlement Audit (December 2015) and is a designated Local Service Centre in the Preferred Strategy. Bretton is a Sustainable Village which relies on Broughton and adjacent settlement for services. The site integrates well with the established pattern of development of Broughton and Bretton. Second tier status scores positively for growth to meet settlement and County needs. Spatial relationship to high quality retail/ employment/airport and other larger settlements enables a service to promote the economic growth strategy. Housing - Accords with search sequence at PPW Para 9.2.8 and 9.2.9. Deliverable, site free from significant constraints and accessible by a range of	Broughton Retail Park and the A55, Broughton.	promotes the site as suitable for allocation within the plan. Candidate site BROU001 was assessed as part of the original call for sites. As part of the Integrated Impact Assessment the site was identified as one of a number of 'reasonable alternative' sites. However it was not allocated within the LDP due to the ongoing cross border study to identify improved vehicular access from the A55 to the Broughton area and Western part of Chester. Until the findings of Broughton Chester Growth Corridor study are known it would be premature to allocate the site and it is understood that further traffic modelling is being undertaken. It is understood that further traffic modelling is currently being undertaken which should determine if the site will be needed for the new slip road or not. Clearly, and as set out in the Plan strategy, the focus for growth in this area is on the development of the strategic site at Warren Hall to allow this long standing commitment to come forward and deliver strategic mixed use growth in a sustainable location, rather than just adding more housing to more housing as proposed by the objector. In addition BROU001 has not been allocated within the LDP as the focus on growth within the Broughton area is at the allocated Strategic Site, Warren Hall. The Warren Hall is central to the North Wales Growth Deal, receiving considerable public sector

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				modes and connectivity Capable of providing 100+ dwellings in a mix to achieve market and affordable needs across all types and age sectors. No identified physical constraints to delivery. Capable of delivery in a location attractive to market and deliverers. Viable site. Access - Sustainable location with potential for one or more vehicular access points. Public footpath crosses. Links to local bus route and adoption of positive measures to encourage non car modes including retention of footpaths, and new cycle links to public highway and Aerospace.		investment over recent years including junction improvements at the interchange of the A5104 and the A55. The site is allocated in the adopted UDP and has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities as well as housing. The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area. The Council have allocated Warren Hall as a strategic mixed use site in order to support the objectives of the North Wales Economic Ambition Board and the Mersey Dee Alliance, and boost the economy within North East Wales. This allocation is supported by Welsh Government. The development of the AMRC was clearly compliant with the present policy framework for Broughton and the wider area, and did not need to be factored into the deposit LDP or await the outcome of the LDP Examination to secure such important investment. This also illustrates that there is a sufficiently flexible framework to allow for such development, which does not simply concern itself with a housing only approach to sustainable development in this location.

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						Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period with 189 units completed on the site to the south of the Retail Park in 2017/18, 24 units completed on the 'compound site' immediately to the west of the retail park (adjacent to Aldi) in 2017/18, and 36 units completed on Chester Road (Park Jasmine) also in 2017/18. In addition there are also 300 dwellings planned on the allocated strategic site at Warren Hall. This is considered sufficient growth within the Plan period. Given the extensive amount of new housing already added to Broughton predominantly by the objector, it would be short sighted and an unsustainable form of development to prevent wider strategic infrastructure issues from being worked through, before simply allow further housing speculation. The present green barrier sits tight against Bretton Road and the shopping park and the settlement boundary for Bretton and offers no scope for future growth. The gap between Bretton and Saltney is 2.1km and the green barrier is considered to be larger than is necessary to prevent coalescence. It is therefore considered appropriate to draw back the green barrier which removes candidate site BROU001 from the green barrier. This would allow for some expansion in the future.

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						It is acknowledged that the site is well located in terms of access to facilities and services, and is well served by public transport. It is also free from constraints such as flooding. However, the site is part of the Broughton Chester Growth Corridor Study. The allocation of BROU001 could potentially threaten future economic growth within the wider area, as the site may be needed as a possible new slip road from the A55 into Broughton. Until the results of this study are finalised it would be premature to allocate this site for development as it could block an important infrastructure project, which would have wider implications for the local economy. Consequently the land at Bretton Road has not been allocated within the plan as it is not needed in addition to the allocated site at Warren Hall, and the results of the Broughton Chester Growth Corridor Study are not available yet. In conclusion, the site is considered premature to be considered as an allocation until the Broughton Chester Growth Corridor Study has been published, and the aim of bringing forward the strategic site at Warren Hall has been achieved.
736	HN1: New Housing Development Proposals	BRYN002 Land North of Hiraethog Brynford	Object	We would like to make an appeal regarding the exclusion of the site at Hiraethog, Brynford (Site Plan No BRYN002) from the LDP.	Inclusion of additional sites within sustainable villages, namely BRYN002 candidate site at	Not accepted. Brynford is a classified as a sustainable settlement in the LDP on account of its proximity to Holywell where there is a range of services and facilities But also recognising that Brynford has a school and some facilities of its own. Brynford is categorised as a Tier 3 sustainable

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				This site went as far as the Preferred Strategy category, but with the exclusion of any sites outside the Settlement Boundaries.0 being considered, we wondered if there cou0ld be certain exceptions. With the idea of 14% of the Housing units being planned for Sustainable Villages, which in my rough calculation being over 900 units. Please see list below for just a few benefits of new houses in this village 1. The field itself is adjacent the Hiraethog House and is no longer being used for agricultural/Farming. 2. More housing (Including Affordable Housing) needed in the immediate and surrounding areas 3. It is in a secluded area and will not spoil the luck	Hiraethog, Brynford.	settlement. The LDP aims to steer development within the first three tiers, within a hierarchy system whereby the plan seeks to distribute development in a sustainable way having regards for the settlement hierarchy and by identifying the most sustainable settlements and sites. In this case Tier 3 settlements will be the location for housing that at related to the scale, character and role of the settlement in this case small scale development. The spatial strategy is not based on every settlement having an allocation. Growth can also occur through completions, commitments, windfalls and small scale exceptions schemes. Reviewing the completions for the first three years of the LDP illustrates that there are six dwellings that are commitments in 2018 two were built and a further 4 awaiting to be built. The land is categorised as Grade 3a agricultural land and therefore will result in the loss of the best versatile land. The site is also located within a Minerals safeguarding area. The site is located within close proximity (within 200m) to a site of International importance – Halkyn Mountain SAC and Halkyn Common and Holywell Grasslands SSSI. Additionally, NRW record that there may potentially be Great Crested Newts within the area. The Environmental Health section have reported that the site contains lead and heavy

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				of the village, as it will be hardly visible from the main roads. 4. A good bus route. 5. Near to the A55 and A541 6. A very good School in the village (Which I believe is being extended in the near future), also Shop and Church which includes a Community Centre.		metals and that the site overlies mine shafts. Further assessment may be needed and a land contamination assessment would be required but has not been provided as part of the objection.. Additionally, Chester Road, Penymynydd 186 Mold is a tier 3 settlement and has already been granted permission for 27 units of affordable housing. Therefore it is considered that additional sites are not needed within the tier 3 settlement for affordable housing. Growth within the Tier 3 settlements, including affordable housing, will occur in a large number of settlements as a result of completions and commitments. In Bryford, policy STR2 allows for small scale affordable housing exceptions schemes and further guidance is set out in policy HN4D. Brynford is of small size and has a rural character and feel to it being located within the elevated Halkyn and Holywell Common. Despite the dwelling and outbuildings in the south west corner, the site is better related to the area of open countryside to the north and east as it is located within a backland area and is not located within the settlement boundary. Additionally, the development of the site would be at odds with the linear character of development along Brynford Road. Although the site may be close to a bus route, the site does not appear to have a frontage

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						with an adopted highway and therefore highways have objected on the grounds that both means of access to the site are unadopted. Developing this site would result in harm to the open countryside and have a detrimental impact upon the character of Brynford. Development also appears technically unacceptable in terms of the lack of a suitable vehicular access to serve a site of this size and the potential dwellings it could accommodate and no evidence has been submitted to show how a suitable access can be provided. The site is not considered necessary or appropriate to be allocated for housing, nor included within the settlement boundary. The above discusses concerns regarding the proposed land for development and therefore the site has not been allocated within the plan. In conclusion the site is not considered appropriate to be included in the Plan.
755	HN1: New Housing Development Proposals	SAL002	Object	Watersmeet in Context Watersmeet offers a strategic location of the scale and physical characteristics that can help to deliver identified housing and infrastructure needs of Flintshire. The site is uniquely positioned to	LDP needs to have a greater regard for the Chester Broughton Growth Corridor. The allocation of the Watersmeet Strategic Site at Saltney would	Not accepted. The objection appears not to be actively promoting the site for allocation in this Plan period, but is seeking: i) The site safeguarded in the Plan as a contingency site in the event that other allocations do not come forward ii) The site identified as a location for future growth

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				accommodate a new residential-led community; well connected to major employment hubs in Deeside and Chester and the wider region; bounded by urban influences which physically and visually provide important context to the character of the site; accessible by a range of public transport providing future residents with opportunities for sustainable travel; and a deliverable site of a scale where significant social benefits can be secured such as new and improved infrastructure, including supporting the CBGC. 1. Safeguarded we request that FCC safeguard Watersmeet within the Plan for future residential-led development. This will ensure that in the event that identified sites do not come forward during the Plan Period,	support the CBGC.	iii) Deleted from the green barrier The Plan has sought to identify an aspirational yet realistic growth strategy in terms of employment and housing and has identified allocations to help deliver this based on a spatial strategy as set out in policy STR2. Watersmeet site comprises a patch work of flat agricultural fields covering a very large area of 159.8 ha. Adjoining the border with Chester and England the site actually extends into the other county and country. The site is in the open countryside and in a C1 Zone of flood risk. The area forms the south eastern end of an extensive green barrier between the River Dee and the Cheshire border. The land is a significant and important part of the green barrier and is best and most versatile agricultural land. Furthermore, because of its scale and location, the implications of developing it are of sub regional significance. The Plans Preferred Strategy seeks to direct growth to the most sustainable settlements in the top three tiers of the settlement hierarchy. The proposed site would in effect remove most if not all of the Plan's housing allocations and focus development on the edge of industrial development at Chester. It would have a poor relationship with Saltney

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				Watersmeet support the long-term growth of the County, meeting a wide range of housing needs to offset any shortfall. This will also strategically position the site to support the delivery of the CBGC, via either contributions towards and/or land to deliver this important infrastructure priority 2. Broad Location for Growth If not to be safeguarded, we consider that the area to the north of Saltney and to the west of Chester (including the Watersmeet site) should be identified within the plan as a 'Broad Location for Growth' shown illustratively on the proposals maps and showing an indicative alignment of the CBGC. 3. It is recommended that the LDP better reflects the importance of the CBGC in the		being separated by the River Dee. To develop such a large site would also take a long period of time to be started and delivered and would do little to assist the Plan in achieving its housing land supply and trajectory in the early years of the Plan period. The site is clearly contrary to the Plan's Strategy and is not appropriate or suitable to be allocated. The site has been promoted for development in previous development plans. Most recently it was submitted as an omission site as part of the UDP and considered by the Inspector who did not recommend allocation of the site or drawing back of the green barrier. The Inspector commented: 'The objection site measures about 25ha and lies to the north of the A548 Sealand Road. Its northern boundary is contiguous with the County's boundary with Chester. It is Grade 2 agricultural land within a C1 flood zone which forms an intrinsic part of the countryside between Chester and the Deeside conurbation. The Council's spatial strategy seeks to concentrate development within the defined towns and villages with their wider range of goods and services. I conclude in Chapter 3 of this report that such a strategy is satisfactory to guide development in a sustainable way. Whilst the objection site may be close to Chester and its amenities, it is

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				proposed infrastructure policies of the Plan, recognising the potential for the CBGC to be delivered during the next Plan Period (to 2030) and, importantly, recognising the importance of key strategic sites in delivering FCC and wider sub-regional infrastructure priorities. It is important that both FCC and CWaC engage as part of their respective Local Plan processes to ensure that strategic and cross-border opportunities are fully and consistently reflected in emerging Development Plans. 4. The Case for Amendment to the Green Barrier Boundary It is considered that the release of the site for development would have a limited impact on the purposes of the wider Green Barrier as set out in the PPW. It is not		only partly contiguous with and relates poorly to Blacon. Across the boundary in Cheshire the land abutting the site is for the most part green belt. Allocation of the site for development would therefore result in a satellite of new building within a strategic area of countryside whose openness is protected by green barrier/green belt designations in order to prevent the coalescence of settlements. It would result in an illogical boundary which would compromise the strategic function of the protected area. The objector has provided scant details of what development would be appropriate on the site. The UDP makes adequate provision for housing and employment growth. If there is no justification, which is the case in this instance, PPW does not support mixed use development of greenfield sites in the countryside. In addition given the sensitive border location where the objections indicate there is pressure, as opposed to need, for development it seems to me that should in the future it be determined there is a need for development in the locality it should be investigated as part of the LDP process with cross border cooperation, not in an arbitrary way in response to an objection to the UDP. The SRSS does not support such a development at the present time'. The Inspector firmly resisted the site and considered it to be inappropriate and the

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				considered that Watersmeet is required to retain the openness of the Green Barrier and will not significantly impact the character of the countryside. The design response for Watersmeet provides the opportunity to create a new settlement that is a natural and logical extension to the urban form and that can support defensible and permanent boundaries on all sides. 5.Environmental and Technical Considerations Initial site investigations demonstrate that the site is deliverable and that there are no identified impediments to the development of the site that cannot be mitigated. The site sits within Flood Zone C1 and is served by significant infrastructure including		Inspectors comments are still considered relevant to the present consideration of the site. Given the non-compliance with the LDP strategy, it would be illogical to designate the land in such a vague and imprecise manner as suggested by the objector. There is as yet no definitive outcome from the ongoing work relating to the Chester Broughton growth Corridor study to determine the transport infrastructure options that could be considered, let alone any development opportunities that may be related to this, either at this site or elsewhere. It would be premature to even broadly outline an intention to look at growth on this site at some future point, particularly in the context that the site has significant constraints that would count against its sustainable development potential. It is evident that Chester West and Chester City Council is meeting its own housing needs, in particular through a large green belt release to the south of the city on Wrexham Rd. It is also evident that Flintshire is seeking to meet its own needs for housing. In this broader context there is no requirement to release a substantial part of a green barrier to accommodate development that is not required in either County. The LDP already recognises the importance of the two strategic sites allocated at Northern Gateway and Warren Hall, where there is

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				flood defences; Whilst further mitigation is likely to be required, it is considered that this is feasible, given the flood defence measures put in place at Northern Gateway. 6. Illustrative Masterplan An illustrative masterplan has been prepared, the proposed area to be developed amounts to 45% of the overall site (74ha of 166ha). This enables 55% of the site to remain open and be devoted to green infrastructure. On this basis, the site can accommodate approximately 1,700 dwellings across 50 ha (43ha of residential land within Wales and 7ha within England), which equates to a density of 34 dwellings per hectare. Each neighbourhood		clear direction of travel for the development of each site, and where they are positioned in a wider economic ambition context of taking forward the North Wales Growth Deal. The same cannot be said for this site. The green barrier in this location is an important designation. Following a review of all green barriers in the County it is proposed to make two minor changes to the extent of the designation in this area. Results of the green barrier review are found in Background Paper 1: Green Barrier Review – September 2019. In summary this is the largest green barrier in the County and comprises a flat and open agricultural landscape on the north side of the River Dee. It mirrors the green belt mirrors the green belt in Cheshire and is essential in seeking to protect open countryside on both sides of the national boundary. The green barrier meets all of the functions set out in PPW and new development would be extremely prominent and conspicuous. The green barrier is justified given its open character and appearance and the level of development pressure in and around the city of Chester, and despite the overall scale and extent of the green barrier, the area covered by this site, and due to its relationship with Chester and its green belt, is a critical part of maintaining this relationship in terms of protecting the openness of the area from inappropriate development.

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				within the development is designed to have easy access to greenspace The site is large enough to support a local centre which would provide a primary school, local shops, leisure and communities uses. The employment element at the site would extend to approximately 18 ha.		There are number of key constraints affecting the objection site: • Agricultural land – Welsh Government have undertaken on-site surveys and confirmed that the site represents grade 2 agricultural land. PPW clearly sets out to protect BMV agricultural land and specifies that it should only be developed where there is an overriding need. In the context of development plans on both side of the national boundary, there is no overriding need for this development. • Flood risk – the site sits within C1 flood risk zone. PPW10 seeks to direct development, particularly highly vulnerable development away from zone C1. TAN15 advises that residential development can only take place in zone C1 where it satisfies the justification tests. Given that one of the tests is that a site comprises brownfield or previously developed land, the proposed development cannot be justified. In any event, no FCA has been submitted by the objector. • Ecology – the site lies adjacent to the Afon Dyfrdwy (R. Dee) SSSI and the River Dee and Bala Lake SAC. No ecological surveys have been undertaken and submitted as part of the objection in order to assess impacts on ecology • Transport – no Transport Assessment has been submitted as part of the objection to demonstrate that the site can be satisfactorily

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						access. The Council's Highways Development Management Officer has highlighted the need for major road improvements and that the only access is cross-border, necessitating the involvement of Cheshire West and Chester City Council. There is no evidence that the site is technically deliverable nor evidence to demonstrate that it is a viable proposition. It would also be inappropriate for the site to be identified in the Plan as a future area of growth as requested by the objector. It will be necessary for the objector to put forward the site as a candidate site as part of the LDP review. The objection is accompanied by a Development Statement which includes an illustrative masterplan. It points to 50ha of residential development, a 6ha local centre comprising schools, leisure and community uses as well as 18ha of commercial development. In effect the objector is portraying the site as, a new settlement. This also reflects the reality of its location being separated from existing residential areas in Chester by industrial development and being located adjacent to a sewage treatments works. PPW10 advises that new settlements must only be considered in exceptional circumstances and there are clearly no exceptional circumstances in this case.

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						In conclusion, the Plan has provided for growth through the allocation of two strategic sites and a range of other employment and housing sites and a further strategic site is not necessary or appropriate particularly as it does not comply with the Plans spatial strategy. The site suffers from major constraints including grade 2 BMV, C1 flood risk, ecology and transport and no evidence has been provided to address these. The site is not necessary or appropriate to be allocated in the Plan, or excluded from the green barrier, or identified as an area for future growth.
756	HN1: New Housing Development Proposals	MOL024 , MOL046 Gwerrnaffield Road Mold	Object	Gwernaffield Road - Land on the western edge of Mold (Mol024 & MOL046) The site represents a logical development opportunity on the edge of a Main Service Centre which is highly sustainable and close to existing services, employment opportunities and is well served by public transport and the surrounding road network.	Allocation of additional residential sites at Gwernaffield Road - Land on the western edge of Mold (Mol024 & MOL046).	Not accepted. The objection site submitted comprises11.8ha of land and is configured differently to several candidate sites. It comprises a mix of: • MOL046 submitted by the landowner • MOL047 submitted by the landowner and which lies to the west of 046 (but the objection site excludes the western part of MOL046). • MOL024 submitted by a third party (but the objection site excludes the southern part of MOL047). The objection is accompanied by two different options. The first is for 130 dwellings on 6.2ha (the north eastern part) and the second is for 240 dwellings on the whole of the site.

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				Given the proposed location to the north of this Site (Allocation HN1-6), this Site also provides an opportunity to deliver additional high-quality family housing. Importantly, Anwyl Land own much of the land promoted in these representations and have control over the remainder and therefore the highest of certainty can be given that housing (both market and affordable) will be delivered from this site from a very early stage of the Local Plan. This Site offers the opportunity to make a very significant contribution to the Council's five-year housing land supply and delivery of the LDP. Our client's site is a sound choice to be allocated for development within the plan period. Additional evidence has been provided as part of these		The objector has made objections to several Plan policies in terms of the Plan's housing requirement figure, its housing land supply and spatial strategy and these are responded to in the context of relevant policies. The Council's conclusion is that the Plan makes a sufficiently aspirational growth strategy and a soundly based spatial strategy, both of which are supported by Welsh Government. The Housing Balance Sheet sets out a housing land supply which is considered to be robust and deliverable, particularly given the level of completions over the Plan period. The Plan also has a flexibility allowance at 14.4% which is above the minimum 10% required by Welsh Government in development Plans Manual 3. As a result of this assessment it is not considered that additional or replacement sites are necessary or appropriate. The Council have clearly identified through the allocation of land (HN1.6) between Denbigh Rd and Gwernaffield Rd that it considers the north west of Mold to be the logical direction for future growth. This takes account of the green barrier, the firm and defensible boundary (for much of Mold) formed by the A494(T), flood risk to the north and east and the green barrier between Mold and the outlying settlements. Taking these considerations into account, the north western part of Mold offers scope for growth as it is not affected by flood risk or green barrier. The

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				representations to outline how the Site is deliverable and can contribute promptly to providing much needed housing in Flintshire. A number of benefits will also be brought to the borough as a result. Given the need for a more ambitious housing requirement, a greater degree of flexibility and the need for contingency sites, we politely request the Council to review the new and additional evidence submitted as part of this representation which demonstrates the site can be delivered in the plan period.		approach was also recognized by Mold Town Council in the Mold Town Plan. Mold will see growth over the Plan period from a number of sources. Based on the Housing Balance Sheet date of April 2018 Mold had seen completions of 156 units over the first three years of the Plan period and had commitments of 177 units. In addition to this the Plan has allocated site HN1.5 at Maes Gwern (160 units) where Wates are presently under construction and the allocated site HN1.6 at Denbigh Rd / Gwernaffield Rd for 246 units. In combination this is a significant level of growth for Mold over the Plan period and it is not considered that additional allocations are necessary. The Council accepts that the objection site may represent a logical site for development but are of the opinion that it is more appropriately considered as part of the review of the adopted LDP. It is noted that the landowner / objector for this objection site is also in control of the allocated site HN1.6 immediately to the north. This enables a longer term approach to be taken in terms of considering further releases of land in this part of Mold in the first review of the Plan. In conclusion, the Plan has provided sufficient growth in Mold and it is not considered necessary or appropriate for further allocations to be made.

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783	HN1: New Housing Development Proposals	CAR001 Land North of Holway Road Carmel	Object	It is our Client's consideration that their land interests at Carmel should be allocated for housing in the Flintshire LDP for up to 60 dwellings. The release and allocation of this Site would not result in over-development in Carmel. The Site is located to the northern edge of the settlement of Carmel. In respect of its surroundings, to the immediate north of the Site lies an existing farm and associated agricultural buildings. To the east lies residential development, whilst the A5026 forms the southern boundary to the Site. Agricultural land lies beyond the western boundary of the Site. Accordingly, the Site is naturally well-contained and a logical development opportunity. Whilst it would result in the loss of land designated as Open Countryside, it	Allocation of additional residential sites to increase supply.	Not accepted. Whilst Carmel is identified as a Sustainable Village the site relates poorly to the main built form of the settlement which apart from development on Mertyn Lane is confined between the A5026 along the northern edge and Carmel Road along the southern edge of the settlement. The site is better related to the open countryside to the west and beyond Golch Farm to the north. It is considered that the land is generally open in character and it is not necessary to include this area within the settlement boundary. With the exception of the housing on Mertyn Lane and the sporadic dwellings north of the A5026, development in Carmel is to the south of the main road. This long straight road marks a strong physical demarcation between the built up area and the countryside and forms the logical limit for the settlement boundary. Development of the site would result in significant and unacceptable urban encroachment extending beyond a well-defined edge. The site may not be actively used at present but Welsh Government has provided information which identifies the site is in agricultural use as grazing land, with a predicted loss of 2.17ha categorised grade 3a Best and Most Versatile land. In the absence

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				would not result in significant encroachment by virtue of its containment. There are already urbanizing influences on the Site by virtue of the presence of dwellings to the immediate east and the A5026 to the immediate south. Further, the A5026 is not a barrier to development as there is already existing development to the north of the road. Site Use: The gross Site area extends to 2.17 hectares. The Site comprises greenfield land. The current use of the Site is agricultural. There are a limited number of existing trees and hedgerows at the perimeter of the Site. There are no Tree Preservation Orders within or at the perimeter of the Site.		of a site specific survey to determine the actual quality of the agricultural and whether it represents BMV it is not considered appropriate to allocate the site. The site is located outside the settlement boundary and is therefore designated as Open Countryside. The candidate site was ranked as 'amber'. Potential constraints on the site include that there are relatively high levels of lead contaminants within the area, further investigation would be required. Additionally, the site is located 500m of Ancient Woodland and this may have a negative impact on local species, this is discussed in more detail below. The site is also crossed by the hypothetical line of a Roman road. It may require assessment prior to development. There are inconsistencies within the representation report to how many dwellings are being proposed. The report mentions both up to 50 and up to 60 units. The submission is lacking in terms of detail as to how various constraints including noise, air pollution, vehicular access, ecology and trees would impact on the suitability and capacity of the site for residential development. The submission also lacks an indicative or schematic layout to indicate the broad principle of how 50/60 units would be accommodated on the site.

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				Designation: The Site is designated as Open Countryside on the Flintshire UDP Proposals Map. It is not subject to any other statutory designations. It is one of the few development opportunities for housing around Carmel given the Green Barrier and Minerals Safeguarding policy constraints which currently preclude development on large swathes of countryside surrounding the settlement. Indeed, it was the only “green’ ranked Candidate Site in Carmel. Potential Uses and Capacity: The Site has potential for the development of up to 50 no. dwellings, comprising 30% affordable housing. The development could accommodate a mix of 2, 3 and 4 bed properties,		Additionally, the details submitted in regards to a concept style masterplan appears to have all the open space away from the residential part of the site. This doesn’t represent good planning. Site would result in the loss of a greenfield site. Development here could have an adverse effect on character and result in the loss of important features such as GI. The site was proposed for housing in the deposit UDP but was rejected by the UDP Inspector who commented "The land is in agricultural use and is a greenfield site. Although the area to the east of the field is urban in character that is not true of the land to the north and west. The adjacent farm complex is not so visually dominant that it separates the field from the adjacent countryside. Development on the allocated site would further consolidate the existing development to the north of the A5026 thereby extending the urban form into the countryside”. Although it is noted that there are no tree preservation orders on the site. No landscape or visual impacts reports have been provided to illustrate that the development would not have a negative impact on the surrounding area. The UDP Inspector considered that the development of the site would 'result in an unacceptable intrusion into the countryside which would be incongruous and poorly

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				detached and semidetached. The Site could also accommodate public open space and other land-uses (roads and footpaths). Environment: The development of the Site may require the minimal loss of some existing landscape features in the forms of trees and hedgerows. Any loss would be kept to a minimum; replacement tree and hedgerow planting could be implemented across the Site as part of a comprehensive scheme of soft landscaping. There are no Tree Preservation Orders within or at the perimeter of the Site. The Landscape Impact associated with the development of the Site would be Substantial to Moderate at most. The Visual Impacts associated with the		related to the built form of the settlement'. From what the objector has said, the degree to which the site would need to be landscaped if developed clearly suggests its prominence as part of the open countryside and the clear difficulties of introducing an urban context to the present open, rural context. Highways were consulted and provided the following feedback stating that Holway Road past the site is subject to a 30mph speed restriction; the provision of appropriate visibility splays appears possible. Care needs to be taken with the location and design of the site access especially in relation to Allt Y Goch, the Halfway House car park access and gradients. The submission provides no detail as to the proposed access arrangements including indicative maps. Although it is recognised that there are services and facilities within the settlement it is considered that there are negative factors which outweigh the few factors which meet the criteria. Noted, however the submission provides no detail as to the proposed access arrangements. Noted, the site is within EA Flood Zone A - low risk. Site is not at risk of surface water

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				development of the Site would be Moderate to Moderate to Slight adverse post-construction, and provided that a robust landscape scheme is implemented across the Site and once it becomes established. Access: Access to the Site, both vehicular and pedestrian, can be secured from the A5026 along the southern boundary of the Site with appropriate visibility splays achievable. The access road would be 5.5m in width, with 2m internal footways through the Site. The internal footways can provide for the safe movement of pedestrians, and to encourage non-car travel in view of the Site's locational sustainability and excellent access to public transport services.		flooding. It is unclear the extent to which replacing greenfield at the site with hard standing would alter surface water flood risk. Further investigation would be required, as limited information has be provided. The objector claims that there are no potential adverse ecological, but has provided no ecological survey to establish whether this is the case or not. The site is within 500m of Ancient Woodland. This may affect priority or protected species, as it is agricultural (e.g. breeding birds) land. Site is a large greenfield site (>0.4 ha). Development at this location would reduce habitat connectivity by increasing distances between habitats or agricultural areas. Further work would be required to investigate whether there are any presence of newts in the vicinity and to what extent the proposed development would impact the local ecology. A key principle in PPW is that allocations are viable and deliverable and free from constraint, yet the objection provides no assurances or evidence that a satisfactory access can be provided or that the other issues covered above can be successfully addressed or mitigated. Site is adjacent to a working farm. The UDP Inspector noted that this may lead to conflict but the two uses would not be entirely

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				The Site is sustainably located benefiting from very good access to local primary education, shops and services, open space and recreation, and bus services all of which are within walking distance. Highways: There are no highway or road safety reasons why the Site could not be developed. A policy compliant quantum of car parking would be provided within the Site. Flood Risk: The Site lies within Flood Zone 1. Sustainable Urban Drainage Systems would be utilised across the Site to manage surface water run-off (i.e. infiltration where feasible). Ecology: The development of the Site would not give rise		incompatible provided appropriate measures such as adequate separation distances and screening are provided. However there has been a lack of detail regarding the proposal in this submission. It is considered that no further work has been submitted to address and overcome the inspector's initial concerns regarding the site. Despite the objector's statement that the site is deliverable no background and technical studies have been submitted which demonstrate that the site is viable and deliverable. Development of this prominent site would result in residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site does not therefore read as a logical urban extension. Additionally, in the context of uncertainty as to a number of constraints which might affect the site. The site is not considered to be necessary or appropriate as an allocation.

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				to any significant adverse ecological impact; there would be the potential to employ mitigation measures where necessary. Deliverability: The Site is being actively promoted. As a leading housebuilder in North Wales, the site would advance a detailed planning application with a view to completing the development within 24 months from commencement. Accordingly, the Site is deliverable in its entirety within five years. There are no land ownership/land assembly constraints which would preclude its development, and the developer has entered into a formal Option Agreement with the landowners to purchase the Site on the receipt of planning permission.		

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786	HN1: New Housing Development Proposals	Land NE of Holywell Road, Ewloe	Object	A Private Developer have submitted representations in relation to policies STR1 and STR11 which, together, conclude that the overall housing requirement should be increased, but that, whether this happens or not, additional housing allocations are, nevertheless, required in order to achieve appropriate housing delivery. 2. In order to increase the allocated sites appropriately, an additional housing site is proposed on land to the north-east of Holywell Road at Ewloe. This representation is accompanied by the following documents: a. Site location plan. b. An illustrative masterplan. c. Preliminary Traffic and Transport Statement (PTTA) The site has a total area of 11.4 hectares, however, the illustrative masterplan envisages that development would be	Additional residential allocations required. Land to the North East of Holywell Road, Ewloe is proposed as an additional allocation to increase supply.	Not accepted. The Council has responded separately to representations relating to the need to increase the overall housing requirement figure and the need for additional houses in order to ensure delivery, irrespective of what the requirement is. The Council's conclusions are that it has pursued a growth based strategy and that the Plans housing requirement figure is significantly in excess of Welsh Government projections. It is noted that Welsh Government are comfortable with the level of growth proposed by the Plan and that the Plan is in broad conformity with the draft National Development Framework. It is disappointing that the objector has sought to put forward the site at this late stage in the Plans preparation. An earlier submission at candidate site stage or at Alternative Sites (Preferred Strategy) stage would have enabled a full assessment and comparison alongside other sites. It is disappointing that the site is submitted without a Sustainability Appraisal as required by Welsh Government in the Development Plan Manual 3 in Diagram 8 'Any new sites proposed at Deposit stage will be required to submit an SA with their site submission'. The Council recognises the importance of housing being delivered through the development plan system. The Deposit LDP was accompanied by Background Paper 10 Housing Land Supply which included a

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				limited to that area of the site which sits behind existing development on Holywell Road and Old Aston Hill, it would be adjoined on its north-western boundary by Shotton Lane and by Church Lane on its north-eastern boundary; the remainder of the land ownership, to the north east, is not envisaged as a site for built development, rather, it would be laid out as open space. In the above terms the proposed development would be within an area that is already defined by its strong boundary features and it would be largely obscured from view behind existing development. In physical and visual terms the site, is, therefore, a logical site for residential development. In accordance with the illustrative masterplan, the potential capacity of the proposed development has been		housing trajectory. This was informed by feedback from developers and site owners. The allocations in the Plan are considered to be available, viable and deliverable and each of the objectors concerns on a number of allocations will be addressed below: The site is in two ownerships where the residential element of each part is being released in phases to multiple interests. The Deposit Plan was accompanied by a 'Northern Gateway Masterplan and Delivery Statement' which provides a progress statement on the southern part of the site. It clearly references that residential development is being released in phases as illustrated in the document. The Northern Gateway Masterplan and Delivery Statement for the northern part of the site also explains that the residential element of the site is being released in phases. The site will be developed by a number of house builders and it is stressed that Countryside Properties are already on site commencing a permission for 300 homes. In addition, a further reserved matters application was approved for 120, subject to a section 106 agreement. The Council has already accepted that part of the housing element may not be delivered until after the end of the Plan period, but the amount included in the Housing Balance Sheet is considered to be deliverable. A more detailed set of responses on Northern Gateway is set out regarding STR3A. It is also understood that a number of developers

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				assessed as being 140 dwellings.		are showing strong interest in the site, as well as Housing Associations. The housing element of this strategic mixed use site can be commenced ahead of the business park. The site forms a key part of the Plans growth strategy and the delivery of the business park element will be assisted by Growth Deal funding as the site is a key part of the regional growth strategy. A fuller response in relation to this site is set out regarding policy STR3B. The fact that the site is in Welsh Government ownership and is clearly identified for infrastructure support funding as part of the Growth Deal both add a degree of certainty about the site's availability and deliverability, removing concerns about land banking which can occur for land in private ownership or developer control. The Well Street site is within the settlement boundary of Buckley and is already allocated in the adopted UDP. A planning application could be submitted at any time as the site need not await the outcome of the Plans examination. It is acknowledged that Welsh Government have been slow in releasing the site to the market but Clwyd Alyn Housing Association are presently in advanced negotiations to buy the site and are working on a planning application for a mixed market and affordable housing scheme. The site is considered to be viable and deliverable as the objector acknowledges given the point about the site's position in the trajectory. The site's

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						ultimate delivery does not therefore appear to be in dispute. In BP10 the Council identifies in a summary in Table 3 that the 150 units for the Highmere Drive allocation will be delivered between years 6 and 10. In appendix 3 the Council sets out a more detailed trajectory for the allocated sites where the Highmere Drive site is shown as delivering 30 units per annum over 5 years from 2020/21 (year 6) to 2024/25 (year 10). There is no inconsistency within the Background Paper for this site. The site is already within the settlement boundary and allocated in the adopted UDP and a planning application is likely in the near future as the owner is in competitive discussions with several developers to option the site. An early delivery of housing on the site is therefore realistic. The site is in two ownerships and discussions have taken place with both parties who are committed to making the site available. The two parties have liaised over background studies to inform the suitability of the site for allocation. Both landowners are continuing to work together and have entered into discussions with a number of housebuilders with a view to identifying a preferred developer for the whole site. The delivery of the site as set out in the trajectory is realistic and achievable.

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						The site owner has an agreement with a preferred house builder in place. The delivery of the site as set out in the trajectory is realistic and achievable. It is not accepted that there are 'significant' concerns relating to the delivery of these allocations, nor is there considered to be a need for additional allocations. The objector's reference to the early years of the Plan is interesting as in the first 4 years of the Plan period the delivery of completions is slightly ahead of what the Plan is seeking to achieve. In addition, no information is provided about the ability of the objection site to delivery early homes from a standing start and so the site would not address any issues of a 'delivery gap' even if the Council were to accept such a principle, which it does not. The objector has also failed to recognise that at least 5 of the LDP allocated sites are capable of, or already are delivering early housing. The Highways Development Management Officer has commented on purely the site boundary / area as follows: 'Unsuitable as a significant application site due to limited access opportunities and capacity concerns at the Holywell Road/Mold Road junction and the interchange roundabout. There may be some opportunity for limited development served from Holywell Road but

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						limitations on the extent of the site frontage and the proximity of other nearby accesses restrict suitable junction locations / arrangements. The application site excludes land either side of the track leading to Old Aston Hill; the existing track is unsuitable for use by additional vehicular traffic and there appears no opportunity to improve this'. In respect of the submitted proposal for 140 dwellings on the site and the Preliminary Traffic and Transport Assessment the Highways Development Management Officer has commented: 'The TA included a draft junction layout onto Holywell Road that appears appropriate but restrictions within the proposed layout would justify a requirement for a Road Safety Audit. The main concern related to allocation of further development in the area however is the limited capacity of the Holywell Road/Mold Road junction and the A494, St David's Interchange. The Preliminary TA suggests that a capacity assessment of the Holywell Road/Mold Road junction, the St David's roundabout and the site access may be required; information of this nature is considered essential to enable

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						any detailed consideration of the proposed allocation at this late stage. There are two potential LDP residential allocations in the area EWL007 and EWL020 with a total of 300 dwellings. They passed through the initial assessment process and include 200 houses served from Holywell Road and an additional 100 off (an improved) Green Lane but both accesses will impact on traffic flows at the Holywell Road/Mold Road junction. An assessment was undertaken with the developer recommending that the following improvement would be required in order to provide adequate capacity at the junction. The capacity analysis indicated existing issues but with the development traffic added and including an allowance for background growth, the proposed improvements show an overall improvement to capacity/operation of the junction even though RFC's will remain greater than 1.0 (an RFC of 1.0 is the maximum theoretical capacity; a new junction would be designed with an RFS of 0.85). Based upon the above; I would suggest that there is little opportunity for the allocation of another significant site in the area. It may be possible for consultants to design-in additional junction capacity improvements; possibly the introduction of signals but the

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						junction is in close proximity to the roundabout and signals would impact on its operation. The previously submitted TA also undertook a capacity analysis of the roundabout; the assessment identified no great concern however I am not certain that this is borne out in reality. Since the previous assessment, short term, am peak queuing has been observed on the A494 eastbound off-slip and pm peak congestion on the roundabout (this however is possibly linked to the Holywell Road junction capacity issue). A further assessment of the operation of the roundabout would be required as part of any future submission. The Active Travel Integrated Network Map has been published since consideration of the previous TA; any additional TA should consider the required improvements of the walking and cycling infrastructure in the vicinity of the site especially the delivery of a safe route to Hawarden High School'. There is also a further site proposed for allocation within HN1 which is EWL007 Old Aston Hill / Church View (id1208) which will add additional traffic on to the A494(T) roundabout. The site area measures 11.4ha which at 30 dwellings per ha could accommodate some 340 dwellings yet the suggested site is limited

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						to 140 dwellings. The submitted masterplan shows that no development is envisaged on the north eastern part of the site beyond Dee View and Aston Hill Farm, but no reasoning is given for this, except for a general reference to land being laid out as open space. The deletion of that part of the site (approx. 2.7ha) leaves some 8.7ha on the main part of the site which could accommodate some 260 dwellings. The proposed development appears to be at a low density which does not make the most efficient use of land and is contrary to a key principle in PPW 10 of making best use of resources, including land. Again, there is no explanation as to why such a low gross density of 16 dwellings per ha is proposed. The northern part of the site sits quite high in the landscape and this is presumably the reason why it was the location for the RAF wireless station and masts. This part of the site has an openness with views of the surrounding landscape. The site forms part of the green barrier between Ewloe, Shotton / Aston and Connah's Quay and development and development would harm its openness and would contribute to coalescence. The Council is also conscious of further development pressure in the locality with candidate and alternative sites in close proximity to Sea View Farm (EWL011 and EWL026AS).

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						It is acknowledged that the site is, for the most part, set behind existing development along Holywell Road and along Old Aston Hill, and partly by the narrow lane leading to Aston Hill Farm. However the north part extent of the site does not extend as far as Old Aston Hill and would leave an intervening field. This part of the proposed site would appear as a detached block of development, poorly related with the existing built form. Other issues identified from internal and external consultation responses are set out below: Agricultural land – The Welsh Government Predictive Agricultural Land Classification Map identifies the site as being grade 3a which represents 'Best and Most Versatile Agricultural Land'. Welsh Government consider that a further detailed ALC survey of the site is undertaken to determine if the land is BMV. Welsh Government further advises that the inclusion of any further allocated sites involving the loss of BMV would need to be fully justified in line with PPW. It is unclear whether the objector has undertaken an on-site survey to identify the actual land quality nor undertaken to justify the loss of agricultural land when compared with the Council's Background Paper.

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						Built heritage – the part of the site which lies to the south of Aston Hall Farm contains a number of buildings formerly used as part of the RAF Hawarden Wireless Station, along with a number of other archaeological features, largely relating to former masts. The submission is silent on how this archaeological and historic interest would be dealt with. The proposed vehicular access off Holywell Rd passes over an archaeological record relating to the former Stockholm Colliery. Wildlife – Although there are no wildlife or ecological designations within the site, it is within approximately 300m of the Deeside and Buckley Newt sites SSSI and SAC primarily designated for Great Crested Newts. It is noted that there is a permanent pond marked on OS maps to the south of Dee View. The Council's Ecologist has noted that the field pond is a recorded Great Crested Newt breeding pond and there have been other ponds / flooded areas recorded in the past with potential for amphibians. The site has potential for badgers, bats, reptiles and nesting birds. Any development would need to assess the ecology of the site and impacts on the nearby designated SAC. Also needed would be an Ecological Impact Assessment with measures to avoid, mitigate, compensate, enhance and manage wildlife

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						features. NRW also state that the proposal has the potential to have indirect adverse effects on the SAC. No ecological background studies have been submitted with the objection. Landfill – The site boundary at its northern end sits adjacent to the 'Land rear of Transport Yard' landfill site and the 'Sea View Farm 1' landfill site, to the rear (north) of which is the 'Sea View Farm 2' landfill site. The northern part of the site sites within a 250m buffer zone for these landfill sites. The Council's Pollution Control Officers identify that the site includes a landfill site. It is considered that a detailed land contamination assessment, including at least 12 months data and a detailed remediation proposal would be required. The submission is silent on the acceptability of residential development in such close proximity to landfill sites. Mining – Land adjoining the proposed access and to the rear of the dwelling Stockholm is identified as a Coal Referral Area as is an area of land on Shotton Lane. The Coal Authority have identified that the site lies in a Development High Risk Area and that there is a recorded mine entry just off the site. Contamination – Public Protection have identified that the site is situated on a Secondary A aquifer with suspected

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						contamination (adjacent to a historic landfill site). As part of any planning application for this site we would advise planning conditions be imposed to ensure that risks associated with any contamination at the site are appropriately managed. It is unclear why the development of the site is limited to 140 dwellings or why such a low density, in the context of making the best use of land, is justified. It is noted that the objector has undertaken a preliminary traffic and transport assessment but site analysis and consultation responses shows that there a number of constraints and issues where there appears to be little clarity on how these will be addressed. The objector expresses concerns about the delivery of the nearby allocated site, but equally there are a number of concerns which question the appropriateness of the objection site being allocated for housing as well as its delivery.
788	HN1: New Housing Development Proposals	Chester Road , Penyffordd	Object	A developer have submitted representations in relation to policies STR1 and STR11 which, together, conclude that the overall housing requirement should be	Additioal allocations required. Land at Daisy Bank Penyffordd should be considered as an additional residential	Not accepted. The Council has responded separately to representations relating to the need to increase the overall housing requirement figure and the need for additional houses in order to ensure delivery, irrespective of what the requirement is. The Council's conclusions are that it has pursued a growth based strategy and that the Plans

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				increased, but that, whether this is accepted or not, additional housing allocations are, nevertheless, required in order to achieve appropriate housing delivery In addition to the above, the assumptions with regard to the delivery of a number of the allocated sites are also queried. It is noted that Welsh Government is looking to place greater emphasis on housing being delivered through the development plan system and, in this context, it is particularly important that the assumptions made with regard to delivery are robust. a.Northern Gateway – It is understood that this site is being delivered by a single developer. Whilst the developer in question has, it is accepted, delivered 100 dwellings from a site in a	allocation within the LDP.	housing requirement figure is significantly in excess of Welsh Government projections. It is noted that Welsh Government are comfortable with the level of growth proposed by the Plan and that the Plan is in broad conformity with the draft National Development Framework. It is disappointing that the objector has sought to put forward the site at this late stage in the Plans preparation. An earlier submission at candidate site stage or at Alternative Sites (Preferred Strategy) stage would have enabled a full assessment and comparison alongside other sites. It is disappointing that the site is submitted without a Sustainability Appraisal as required by Welsh Government in the Development Plan Manual 3 in Diagram 8 'Any new sites proposed at Deposit stage will be required to submit an SA with their site submission'. The Council recognises the importance of housing being delivered through the development plan system. The Deposit LDP was accompanied by Background Paper 10Housing Land Supply which included a housing trajectory. This was informed by feedback from developers and site owners. The allocations in the Plan are considered to be available, viable and deliverable and each of the objectors concerns on a number of allocations will be addressed below:

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				single year, this has been in relation to a particular product, extrapolating such a level of performance over an entire Plan period, and in an untested market area, appears unduly optimistic, as does the completion of 94 units in the year 2020/21 from a standing start. b.Warren Hall – The notes within BP 10 emphasise that the housing allocations are made in order to improve the viability of the already established employment allocations. It, therefore, follows that in order for the housing development to proceed, it will first be necessary to secure a commitment to the employment development coming forward, there would be no logic in the housing development being allowed if it did not achieve this objective. Consequently, until this		The site is in two ownerships where the residential element of each part is being released in phases to multiple interests. The Deposit Plan was accompanied by a 'Northern Gateway Masterplan and Delivery Statement' which provides a progress statement on the southern part of the site. It clearly references that residential development is being released in phases as illustrated in the document. The Northern Gateway Masterplan and Delivery Statement for the northern part of the site also explains that the residential element of the site is being released in phases. The site will be developed by a number of house builders and it is stressed that Countryside Properties are already on site commencing a permission for 300 homes. In addition, a further reserved matters application by Keepmoat was approved for 120, subject to a section 106 agreement. The Council has already accepted that part of the housing element may not be delivered until after the end of the Plan period, but the amount included in the Housing Balance Sheet is considered to be deliverable. A more detailed set of responses on Northern Gateway is set out regarding STR3A. It is also understood that a number of developers are showing strong interest in the site, as well as Housing Associations. The housing element of this strategic mixed use site can be commenced ahead of the business park. The site forms a key part of the Plans growth strategy and the delivery of the business park element will be assisted by Growth Deal funding as the site is a key part

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				commitment is in place, this housing allocation should not be relied upon. c.Well Street, Buckley – As a site that has been allocated in the present UDP, but which has not been released, considerable caution needs to be exercised in relying on its delivery within the next plan unless or until it is in the hands of developers – BP 10, Table 3 indicates that it is a "likely" housing association development which only emphasises that its future still remains uncertain. In such circumstances an assumption of delivery between 2020 and 2023 is unduly optimistic and delivery should at the very least be delayed in the trajectory. d.Highmere Drive – BP10 Table 3 and Appendix 3 conflict with one another as to when		of the regional growth strategy. A fuller response in relation to this site is set out regarding policy STR3B. The fact that the site is in Welsh Government ownership and is clearly identified for infrastructure support funding as part of the Growth Deal both add a degree of certainty about the site's availability and deliverability, removing concerns about land banking which can occur for land in private ownership or developer control. The Well Street site is within the settlement boundary of Buckley and is already allocated in the adopted UDP. A planning application could be submitted at any time as the site need not await the outcome of the Plans examination. It is acknowledged that Welsh Government have been slow in releasing the site to the market but Clwyd Alyn Housing Association are presently in advanced negotiations to buy the site and are working on a planning application for a mixed market and affordable housing scheme. The site is considered to be viable and deliverable as the objector acknowledges given the point about the site's position in the trajectory. The site's ultimate delivery does not therefore appear to be in dispute. In BP10 the Council identifies in a summary in Table 3 that the 150 units for the Highmere Drive allocation will be delivered between years 6 and 10. In appendix 3 the Council

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				this site will be released. However, the site has not come forward through the UDP where it has previously been allocated, it may be that the power lines running along the site frontage are seen as a significant constraint. However, the commencement of delivery of housing in 2020/21 (Appendix 3) certainly appears optimistic and, indeed, it is not considered that the site should be relied upon at any stage until it is in the hands of a developer. e.Holywell Road/Green Lane, Ewloe – Recent discussions have established that this site is in two ownerships and there is not at present any collaboration or any commitment to release the site to a developer. Until this situation changes, it is unduly optimistic to rely on it		sets out a more detailed trajectory for the allocated sites where the Highmere Drive site is shown as delivering 30 units per annum over 5 years from 2020/21 (year 6) to 2024/25 (year 10). There is no inconsistency within the Background Paper for this site. The site is already within the settlement boundary and allocated in the adopted UDP and a planning application is likely in the near future as the owner is in competitive discussions with several developers to option the site. An early delivery of housing on the site is therefore realistic. The site is in two ownerships and discussions have taken place with both parties who are committed to making the site available. The two parties have liaised over background studies to inform the suitability of the site for allocation. Both landowners are continuing to work together and have entered into discussions with a number of housebuilders with a view to identifying a preferred developer for the whole site. The delivery of the site as set out in the trajectory is realistic and achievable. The site owner has an agreement with a preferred house builder in place. The delivery of the site as set out in the trajectory is realistic and achievable. It is not accepted that there are ‘signficant’ concerns relating to the delivery of these

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				being brought forward, and especially by 2023/4 f.Ash Lane, Hawarden – Commencement of delivery of housing from this site in 2023/4 seems optimistic, in order to be robust it is suggested that the assumptions with regard to delivery are put back by at least one year. Whilst it is not suggested that none of the above sites will come forward in the Plan period, it is clear that there are significant concerns in relation to a number of the sites and particularly in relation to the assumptions on timing and rates of delivery. These concerns impact on the overall number of allocations that are required, and particularly so in the early years of the Plan period where additional sites that can make an early		allocations, nor is there considered to be a need for additional allocations. The objector's reference to the early years of the Plan is interesting as in the first 4 years of the Plan period the delivery of completions is slightly ahead of what the Plan is seeking to achieve. In addition, no information is provided about the ability of the objection site to delivery early homes from a standing start and so the site would not address any issues of a 'delivery gap' even if the Council were to accept such a principle, which it does not. The objector has also failed to recognise that at least 5 of the LDP allocated sites are capable of, or already are delivering early housing. It is acknowledged that Chester Rd and Lower Mountain Rd could represent firm physical features. However, the question as to whether this is a logical extension to the settlement depends on i) whether there is a need for further development and ii) whether the site represents the most sustainable site. In respect of i) the settlement is one which has seen a significant amount of development. The settlement of Penyffordd / Penymynydd has already taken a significant level of the growth apportioned in the Deposit Plan to Tier 3 settlements as a result of two commitments at Rhos Road South (40 dwellings) and Hawarden Rd (32 dwellings) and the allocated site at Chester Road (186 dwellings). In addition a further planning permission for 36 no, over 55's retirement apartments was granted on appeal

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				contribution are considered necessary. The site has a total area of approximately 3.85 hectares. Land to the immediate west of this site was granted planning permission on appeal in May 2018 and is currently being developed. This site is, therefore, the final parcel of land within the logical settlement boundaries of Chester Road and Lower Mountain Road in this locality and would, therefore, represent a logical extension of the settlement. In accordance with the illustrative masterplan, the potential capacity of the proposed development has been assessed as being 107 dwellings. The Preliminary Traffic and Transport Assessment provides		on 27/04/20. This represents some 296 dwellings in the settlement which is on top of the 77 completions during the first three years of the Plan period arising from UDP allocations. Although the LDP has moved away from settlement growth rates for different tiers of the settlement hierarchy, it is useful to look back at the context in the UDP which identified a growth band of 8-15% for category B settlements. Over the UDP period the settlement saw actual growth of 21% as a result of 282 completions which was well in excess of the growth band. In the first 4 years of the LDP period the completions of 77 units equated to a 5.7% growth. As at April 2019 there were commitments of 267 units on the three earlier appeal sites which increases growth over the Plan period to 21%. The recent appeal decision for the over 55's apartments increased growth to 23.4% and the inclusion of 37 units on the objection site would increase growth further to 30%. This settlement has more than provided a significant contribution of housing in the LDP Plan period for a Tier 3 settlement. The references to various background studies are noted as is the reference to the developer, but this does not change the fundamental concerns about the level and pace of development which this settlement is and will experience and disproportionate amount of development in one settlement having regard

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				detail in relation to the following: a. A principal access to the development from Chester Road is envisaged, the required visibility splays can be achieved, although discussions with the Highway Authority may indicate a preference for reduced splays following a reduction in the speed limit on Chester Road. b. There is a good network of public footpaths within the area including those running through the site itself and through neighbouring residential areas to access facilities in the Village centre which include a supermarket, several other shops, drinking and eating establishments, a primary school and community facilities. c. The bus stop on Chester Road is within walking distance of the		to the Plan's spatial strategy. Previous appeal decisions dealt with proposals individually and without reference to the cumulative effects that such decisions were having on this settlement which this proposal simply seems to be an attempt to further capitalise on. It is a comfort that prompted by the situation in settlements such as Penyffordd/Penymynydd the Welsh Government recognised the harm that such cumulative speculative development was having and initially suspended the key element of TAN1, and has following receipt of evidence revoked that policy in full. Given a key part of the objector's case is centred on plan led delivery, it is very disappointing that they have not engaged positively in the plan making process over sites such as this at an earlier and more appropriate stage in the process. Policy STR2 sets out the hierarchy of growth to the tiers in the settlement boundary. Tier 1 Main Service Centres are the 'main' locations for new development, Tier 2 Local Service Centres are the locations for more modest levels of development whilst Tier 3 Sustainable Settlements will be the locations for 'housing development related to the scale, character and role of the settlement'. The policy clearly adopts a sliding scale of growth appropriate to each tier and the level of growth proposed by the objector in this settlement is not considered acceptable. In terms of ii) there are a large number of candidate sites and alternative sites promoting development in the settlement. Land at Wood lane Farm is considered to be sequentially preferable as it

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				site and provides regular services to Chester, Broughton, Buckley and Mold. d. Penyffordd railway station is located at the southern end of the Village and provides services to Bidston (with links to Liverpool) and Wrexham. e. A preliminary highways assessment concludes that traffic generated by the proposed development would have no more than a minor impact on the existing highway network. In granting planning permission for development on the adjacent land, the Welsh Ministers concluded that the development was in a sustainable location, there was no compelling evidence of unacceptable impacts on local economic, social and environmental		is adjoined by the settlement boundary on three sides and by the A550 to the west and is closer to the village centre than the objection site. In contrast to this clear case of infill development, the objection site is bounded by the settlement boundary on only one side and represents an extension into open countryside. Nevertheless, it is the Council's strongly held view that no further development is necessary in this settlement in the LDP. The indicative capacity of the site of 107 units is noted. Highways Development Management consider that the site is potentially suitable subject to the outcome of a full Transport Assessment but consider that there are limited local facilities available within walking distance. '..due to the limited nature of the document, it fails to fully address a number of issues. The location of the proposed site access and available visibility splays is discussed in relation to the plan format but does not consider the vertical profile of the Chester Road. A crest in the road has the potential to limit visibility splays. It is however considered likely that the provision of an associated speed survey and/or an additional speed restriction, will enable the identification of a suitable access location (or locations). It is likely that the local highway network has adequate capacity to accommodate traffic

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				infrastructure, and the proposal would not undermine the principles of sustainable development or the creation of cohesive communities (indeed, it was noted that the development contributed towards the Welsh Ministers' objective of building resilient communities, culture and language). The present proposed site would represent a modest addition to the settlement for the period through to 2030, there is no reason why the conclusions in respect of the adjacent appeal site are not equally applicable to the proposed site. For all of the above reasons it is concluded that development on this site could deliver sustainable development in line with the objectives of proposed Policy STR11. Having regard to the criteria within Policy STR2, it is clear that this		generated by the development but this can only be verified by the capacity assessments identified in the report. Seemingly unrealistic TRICs traffic generation rates have been quoted; appropriate rates should be agreed. Due the relatively remote location of the site, future residents are more likely to rely on the use of private cars for access to community facilities in comparison to those living in more urban developments. Although walking and cycling isochromes have been provided, these make no reference to the quality of the provision and the suitability for use. Further consideration should be made to the provision/improvement of on-site facilities and those external links listed on the Active Travel Integrated Network Map. Crash Map has been used in the identification of the traffic accident history in the area; whilst there is no objection to this use, the scope of the search should be extended to a ten year period. The usually accepted five year period omits a fatal incident and other recorded incidents at the Chester Road/A5104 junction'. As commented on above, the Council is preparing a Plan for the County and not just this settlement. If the Inspector decides that additional development is necessary through additional allocations then there are two tiers of settlements above which sequentially preferable locations for development. If the Inspector considers that additional allocations

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				proposed development would result in a development that would be well related to the character, scale and role of Penyffordd. It is considered that there is a need for additional housing allocations and this site is an appropriate site on which such an allocation should be made.		are required in Tier 3 settlements then are a large number of other settlements which could accommodate development. The objector offers no explanation as to why Penyffordd / Penymynmydd is preferable to these other settlements. There is also nothing to indicate or make the assumption that the Welsh Ministers would have come to the same view if they had been presented with a single development proposal for almost 300 homes, rather than the incremental approach taken and that from a speculative development perspective, has been recognised as harmful by the deletion of TAN1. It is not considered that further allocations are either necessary or appropriate in this settlement in the light of growth as a result of completions and commitments and the recent appeal decision at Rhos Rd (south). If the Inspector considers additional allocations are necessary there are other sites available in higher order settlements and in other settlements in Tier 3. Even in the context of Penyfordd / Penymynydd there is considered to be a sequentially preferable site. The following stakeholder consultation responses have been received on this proposed new site: Ecology: The Ecologist has commented 'Improved Agricultural grassland with trees and hedgerows and limited protected species

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						records but with potential for bats, amphibians, badgers and nesting birds. GCN occur within 250m at the White Lion Nature Reserve and wildlife corridors were designed into the adjacent development; there are also numerous Hedgehog records associated for the locality. Depending on the proposal, the farm and associated buildings have potential for roosting bats and nesting birds such as swallows, house sparrow, starling and barn owl. Any development would need to assess the Ecology of the site and provide an Ecological Impact Assessment with measures to avoid, mitigate, compensate, enhance and manage wildlife features. It would also need to link to the mitigation/provision of associated green corridors associated with the adjacent development. Reference should have been made to FCC Planning Guidance SPG No 8 Nature Conservation and Planning and specifically for this site SPG No 8a Great Crested Newt Mitigation Requirements: http://www.flintshire.gov.uk/en/Resident/Planning/Supplementary-planning-guidance.aspx '. However, no ecological survey has been submitted with the objection.
813	HN1: New Housing Development Proposals	BUC026 Adj Viandra Bannel Lane Buckley	Object	1. The site BUC018 (BUC026) is on the edge of a sustainable settlement. 2. Developing this site would mirror development on the opposite side of the road	Allocation of candidate site BUC026	Not accepted. Buckley is a sustainable settlement and has been categorised in the settlement hierarchy as a Tier 1 Main Service Centre. During the UDP plan period Buckley grew by 17.4%, as a Category 'A' settlement, the aim for growth to be within 10% to 20% was therefore fulfilled. The LDP makes provision for the future growth in Buckley through the allocated site at Well Street and

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				and as such we do not believe that this does constitute ribbon development but a squaring off of the development to mirror that allowed on the opposite side of Bannel Lane. 3. Examples - There are examples of similar developments in the Buckley area where development has been given approval when it extends into the open country side. 4. Under Flintshire County Councils Planning guidance you are able to approve limited infill for development outside of settlement boundaries where the land in question: a. is not an important landscape, nature conservation, historic or other amenity feature which this site is not, and would provide a clearly		as a result of 175 completions in the first three years of the Plan period and commitments of 138 units as at the Plans Housing Balance Sheet date of April 2018. Whilst it is acknowledged that the site proposed adjoins the settlement boundary of Buckley. However, the site has a narrow almost rectangular shape and extends away from the settlement boundary partially along the southern side of Bannel Lane and to the field boundary to the south. Beyond the properties 'Dovecote and Viandra' the land on the southern side of Bannel Lane features a sporadic, scattered pattern of development. Built development in this location would undermine the function and openness of the green barrier. Development would also consolidate and perpetuate the existing ribbon development along Bannel Lane. Given the shape and configuration of the site, it relates poorly to the existing form and pattern of built development and forms an integral part of the open countryside and green barrier. All the Green Barriers in the UDP were reviewed as part of the Deposit LDP and the results of that review are found in Background Paper 1: Green Barrier Review – September 2019. The Green Barrier in this area is designated to form a break between residential

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				identifiable small group of house within a continuously developed frontage to square of development as approved on the opposite side of Bannel Lane. b. It does not constitute, or extend existing ribbon development. (see point 2) c. Any development on the land would respect adjacent properties and the surrounding area in terms of its siting, form, design and scale which could be controlled by any planning conditions applied to the site. I therefore believe this site should be re-considered for the latest LDP		development at Buckley and the Padeswood / Castle Cement works which although is not a settlement, does comprise a large built up form in the landscape. The area has seen significant development pressure over successive development plans. The site was considered for development at the UDP Inquiry where the Inspector noted that ''By its character and appearance the site has more in common with the open countryside than the built up area and is included within the strategic green barrier which protects the rural area to the south of Buckley'' This conclusion is still relevant today. It is also important to note that there is still significant pressure for development on the area to the south of Buckley. This is demonstrated by the planning application submitted at Spon Green, for 435 dwellings and 450sqm of retail,(ref 058237) which was refused permission in July 2018 and is located directly to the south east of this site. The main reasons for refusal were the fact that the site was in the open countryside and green barrier. Another more recent application was refused at Land South of Megs Lane Buckley (Ref 059387, March 2019) and again its location within the open countryside and green barrier were the main reasons for refusal. This demonstrates that the Green Barrier designation has been tested and has been

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						found to be reasonable and justified in this location. It is also interesting to note that there has been no appeals lodged against these decisions. These decisions and the inspectors comment give added strength to the continued Green Barrier designation in this location. The green barrier seeks to prevent coalescence of Buckley with built development at Padeswood and seeks to prevent encroachment into open countryside which provides a setting to the built form of this part of Buckley. The green barrier is not designated on the basis of protecting views or landscape quality per se, but in terms maintaining the openness of the land defined by it. Adding built development within the area as proposed, would reduce the openness and is therefore harmful in planning terms to the purpose and function of the green barrier in this location. The land fulfils the purposes for green barrier designation and should be retained. The houses along the northern side of Bannel Lane opposite to the site are a clear example of historic ribbon development, with a row of properties facing on to the road with individual access points. The existence of ribbon development on one side of a road does not lead to a presumption that developing on the other side of the road is acceptable, as it is necessary to look at the individual

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						characteristics of each. In this case the proposal would result in a narrow block of development extending into open countryside away from and beyond the well defined settlement boundary along this part of Buckley i.e. to the south of Spon Green. It would harm an area of land which has an open aspect and which also provides a setting to urban edge and as such development of the site would consolation / perpetuate the existing ribbon development along Bannel Lane thereby confirming that further development is not sustainable in this location. The objector has not included any specific examples to consider. The objector is referring to policy HSG5 in the adopted UDP and Policy HN4 – C Infill Development in Groups of Houses in the LDP. It is inappropriate to use this policy with reference to this site and proposal, since land does not need to be in the settlement boundary to be considered against the infill policy. This policy is specifically in relation to small scale infill development outside settlement boundaries in rural areas where there are clearly defined groups of houses. Only a single house or a semi detached pair of houses would be permitted in a small gap between existing dwellings and the resultant house would also be for local housing need. This policy is to allow some development in rural areas where there is an absence of

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						housing allocations or the possibility of other sites coming forward within settlements. By contrast Buckley is a Tier 1 settlement where there are housing allocations, completions, brownfield sites and existing commitments yet to be built so there are many opportunities for development negating the need to use this policy. It is also not applicable to this case as there is not a clearly defined group of houses nor a small infill plot. In conclusion the Plan made provision for growth in Buckley and it is not necessary or appropriate for a further allocation to be made, particularly where it would harm a green barrier. The site is not appropriate to be allocated to be allocated in the Plan.
815	HN1: New Housing Development Proposals	PEN047AS	Object	Our client has significant concerns at the heavy reliance on the two strategic sites, Northern Gateway and Warren Hall. The 1,294 homes forecast for these sites comprise 16% of the total plan requirement and 37% of the current residual requirement (overall requirement minus completions during the plan period to date and commitments). Our client is of the opinion that despite the Council's newly-found	In order to help ensure the soundness of the LDP so that it will deliver against its housing requirement, our client considers that the Council could retain the Northern Gateway and Warren Hall allocations but reduce the numbers of homes these sites are expected to bring forward by	Not accepted. The Council does not accept that the Plan is over-reliant on the two strategic sites in terms of its housing supply. The Warren Hall site involves 300 homes and this is on a par with several of the Plans housing allocations in terms of scale. It is acknowledged that the Northern gateway represents a significant part of the Plan's housing land supply, but it is evident that significant recent progress has been made with the granting of reserved matters applications for both housing and employment development, which are the "galvanizing" factors sought by the objector. Countryside properties are now on site building 280 homes and use a method of construction which can bring about high levels of annual completions. The commitment of Countryside

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				confidence, the deliverability of the site is far from guaranteed and there does not seem to be any compelling argument or reason advanced by the Council that sites that have failed to deliver over a prolonged period will suddenly be galvanized. In order to help ensure the soundness of the LDP so that it will deliver against its housing requirement, our client considers that the Council could retain the Northern Gateway and Warren Hall allocations but reduce the numbers of homes these sites are expected to bring forward by 2030. The Council should reapportion the homes from the two strategic sites to alternative, more immediately deliverable sites which accord with the plan's overarching strategy, including the allocation of additional sites in Tier 3 sustainable settlements.	2030. The Council should reapportion the homes from the two strategic sites to alternative, more immediately deliverable sites which accord with the plan's overarching strategy, including the allocation of additional sites in Tier 3 sustainable settlements. Allocating the site for residential development in the LDP would require a minor modification to draft policy HN1 and the village's settlement boundary, but would assist in the deliverability of the plan's overall housing requirement and contribute to the soundness of the plan.	Properties to the site has brought about a confidence factor and enquiries and pre-apps are being received on subsequent phases. A further resolution to grant reserved matters consent for 120 homes was granted on the Pochins-owned part of the site for Keepmoat, a housing developer, subject to a S106 agreement. Both of the strategic sites have seen significant investment with Welsh Government funding the junction upgrade at Warren Hall and flood risk measures and construction of spine road at Northern Gateway. These two sites are unique in that they comprise mixed use development in sustainable locations and are a key component of the Government's Growth Deal for the region, with further funding of infrastructure provision. The sites are quite rightly a key part of the Plan's strategy for employment and housing growth and will bring about significant economic benefits which the objector's site simply will not do. The Council has already undertaken an assessment of the delivery from the Northern Gateway site and identified units that will be delivered beyond the Plan period and these are not included in the Plans Housing Balance Sheet. The delivery of 300 units in an attractive location alongside a high quality business park with a local commercial hub, is not considered to bring about delivery issues,

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				Allocating the site for residential development in the LDP would require a minor modification to draft policy HN1 and the village's settlement boundary, but would assist in the deliverability of the plan's overall housing requirement and contribute to the soundness of the plan. Seeks the allocation of land to the east of Vounog Hill, Penyfford based on the following points (summarized): The site is situated immediately adjacent to the current settlement boundary of Penyffordd The site is bound to the east by housing development built on the former Meadowslea hospital site, Min y Ddol; to the south by properties along the Wrexham Road and Min y Dol; to the west by properties along Vounog		as set out in the Councils housing trajectory in LDP10 Housing Land Supply. Even if the Inspector (or indeed the Council) did consider that there should be additional allocations in the Plan, there are two tiers of more sustainable settlements in terms of a sequential approach. In the scenario that there was considered to be a need for additional sites within Tier 3 settlements, there are another 21 other sustainable settlements in Tier 3. The objector offers no explanation as to why this settlement should accommodate such a high proportion of growth relative to other settlements. It is also counter intuitive to reduce the amount of housing delivery on strategic sites that have consent, that have had infrastructure investment, that have developers on site, and that bring about multiple benefits for communities and the economy, that the objector's site cannot hope to replicate. It is unclear how a site with a housing only use and capacity for just 45 units can mitigate and compensate for strategic site under-delivery in the way speculated by the objector. Each of the objectors points are addressed in turn: The site adjoins the settlement boundary, but only on its western edge. The present settlement boundary represents a firm and defensible boundary to existing development,

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				Hill; and to the north by undeveloped land between the appeal site and built development in Penyffordd The site topography slopes upwards north to south, across the site towards higher ground where the Min y Ddol access road and associated houses east of the appeal site are present. There is an existing public right of way across the site which will be retained, improved and incorporated into the proposed development The settlement is well connected to surrounding towns with regular bus services to Chester, Wrexham and Mold and good train services The Adopted Flintshire Unitary Development Plan classifies Penyffordd as a Category B settlement		whereas the objection site relates poorly with that existing form and pattern of development. The site is bounded by existing development to the east comprising Min y Ddol. This residential arose as a result of a policy in the Deposit UDP which identified two former hosptial sites as being available for development. The site has no development for some 260m to the north and to the south of the Min y Ddol access road is only sporadic houses and clusters of houses. The predominant built form of this part of the settlement is on the western side of the settlement, to which the site relates poorly. The site was promoted for development as an omission site (for a larger portion of land extending northwards along the eastern side of the road) as part of the UDP. The UDP Inspector did not recommend inclusion of the site commenting 'Vounog Hill provides a strong physical boundary between the built up area to the west and the countryside to the east. This extensive elongated site along the eastern side of Vounog Hill disregards the existing field boundaries and would result in an illogical incursion into the countryside. Furthermore, it would result in an unacceptable ribbon of development that would be poorly related to the existing urban form'. The potential harm was clearly recognized by the UDP Inspector.

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				(main village) which has the potential for further growth, a view shared within the draft LDP which classifies the village as a Tier 3 Sustainable Settlement. Background Paper 8 'Assessment of Candidate Sites and Alternative Sites', September 2019 rates the site as 'amber' - the Council's assessment focusses on a potentially harmful landscape impact of any future development. The site is currently the subject of an appeal against the Council's refusal in October 2019 of an outline application for 37 dwellings with all matters reserved except for access. The application was accompanied by an indicative masterplan and a comprehensive package of technical reports prepared by specialist consultants.		The site forms part of an agricultural landscape which generally slopes downwards to the north. It has an open aspect and far reaching views. The development of the site would result in a block of development which relates poorly to the built form of the settlement and would harm that character and appearance of open countryside and the settlement. Noted It is accepted that the settlement is seen as a sustainable settlement within the context of the settlement hierarchy in the UDP and Deposit LDP. However, the Plan strategy is not based on every settlement having an allocation. Clearly the Plans housing provision is met through a variety of sources of supply including commitments, completions and windfalls, as well as allocations. The Council's concern is related to the poor relationship of the site with existing built form as explained above. Noted The Council maintains, as explained above, that the site relates poorly with the existing pattern of built development and will harm the character and appearance of the locality. In conclusion, the settlement of Penyffordd/ Penmymynydd will significant growth as a

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				A Landscape and Visual Impact Assessment was prepared which concluded that the permanent adverse landscape and visual effects are not at such a scale (e.g. major adverse or major to moderate adverse) that the identified landscape or visual harm would be sufficient to prevent development.		result of four speculative appeal decisions. It is not necessary or appropriate for a further allocation to be made, particularly where it would not represent a logical extension to the settlement.
817	HN1: New Housing Development Proposals	NH003 Land off Bryn Gwyn Lane, Northop Hall	Object	Under the LDP strategy Northophall is identified as a tier 3 "sustainable village" where the plans states inter alia, housing land will be allocated. Despite that, no allocation is provided in Northophall. Indeed the plan makes provision for a mere 2 no housing allocations in the 22 Tier-3 settlements the plan identifies. Of those 1 (Chester Road, Penymynydd) is in fact a a committed site following a success appeal. The consequence of that is	Amend the boundary of the Green Barrier to delete candidate site NH003 from it and allocate this site for housing within the LDP.	Not accepted. Northop Hall is a tier 3 settlement where housing development should be related to the scale, character and role of the settlement. Allocations have not been made in all settlements as the LDP does not seek to apportion development spatially by the use of numerical methods or growth bands and neither, "inter-alia", does the plan say that all settlements will have allocations. That would neither be logical, necessary, or sustainable. The plan seeks to distribute growth in a sustainable manner having regard to the settlement hierarchy. As part of this approach it is necessary to have regard to the character and role of each settlement and the circumstances prevailing at the present time. In this context it does not mean that, in the absence of an allocation, Northop Hall will not experience growth during the plan period, the

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				unless a site is a current commitment (Cae Eithin) the settlement boundaries drawn round NorthopHall are such, when taking account the Housing Trajectory, that there will be very limited if zero opportunity for further housing development over the remaining plan period unless of very modest scale on existing urban redevelopment sites. The evidence of need for the Green Barrier in this location is questioned. Were the land to be allocated for housing, its loss would be insignificant to the size and scale of the Green Barrier retained. My client considers there remains significant doubt and risk to the delivery of the quantum of housing on Strategic Sites and other housing sites in the LDP with the housing trajectory set out. Not least, the Council has a record of not delivering		village has already seen the completion of 85 dwellings in the early years of the LDP (2015-2018) and further growth is planned on the committed site at Cae Eithin for a further 9 dwellings. This will provide sufficient growth for the settlement over the plan period. The site is situated on the north eastern edge of the settlement and contains a large pond in the northern portion of the site. The western boundary and a small part of the southern boundary are adjacent to the settlement boundary which contains residential development along Bryn Gwyn Lane and Primrose Close. Tracts of open countryside are located to the north, east and majority of the southern boundary. The development of this site would result in the predicted loss of 3.15ha of grade 3a agricultural land. The site is an integral part of an area designated as Green barrier between Northop Hall and Connah's Quay to the east and this is commented on in more detail in the representation regarding EN11. Development would encroach in to the green barrier and result in a reduction in the narrow gap between the two settlements which would harm the open character and appearance of the green barrier and undermine its function. The southern part of the green barrier (EN11.4) seeks to protect the narrow neck of land between Northop Hall and Connah's

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				planned-for housing targets. Welsh Government Housing Policy is increasingly based on and requires delivery. The site could be delivered such that it excludes that part of the former railway line designated as SSS1 and additional buffer zone to reinforce the site edge and enhance biodiversity. The only other key constraint to the site not being allocated is access according to the Candidate Alternative Site Assessment document. It would be possible to access the site from Bryn Gwyn Lane using an option to acquire an existing dwelling on that road. This would facilitate delivery of the site. My client for the reasons outlined above considers the site suitable for		Quay. This is the most important part of the green barrier given the narrow gap. There is clear development pressure as demonstrated by the objection site and candidate site CON011 and CON021 (the latter site has been submitted multiple times). The implication of these sites together would result in the direct coalescence of Connh's Quay and Northp Hall. The release of the objection site would significantly erode the gap and increase the likelihood of coalescence. The ribbon of development along Bryn Gwyn Lane marks a firm and defensible boundary for both the settlement boundary of Northop Hall and the green barrier. Only part of the settlement is protected by a green barrier. Therefore, even if there were a need to make provision for planned growth in Northop Hall (which is not the Council's case) then there are other options on the western edge of the settlement. Adopting a sequential approach to site selection, it must be the case that a site outside of a green barrier is preferable to a site within a green barrier. Part of the site contains the former dismantled railway line which is of ecological importance of national significance (SSSI). The northern boundary of the site is also adjacent to the Pentre Moch Pond Wildlife Site and in close proximity to the Connahs Quay Ponds and Woodlands SSSI and SAC. The objector has

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				allocation for housing to meet the growth needs of the NDF and LDP.		not submitted an ecological survey in support of the site. The objector does not provide any technical evidence to show how the site can be accessed. Although reference is made to demolishing a dwelling to enable a vehicular access, no evidence has been provided to identify which dwelling this would be or to demonstrate that this would be not affect viability. Highway Development Control have states that the site is "Considered unsuitable. The site was initially considered unsuitable due to the limited width of the site frontage onto Bryn Gwyn Lane and an inability to provide appropriate access and visibility splays. The Applicant has suggested that the demolition of one of the existing properties would provide appropriate access but fails to identify which property. Most properties fronting onto Bryn Gwyn Lane have a frontage width of approximately 13m and are considered too narrow to accommodate an adoptable road that would include footways and appropriate entry radii. Wayside and Strathcraig are located either side of the access track; this could provide an additional width but still considered inadequate. The only location that would appear suitable to provide access would be the existing access track combined with Norberry House, no.22 Bryn Gwyn Lane; an

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						access in this area would have implications for the public footpath Pentre Mach and an area of trees. Apart from the difficulties in providing an appropriate vehicular access, limited width and discontinuous footways and lack of any off road cycle provision throughout Northop Hall and the surrounding area, suggest that it would not be possible to provide off-site links conforming with the requirements of the Active Travel Wales guidance. It would be difficult to access the limited community facilities available within the village with no opportunity to safely access the closest secondary school." The objector does not provide sufficient justification for the inclusion of this candidate site, it will significantly reduce a narrow green barrier and there are significant constraints to the deliverability and viability of the site in terms of ecology and access. Northop Hall is a tier 3 sustainable settlement which has already seen growth through the development of 85 dwellings since the start of the plan period, with a further 9 dwellings planned at Cae Eithin. This will provide sufficient growth for Northop Hall therefore no further sites have been allocated within this area at this time. In conclusion, growth has occurred in Northop

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						Hall and it is not necessary or appropriate to make an allocation, particularly when the proposed site would harm a green barrier and where there are constraints which have not been addressed.
831	HN1: New Housing Development Proposals	HK003 Land Adj/ S of Kinnerton Lane	Object	Suitability of KH003 for allocation. The site was identified amber (according wth the Plan Strategy in 2017) and noted as being compliant with the Council's Preferred Strategy, however there are site constraints that would need to be overcome to allow the site to be developed. LDP Background Paper 08 (Candidate Alternative Sites) September 2019 states: "Development of the site would relate poorly to the nucleated built form of the settlement and result in an illogical pattern of development. This site of approx 16ha could accommodate about 500 dwellings and would amount to a very high level of growth for Higher Kinnerton. In addition	Inclusion of candidate site HK003 as an allocation	Not accepted. This site of approximately 16ha could accommodate about 500 dwellings and would amount to a very high level of growth for Higher Kinnerton. The submission IIA states that the site would include 300 dwellings which is a sizeable site. The objector's submission also includes a portion of the 16ha site for employment land, including a health care centre and an equestrian centre. The need for a health care facility is not supported by evidence or information on funding or any evidence obtained by the objector from the Local Health Board, and in the absence of a masterplan it is difficult to envisage where the employment and residential elements will sit on the site, along with the somewhat random mix of other uses, and what their full impact may be. The UDP inspector made the following comments on two omission sites from Higher Kinnerton, which were considerably smaller than the 16ha site proposed at HK003; "(11.119.4.) The objection site measures some 4.6 ha which would potentially produce growth in the region of 20%. Excluding HSG1(57), in total this would result in over 25% growth within the plan period which is

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				this would have a significant impact upon the character of the open countryside and the settings of the complex of Grade 2 Listed buildings to the north and south of the site." Detailed analysis of potential of the site to come forward has and is being carried out including: Transport and Sustainable Assessment - building on the findings and off site highways works being carried out on Kinnerton Land Landscape Assessment. Heritage Assessment (including archaeology) Ecological and Biodiversity Assessments. Agricultural Land classification (grade 3b) Drainage Assessment (including SUDs/SAB ready design) and FCA		well over the indicative growth for even category A settlements such as Mold and Flint. I have seen no substantive arguments which justify that level of growth in what is a relatively small rural village with limited facilities in comparison to the larger settlements." Higher Kinnerton is a tier 3 settlement in the LDP (STR2) and previously a category C settlement in the UDP. The UDP provided growth for the village through the allocation at HSG1(40) with a capacity for 40 units. The final 6 units were completed by 31st March 2015 according to the 2014/15 Land Availability Study. A speculative site on land at Kinnerton Lane has also been granted planning permission on appeal with capacity for 56 dwellings. According to the 2019/20 Land Availability Study 31 units have been completed, with 13 under construction and 12 not yet started. It is anticipated that these remaining units are due to be completed by April 2021. That speculative site was put forward on the basis of there being a need to make an exception to policy under the terms of the now revoked TAN1, where the Minister has clearly recognized the harm that such unplanned development was causing to communities such as Higher Kinnerton. Given that the objector was the applicant for that site, they now appear to be asking for an exception to the exception which is somewhat disingenuous and ignores the impact on this settlement, and seems primarily an exercise

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				Detailed masterplanning including Phasing. Utilities Statement Arboricultural Reporting Ground Investigations Landscape Assessment Viability Assessment The conclusions of this analysis is that the site is free from substantive constraint and can be developed to meet the objectives the expired UDP (in so far as it remains currently relevant), the place-making objectives of the LDP, the national placemaking outcomes of Planning Policy Wales and the aspirations of the Higher Kinnerton Village Plan 2018-2030. Furthermore the developer provides its commitment to further engaging Flintshire County Council and Higher Kinnerton		in adding value to land rather than a sustainable development proposition. Candidate site HK003 is adjacent to the speculative site at Kinnerton Lane, given that Higher Kinnerton is a Tier 3 sustainable settlement where housing development must be related to the scale, character and role of the settlement, it is considered that the speculative site at Kinnerton Lane will provide sufficient growth for the village over the plan period, and no allocations are needed within the village. Higher Kinnerton is a Tier 3 Settlement and does not have sufficient facilities to sustainably accommodate the level of growth proposed by the objector. This large site is located in the open countryside to the west of Higher Kinnerton. It comprises two field parcels in agricultural use which contains several mature trees both within and on the periphery of the site. The eastern part of the site sits between a complex of listed buildings at Kinnerton Lodge (to the north) and Crompton Hall Farm (to the south). The objector's site is outside of the settlement boundary which follows the line of the public right of way along the edge of the speculative site at Kinnerton Lane. The planning application for the speculative site included a landscape buffer along its western boundary to provide a significant green edge to the new development and minimize its impact upon the open countryside. The agent for the speculative site promoted its

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				Community Council to deliver the Place the site could be and to ensure concerns over the scale and phasing of development - not least to set aside the LPA's suggestion that the site could accommodate 500 dwellings - are fully resolved. The development offers strategic sustainable growth of Flintshire. It's focus on Housing including Extra Care within both the Private & Public Sectors, including Dementia Care, Residential Housing and an Equestrian Centre, associated Employment opportunities and development of sustainable transport route scores positively on the housing and access objectives, and is aligned with national place-making outcome of Planning Policy Wales. Access - Sustainable village location.		development on the basis that it would form a "logical and contained extension to the settlement" (Planning Statement 054770). However, further development beyond this initial 'contained' extension is now proposed. It is the Council's view that a further extension would be harmful to the appearance and character of the village. Development of the site would relate poorly to the nucleated built form of the settlement and result in an illogical pattern of development. In addition this would have a significant impact upon the character of the open countryside and the settings of the complex of Grade 2 Listed buildings to the north and south of the site as development would extend beyond the well-defined western edge of built development in the village. The Council's Highways Development Management team consider access to the site to be unsuitable as there is limited opportunity to construct an appropriate access due to the limited frontage length and restricted visibility caused by the vertical road alignment. There are also other factors which make the site inappropriate for development including the predicted loss of 16.03ha of grade 3a agricultural land. The objector's submission includes a list of ongoing assessments including an agricultural land classification. This has not been submitted with the objection, therefore the Council can only

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				Enhanced Public footpath adjacent and scope to extend links to Bus Route and Active Travel route. Well located to maximise benefits of investment and potential to include and adopt positive measure to encourage none car modes including retention of footpath, new cycle links to pubic highways as exemplar development. Economy - The site will promote economic development and increase employment opportunities via its commitment to developing part of the 16ha of employment land, including a Health Care and Equestrian Centre. Placing homes and jobs close together could benefit other local businesses and promote investment in and around the local sustainable location such as Penyffordd, Penymynydd and the		assess this site against the information it has which shows the site to be Grade 3a. In addition HK003 has not been allocated within the LDP as the focus on growth within this area is at the allocated Strategic Site, Warren Hall. The Warren Hall site has been identified as the focus for growth and is a key part of the North Wales Growth Deal, receiving considerable public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55, and a further commitment to public funding to secure infrastructure necessary to develop the site. The site has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities. The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area. Consequently the land at Higher Kinnerton has not been allocated within the plan as it is not needed in addition to the residential units at Warren Hall. It is not considered to be a logical extension to the settlement as it extends significantly beyond the well defined western edge of the village and beyond the

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				Local Service Sector/Warren Hall/Broughton significant positive for the economy objective.		'green edge' that the speculative development sought to deliver. It is also constrained, with highways advising it is unlikely that an appropriate access can be made to the site due to the restricted visibility caused by the vertical road alignment. In conclusion, adequate development is provided for in Higher Kinnerton over the Plan period and the site is in close proximity to the Warren Hall Strategic Site where provision is made for mixed use development. It is not necessary or appropriate for an additional allocation particularly when the site would result in development which is poorly related to the urban form.
870	HN1: New Housing Development Proposals	BROU001 Bretton Road, Bretton	Object	Several proposed allocations are at clear risk of stagnating and thus remaining undelivered for a further plan period. Furthermore, the LDP approach to assessing potential allocations is inconsistent and this further undermines the soundness of the sites which are simply rolled forward. We therefore go on to identify inconsistencies in the way the council has assessed potential	HN1 should be revised to include additional site such as our site at Bretton Road, Broughton	Not accepted. Candidate site BROU001 was assessed as part of the original call for sites. As part of the Integrated Impact Assessment the site was identified as one of a number of 'reasonable alternative' sites. However it was not allocated within the LDP due to the ongoing cross border study to identify improved vehicular access from the A55 to the Broughton area and Western part of Chester. Until the findings of this study are known it would be premature to allocate the site and it is understood that further traffic modelling is being undertaken. Clearly, and as set out in the Plan strategy, the focus for growth in this area is on the development of the strategic site at Warren Hall to allow this long standing commitment to come forward and deliver strategic mixed use growth in a sustainable location, rather than just adding

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				sites, with reference to the assessment of our client's site. Background Paper 9 'Assessment of Candidate Sites and Alternative Sites' (2019), which forms part of the LDP evidence base, discusses the site (ref: BROU001) and states: 'The site is well defined by existing roads and wraps around existing residential development… Although the site is in close proximity to Bretton, the configuration of the site and its relationship with Bretton would ensure that development would not harm the present character and appearance of the Settlement' The evidence base is clear that the site is appropriate for residential development and should be considered for allocation,		more housing to more housing as proposed by the objector. It is acknowledged that the site is well located in terms of access to facilities and services, and is well served by public transport. It is also free from constraints such as flooding. However, the site is part of the Broughton Chester Growth Corridor Study and has been identified as a possible new slip road from the A55 into Broughton. Until the results of this study are finalised it would be premature to allocate this site for development as it could block an important infrastructure project, which would have wider implications for the local economy. Given the extensive amount of new housing already added to Broughton predominantly by the objector, it would be short sighted and an unsustainable form of development to prevent wider strategic infrastructure issues from being worked through, before simply allow further housing speculation. Noted. Noted Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period with 189 units completed on the site to the south of the Retail Park in 2017/18, 24 units completed on the 'compound site' immediately to the west of the retail park (adjacent to Aldi) in 2017/18,

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				yet an allocation has not been taken forward. Site context The site is south of Bretton Road, Broughton, within a pocket of enclosed land close to Broughton Shopping Park. The site is bound by Bretton Road a small number of dwellings to the north, Bretton Lane to the east, A55 slip road south and a farm access road to the west. The site is therefore clearly bound on all four sides, creating a neat parcel of potential development land. Beyond these immediate site boundaries are Broughton Shopping Park 125m north which includes a Tesco Extra, M&S Foodhall, Cineworld, McDonald's and various retail outlets. Beyond Broughton Shopping Park is Hawarden Airport, Airbus UK East Factory and		and 36 units completed on Chester Road (Park Jasmine) also in 2017/18. In addition there are also 300 dwellings planned on the allocated strategic site at Warren Hall. This is considered sufficient provision for the Plan period, particularly as the Plan Strategy does not prescribe set amounts or targets to each settlement. BROU001 has not been allocated within the LDP as the focus on growth within the Broughton area is at the allocated Strategic Site, Warren Hall. The Warren Hall strategic site is central to the North Wales Growth Deal, receiving considerable public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55 and will benefit from further additional infrastructure funding to drive the development of the strategic mixed use site forward. The objection site does not appear to be presented either in scale or use as a suitable strategic alternative and it is therefore difficult to see how the objection site can benefit from or give benefits to the ambition behind the Growth Deal. The site at Warren Hall is allocated in the adopted UDP and has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities as well as

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				other industrial / commercial uses. A dense area of residential dwellings is 350m west with open grassland to the east and south. In terms of the wider locality, the settlement of Bretton is approximately 0.50km northwest with Broughton 1.50km west. In terms of public transport, there are two bus stops (Buses 4, 4S, 9, 11, 11A, 13, 811, LT6, CT1, X1 and X4) at Broughton Shopping Park which provide access to the wider area. There site is not subject to any statutory designations (such as listed buildings or conservation designations) and there are no locally sensitive uses. The site is predominantly in Flood Zone A and therefore at the lowest risk of flooding, as shown on the Welsh Flood Map for planning.		housing. The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area. The Council have allocated Warren Hall as a strategic mixed use site in order to support the objectives of the North Wales Economic Ambition Board and the Mersey Dee Alliance, and boost the economy within North East Wales. This allocation is supported by Welsh Government. The development of the AMRC was clearly compliant with the present policy framework for Broughton and the wider area, and did not need to be factored into the deposit LDP or await the outcome of the LDP Examination to secure such important investment. This also illustrates that there is a sufficiently flexible framework to allow for such development, which does not simply concern itself with a housing only approach to sustainable development in this location. The allocation of BROU001 could potentially threaten future economic growth within the wider area, as the site may be needed as part of the Broughton Chester Growth Corridor Study to identify a possible new slip road from the A55 into Broughton. Until the results of this study are finalised it would be premature to allocate this site for development as it could block an important infrastructure project, which would have wider implications

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				Planning policy position It is relevant that the site is currently allocated as a Green Barrier in the Unitary Development Plan ('UDP') (2011). However, the emerging LDP proposes to remove this Green Barrier allocation as per the council's Green Barrier Review in order to meet expected growth needs in this area of Flintshire. Planning history The private developer secured a Screening Opinion (ref: 059846) under Regulation 6 of the Town & Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 which confirmed residential development on the site would not constitute EIA development. There are no other applications of note.		for the local economy. Consequently the land at Bretton Road has not been allocated within the plan as it is not needed in addition to the allocated site at Warren Hall, and the results of the Broughton Chester Growth Corridor Study are not available yet. Candidate site BROU001 was not allocated within the LDP due to the ongoing cross border study to identify improved vehicular access from the A55 to the Broughton area and Western part of Chester. Until the findings of the Broughton Chester Growth Corridor study are known it would be premature to allocate the site. It is understood that further traffic modelling is currently being undertaken which should determine if the site will be needed for the new slip road or not. In conclusion, the site is considered premature to be considered as an allocation until the Broughton Chester Growth Corridor Study has been published and the aim of bringing forward the strategic site at Warren Hall has been achieved.

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				Development context Broughton is identified as a Local Service Centre in the Deposit Plan and therefore has a key role in providing locally accessible services and facilities. Of note, Broughton Shopping Park (to the north) provides a significant location for retail and other commercial development which serves both Flintshire and the wider North Wales and Cheshire sub-region. As such, Broughton and Flintshire are areas for growth, and this is relevant to understanding the site and development context. Broughton in particular has seen major investment from the Welsh Government. The Government have invested £20 million into an Advance		

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				Manufacturing Research Centre (AMRC) in Broughton (Adjacent to the existing Airbus site). The AMRC is touted to increase GVA to the Welsh economy by as much as £4 billion within the next 20 years. It's scheduled to complete development by end of this year and is not considered within the Deposit Plan. This indicates there is a disconnect between Government ambitions to foster growth in Broughton (as evident by the funding) and the Councils ambition. The Deposit Plan must reflect its employment and housing targets with the growth anticipated from the AMRC. In addition, on November 4th 2019, the Welsh and UK Government pledged £240 million investment as part of the North Wales Growth Deal. The deal promises a government investment		

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				of £240 million and has potential to secure 4,000 new jobs across the 6 North Wales LPAs (Anglesey, Conwy, Denbighshire, Flintshire, Gwynedd and Wrexham) – with private sector investment it is expected the deal will bring up to £1 billion of investment in North Wales in total. This has been a key driver for the North Wales Economic Ambition Board, and should be considered as part of the Local Plan. Flintshire is also a key partner in the Mersey Dee Alliance ('MDA') which promotes economic, social and environmental interest across the West Cheshire, Wirral and North East Wales area. The MDA growth region is, although with both England and Wales, a single economic sub-region with a population of close to 1 million.		

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				The Mersey Dee Growth Prospectus sets out the transport infrastructure required to unlock the economic growth potential, in addition and complementary to the rail investment identified in the 'Growth Track 360' prospectus. These documents set out that by 2040 the MDA will: Double its economy to £44bn GVA; Increase its population beyond 1.1 million people; Create a minimum of 50,000 jobs; and Build up to 25,000 homes. Therefore, Flintshire and within the wider MDA area are areas of potential significant growth in the plan period and MDA growth can have catalytic benefits for Flintshire. This is relevant to		

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				understanding the site and development context. Site – land at Bretton Road The site at Bretton Road (Broughton) is deliverable in the short term and is entirely suitable for housing. Indeed, an Environmental Impact Screening Opinion has been secured which concludes development would not be EIA development, and this is relevant when considering the pace at which the site could yield housing completions. A site 'Development Framework Document' showing how development could proceed is enclosed at Appendix 4, it shows development can proceed without any adverse impacts. Although site specific matters will need to be		

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				addressed, they are not insurmountable. The suitability for housing is not least evidenced by the fact that the Deposit Plan removes the site from the current UDP 'Green Barrier' allocation. Indeed, LDP Background Paper 1 'Green Barrier Review' concludes: "Broughton sits at the heart of the growth area which is referenced in the Wales Spatial Plan. The present green barrier sits tight against Bretton Road and the shopping park and the settlement boundary for Bretton and offers no scope for future growth. The gap between Bretton and Saltney is 2.1km and the green barrier is considered to be larger than is necessary to prevent coalescence. It is therefore considered appropriate to draw back		

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				the green barrier so that it broadly follows the line of the green barrier alongside Broughton Mills Industrial Estate, on the north side of Chester Road. The remaining green barrier is sufficiently robust and well defined to prevent coalescence with Saltney. However, the remaining green barrier would allow for possible future expansion eastwards of Broughton / Bretton." The council has (in Background Paper 9) already concluded the site is suitable for housing and that it can be brought forward with no appreciable effects on the surrounding area. The relevant extract of Background Paper 9 is set out earlier in Section 3 of these representations. The private developer consider the site is		

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				deliverable and, subject to planning permission, could be brought forward quickly provided the planning policy context is favourable (or at least does not place unnecessary burdens). Therefore, there is a compelling and reasoned case for the site to be allocated. Clearly, therefore the council envisages growth in this location and the site at Bretton Road should be allocated in the emerging Deposit Plan.		
876	HN1: New Housing Development Proposals	BUC 30 Land between Chester Road and Bannel Lane, Buckley	Object	An extent of land between Bannel Lane and Chester Road, Buckley is proposed for removal from the Green Barrier, as a result of the Green Barrier review. Whilst this is supported in principle, we are of the view that the extent of land needs to be increased to include all land up to Bannel Lane,	Inclusion of additional site Bannel Lane	Not accepted. The objector has made a separate objection to the green barrier in terms of policy EN11 (id 875) and this is responded to separately. Buckley is a sustainable settlement and has been categorised in the settlement hierarchy as a Tier 1 Main Service Centre. During the UDP plan period Buckley grew by 17.4%, therefore as a Category ' A' settlement, the aim for growth to be within 10% to 20% was fulfilled. The LDP makes provision for growth

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				which acts as a natural line of delineation. It is submitted that the land on the north east side of Bannel Lane is read as a whole. Whilst in the ownership of two parties, the land on the ground is maintained / managed as one and presented physically accordingly. There is a distinct boundary line to the east, comprising a wooded area and the ribbon development on the southern side, up to and including Bannel Lane itself, acting as a natural boundary line. Accordingly, all of the land up to Bannel Lane should be excluded from the Green Barrier designation. We request the opportunity to present further evidence, including a landscape review, at the Examination, if so required.		in Buckley as a result of the allocated site at Well Street and growth as a result of 175 completions in the first three years of the Plan period and commitments of 138 units as at the Plans Housing Balance Sheet date of April 2018. This shows that for the first 3 years of the LDP plan period there is an appropriate level of development for a Tier 1 settlement and a healthy number of commitments coming forward. The green barrier has been reviewed and the land between Bannel Lane, Chester Rd and Little Mountain Industrial Estate has been excluded from the green barrier as it is not considered to contribute to the purposes of this green barrier. The ribbon of development along Bannel Lane and the arm of development at the industrial estate almost encircle the land that has been excluded from the green barrier in the LDP. This contrasts sharply with the land which slopes down to Bannel lane. The dwelling Haulfryn is considered to represent a clear end to built development, on the north side of Bannel Lane, beyond which there are only two sporadic bungalows. The green barrier therefore seeks to protect this highly visible parcel of land as it contributes to the remainder of the green barrier wrapping around Little Mountain Industrial Estate and Little Mountain. The deposit plan was the time to submit suitable evidence to support the case being made by the objector and this was made clear to the objector by the Council in

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				It is further questioned that 'lack of certainty' is justification for not including the candidate site as a housing allocation. The position can equally change and what has been deemed an appropriate site for allocation in principle would be lost. At the very least, the site should be considered as safeguarded land.		advance of the deposit consultation period. The fact that they did not submit such evidence is entirely their failing and does not help the case being made. Viability and deliverability of sites allocated in the LDP is vitally important. Following the revocation of TAN1 the Minister has provided an update to the wording of PPW10 and para 4.2.10 now states 'To be 'deliverable', sites must be free from planning, physical and ownership constraints and be economically viable …'. The Council's response on candidate site BUC030 in LDPBP08 clearly references that the site was considered suitable in principle for a possible housing allocation but discussions with the owners and agents of the two parts of the site has resulted in a lack of certainty about the availability and deliverability of the site. There is clear evidence that ownership constraints apply to this site which cast doubt on its genuine availability and the objector has presented nothing at the deposit stage to clearly demonstrate the site's availability given the two ownerships and the previous inability to agree on bringing the site forward. In any event the Deposit Plan has now set out its proposals for making suitable housing provision to meet the plan's requirement and this site is not part of that provision. It is not considered that this site should be included as safeguarded land as the LDP includes a 14.4% flexibility allowance (1,000

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						dwellings) in addition to the 6,950 housing requirement, which provides a contingency to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. Therefore the LDP does not need to identify specific contingency sites, and there is presently no requirement in PPW10 or the Development Plan Manual to do so. A flexibility allowance of at least 10% is supported by Welsh Government within the LDP Manual (Edition3), therefore the Council are satisfied that the plan contains adequate flexibility/contingency to ensure a sufficient housing supply and Welsh Government in their formal comments on the plan have no concerns about the housing growth provided. In conclusion it is not considered that the site is genuinely available and therefore not deliverable. The revised green barrier has been drawn logically and it is not considered that the green barrier should be deleted from the parcel of land fronting onto Bannel Lane. The land now not designated as green barrier may be suitable for future consideration as part of a plan review, subject to existing ownership and availability constraints being clearly resolved.
914	HN1: New Housing	DRU001 Bank Lane Drury	Object	As noted at the outset of these representations,	Inclusion of additional site at	Not accepted. The site is shown as being unannotated land within the settlement

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	Development Proposals			the representor promoted the land at Drury Lane as a housing allocation through the previous UDP. Set out below are the comments from the previous Inspector setting out his thoughts on the site in his report published in June 2009. It is clear that the previous Inspectors at the UDP inquiry (see below) had no concerns about the suitability of the site to accommodate residential development on it and that only the absence of the need for any additional land for housing stopped the site from being allocated as such. In light of the Council's current five year housing land supply shortfall, its reliance on two long standing strategic allocations and windfall development to meet its housing needs going forward, we contend that	Drury Lane in order to deliver the level of houses needed within Flintshire.	boundary of Drury in the LDP, which repeats the manner in which the site is designated in the adopted UDP. Given that the site lies within the settlement boundary of Drury, then it can be considered as a windfall site in the context of policies in each development plan. It is certainly the case that the UDP Inspector considered that Bank Lane was a firm boundary and that the land to the west of Bank Lane related better to the settlement than it did to open countryside. However, the Inspector retained the land to the east of Bank lane as open countryside and green barrier. More recently, the site has been subject to various applications in recent years (058489 – outline 66 dwellings refused, 090160 – outline 66 dwellings refused). At present a full planning application (060587) for the demolition of 81 Drury Lane and construction of up to 56 dwellings has been refused and an appeal is ongoing at the present time (May 2020). Rather than devise a housing scheme which functions within the settlement boundary, as recommended by the UDP Inspector, the applicant has sought to extend the application site boundary beyond the settlement boundary in order to increase on-site housing density by siting open space to the east of and outside the settlement boundary.

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				the land at Drury Lane presents a strong and credible option to be allocated for housing. The land at Drury Lane has been promoted to accommodate up to 66 dwellings on 1.74 hectares. It is of note that the Plan does identify other allocations on smaller sites (Site 2 - Broad Oak Holding) and in other settlements in Tier 3 Sustainable Settlements. As such, we can see no justification as to why the land at Drury Lane, Drury should not be allocated. UDP Inspectors comments '' paragraph 11.106.11. Bank Lane Drury - 523, 5147, 5293, 11628 - It was confirmed at the inquiry that 523 and 5147 now relate to land to the west of Bank Lane only. As a consequence my observations and conclusions below relate		Given that there are concerns about the manner in which the site was being proposed for development in the planning applications, it was not considered appropriate for the site to be allocated in the Plan. With the direction of travel set by the latest planning application the Council maintains its stance that it would be inappropriate to allocate the site unless assurances can be given that the whole development can be fully contained within the settlement boundary. Clearly, the outcome of the appeal will inform how the site is treated in the LDP, but scope exists for the site to still be considered as a large windfall site against the Plan's framework of policies. An allowance for windfall development is made as part of the Plan's housing provision but this is by no means an 'over-reliance' and is backed by a sound evidence base where the allowances made are modest in relation to the long term windfall completions trend. The allowances made for windfall are supported by the HBF. In conclusion, the site can come forward as a windfall site, given that it is within the settlement boundary of Drury, provided that an appropriate development scheme is put forward. It would be entirely inappropriate for the site to be allocated for housing in the Plan when the objector is intent on pursuing a scheme which extends beyond Bank Lane and the settlement boundary.

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				only to this area. 11.106.12. The site is rectangular in shape and has a back land location. Whilst the objection site has similar characteristics to the countryside, it shares 3 boundaries with the built up area and to my mind has a close relationship with it and development could be seen as a rounding off the settlement, in a similar way to HSG1(28). The Council recognises the difference between the objection site and land beyond to the east and has made Bank Lane the green barrier boundary. In effect this leaves the objection site as a small parcel of land subject to open countryside policies, but not recognised as being of importance in the longer term for its open characteristics or necessary to fulfil any of		

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				the purposes of the green barrier. 11.106.13. Because of its location and appearance I consider it would be more appropriately located within the settlement. However, because of the level of growth that has and could potentially take place, I do not consider the site should be positively allocated for housing development. This is primarily because the figures presented to the inquiry do not demonstrate that there is a need for further housing. 11.106.14. That being said what the evidence does demonstrate is that there are no physical constraints to development in terms of ownership, access,		

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				nature conservation and the like. In these circumstances and as recommended to be modified, development could be permissible if it was in accord with HSG3. It would be treated as any other windfall. 11.106.15. I have looked at the relative merits between the objection site and HSG1(28). The matter is finely balanced and I find marginal difference between the sites in terms of accessibility, availability, impact on the landscape and appearance of the village. The relative prominence of HSG1(28) does not to my mind equate to material harm. When weighing up all the matters it seems to me that the necessity to demolish a dwelling to achieve development on the objection site is just sufficient to weigh in		

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				favour of the allocated site remaining.''		
915	HN1: New Housing Development Proposals	DEE009(AS) Land North of Shotwick Road	Object	Generally we are broadly supportive of the supply sources and how the dwellings have been distributed. We would simply like to see additional sources of supply (i.e. site allocations) for residential development to accommodate a slightly higher buffer. If a 20% buffer was applied to the proposed housing requirement of 6,950 dwellings (8,340 dwellings) then this would require the identification of sites to accommodate a further 390 dwellings. The housing allocation at land north of Shotwick Road would provide a valuable additional supply of housing of up to 300 units and accommodated by the buffer. Allocating part of our client's land interest for	The housing allocation at land north of Shotwick Road would provide a valuable additional supply of housing of up to c. 300 units and accommodated by the buffer. Paragraph 3.28 of the Deposit Plan acknowledges how Deeside Industrial Park forms the basis of the growth hub and forms part of the Wales Spatial Plan triangle of growth comprising Wrexham, Deeside and the Cheshire area. Generally we are broadly supportive of the supply sources and how	Not accepted. The Council's flexibility allowance of 14.4% has already exceeded the minimum 10% required by Welsh Government in the Development Plans Manual 3 and is considered to provide sufficient flexibility to ensure the delivery of the sites already provided in the plan, and not objected to by the objector. In addition, in their formal comments on the LDP the Welsh Government are supportive of the level of housing growth provided for in the plan, including the level of flexibility. The Plan has sought to provide a balanced housing land supply comprising two strategic mixed use sites and 11 housing allocations in sustainable locations. The two strategic sites at Northern Gateway and Warren Hall both form part of the North Wales Growth Deal. The Council is unaware of any support in the Growth Deal for the objection site. The Northern gateway site has now seen the granting of reserved matters approvals on both housing and employment development and one developer Countryside Properties has commenced construction on site. Given that the housing element on the Northern Gateway site is 1325 dwellings it is not necessary or appropriate to provide a further allocation only 1km from that site. It is also not clear how the provision of a housing site, as part of complex mixed use

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				residential development is considered an entirely sound and justified decision, given that it represents a sustainable, deliverable and developable site which should be recognised for its potential to contribute to the sustainability of the growth hub as set out in the Development Plan and the triangle of growth as set out in the Wales Spatial Plan Paragraph 3.28 of the Deposit Plan acknowledges how Deeside Industrial Park forms the basis of the growth hub and forms part of the Wales Spatial Plan triangle of growth comprising Wrexham, Deeside and the Cheshire area. Generally we are broadly supportive of the supply sources and how the dwellings have been distributed. In order to maximise the benefits of transport	the dwellings have been distributed. We would simply like to see additional sources of supply (i.e. site allocations) for residential development to accommodate a slightly higher buffer. If a 20% buffer was applied to the proposed housing requirement of 6,950 dwellings (8,340 dwellings) then this would require the identification of sites to accommodate a further 390 dwellings.	development, with the added uncertainty over the Red Route would assist the Plan in terms of the delivery of housing. If the Inspector were to identify a need for additional housing allocations there would be other possible sites which would be sequentially preferable and more deliverable. The basis for the objector's submission is that development will be delivered on the back of the Welsh Government Red Route road scheme but, despite the timings given by the objector, there is still uncertainty that this will be delivered within the Plan period. Highways Development Management Officers have commented that 'These sites do not have direct access to the public highway but it is assumed rely on the future construction of the A548. Following improvement, Welsh Government will become the highway authority for the A548 and their views ought to be considered in relation to future access. As the road alignment/design has not been completed, it would appear premature to allocate specific areas in this vicinity'. In the absence of a Transport Assessment it is difficult to offer further comment as to whether the local highway network can accommodate the proposed development. The indicative land use plan provided by the objector shows an arc shaped housing site

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				infrastructure investment, our client would be looking to unlock the development potential of the site from around 2025. The timings would be dependent on the progress of the Red Route. It is reasonable to expect that the residential element of the scheme would be available by middle part of the plan period. It is important to emphasise that the Welsh Government have already deemed that development within this site is acceptable having taken into account technical, social, economic and environmental considerations. There are no known impediment that could restrict the development of this site for the uses put forward through this representation. In addition, the local authority and Welsh		located between the existing A548 and A494 (T) (to the north west of the interchange) and the line of the new Red Route. At present there appears to be no means of securing a vehicular access to the housing element. In this context it is not clear how the housing element could possibly be delivered until the very end of the Plan period at the earliest. The objector's assertion that it could be delivered in the middle part of the Plan period, based on a timescale of constructing the Red Route in 2023, is highly ambitious. Furthermore, the proposed residential element is considered to be an isolated area for those to live being separated by trunk roads. It is surprising that the objector would seek to establish the agricultural land quality of the site by consulting the Councils Community Strategy document. The Welsh Government has placed on its Lle mapping system a data set of predictive agricultural land quality. The results show not only a predictive loss of grade 2 BMV but also a confirmed loss of grade 2 BMV (on the basis of previous site surveys) for the whole of the site. The proposed development would therefore result in the loss of 40ha of grade 2 BMV agricultural land without any justification by the objector. Whether or not the site has been previously promoted for development by the WDA, it is a matter of fact that the proposal results in the loss of BMV and it was on that basis that previous proposals were rejected.

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				Development Agency have both previously considered and promoted the site for development. Agricultural Land Classification 10.4 The Community Strategy Flintshire 2009-2019 shown how the site occupies grade 4 agricultural land and therefore does not comprise best and most versatile agricultural land. Relevant extract from the Community Strategy is set out below (with area around the site circled in red): - Flood Risk 10.5 The TAN 15 Development Advice Map for Wales locates the site within Flood Zone C1 (relevant extract is set out below). C1 is areas of the floodplain which are developed and served by significant infrastructure,		The site also sits within flood risk zone C1 in the NRW Development Advice Map. Para 6.6.22 of PPW10 states 'Planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding from the sea or from rivers'. More detailed advice in TAN15 which advises that in C1 areas, 'development can take place subject to the application of justification test, including acceptability of consequences'. One of the justification tests is that the site meets the definition of previously developed land and another test is that the potential consequences of a flooding event have been considered and found to be acceptable. Given that the site involves greenfield land it is unclear how the brownfield test can be met and in respect of the consequences test the objection has not been accompanied by a Flood Consequences Assessment. It is unclear how the objector proposes to meet the justification tests in TAN15, particularly as the proposal involves highly vulnerable development including a hotel and 300 houses. The candidate site is located between Deeside Industrial Park and the Flintshire / Cheshire County boundary and it is currently designated as green barrier land. The objector has submitted a separate objection in

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				including flood defences. TAN 15 allows for highly vulnerable development and less vulnerable development within C1 and these development category include all the land use proposal put forward by our client. Request land to be released from the green barrier designation and for it to be allocated and safeguarded as land to meet specific future development needs that will be required during the development plan period. The five options put forward in this Deport Plan representation supports and supplements the 2017 representations which introduced the masterplan components comprising the data centre, lorry park, service station, hotel / conference facility and residential. These representation take the form of a formal		respect of the green barrier and this will be dealt with in terms of policy EN11 (id916). It is unclear, given that the site is dependent on the Red Route, and there is uncertainty over the detail or timescale for the Red Route, how this site represents a realistic development opportunity within this Plan period. Whereas there is clear support for the Northern Gateway and Warren Hall strategic site allocations in the North Wales Growth Deal, there is no such support for the objection site. Furthermore, the site will result in the significant loss of confirmed grade 2 BMV agricultural land and result in highly vulnerable development within a C1 flood risk area, without any supporting technical justification or evidence and has not undertaken a Transport Assessment. In this context it is not understood how the exclusion of such a poorly evidenced strategic site proposal can result in the Plan being unsound. In conclusion, it is considered that there is no need for the removal of a significant portion of given that the Plan makes provision for growth at both a strategic and local level. The allocation of a large mixed use development on the back of a major new road, for which there is a lack of certainty in terms of detail and timing, combined with the lack of any technical evidence to support the objection, is considered to be premature and

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				objection in that the objectors do not consider the Development Plan to be 'sound' and does not meet the requirements of all of the three tests of soundness (Test 1: Does the plan fit?; Test 2: is the plan appropriate?; Test 3: Will the plan deliver?) The site at Shotwick Road has direct inter-connectivity with the urban form of the Deeside Industrial Estate and this will be further enhanced with the physical introduction of the Red Route. The allocation of our client's site will ensure that Deeside is allowed to maximise from the growth and economic benefits linked with the proposed transport infrastructure investment. Drawing back the green barrier and allocating the site for the options set out in this		inappropriate. Therefore the proposed site should not be allocated within the LDP.

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				representation will ensure that the Development Plan becomes consistent with other key economic and transport plans of the region. This representation has provided credible evidence to support a much needed gateway development to North Wales and this opportunity would be missed without such an allocation. The introduction of the Red Route provides clear evidence that the wider site can be developed, and the allocation of the site provides a logical action that will contribute towards the soundness of the Development Plan.		
926	HN1: New Housing Development Proposals	BUC22 Land at Liverpool Road Buckley	Object	The site covers an area of approximately 13 hectare and is located to the north of Liverpool Road close to the Town Centre of Buckley. It is bounded to the north by a landfill site, to the east by a newt breeding area	It is our view that the plans overall supply for housing in STR1 underprovides and has underestimated future growth in Flintshire,	Not accepted. The original Candidate site adjoins the settlement boundary along 3 sides and at 12.4 ha (375 dwellings) is a large infill area. This site extends north of Buckley up to the boundary of the SSSI and SAC designated the Great Crested Newt breeding Area. In resubmitting the site, the objector has stated that they do not intend to develop the whole site as one scheme but suggests that

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				(currently managed by Flintshire County Council and the Amphibian and Reptile Conservation Trust ARG), to the south by residential developments associated with Liverpool Road and Ewloe Place, while to the west the site is bounded by further residential development associated with Ewloe Heath and Catheralls Industrial Estate. The site is currently in use for agricultural purposes and consists of a number of fields with associated hedgerows and trees located along its boundaries, there are three ponds located within the site. The site is not within any statutory designated area and is not within green barrier. The site is not at risk from flooding. The site is not BMV and an ALC report has been undertaken to support this. (see attached). A phase II Site	therefore further allocations are required under HN1. the allocation of affordable housing sites should also be given due consideration. Consider alternative sites at Liverpool Road and Aston Hall Farm, previously submitted as candidate sites.	only 5.3ha at the southern part of the site be allocated at this time. The reduced site area abuts housing to the south east and south west. The site comprises a patchwork of fields and is bounded to the north by a track beyond which is a similar patchwork of fields. To the north of this is the Great Crested Newt Breeding Area. Although the amended site is enclosed by built development on two sides and is well related to the settlement pattern of Buckley, it is still close to a very important area for wildlife, primarily great crested newts. The north east corner of the emended site abuts the Buckley Claypits and Commons SSSI and the Deeside and Buckley Newt Sites SAC which are home to Great Crested Newts (GCN) and act as breeding ponds and terrestrial habitat. COFNOD records indicate that Great Crested Newts are present on the site. The proximity of the amended site to known GCN sites is such that there would be a need to ensure that there are no long term effects upon the GCN population through agreed avoidance and mitigation measures. The county ecologist originally commented on the larger site which extended up to the Newt site and this scheme was not considered acceptable. However in relation to the principle that a smaller area could be developed , the county ecologist commented as follows:-

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				investigation has also been undertaken which shows no prohibitive ground conditions. The site is in a sustainable location, with excellent access by foot and public/private transport, the site is within easy walking and cycling distance of a number of key service requirements. There is significant employment opportunities in Buckley through a range of service sectors including food and retail providers, also offices and industry, particularly being located adjacent to Pinfold Industrial Estate. Assessment of the site as part of the Candidate Sites Process It is noted that site has been assessed as part of the candidate site process. The site was assessed as Amber and		'' While the SAC and presence of GCN does not preclude development, it does limit the scale, 280 houses does not take the SAC or GCN population present at Brookhill ponds into account and would not be acceptable. The Appropriate Assessment would not be able to conclude "no effect" and with regards to the "3 Tests" for the derogation licence, there are likely to be alternative solutions that are less damaging. Other developments adjacent to the SAC have been developed on the "thirds principle;" namely one third development, one third GCN mitigation and one third informal recreation to avoid both direct and indirect impacts on the SAC. The reduction of the development to 150 units may be acceptable providing there is adequate provision for GCN and to prevent indirect impacts on the SAC. This does not preclude the necessity of ecological surveys for habitats present and the potential for other species (e.g. badger, breeding birds, reptiles etc) on site. Any development would need to assess the Ecology of the site and provide an Ecological Impact Assessment with appropriate avoidance and mitigation measures.''

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				it was acknowledged that it complied with the preferred strategy and was well sited in relation to Buckley and surrounded on 3 sides by development. The main barrier to its inclusion as a candidate site related to the ecological issues with the SSSI and SAC. It was indicated that a smaller land parcel on the southern side of the site could be more appropriate for inclusion in the LDP. Therefore, as outlined below, an amended area has been supplied for consideration as an Alternative site in line with the provisions of the Development Plan Manual. The amended area of 5.3 ha has the ability to deliver approximately 120 units, along with ecological mitigation, Suds and open space and can be designed to allow for future growth		This indicates that the smaller site area as put forward, may be developable if appropriate ecological measures are put in place. However, the masterplan submitted as part of the objection shows an indicative layout with a small part of the site (the north western part) as open space but it does not show the wider context for the site as identified by the Ecologist ie recreational and mitigation on land between the site and the designated areas. As presented, the scheme provides insufficient certainty that the site can be satisfactorily developed without harming the SSI/SAC. The Highways Development Management Officer has commented: ‘’Considered unsuitable for development due to restricted access arrangements and inadequate pedestrian and cycle connectivity. The applicant has requested the consideration of a reduced size site suggesting access from both Liverpool Road and Ewloe Heath. Whilst two points of access would increase the accessibility of the site an access via Ewloe Heath would generate additional movements on Ewloe Place; this road has limited capacity due to width constraints and an existing on-street residential parking demand.’’ In terms of the access from Liverpool Road he added:- ‘’The additional information shows the demolition of an existing building at no.55

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				into the adjoining additional land if considered appropriate in the future. The public footpath would become the access road into the site and all development would be to the south of the existing footpath. This would leave a significant buffer to the GCN SSSI/SAC. As the owner of the site, we can confirm that the site is deliverable within the Plan period, more over can be delivered quickly, as we are presently gearing up for submission of a planning application.		Liverpool Road with a potential access through the property. The proposed access appears to avoid the existing access track that carries public footpath no.18; it is not clear whether this land forms part of the application site. Junction visibility splays are not shown on the access drawing however it would appear that as drawn, a 2.4x43m splay (the minimum required for a road subject to a 30mph speed restriction) would cross the boundary of the adjacent property. The requirements of Active Travel Wales legislation must be considered; the requirements, including accurate assessment of connectivity between the site and community facilities, would be included within any Transport Assessment. Any existing retail facility within the suggested 800m of the site, is unlikely to provide an appropriate level of convenience shopping''. Despite the reduced area and reduced number of units associated with the amended objection site, it is still not considered that an adequate vehicular access can be provided to serve the site. In conclusion, the objector has reduced the site area and number of units but there are still concerns relating to ecology and also it would appear that a vehicular access cannot

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						be provided. The site is not appropriate to be allocated in the Plan.
929	HN1: New Housing Development Proposals	HWN001 Land at Lower Aston Hall Farm, Hawarden	Object	Aston and Shotton is a Tier 1 main service centre and there are no specific housing allocations within it. The settlement boundary is tightly drawn surrounded by green barrier limiting the opportunity for windfall sites. Furthermore the consultation draft of TAN15 indicates that planning policy towards highly vulnerable development such as housing in flood zone 3 could be advised against therefore reducing the capacity of settlements in proximity to the tidal River Dee such as Shotton and Aston. Summary of the Suitability of Site for Development: Site description Private developers own the site at Aston Hall, as well as land adjoining the		Not accepted. The Plan's spatial strategy is not premised on every settlement having a housing allocation. The Plan's housing requirement will be met through a variety of sources of supply such as completions, commitments and windfalls. Growth may therefore be achieved in a settlement without there being an allocation. Shotton / Aston is clearly a settlement that is constrained in its urban form by the adjoining settlements, by the R. Dee and by the line of the Wrexham / Bidston railway line. Nevertheless, the settlement has seen growth in the first four years of the Plan period with 55 completions recorded. It is noted that the objection submission document includes 'Hawarden' in the description of the site location. However, it clearly does not physically adjoin the settlement boundary of Hawarden which lies some 380m to the west. Site description The objection does not specify the size of the objection site, given that it has been reduced from the candidate site submission. Nevertheless, the Council measures it at

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				site to the south-east, totalling circa 18ha. The site is currently used for agricultural purposes and consists of a number of fields with trees along its boundaries. There is a large pond located in the centre of the site which would be retained and incorporated in to public open space. There are also other waterbodies nearby the site. The site is not shown as being at risk from flooding from rivers or the sea and so a formal Flood Consequences Assessment is not be required. Proposed site As outlined above, and previously within the candidate site submission, these representations put forward a site which is considered to be suitable for residential development. Pre-application discussions		6.4ha. The submission references 122 units which equates to a density of 19 dwellings per ha. Consultation with Welsh Government on the original larger candidate site identified a predicted loss of 3.02ha of grade 2 agricultural land and 15.07ha of grade 3a agricultural land. The objection has not been accompanied by the results of an on-site survey to determine the precise nature and extent of the loss of BMV. Proposed site It is of note that the objector owns another 12 ha of land adjoining this site and, in conjunction with other candidate sites in the locality there is clearly a threat of further development pressure. In terms of the prominence of the site, the provision of a vehicular access will require the removal of vegetation and trees which presently screens the site. This will clearly open up views of the wider landscape and built development will be prominent in the landscape. This is particularly the case given that the site sits lower in the landscape than the access point. Green barrier It is not considered that the site represents a logical urban extension to the settlement of

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				have stated that bringing forward the total land holding would lead to coalescence between settlements and would undermine the objectives of the green barrier. We have therefore reduced the area of land to be put forward as an alternative site. (attached) This plan would deliver around 122 units. The proposal would incorporate areas of open space throughout the development, intended both for recreational use and biodiversity enhancement. Landscaping would be provided along the north-eastern and south-eastern boundaries of the site to contain the development and provide screening from the open countryside to the north east. The indicative masterplan also illustrates the intention to strengthen the woodland corridor to the north east which		Shotton / Aston. The bulk of the settlement lies to the north of the A494(T) whereas on the southern side of the A494(T) there is only a small block of estate type development and buildings around Aston Hall Farm, in the form of an 'outlier' of development. Although this outlier is included within the settlement boundary of Shotton / Aston in successive development plans, the outlier does not relate well to the settlement. The site forms part of a narrow green barrier between Shotton / Aston to the west and Hawarden to the East. The green barrier is some 300m to 600m wide and its primary purpose is to protect the openness of the gap between the settlements by preventing urban encroachment and coalescence. Despite the outlier of development eating into the green barrier it is of note that on the north side of Lower Aston Hall Lane there is only a ribbon of dwellings along the road and a small courtyard type development 'The Barnyard' adjacent to Aston Hall Farm. Despite the type development on the south side of Lower Aston Hall lane, the general character of the area is rural with the narrow roads, lack of footways and streetlighting. It is not considered that this form and pattern of development on the north side of the road acts as a context for the introduction of a block of development. The development of the site would represent a substantial loss of and harm to the green

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				includes the footpath running from Higher Shotton to Big Mancot. Green barrier The proposed development offers an opportunity to provide new, high quality housing within a sustainable location and would form a logical extension to the settlement of Aston and Shotton. The proposal would provide a diverse range of houses including a high proportion of affordable homes, easing the pressure on the social housing sector within the area. The site is within the Green Barrier allocation EN11, this allocation covers the areas of 12. Shotton - Mancot - Hawarden – Ewloe. The scheme as proposed is considered to provide a logical extension of the housing on Lower Aston		barrier and weaken the gap between the two settlements. The role and purpose of the green barrier was commented on by the UDP Inspector in respect of two omission sites to the immediate south east of the objection site. The Inspector comments on a site incorporating Aston Hall Nursing Home and Farm '9095 - The objection site is within the green barrier. In this location it safeguards the countryside from encroachment and prevents the merging of Shotton/Aston and Hawarden. In doing so it protects the countryside setting of the settlements and is particularly important because the strategic gap is relatively narrow between the built up areas'. The Inspector goes on to comment 'The objection site abuts the southernmost extremity of Aston to the east of the A494. Whilst the site does encompass some buildings, a significant part of it is open land associated with the properties and as such their spacious setting relates better to the surrounding countryside than to the more tightly knit housing within the settlement. At present the green barrier boundary is clearly defined and I see no reason to change it'. In respect of a site to the east of the Nursing Home the Inspector comments '10371 - … the development/allocation for housing would both consolidate and extend the built form and be a significant incursion into an area of open countryside which forms part of a

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				Hall Lane, with good vehicular access to the local and strategic highway network and good pedestrian links to Aston and Higher Shotton. The proposal respects the boundary to the north east which would help contain views of the site from the open countryside which exists beyond the site. The scheme would look to enhance and strengthen this boundary to create a defensible boundary for the site. Whilst the presence of Green Barrier is a clear policy constraint, it is considered that the removal of this site from the green barrier would not harm the overall function of the green barrier in this location and would be a sustainable extension to a Tier 1 settlement which has little room for windfall growth and no allocations in the current plan period.		strategic gap preventing the coalescence of built up areas'. The comments of the UDP Inspector are considered to be equally applicable to the situation at present. There has been no change in the character of the area that would justify a significant reduction in and harm to the green barrier. Highways It is of note that despite previous discussions with the lpa, the objection is not accompanied by a Transport Assessment nor evidence of discussions with Welsh Government given the proximity of the proposed access to the A494(T) and the fact that the layout of the slip roads fall below current design standards and the need to cater for improved pedestrian and cycling facilities. There is also a concern that the traffic generated from the development may impact on the Plough lane Link Road and there is no evidence of liaison with the Councils Streetscene Highways Strategy Section. Ecology The lack of ecological designations on or near the site are noted as is the reference to the

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				Highways To the northwest of the site Lower Aston Hall Lane runs parallel to the A494 dual carriageway trunk road and ultimately forms a direct terminal connection to the westbound carriageway of this route via local merge / diverge slip road connections. Access to the eastbound carriageway of the A494 and the residential area of Higher Shotton is available to the north via a local bridge connection over the A494, linking from a T-junction on Aston Hall Lane (north western corner of the site) to the local roundabout junction of Courtland Drive / Plough Lane / Aston Park Road. The immediate section of Lower Aston Hall Lane parallel to the A494 is of circa 7.1m operating width, with a footway to the northern carriageway edge (non-site side). This section of route is		ecological assessment and lack of recorded Great Crested Newts in the pond. Economic Viability The objection site offers no viability assessment to demonstrate that it is viable and therefore deliverable. This is particularly the case when the objection refers here to 'delivering a large quota of the affordable housing provision sought by the LDP' and below to 'meet and exceed the expectations on the delivery of affordable homes'. Policy HN3 of the Deposit Plan seeks the provision of 40% affordable housing in this location. However, the objector does not specify whether or how the site will exceed this requirement whilst remaining viable. Clearly the offer of more affordable housing than is required by policy does not make an inappropriate site suddenly acceptable. Highways Highways matters have been commented on above and raise concerns about the proximity of the site to the A494(T) and lack of submitted Transport Assessment. Sustainability

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				understood to be under the control of Flintshire County Council as local highway authority. The identified extent of the site does not provide a direct frontage to Lower Aston Hall Lane, with third party land forming a buffer between the road and the proposal land boundary. Discussions with the landowner have indicated that they would be open to the principle of allowing access through this land to serve the development of the site. Given the nature of the frontage section of Lower Aston Hall Lane, it is considered that a simple T-junction option would represent an appropriate new development access option in highway capacity and safety terms. It is noted that there is a significant drop in levels		In terms of sustainability, the proximity of the site to facilities and services in Shotton / Aston is noted. Environmental Health / Amenity The site lies alongside the A494(T) where, as a result of roadside air quality monitoring results, Welsh Government have introduced a 50mph speed limit on the A494(T) in order to reduce emissions. The proximity of the site raises concerns about air quality, in the absence of evidence. Biodiversity / landscape It is possible to reduce visual impacts of a development on the landscape through design and landscaping measures. However the key function of the land in respect of the green barrier is to retain the openness and to prevent urban encroachment and coalescence. The introduction of additional landscaping measures will not mitigate the harm to openness and the function of the green barrier caused by large scale development. In terms of the summary of factors put

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				from Lower Aston Hall Lane to the development site, however, it is not considered that this change in levels would represent a constraint on development access and could be addressed via appropriate local earthworks in order to deliver an access road of suitable residential standard gradient. Ecology An Ecological Assessment has been completed to inform the pre-application request. This assessment identified that the site is not located in any statutory or non-statutory designated sites for nature conservation. The search identified five statutory designated sites within a 5km radius of the site boundary, the closest being the Connah's Quay Ponds and Woodland SSSI and the Deeside and Buckley Newt sites SAC, both		forward to support the residential development of the site it is of note that: • The reference to the development of the site sustaining services in Hawarden is puzzling as the site is promoted by the objector as being an extension to the settlement of Shotton / Aston given reference to proximity of the site to facilities in that settlement. Linkages to Hawarden for vehicles and in particular pedestrians and cyclists are poor given the narrowness of Lower (and Upper) Aston hall lane and the lack of footways, streetlighting and gradient. In terms of the changes sought to the proposals maps and written statement it is unclear, despite reference to 'Consider the use of specific allocations for Affordable Housing Provision' whether this site is proposed as an affordable-only housing development or a market led housing development with a proportion of affordable housing. In conclusion, provision for growth has been made in the locality with allocations at Hawarden, Ewloe and Northern Gateway. It is not considered necessary or appropriate to allocate a further site particularly when it would relate poorly to the pattern of development and harm a green barrier.

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				1.3km west of the site. The nearest non-statutory site is the Aston Wetland Wildlife Site 540m west of the site. The site itself is considered to be of low ecological value. The habitats present on site predominantly comprise open improved pasture fields with some semi-improved grassland in the north-western part of the site. A large pond is located in the southern part of the site which is fed by a wet ditch running from the north. The field boundaries comprise species poor hedgerows dominated by hawthorn (Crataegus monogyna) with hedgerow trees or post and wire fences. Broadleaved woodland exists along the north-western and north eastern boundaries of the site. At the north-western boundary this woodland adjoins Lower Aston Hall Lane. No ancient woodland is		

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				present on site. The pond on site and accessible ponds within the surrounding area were surveyed for great crested newt presence in early June 2017. The survey results were negative for great crested newts and as such this species is not considered to be present on site. Given the separation distance from the designated and non-statutory sites, the development of the site for housing is not considered likely to have any direct effects on designated habitats and species. The potential for indirect effects is similarly considered unlikely and could be suitably avoided and mitigated through a Construction Environment Management Plan (CEMP) and implementation of standard pollution		

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				prevention and control measures in line with guidance provided by Natural Resources Wales. Based on the findings of the Preliminary Ecology Assessment, it is considered unlikely that there would be any significant adverse effects in terms of ecology resulting from the development of the site. In summary therefore, the site is considered to be suitable for residential development for the following reasons: Economic Viability • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site.		

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				• There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. • The site will assist in delivering a large quota of the affordable housing provision sought by the LDP. Highways • Local destinations can be safely accessed from the site via the local highway network. • The site has good access to the wider highway network and strategic highway routes. Sustainability • The site is accessible to local destinations on foot,		

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				• The settlement of Aston provides a range of services / facilities. St.Ethewold's Primary School (500m); Deeside Community Hospital 575m, Local shops and public house in Aston 400m. • The development of additional residential units will further sustain the existing services within Buckley. Environmental Health / Amenity • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. No adverse impact should arise from the development of the site in terms of contamination. Biodiversity / Landscape • It is considered that the		

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				development proposal will not have any negative impact on the surrounding countryside. • Any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm. Our proposed sites are considered to be suitable site for residential development, particularly in view of the following factors: • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the sites.		

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				• The landowner as an affordable housing provider will be able to meet and exceed the expectations on the delivery of affordable homes in these locations, identified as a strategic importance to the County. • Satisfactory highway access can be provided to serve both sites and the current highway network can accommodate the anticipated traffic movements. • Both sites are located within close proximity to frequent public transport services. • Both sites are accessible to local destinations on foot. • The development of additional residential units will further sustain the existing services within Buckley and Hawarden.		

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				• The site is not subject to any landscape or ecological designations. • The location of both sites provide an opportunity for residential development which would be neither prominent nor isolated. • There are no fundamental environmental or ecological constraints that would prohibit development on each site. • Existing mature planting / hedgerows, could be maintained and / or supplemented to ensure the developments fit well into the surrounding land uses. Requested / Recommended Changes to the Plan In light of, and as a consequence of these		

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				representations, the particular parts / policies of the Plan subject to these representations, and which are considered to need amendment are: • Strategic Policy – Meeting Housing Needs – increase in the overall housing numbers to ensure that the needs of the Authority are provided for, and also to provide a 'contingency' for flexibility over the Plan period. • Consider the use of specific allocations for Affordable Housing Provision • Consider the alternative site put forward at Aston Hall Farm as an appropriate site for allocation in the LDP In addition, the Proposals Map of the LDP needs to be amended to include:		

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				• The Alternative Sites as housing allocations • Amend the settlement boundary of Aston to include the smaller parcel of land and remove the area from the green barrier		
959	HN1: New Housing Development Proposals	Mancot Lane, Mancot, Queensferry MAN0012	Object	The spatial distribution does not reflect the settlement hierarchy and we have considerable doubt that a host of the (draft) sites are actually deliverable over the plan period and beyond. Para 19.2 in the supporting text refers to a background paper on “Candidate & Alternative Site Assessment” yet this is not available. MAN001 is being promoted as an edge of settlement exception affordable housing site and an application is due	There is a belief that additional sites must be identified and that reserve sites are required in the event allocated sites do not deliver. The Assessment findings for MAN0012 found it to be an “AMBER” site and stated that: The site presently contributes to a wedge of countryside which serves to separate the settlements of Pentre, Mancot and Sandycroft.	Not accepted. The Plan’s strategy is not based on making planning growth through new allocations in every single settlement. In the case of Mancot the allocated site at Ash Lane (288 units) clearly adjoins the settlement boundaries of both Hawarden and Mancot and can meet the needs of both settlements. The objector fails to explain how the provision of 22 units rectifies concerns about the spatial distribution of development or the “considerable doubt that a host of the (draft) sites are actually deliverable”. It is unclear what document para 19.2 refers to as there is no para 19.2 in the LDP Deposit written statement. Despite commenting that the background paper on candidate site assessments not being available (which was not correct), the objector later in the objection quotes from it. Within the context of PPW10 affordable housing is no longer permissible within green wedges (barriers). Even an exceptions affordable housing scheme would represent ‘inappropriate’ development within the green

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				to be submitted very soon. The Assessment findings for MAN0012 found it to be an “AMBER” site and stated that: ‘The site presently contributes to a wedge of countryside which serves to separate the settlements of Pentre, Mancot and Sandycroft. The development of the site would result in a block of development extending into open countryside which would relate poorly to the form and pattern of built development. The development of the site would undermine the objective and openness of the green barrier and place pressure on adjoining land. Part of the site also lies within a C1 flood risk area and with pockets of surface water flood risk. Further commentary on the	The development of the site would result in a block of development extending into open countryside which would relate poorly to the form and pattern of built development. The development of the site would undermine the objective and openness of the green barrier and place pressure on adjoining land. Part of the site also lies within a C1 flood risk area and with pockets of surface water flood risk. Further commentary on the green barrier will be provided in the green barrier review. That the site is not considered suitable to be allocated. We consider that there are no	barrier. A planning application would be contrary to national planning guidance as well as policies in the adopted UDP. The site is promoted for 100% affordable housing by a housing association, but just because the units would all be affordable doesn’t make an inappropriate site suddenly appropriate. The Plan already makes provision for housing development on land between Ash Lane and Gladstone Way which will provide for both market and affordable housing, meeting the needs of both Hawarden and Mancot, given that the site adjoins the settlement boundary of each. Background Paper 07 Affordable Housing explains that based on the allocations capacity of 288 units, some 115 units would be affordable. The site was promoted for development in the form of an omission site as part of the UDP. The Inspector did not recommend allocating the site for housing nor amending the green barrier and commented ‘The objection site is a field with an area of about 1.5ha. It abuts the southern boundary of 860. The land is an integral part of the open countryside and part of the narrow green barrier between Mancot and Pentre which prevents the coalescence of the settlements. The rectangular shape of the site with its relatively short border with the built up area would mean that development would effectively bisect the open land between the 2 villages and compromise the

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				green barrier will be provided in the green barrier review. That the site is not considered suitable to be allocated'. We consider that there are no technical constraints that prevent this site from being brought forward for development'	technical constraints that prevent this site from being brought forward for development.	strategic nature of the green barrier in this location'. The objector's original candidate site was for 43 units or for a care home / extra care living scheme on the whole site and was considered in that context. The objection now submitted is promoting only the southern half of the site for housing development, with the northern part of the site as open space. However, the site is still considered to be an extension of development into open countryside which will weaken the gap between Mancot and Pentre, as recognized by the Inspector. Data from Welsh Government on the original candidate site showed that the whole site was predicted as grade 3a BMV. Although the objector criticizes the Councils Background Paper 9 Agricultural Land as being unsound, the approach to minimizing the loss of BMV agricultural land has not been objected to by WG but has been supported in principle. The objector has not submitted a site based assessment so it is not possible to ascertain what grade BMV the site actually is. The submission includes an illustrative layout for the development which shows 22 dwellings on the southern half of the site and open space on the northern half. The boundary of the developable area appears to be based on flood risk considerations. However, based on the C1 boundary in the

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						NRW Development Advice Map it appears that the potential for flood risk still extends slightly into the southern part of the site. This is a key concern if the site boundary includes C1 flood risk zone as a greenfield site cannot satisfy the justification tests in TAN1. In the absence of a FCA it is not possible to determine whether or not there is a risk of flooding on the site. The Inspector recognized flood risk as an issue commenting 'It is also within a flood risk area where TAN15 advises that allocations should only be made if they can be fully justified. There is no such justification in this case and in these circumstances I do not find the objection warrants any changes to the plan'. Despite the objectors criticism of the Plan and its evidence base it is disappointing that the submission has not provided evidence in relation to flood risk and agricultural land. In addition to the harm that the development of the site would cause to the green barrier, the site is not appropriate to be allocated in the Plan. In conclusion, the Plan has provided for growth in Hawarden and Mancot and it is not necessary or appropriate to make a further allocation when it would harm a green barrier and where there is no background evidence regarding constraints.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
974	HN1: New Housing Development Proposals	Warren Bank Lane, Broughton BROU10	Object	The spatial distribution does not reflect the settlement hierarchy and we have considerable doubt that a host of the (draft) sites are actually deliverable over the plan period and beyond. Para 19.2 in the supporting text refers to a background paper on "Candidate & Alternative Site Assessment" yet this is not available. We believe that many sites have a variety of significant constraints affecting deliverability and viability.	There is a belief that additional sites must be identified and that reserve sites are required in the event allocated sites do not deliver.	Not accepted. The proposed site is 9.2ha and the objector indicates a capacity for 230 dwellings. The site was initially submitted as a smaller candidate site (BROU010) which was assessed as part of the original call for sites. It was not considered suitable for allocation within the LDP as it is divorced from the settlement boundary of Broughton, and forms part of the open countryside. The site was clearly separate from the existing ribbon of development to the West of the site, therefore it relates more closely to the open countryside than it does to the nearby settlement. The allocation and development of this site would result in a small block of housing that poorly relates to the existing form and pattern of the settlement, and is too small for allocation within the plan. BROU10 was then resubmitted as an alternative site as part of a much larger scheme known as BROU17AS. This has also been assessed as part of the LDP site selection process. The larger BROU17AS site would adjoin the settlement boundary, however it would intrude into the open countryside in a ribbon like block of development, which would appear divorced from the form and pattern of existing development which is South of the A5104. The settlement boundary is presently well defined by the A5104, an extension across this into the Old Warren would harm the rural

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						character of this locality and be poorly related to the existing settlement. The development of BROU17AS would result in a large block of development extending into the open countryside. This contrasts sharply with the existing pattern of ribbon development along The Warren and the well defined residential development to the south of the A5104. The site does not represent a logical urban extension to the settlement. The site is also subject to constraints including being within the flight path for Broughton Airfield and the Southern part of the site is within 250m buffer zone of a landfill site. In view of the objector's criticism of the Warren Hall strategic site (Masterplan Delivery Statement) in terms of the implications of the flight path on built development, it is surprising that no detailed analysis on the implications of the flight path for this site has been submitted. Considering the size of the site and its potential to accommodate 230 dwellings, the objection is not accompanied by background studies or assessments nor a commentary as to the ethos behind the site, or the principles on which the site is to be developed. An example of this is the lack of any indication as to where for instance the vehicular access will be located and it is not sufficient at this late stage to simply state that "we will demonstrate that this site is technically

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						deliverable" without providing this detailed evidence. Highways have also raised concerns and advise that "a Transport Assessment is required to determine the full implications of any site over 100 dwellings. A site of this size is likely to have a detrimental impact on the operation of the Warren Hall Interchange especially when generated traffic is considered in addition to that of the proposed Warren Hall Development. Additional traffic is also likely to have a detrimental impact on the operation of Main Road Broughton. The full extents of the impact can only be determined by the consideration of a full Transport Assessment'. No Transport Assessment has been submitted by the objector. The focus on growth within this area is at the allocated Strategic Site, Warren Hall. The Warren Hall site has been identified as the focus for growth and is central to the North Wales Growth Deal, receiving considerable public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55. The site has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities.

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						The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area. Consequently the land South of Old Warren has not been allocated within the plan as it is not needed in addition to the strategic allocation at Warren Hall. Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period with 189 units completed on the site to the south of the Retail Park in 2017/18, 24 units completed on the 'compound site' immediately to the west of the retail park (adjacent to Aldi) in 2017/18, and 36 units completed on Chester Road (Park Jasmine) also in 2017/18. In addition there are also 300 dwellings planned on the allocated strategic site at Warren Hall. This is considered sufficient provision for the Plan period, particularly as the Plan Strategy does not prescribe set amounts or targets to each settlement. The development of the site would also result in the loss of grades 2 and 3a agricultural land. Despite the objector criticizing the Council's background paper on agricultural land, they have not even submitted an on-site assessment to establish what grade the site actually is.

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						In conclusion, the Plan has made provision for growth at Warren Hall and there is considered to be no need for a further housing allocation, particularly where it relates poorly to the built form of the settlement. The site is not considered appropriate to be allocated in the Plan.
991	HN1: New Housing Development Proposals	Plas Aney, Ruthin Road, Mold MOL002/MOL 051	Object	The spatial distribution does not reflect the settlement hierarchy and we have considerable doubt that a host of the (draft) sites are actually deliverable over the plan period and beyond. Para 19.2 in the supporting text refers to a background paper on "Candidate & Alternative Site Assessment" yet this is not available. We believe that many sites have a variety of significant constraints affecting site deliverability and viability. There is a belief that additional sites must be identified and that reserve sites are required in the event allocated sites do not deliver. MOL002 and	There is a belief that additional sites must be identified and that reserve sites are required in the event allocated sites do not deliver. MOL002 and MOL051 are being promoted as an edge of settlement housing site and an application is due to be submitted very soon. The Assessment findings for them found it to be an "AMBER" site and stated that: The site sits in a prominent location on Ruthin Rd which is a key	Not accepted. The objector has objected to multiple policies and proposals in the LDP as well as background papers. However, despite alleging that allocated sites have constraints and are not viable and deliverable the objector has not provided a single piece of evidence to support this. Since making Deposit consultation objection, the objector has submitted a planning application 061154 for residential development. The submission of the planning application does not alter the Council's view that this site should not be allocated in the Plan. In responding on other representations by the objector the Council considers that its housing requirement figure is appropriate and it should be noted that this is not objected to by Welsh Government. The Council also considers that the various elements of housing supply within the Housing Balance Sheet are robust and reasonable. The effect is that the Council does not consider that additional allocations are required, particularly given the existence of a 14.4% flexibility allowance which exceeds the required minimum of 10% as set out by

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				MOL051 are being promoted as an edge of settlement housing site and an application is due to be submitted very soon. The Assessment findings for them found it to be an “AMBER” site and stated that: ‘The site sits in a prominent location on Ruthin Rd which is a key route into the town. Development would extend built development south westwards from Mold and would significantly weaken the green barrier between Gwernynynydd and Mold. A further consideration is that there is land along the north western edge of the settlement which does not involve the loss of green barrier land. In sequential terms the land off Ruthin Rd is less preferable than the land outside the green barrier in the vicinity of Denbigh Rd and Gwernaffield Rd.	route into the town. Development would extend built development south westwards from Mold and would significantly weaken the green barrier between Gwernynynydd and Mold. A further consideration is that there is land along the north western edge of the settlement which does not involve the loss of green barrier land. In sequential terms the land off Ruthin Rd is less preferable than the land outside the green barrier in the vicinity of Denbigh Rd and Gwernaffield Rd. A commentary on	Welsh Government in Development Plans Manual 3. The sites contribution to the green barrier is commented on in respect of policy EN11. The threat to the green barrier is enhanced by the Deposit consultation objection to the non-allocation of the candidate site MOL005 immediately to the west of the site. The Council do not agree that the site is sequentially preferable to other sites in Mold as there are sites which do not involve the loss of green barrier. Commitments exist at Bromfield Timber and Broncoed Park as well as the present development By Wates which is under construction at Maes Gwern, only 500m to the east for 186 dwellings. The Plan has also allocated a further site on land between Denbigh Road and Gwernaffield Rd and this has not involved the need to review a green barrier. In this context it is clearly sequentially less preferable to delete land from a green barrier when other non-green barriers opportunities exist, and particularly when the site concerned would fundamentally harm the green barrier concerned. The Plan’s approach to identifying a future direction of growth in Mold was also recognized by Mold Town Council in the Mold Town Plan. Growth in Mold will take place as a result of completions (156 completions in first 3 years of the Plan period) and commitments (177

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				A commentary on the green barrier is set out in the green Barrier review but development of the site would clearly weaken the gap between Mold and Gwernymydd when it is presently not necessary to do so. In addition, a large housing development is presently taking place on land at Maes Gwern, only a short distance from the site. In this context it is considered unnecessary and inappropriate to utilise green barrier land for development. That the site is not suitable for consideration as a housing allocation'. We consider that there are no technical constraints that prevent this site from being brought forward for development. Moreover, we have sought to show that the Green Barrier Review has not involved a full or considered assessment and is flawed. Whilst it may be	the green barrier is set out in the green Barrier review but development of the site would clearly weaken the gap between Mold and Gwernymydd when it is presently not necessary to do so. In addition, a large housing development is presently taking place on land at Maes Gwern, only a short distance from the site. In this context it is considered unnecessary and inappropriate to utilise green barrier land for development. That the site is not suitable for consideration as a housing allocation We consider that there are no technical	commitments as at April 2018) plus the two allocated sites, one of which is already under construction. In conclusion, sufficient provision for growth has been made in the Plan for Mold and it is not necessary or appropriate for a site to be allocated where it would harm a green barrier.

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				important to retain Green Barrier, this must be done in the light of all other technical assessments, such as BMV land, accessibility, drainage, sustainability and landscape impact. The site performs on every level when compared with other alternatives in Mold (and elsewhere) and sequentially we consider it ought to be identified for housing.	constraints that prevent this site from being brought forward for development. Moreover, we have sought to show that the Green Barrier Review has not involved a full or considered assessment and is flawed. Whilst it may be important to retain Green Barrier, this must be done in the light of all other technical assessments, such as BMV land, accessibility, drainage, sustainability and landscape impact. The site performs on every level when compared with other alternatives in Mold (and elsewhere) and sequentially we consider it ought	

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					to be identified for housing.	
1013	HN1: New Housing Development Proposals	Bistre, Well Street, Buckley BUC023, BUC036, BUC055AS	Object	Land south of Bryn Awelon (east of Well Street), Buckley (BUC023, BUC036 and BUC055) has been promoted. The Assessment findings for them suggest it is an "AMBER" site and states that: The site adjoins the settlement boundary and in terms of the settlement form, the site is built up along the north east side and the Well Street allocation is along the north west side. However, there are highways concerns that there should be no further traffic on the road network, over and above the existing Well Street allocation, and that there is a need to avoid any increase in traffic southwards along Well Street. It could be considered as a	there is a belief that additional sites must be identified in the event allocated sites do not deliver. Land south of Bryn Awelon (east of Well Street), Buckley (BUC023, BUC036 and BUC055) has been promoted. The Assessment findings for them suggest it is an "AMBER" site and states that: 'The site adjoins the settlement boundary and in terms of the settlement form, the site is built up along the north east side and the Well	Not accepted. The objection site most closely resembles Alternative Site BUC055-AS in terms of size and configuration but has a slightly smaller site area as it excludes small parcels of land between Oakcroft and Bistre Cottage Farm. The objection does not specify the area of the submitted site boundary but it is likely to be slightly less than the 12.8ha of BUC055-AS. Buckley is a sustainable settlement and has been categorised in the settlement hierarchy as a Tier 1 Main Service Centre. During the UDP plan period Buckley grew by 17.4%, as a Category 'A' settlement the aim for growth to be within 10% to 20% was therefore fulfilled. The LDP makes provision for growth in Buckley through the allocated site at Well Street and as a result of 175 completions in the first three years of the Plan period and commitments of 138 units as at the Plans Housing Balance Sheet date of April 2018. This shows that for the first 3 years of the LDP plan period there is an appropriate level of development for a Tier 1 settlement and a healthy number of commitments coming forward. The Council's approach to allocating development in this part of Buckley is clear and follows advice in PPW in terms of

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				sensible extension to the settlement but there are highways constraints. The site is not appropriate for a housing allocation They all refer to highway capacity being a concern; yet pre-application discussions on this site does not support this conclusion and we will challenge this.	Street allocation is along the north west side. However, there are highways concerns that there should be no further traffic on the road network, over and above the existing Well Street allocation, and that there is a need to avoid any increase in traffic southwards along Well Street. It could be considered as a sensible extension to the settlement but there are highways constraints. The site is not appropriate for a housing allocation'.	sequentially preferable land, as well as a clear logic in terms of bringing land forward that has already been identified for development and that sits in the settlement boundary of Buckley. This relates to the re-assessment and allocation of land off Well Street in Buckley, opposite the objection site, that was previously allocated in the UDP. From a planning and highways perspective, and given the commitment to see the allocated land come forward, until this land is developed and the traffic from it has successfully been integrated into the local highway network, it would be premature and potentially unsustainable to consider the allocation of significantly more land as proposed, in this part of Buckley within this Plan. Also, the time to submit evidence in support of the proposal to allocate this land was as part of the plan process up to and including the deposit consultation, and the agent's reluctance to present such evidence has understandably meant that the Council cannot fully assess the impacts of development, including highways where, as has been logically set out by the Council's highway development control officer, without the submission of a full transport assessment it is not possible to consider the impacts of this scale of development on the highway network both from the site alone, and also in

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					They all refer to highway capacity being a concern; yet pre-application discussions on this site does not support this conclusion and we will challenge this.	combination with the proposed adjacent allocated land. Comments have been received on this site from the councils Highways Development Management Officers: ‘’Submission of a Transport Assessment is required to determine the full implications of a development of this scale. The site may not be suitable to provide the full potential of 384 dwellings but information submitted in support of a previous pre-application enquiry suggests that undue capacity concerns would not result from significant development on the site. Well Street is split into an urbanized, improved length and a rural un-improved length of road. The layout of the rural section is considered unsuitable to cater for any significant increase in the number of traffic movements. Any development proposal must provide improved access to the site and include measures to protect the rural section of road. ‘’ Whilst the highway network ‘may’ be capable of accommodating the level of traffic that this site would generate there is no certainty of this, or the cumulative impact when the development of the allocated site is factored in. This is particularly relevant given its status within the Buckley settlement boundary and where early development is likely given the advanced status of the sale of the land to a housing association and their plans to develop the site. This does not need to wait

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						for LDP adoption. The objector has not submitted a Transport Assessment as part of the objection but PPW emphasizes that for land to be allocated in a development plan it must be genuinely available and free from constraint, and the agent has failed to demonstrate this. In any event, the deposit plan has already set out sustainable and deliverable sites to meet the Plan's housing requirement which includes an additional contingency of 14.4%, which clearly demonstrates that there is no need to consider further sites for allocation in the plan. However opposite to the site is the Well Street allocation for 159 dwelling. This site has been reassessed for allocation in the LDP, having been previously allocated in the UDP, and it is considered to be a suitable allocation and the site has recently been purchased by a developer who are due to submit a planning application soon. Given the site's position within the settlement boundary of Buckley, and this clear intention to develop, it is capable of delivery early housing and is not technically reliant of LDP adoption, providing greater certainty that the housing will come forward. As explained above, Buckley will also deliver growth through completions and commitments which means that further allocations are not required for this plan period, either in Buckley as a whole or in this particular part of Buckley.

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						The LDP includes a 14.4% flexibility allowance (1,000 dwellings) in addition to the 6,950 housing requirement, which provides a buffer to enable the plan to respond to unforeseen circumstances or any delay to sites coming forward. In conclusion, it is considered that sufficient growth has been provided for at Buckley and that a sequentially preferable allocation has been made at Well St, directly opposite the objection site. There remain highways concerns about the capacity of the objection site in terms of impact on local highway network.
1108	HN1: New Housing Development Proposals	land off Church Road, Northop	Object	we object to the councils proposal to retain land off Church Road, Northop in the Green Barrier and therefore to exclude it from the list of potential sites in Policy HN1 (Tier 3). We argue separately for the exclusion of the land from the Green Barrier. Provide out objection ti EN11 is upheld there seems no reason not to add this land to the tier 3 list. the site is unconstrained by other local or national designations that would rule out housing	Add site described above to the list or tier 3 sites in policy HN1.	Not accepted. Northop has been categorized as a Tier 3 Sustainable Settlement in the LDP. Policy STR 2 sets out that Sustainable Settlements will be the locations for housing development related to the scale, character and role of the settlement. The plan also clearly states in paragraph 5.13 that ‘’The Plan intentionally avoids creating the perception that every settlement in every tier must contribute towards growth through having a housing allocation.’’ Although there have been no development completions in Northop in the first three years of the LDP, during the UDP period Northop grew by 21.9%. (80 dwellings) This was a very significant level of growth considering Northop was a Category B settlement with an indicative growth rate of between 10% and 15%. There is some opportunity for development in the village, as a small parcel

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				development. It is in an accessible location with local services and facilities nearby plus access to public transport. Development can be achieved without harm to the landscape or biodiversity, and there are no technical reasons to prevent development for housing.		of undeveloped land has been included within the settlement boundary towards the end of Church Road. The site comprises 7 fields of varying sizes and adjoins the settlement boundary along the rear of properties on Church Road to the south and along A5119 Northop Rd to the west. The broadly triangular shaped wedge of land is bounded by the A55 to the north. Although the site has distinct physical boundaries it has the character and feel of open countryside which is important in providing an open setting to this part of the settlement of Northop. To the east the site is bounded by a sewage works and to the west by a cemetery and cricket ground so the whole area enclosed by the A55 is open land. To the south of the cricket ground is the boundary of the Northop Conservation Area and a number of listed buildings in the vicinity of and including St Eurgain and St Peters Church. The site is a large area of land extending to the north of Northop and at 6.9 ha could accommodate 208 dwellings which is a significant level of development. Such a scale of development is considered to be out of keeping with the relatively small size, character and form of this tier 3 sustainable village. In particular, whereas the cricket ground presently has an open setting, it would be engulfed and encircled by built development if the site were developed. This

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						would fundamentally alter in a harmful manner the character and appearance of this part of the settlement and the setting of the historic core. The site was submitted as an omission site for housing as part of the UDP. The Inspector did not recommend the inclusion of the site and commented 'Although the site is well contained by existing development, the A55 and the A5119, it is an area of countryside which contributes to the rural setting of Northop. Moreover because of its open nature it is designated as part of the green barrier in order to protect a major road junction from visually intrusive development. In a situation where there is no need to release more greenfield sites to meet housing need, where the land meets the purposes of green barrier designation and contributes to the rural setting of Northop, I see no reason to allocate all or part of the site for housing purposes or to include the land within the settlement boundary where all things being equal there would be a presumption in favour of development'. The Inspector also noted that 'The objection site is over 7ha in extent and could accommodate a significant level of development'. In the context of the LDP where the provision for growth has been made in other sustainable locations, as demonstrated in the Housing Balance Sheet and policy STR3 and

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						HN1, it is considered that the comments of the Inspector are still relevant and applicable. The objection refers to there being no technical reasons to prevent development yet there are a number of constraints yet to be resolved as no further background evidence has been submitted with the evidence. On the original candidate site, Highways Development Management Officers considered that the site was suitable subject to a Transport Assessment. Further comments were that 'Additional vehicular traffic generation onto Church Road should be limited due to the nature of the road and the limited available visibility from the existing access road. A ghost Island and right turning lane is likely to be required on Northop Road, the A5119'. In a subsequent planning application (055807) which was refused on 21/03/17 one of the reasons for refusal related to a lack of evidence leading to uncertainty relating to the impact of development upon the A55(T). Dwr Cymru/Welsh Water requested clarification of surface water drainage details and the submission of an Odour Assessment given the site's proximity to the Northop Waste Water Treatment Works and the need to assess impact on occupiers of proposed development. Natural Resources Wales also requested the submission of a Revised Flood Consequences Assessment in order to

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						assess whether the consequences of flooding can be acceptably managed. A reason for refusal on the application related to concerns about surface water drainage scheme, FCA, and odour assessment being unresolved. Despite these clearly being in the public domain, no further technical information has been provided as part of the objection to demonstrate that these concerns can be overcome. Green barrier designations have all been reviewed as part of the LDP Deposit Plan the results of which is contained in the Background Paper 1: Green Barrier Review. This objector has submitted a separate objection to the Green Barrier and this is dealt with in full under objection ID 603 to policy EN11 Green Barrier. In the context of the purposes of a green barrier in PPW, the justification for this green barrier is: to manage urban form through controlled expansion of urban areas, assist in safeguarding the countryside from encroachment and to protect the setting of an urban area. The countryside setting for the historic village of Northop is important as it protects the setting of the conservation area and various listed buildings. It is a very important function of the green barrier in this location. The green barrier will therefore be an

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						important planning tool in managing urban form, and protecting the open countryside setting of this settlement. It will also assist in resisting the inevitable future pressure for development associated with the Red Route although the timescale is presently unclear. The LDP review provides the opportunity to re-assess this once the route and implications of the Red Route are more fully understood. Rather than taking a cautious approach to the designation of green barriers, the objector's stance to allocating housing seems cavalier and not based on sound sustainability principles, the allocation of land for housing for housing's sake, to simply add value to land. In conclusion, Northop is a relatively small Tier 3 settlement where the scale of development proposed is too great for Northop and the location of the site is in a very sensitive area of Green barrier. Protection of the green barrier is vitally important to retain the open setting for the historic character of the village. A number of unresolved constraints also question the viability and deliverability of the site. All these matters make this site unsuitable for a housing allocation in the LDP.

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1112	HN1: New Housing Development Proposals		Support	Support for not including Candidate sites in Pantymwyn.		Support Noted.
1115	HN1: New Housing Development Proposals		Support	Support for the Non allocation of Candidate Site NOR032 Land North of Northop brook The Green Northop. We do not support the development of the Bog field as it would have an adverse effect on the conservation of the area also the green barrier and the SNCI on this land. This land also floods in wet weather which is of great concern. Also we feel that it would upset the rural settlement of Northop. We think there is no reasonable grounds to build on this site.		Support Noted.
1124	HN1: New Housing Development Proposals	Candidate Site Ref HOL015 Land at wood Lane Pen Y Maes, Holywell	Object	Candidate Site Ref HOL015 Land at wood Lane Pen Y Maes, Holywell In 1969 an area of land was conveyed to Charles Maxwell Developments	Inclusion of candidate site HL015	Not accepted. The site is an intrinsic part of the open countryside and forms part of a wider area designated as green barrier, which seeks to prevent the coalescence of Holywell and Greenfield. Wood Lane provides a firm and defensible boundary to this part of Holywell. The site

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				Limited. Outline Planning was given in or around 1970 for the whole site and development commenced in phases. The area of land, the subject of the candidate site, was never built upon as Maxwell Developments went into liquidation. In 1991 we approached the administrators for Maxwell Developments to see if we could purchase this land. The land was duly purchased and we attempted to seek planning for this area of land. Unfortunately we were met with opposition by our then local Councillors who saw fit to apply for a landscape order thus preventing planning ever taking place. There are services running to this area of land and indeed a concrete base where building was to commence. Over the years and of recent times we have been approached by a number		comprises a narrow swathe of former pasture land with woodland at its southern and northern end, the northern end includes a large area of TPOs which cannot be developed. In the gap between the two woodlands the site affords open views of the landscape as it slopes down towards Greenfield. The site therefore performs an important function in protecting this open green barrier gap between the two settlements. To develop the site would represent an intrusion into the open countryside and undermine the green barrier function, and would also potentially threaten the woodland at either end of the site. The objector refers to a historic planning permission which is alleged to have included the objection site. However, in the absence of any documentary evidence either from the Council or the objector then it is not possible to attribute this weight in the present consideration of the site. It is important to note that the site was considered as part of the UDP, and rejected by the inspector for the same reason as given above. The UDP Inspector commented on the site in para. 11.120.5 'It is 40 years since permission was granted for housing and planning policy has changed significantly in that time. Whilst it has a different appearance to adjacent land, it is nevertheless open in nature and makes a positive contribution to the green barrier. Wood Lane provides a firm

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				of people wishing to purchase building plots upon this site. We recently took planning advice and we were advised that if this land was encompassed in the original Outline Planning Permission then the order should never have been placed on the land and, indeed, we could apply for a Certificate of Lawfulness. It is indeed the case that this land was always included in the Outline Planning Permission. Unfortunately due to the passage of time we are unable to locate a copy of the Outline Planning Permission having attended at your offices at Ewloe and requested a search of your registers. We would ask that you take all of the above information into consideration.		defensible boundary. I appreciate that development on the site would only be a small incursion into the strategic gap, but the same could be said of many similar sites on the urban fringe'. The Inspectors comments are considered to be equally applicable at the present time in terms of the character and role of the site. The Council's Environmental Health section have reported that the site contains lead and heavy metals. A land contamination assessment would be required. The site is also within 250m buffer of the former Bagillt Hall Farm landfill site. The objector offers no justification for the inclusion of this candidate site ahead of the allocated sites in terms of its sustainability and its performance sequentially. Furthermore, provision exits for development in Holywell in the form of completions of 36 units in the first three years of the Plan period and planning permissions at the former Lluesty Hospital (89 units on northern part and 69 units on southern part), the Ysgol Fabanod site at Perth Y Terfyn (55 dwellings) and Halkyn Road (45 dwellings), providing a total of 294 dwellings during the plan period. It is not considered necessary or appropriate to allocate additional land at Holywell particularly as developing this site would result in harm to the open countryside and green barrier and have a detrimental impact upon the character of Holywell when approaching from the North

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						of the settlement. Therefore the site is not considered appropriate to be allocated within the plan. A further consideration is that the Lluesty Hospital site is an important listed building and gateway to the town. The refurbishment and conversion of the listed buildings and redevelopment of other parts of the site will not be aided by a further greenfield allocation which would only serve to divert market interest away from the hospital site. In conclusion, sufficient provision for growth has been made for Holywell in the Plan period and a further allocation is not necessary or appropriate particularly when it would have a negative impact on open countryside and a green barrier.
1183	HN1: New Housing Development Proposals	PEN050AS Land east of Vounog Hill, Penyffordd	Object	Land east of Vounog Hill, Penyffordd Our Client has land interests located to the east of Vounog Hill in the settlement of Penyffordd, which is identified as a Sustainable Village in the Deposit Plan. The location of our Client's land is shown on the appended Site Location Plan. Technical details of the land are provided in Table 3 see full representation. Our	Include land East of Vounog Hill Penyffordd as a housing allocation (PEN050AS)	Not accepted Land-Use and Description The Welsh Government Predictive Agricultural land Classification Map shows the site as being grade 3a which represents BMV. However, the objection is not accompanied by an on-site survey to determine the exact quality of the land. Location Only the smaller front (western) part of the site adjoins the settlement boundary for approximately 40m along the site frontage

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				Client's land interests have been subject to previous promotion through the LDP process, as demonstrated by its inclusion as a Candidate Site. The land is in single ownership, and is immediately available and deliverable within the Plan period (over a phased basis), or indeed within a five-year period in its entirety. There are no overriding technical or land assembly constraints which would preclude its development. In view of the above, it is our Client's consideration that their land interests should be allocated for housing in the LDP for up to 120 dwellings. In the event that the Council considers that only the single field fronting on Vounog Hill should be allocated, this could deliver up to 30 dwellings.		and approximately 100m alongside development at The Pastures. The remainder of the site is 'backland', being separated from the settlement boundary at Cambrian House by an intervening field and with an awkward 'pinch point' almost dividing the proposed site into two separate entities. The site would not represent a logical extension to the settlement as it would result in a disjointed pattern of development which is not well related to exiting built form. The site was promoted for development in the form of an omission site as part of the UDP. The Inspector commented in respect of the front part of the site '4835 Vounog Hill provides a strong physical boundary between the built up area to the west and the countryside to the east. This extensive elongated site along the eastern side of Vounog Hill disregards the existing field boundaries and would result in an illogical incursion into the countryside. Furthermore, it would result in an unacceptable ribbon of development that would be poorly related to the existing urban form'. Turning to the rear part of the site the Inspector commented '1924 - This land is part of the countryside on the edge of the settlement and is rural in character. Allocating this site would result in a significant incursion into the countryside. Furthermore, given the shape of the objection site it would isolate undeveloped land to the north and result in an incongruous settlement boundary.'

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						Designation Although the site may not fall within any designated areas the submission has not included ecological survey information to establish ecological interests in the site. The Development Advice Map shows a wide band of low risk of surface water flood risk running north south across the site and is notable because it covers the narrow 20m 'link' between the two parts of the site. No information has been provided to demonstrate whether this constraint can be overcome to enable development. Potential Uses and Capacity The Plan has a spatial strategy which seeks to direct sites to the most sustainable settlements and sites and is not based on each settlement having a housing allocation. It must be noted that there are two sets of more sustainable settlements above the Tier 3 settlements and also that there are another 21 Tier 3 Sustainable Settlements. The settlement of Penyffordd / Penymynydd has already taken a significant level of the growth apportioned in the Deposit Plan to Tier 3 settlements as a result of two commitments at Rhos Road South (40 dwellings) and Hawarden Rd (32 dwellings) and the allocated site at Chester Road (186 dwellings). In addition a further planning permission for 36 no, over 55's retirement apartments was granted on appeal on

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						27/04/20. This represents some 296 dwellings in the settlement which is on top of the completions during the first few years of the Plan period arising from UDP allocations. Although the LDP has moved away from settlement growth rates for different tiers of the settlement hierarchy, it is useful to look back at the context in the UDP which identified a growth band of 8-15% for category B settlements. Over the UDP period the settlement saw actual growth of 21% as a result of 282 completions which was well in excess of the growth band. In the first 4 years of the LDP period the completions of 77 units equated to a 5.7% growth. As at April 2019 there were commitments of 267 units on the three earlier appeal sites which increases growth over the Plan period to 21%. The recent appeal decision for the over 55's apartments increased growth to 23.4% and the inclusion of say 100 units on the objection site would increase growth further to 31%. This settlement has more than made a reasonable contribution of housing in the LDP Plan period. The references to various background studies are noted as is the reference to the developer, but this does not change the fundamental concerns about the level and pace of development which this settlement is and will experience and disproportionate amount of development having regard to the Plans spatial strategy.

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						Policy STR2 sets out the hierarchy of growth to the tiers in the settlement boundary. Tie 1 Main Service Centres are the 'main' locations for new development, Tier 2 Local Service Centres are the locations for more modest levels of development whilst Tier 3 Sustainable Settlements will be the locations for 'housing development related to the scale, character and role of the settlement'. The policy clearly adopts a sliding scale of growth appropriate to each tier and the level of growth proposed by the objector in this settlement is not considered acceptable. Accessibility It is acknowledged that the site is well related in terms of proximity to facilities and services and public transport. Highways/Traffic The Highways Development management Officer has advised that a Transport Assessment is required in order to fully consider the site and proposal. However, it is questioned whether an appropriate access road junction design can be developed given the location of Wats Dyke Road opposite. Flood-Risk and Drainage The issue of flood risk and drainage is

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						commented on above. Ecology Ecology is commented on above. Landscape and Visual Impact The site does not relate well to the existing form and pattern of development and would appear as a block of built development largely detached from the settlement and having an impact on landscape and open countryside, particularly given the public rights of way bordering the site. Deliverability The objector has provided no indication as to the timescales for the site to be delivered in terms of the Council's housing trajectory as set out in the Background Paper LDP10 Housing Land Supply. In view of the settlements position in the hierarchy, the level of development already permitted and the poor relationship of the site it is not considered necessary or appropriate for either the whole or smaller part of the site to be allocated in the Plan. Soundness: The Plan has formulated its housing requirement figure in line with advice in PPW

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						and subsequent versions of PPW and the Development Plan Manual and objections relating to historical unmet need have been comprehensively dealt with in responses to representations to policy STR1. There is no requirement either in PPW or DPM for the unmet housing requirement from a previous development plan to be merely added on to the next development plan. Welsh Government submitted formal representations on the Deposit LDP and have not commented on any shortfall from the UDP. Welsh Government state 'The Welsh Government is generally supportive of the spatial strategy and level of homes and jobs proposed and has no fundamental concerns in this respect'. The Plan's housing requirement is considerably in excess of the Welsh Government base population and household projections as the Plan seeks to support regional growth strategies. The Plan is clearly aspirational and the objector has identified no challenge in respect which would question the Plans soundness. The objector ignores the fact that the LHMA methodology produces an inflated need as it assesses the backlog of need but only has a lifespan of 5 years. It is therefore incorrect to transpose the annual need over the Plan period. It is also the case that affordable housing will be delivered through other initiatives and strategies and not just through the planning system.

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						The point about UDP shortfall has been commented on in the previous section. The Plan has a conservative and realistic allowance for small and large site windfalls, having regard to previous trends. The allowances have also been informed by an Urban Capacity Study which demonstrates that the Plans allowance figures are realistic. It is of note that the HBF is supportive of the approach taken regarding windfalls. Also, Welsh Government in their formal representations on the Plan have made no comments about an over-reliance on windfalls. The Plans vision is meant to encapsulate the whole Plan strategy and purpose and is not meant to focus in detail on housing only. The Plan has identified a robust but aspirational housing requirement figure, well in excess of forecasts. In the absence of a formal objection from Welsh Government it is not considered that the Plan fails soundness test 2. The objector fails to explain why smaller sites in Tier 3 settlements are more capable of early delivery than the Plan's allocations, particularly given that the Plans allocations are backed up by a considerable amount of background studies and work. By contrast, the objector has submitted not a single

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						background study or piece of technical evidence to show that it is capable of early delivery. The two sites carried forward from the UDP were reassessed by the Council by putting them through the candidate site assessment process. The Highmere Drive allocation is backed up by a number of background studies by the owners and a renewed commitment to deliver the site and the Well Street allocation is in the process of being sold by Welsh Government to Clwyd Alyn Housing Association who are intending to submit an early planning application. On both of these sites, planning applications can come forward ahead of LDP examination as they are already allocated and within the settlement boundary. It is not accepted that the Plan is unsound in terms of test 3. In conclusion, the settlement of Penyffordd/ Penmymynydd will significant growth as a result of four speculative appeal decisions. It is not necessary or appropriate for a further allocation to be made, particularly where it would not represent a logical extension to the settlement.
1193	HN1: New Housing Development Proposals	Land adj Brook Farm, Kinnerton Lane, Higher Kinnerton		Objection to Strategic allocation at Warren hall, Broughton and suggestion of alternative site at Higher Kinnerton. Objection to allocation at Warren Hall for the following reasons: Access Volume of traffic	inclusion of alternative site at Higher Kinnerton	The Council have responded separately to the objection to the Warren Hall strategic allocation - see rep 1116 regarding policy STR3B. It is disappointing that the objector has sought to put forward the site at this late stage in the Plans preparation. An earlier submission at candidate site stage or at Alternative Sites

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				on Lesters Lane, a single track rural lane currently used for agricultural Lorries, tractors, surface water. This will affect our land causing flooding, ribbon development. Higher Kinnerton and Broughton will merge, unable to identify each village producing mass development. Warren Hall planning originally permitted to address planning requirements for 30 years ago. Failed to attract industry and use land for original permission. Should not be used for present day housing. I would like to put forward a field adjacent to the village of Higher Kinnerton to be considered for planning. This field is located within the village and has wide, good access onto a main road, Kinnerton Lane, which has a 30mph speed restriction in place. The field has a pavement adjoining it, a main sewer running through the middle with good access to electric,		(Preferred Strategy) stage would have enabled a full assessment and comparison alongside other sites. It is disappointing that the site is submitted without a Sustainability Appraisal as required by Welsh Government in the Development Plan Manual 3 in Diagram 8 'Any new sites proposed at Deposit stage will be required to submit an SA with their site submission'. The promoted site is located outside of the Settlement Boundary within the open countryside, north of Kinnerton Lane. Expansion of development beyond the settlement boundary north of Kinnerton Lane would create an irregular shaped block of development that would be illogical to the current built form of Higher Kinnerton and ultimately harmful to the open countryside. The green barrier designation in the UDP has been extended in the Deposit LDP to run alongside the north side of Kinnerton Lane to ensure a gap between the village and the Warren Hall allocation is retained. Development of the site would intrude in a harmful manner into the newly designated green barrier. The UDP inspector made the following comments on two omission sites from Higher Kinnerton, which were considerably smaller than the site proposed on land adjacent to

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				water and drainage. I have enclosed an Ordnance Survey map with the location of field I wish to be considered.		Brook Farm, Kinnerton Lane; "(11.119.4.) The objection site measures some 4.6 ha which would potentially produce growth in the region of 20%. Excluding HSG1(57), in total this would result in over 25% growth within the plan period which is well over the indicative growth for even category A settlements such as Mold and Flint. I have seen no substantive arguments which justify that level of growth in what is a relatively small rural village with limited facilities in comparison to the larger settlements." Higher Kinnerton is a tier 3 settlement in the LDP (STR2) and previously a category C settlement in the UDP. The UDP provided growth for the village through the allocation at HSG1(40) with a capacity for 40 units. The final 6 units were completed by 31st March 2015 according to the 2014/15 Land Availability Study. A speculative site on land at Kinnerton Lane has also been granted planning permission on appeal with capacity for 56 dwellings. According to the 2019/20 Land Availability Study 31 units have been completed, with 13 under construction and 12 not yet started. It is anticipated that these remaining units are due to be completed by April 2021. Given that Higher Kinnerton is a Tier 3 sustainable settlement where housing development must be related to the scale, character and role of the settlement, it is

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						considered that the speculative site at Kinnerton Lane under construction will provide sufficient growth for the village over the plan period, and no allocations are needed within the village. Higher Kinnerton is a Tier 3 Settlement and does not have sufficient facilities to sustainably accommodate the level of growth proposed by the objector. In addition land adjacent to Brook Farm has not been allocated within the LDP as the focus on growth within this area is at the allocated Strategic Site, Warren Hall. The Warren Hall site has been identified as the focus for growth and is a key part of the North Wales Growth Deal, receiving considerable public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55, and a further commitment to public funding to secure infrastructure necessary to develop the site. The site has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities. The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area. The promoted

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						site has been assessed by FCC's Ecologist who advised that "The site comprises improved agricultural grassland with trees and hedgerows and limited protected species records but with potential for bats, amphibians, badgers and nesting birds. From aerial photos the key features on site are the boundary trees and hedgerows. There are limited known ecological records but GCN, Common Pipistrelle and Hedgehog occur within the locality. Any development would need to assess the Ecology of the site and provide an Ecological Impact Assessment with measures to avoid, mitigate, compensate, enhance and manage wildlife features. It would also need to link to the mitigation/provision of associated green corridors associated with the adjacent development." Highway's Development Control have advised that "There would appear to be sufficient frontage (within the site outlined in red) to enable the construction of an appropriate access to the site but pedestrian and cycle provision in the area is inadequate with little opportunity to deliver improvement. A narrow footway has recently been constructed on the southern side of Kinnerton Lane and around the Royal Oak junction but the width is limited in places to 1.5m; this is significantly below the standard

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						minimum width of 2.0m. The existing footway along the western side of Main Road provides the shortest link from the site towards the village but is limited in width to approximately 1.3m in places. A development of 90 dwellings would not only add additional pedestrian movements onto a substandard footway but would add additional traffic movements onto a section of road where pedestrians are likely to be stepping off the footway in order to pass others. Natural Resources Wales (NRW) have identified that the submitted site may affect European and/or nationally protected species. European Protected Species (EPS) are given the highest legal protection through British and European legislation. Where an EPS is present, a development may only proceed under an appropriate license issued by Natural Resources Wales. We assume that the submitted site has not been subject to detailed ecological survey for protected species interest. NRW have no objection to the allocation of the submitted site in terms of protected species, however it should be noted that protected species surveys and, if required, any necessary mitigation measures would need to be provided in support of any planning applications at these submitted sites. NRW submitted the following comments on this site; "We refer you to Welsh Government Circular 008/2018 on the use of private sewerage in new development,

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						specifically paragraphs 2.3- 2.5 which stress the first presumption= must be to provide a system of foul drainage discharging into a public sewer. The additional submitted site is within a current sewer network area and therefore connection to main sewer would be expected for this site. There are a considerable number of new houses already in this area therefore investment in the sewer network and the receiving sewage works should be considered as part of the development. We advise that you liaise with Dŵr Cymru Welsh Water with regards to any improvements needed to sewer networks." CPAT have advised that "There are the vestigial remains of an area of medieval/post medieval ridge and furrow. This does not necessarily mean that the field cannot be developed but the historic asset may require recording prior to development." The predictive Agricultural Land Classification map indicates that this site is subgrade 3a which is best and most versatile agricultural land. Welsh Government has stated that a detailed ALC survey of the sits should be undertaken to determine if the land is 'Best and Most Versatile' (BMV) agricultural land and the proportion of grades identified. PPW strongly resists development on BMV unless there is a

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						justifiable overriding need for development on the site. The objector has not evidenced an overriding need for development on this site, and growth will be provided for within the village on the speculative site at Kinnerton Lane, and on the nearby Strategic Site at Warren Hall. This is sufficient growth for this tier 3 settlement and locality over the plan period.
1194	HN1: New Housing Development Proposals	Candidate sites HK008	Object	Policy HN1 – New Housing Development Proposals During the 'Call for Sites' stage of the LDP, a number of candidate sites were put forward on the edge of the settlement of Higher Kinnerton. These sites proposed residential development in a sustainable location being a settlement that is closely located to the Cheshire and Wrexham borders. It is an area known to be occupied by commuters given its accessibility and some time ago, during the UDP examination, the Inspector recognised that there is a lack of constraints on these parcels of land. The	Allocate land at Higher Kinnerton. Candidate sites HK007, HK008, HK011 and HK012	Not accepted. The objector seeks the allocation of two candidate sites within the village of Higher Kinnerton, HK007/HK012 On land South of the Grange and HK008/ HK0011 also off Sandy Lane for approximately 100 dwellings. This response covers both sites. Higher Kinnerton is a tier 3 settlement in the LDP (STR2) and previously a category C settlement in the UDP. The UDP provided growth for the village through the allocation at HSG1(40) with a capacity for 40 units. The final 6 units were completed by 31st March 2015 according to the 2014/15 Land Availability Study. A speculative site on land at Kinnerton Lane has also been granted planning permission on appeal with capacity for 56 dwellings. According to the 2019/20 Land Availability Study 31 units have been completed, with 13 under construction and 12 not yet started. It is anticipated that these remaining units are due to be completed by April 2021. Given that Higher Kinnerton is a

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				settlement of Higher Kinnerton has recently lost community amenities such as the Post Office and bus services, yet, residential development could have increased the population and therefore, made these services a viable option in the future to serve the whole community again. Strangely, the Authority chooses not to provide any opportunity to improve the offerings of an existing settlement and focusses all attention on a strategic site that, as discussed in the above section is considered difficult to deliver and would create an unsustainable development.		Tier 3 sustainable settlement where housing development must be related to the scale, character and role of the settlement, it is considered that the speculative site at Kinnerton Lane will provide sufficient growth for the village over the plan period, and no allocations are needed within the village. The allocation of both HK007/HK012 and HK008/ HK0011 would amount to an additional 100 dwellings, Higher Kinnerton is a Tier 3 Settlement and does not have sufficient facilities to sustainably accommodate the level of growth proposed by the objector. The objector refers to the loss of services in Higher Kinnerton such as the Post Office and bus services, and points to the need to increase the village's population to support these services. Higher Kinnerton has in fact seen the completion of 40 dwellings on UDP site HSG1(40) and 31 units on the speculative site at Kinnerton Lane, with a further 25 yet to be completed. Therefore residential development has taken place, yet services have continued to decline. This is the case in many rural and urban settlements across the Country, and is not unique to Flintshire. It is a sign of the times as demand shifts towards more online shopping and services. Simply building more houses is clearly not guaranteed to safeguard services and the proposition that if more housing is provided then facilities will return is both naive and un-

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						evidenced in terms of how and when such facilities would be provided. In addition HK007/012 and HK008/HK011 have not been allocated within the LDP as the Warren Hall strategic site has been identified as the focus for growth and is central to the North Wales Growth Deal, receiving considerable public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55. The site has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities. UDP Inspector's comments; The two resubmitted candidate sites by Caulmert are also omission sites from the UDP. The UDP Inspector removed the site from the plan for the following reasons; "(11.119.4.) The objection site measures some 4.6 ha which would potentially produce growth in the region of 20%. Excluding HSG1(57), in total this would result in over 25% growth within the plan period which is well over the indicative growth for even category A settlements such as Mold and Flint. I have seen no substantive arguments which justify that level of growth in what is a

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						relatively small rural village with limited facilities in comparison to the larger settlements. (11.119.5.) Should more growth be required and Higher Kinnerton was judged to be a suitable location to accommodate that growth then the lack of constraints on the site would no doubt mean development could take place. Similarly road improvements, recreational facilities and affordable housing above and beyond the requirements of UDP policies would bring community benefits, but they are not good reasons to allocate greenfield land unnecessarily. To do so would be contrary to the sustainable objectives of the plan. (11.119.6.) The site consists of fields, is open in nature and forms an integral part of the countryside. It is not part of the built up area in either character or appearance. It follows from the above that I do not consider the land should be included within the settlement boundary where there would be a presumption in favour of development." HK008/ HK0011 HK008/ HK0011 is on the North Eastern edge of the village. It is outside but adjoining the settlement boundary along its Southern edge which is formed by the well-defined rear curtilages of properties on Deans Way. Of all the Candidate Sites submitted for Higher

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						Kinnerton this relates relatively well to the settlement as opposed to the open countryside beyond Main Road to the north and Sandy Lane to the east. At 2.47 ha approximately 75 units could be accommodated. The Council's Highways Development Management Team stated that pedestrian facilities along the Main Road frontage are inadequate and there would not appear to be any opportunity to provide improvement. It would appear possible however to access the site from Sandy Lane; this would provide an opportunity to restrict pedestrian access from the site to the village, to the use of the bridleway. Development will necessitate a road improvement scheme on Sandy Lane to include road widening, improvements to the Main Road/Sandy Lane junction, the provision of pedestrian footways and improvements to the bridleway. Given the comprehensive highways improvements required it is not considered appropriate to allocate this site at the present time. Furthermore as a scheme for 56 dwellings has been allowed on appeal on land south of Kinnerton Lane this is considered to be sufficient as a commitment to meet the housing requirement for the village. There are also other factors which make the site less favorable to develop including the

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						predicted loss of 2.48ha of grade 3a agricultural land. HK007/012 This irregular shaped 3.1 ha of land is located outside of the settlement boundary, on the Eastern edge of the village comprising gently sloping grade 3a agricultural land. It incorporates and is bounded by the dismantled railway line to the South East, a rural lane (The Green) and a dwelling (The Grange) together with a barn conversion scheme to the North. Whilst the site is outside of the village confines the Western boundary lies adjacent to the settlement boundary which runs along Sandy Lane beyond which is residential development at Beeston Road, Deans Way and Greenfield Avenue. The rear curtilages of these properties back onto Sandy Lane. However development of this site would not relate well to the existing pattern and form of development of the village the bulk of which is located to the West of Sandy Lane and the dismantled railway line. Sandy Lane is considered to be a logical and well defined boundary for this part of the settlement. Development of the site would create an illogical change to the boundary that does not constitute a rounding off of the village but rather would represent an unacceptable incursion into the countryside which would

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						result in the predicted loss of 2.26ha of grade 3a agricultural land. Highways Development Control have stated that alterations would be required to improve the operation of the Sandy Lane/Main Road junction along with improvements to the bridleway link into the village. Provision of a footway along the site frontage would also be required. Given the comprehensive highways improvements required it is not considered appropriate to allocate this site at the present time. In conclusion, the two proposed sites would result in a level of growth that is not sustainable for this tier 3 settlement. Higher Kinnerton has already experienced growth in the UDP and during the early years of the LDP. An additional 100 dwellings would not be appropriate for the scale, character and role of this settlement, particularly when there is a strategic allocation for 300 dwellings at Warren Hall in close proximity to Higher Kinnerton. The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area, rather than just taking housing only approach as with the two objection sites. Consequently there two candidate sites have not been allocated within the plan as it is not needed in addition to the

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						residential units at Warren Hall and the existing commitments within the village. In conclusion, adequate development is provided for in Higher Kinnerton over the Plan period and the site is in close proximity to the Warren Hall Strategic Site where provision is made for mixed use development. It is not necessary or appropriate for an additional allocation.
1195	HN1: New Housing Development Proposals	Candidate sites HK011	Object	Policy HN1 – New Housing Development Proposals During the 'Call for Sites' stage of the LDP, a number of candidate sites were put forward on the edge of the settlement of Higher Kinnerton. These sites proposed residential development in a sustainable location being a settlement that is closely located to the Cheshire and Wrexham borders. It is an area known to be occupied by commuters given its accessibility and some time ago, during the UDP examination, the Inspector recognised that there is a lack of constraints on these parcels of land. The	Allocate land at Higher Kinnerton. Candidate sites HK007, HK008, HK011 and HK012	Not accepted. The objector seeks the allocation of two candidate sites within the village of Higher Kinnerton, HK007/HK012 On land South of the Grange and HK008/ HK0011 also off Sandy Lane for approximately 100 dwellings. This response covers both sites. Higher Kinnerton is a tier 3 settlement in the LDP (STR2) and previously a category C settlement in the UDP. The UDP provided growth for the village through the allocation at HSG1(40) with a capacity for 40 units. The final 6 units were completed by 31st March 2015 according to the 2014/15 Land Availability Study. A speculative site on land at Kinnerton Lane has also been granted planning permission on appeal with capacity for 56 dwellings. According to the 2019/20 Land Availability Study 31 units have been completed, with 13 under construction and 12 not yet started. It is anticipated that these remaining units are due to be completed by April 2021. Given that Higher Kinnerton is a

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				settlement of Higher Kinnerton has recently lost community amenities such as the Post Office and bus services, yet, residential development could have increased the population and therefore, made these services a viable option in the future to serve the whole community again. Strangely, the Authority chooses not to provide any opportunity to improve the offerings of an existing settlement and focusses all attention on a strategic site that, as discussed in the above section is considered difficult to deliver and would create an unsustainable development.		Tier 3 sustainable settlement where housing development must be related to the scale, character and role of the settlement, it is considered that the speculative site at Kinnerton Lane will provide sufficient growth for the village over the plan period, and no allocations are needed within the village. The allocation of both HK007/HK012 and HK008/ HK0011 would amount to an additional 100 dwellings, Higher Kinnerton is a Tier 3 Settlement and does not have sufficient facilities to sustainably accommodate the level of growth proposed by the objector. The objector refers to the loss of services in Higher Kinnerton such as the Post Office and bus services, and points to the need to increase the village's population to support these services. Higher Kinnerton has in fact seen the completion of 40 dwellings on UDP site HSG1(40) and 31 units on the speculative site at Kinnerton Lane, with a further 25 yet to be completed. Therefore residential development has taken place, yet services have continued to decline. This is the case in many rural and urban settlements across the Country, and is not unique to Flintshire. It is a sign of the times as demand shifts towards more online shopping and services. Simply building more houses is clearly not guaranteed to safeguard services and the proposition that if more housing is provided then facilities will return is both naive and un-

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						evidenced in terms of how and when such facilities would be provided. In addition HK007/012 and HK008/HK011 have not been allocated within the LDP as the Warren Hall strategic site has been identified as the focus for growth and is central to the North Wales Growth Deal, receiving considerable public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55. The site has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities. UDP Inspector's comments; The two resubmitted candidate sites by Caulmert are also omission sites from the UDP. The UDP Inspector removed the site from the plan for the following reasons; "(11.119.4.) The objection site measures some 4.6 ha which would potentially produce growth in the region of 20%. Excluding HSG1(57), in total this would result in over 25% growth within the plan period which is well over the indicative growth for even category A settlements such as Mold and Flint. I have seen no substantive arguments which justify that level of growth in what is a

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						Kinnerton this relates relatively well to the settlement as opposed to the open countryside beyond Main Road to the north and Sandy Lane to the east. At 2.47 ha approximately 75 units could be accommodated. The Council's Highways Development Management Team stated that pedestrian facilities along the Main Road frontage are inadequate and there would not appear to be any opportunity to provide improvement. It would appear possible however to access the site from Sandy Lane; this would provide an opportunity to restrict pedestrian access from the site to the village, to the use of the bridleway. Development will necessitate a road improvement scheme on Sandy Lane to include road widening, improvements to the Main Road/Sandy Lane junction, the provision of pedestrian footways and improvements to the bridleway. Given the comprehensive highways improvements required it is not considered appropriate to allocate this site at the present time. Furthermore as a scheme for 56 dwellings has been allowed on appeal on land south of Kinnerton Lane this is considered to be sufficient as a commitment to meet the housing requirement for the village. There are also other factors which make the site less favorable to develop including the

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1200	HN1: New Housing Development Proposals	BROU010 Land to the S of Old Waren Broughton		BROU010 is part of the enlarged site now being promoted. The Assessment findings for BROU0110 found it to be a “RED” site and stated that: The site does not comply with the Preferred Strategy as it is divorced from the Broughton settlement boundary. The site forms of part of open countryside to the west of Broughton and to the north of the A55. Despite having a dwelling and some commercial buildings, the site is divorced from ribbon development further to the west of the site. The site relates more closely to open countryside than it does to the nearby	We consider that the extended and conjoined site area addresses the issues of the original BROU010 site not being contiguous to Broughton and we will demonstrate that it is technically deliverable and should be identified for new housing and be identified as a “GREEN” site, which, at the very least is considered a suitable reserve site.	Not accepted. The proposed site is 9.2ha and the objector indicates a capacity for 230 dwellings. The site was initially submitted as a smaller candidate site (BROU010) which was assessed as part of the original call for sites. It was not considered suitable for allocation within the LDP as it is divorced from the settlement boundary of Broughton, and forms part of the open countryside. The site was clearly separate from the existing ribbon of development to the West of the site, therefore it relates more closely to the open countryside than it does to the nearby settlement. The allocation and development of this site would result in a small block of housing that poorly relates to the existing form and pattern of the settlement, and is too small for allocation within the plan. BROU10 was then resubmitted as an alternative site as part of a much larger scheme known as BROU17AS. This has also

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				settlement. Development would result in a small block of development which would appear as an outlier of development in open countryside, poorly related to the form and pattern of existing development. That the site is not considered suitable as an allocation. Other sites referring to land "south of Old Warren" (i.e. BROU14-AS, 15, 16, 17, 18, 19) have also been assessed and these may actually involve the land we are now promoting, but because no mapping is available this is unknown. However, the assessment findings determine them either as AMBER or RED. We consider that the extended and conjoined site area addresses the issues of the original BROU010 site not being contiguous to Broughton and we will demonstrate that it is technically deliverable and should be identified for new		been assessed as part of the LDP site selection process. The larger BROU17AS site would adjoin the settlement boundary, however it would intrude into the open countryside in a ribbon like block of development, which would appear divorced from the form and pattern of existing development which is South of the A5104. The settlement boundary is presently well defined by the A5104, an extension across this into the Old Warren would harm the rural character of this locality and be poorly related to the existing settlement. The development of BROU17AS would result in a large block of development extending into the open countryside. This contrasts sharply with the existing pattern of ribbon development along The Warren and the well defined residential development to the south of the A5104. The site does not represent a logical urban extension to the settlement. The site is also subject to constraints including being within the flight path for Broughton Airfield and the Southern part of the site is within 250m buffer zone of a landfill site. In view of the objector's criticism of the Warren Hall strategic site (Masterplan Delivery Statement) in terms of the implications of the flight path on built development, it is surprising that no detailed analysis on the implications of the flight path for this site has been submitted.

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				housing and be identified as a “GREEN” site, which, at the very least is considered a suitable reserve site.		Considering the size of the site and its potential to accommodate 230 dwellings, the objection is not accompanied by background studies or assessments nor a commentary as to the ethos behind the site, or the principles on which the site is to be developed. An example of this is the lack of any indication as to where for instance the vehicular access will be located and it is not sufficient at this late stage to simply state that “we will demonstrate that this site is technically deliverable” without providing this detailed evidence. Highways have also raised concerns and advise that “a Transport Assessment is required to determine the full implications of any site over 100 dwellings. A site of this size is likely to have a detrimental impact on the operation of the Warren Hall Interchange especially when generated traffic is considered in addition to that of the proposed Warren Hall Development. Additional traffic is also likely to have a detrimental impact on the operation of Main Road Broughton. The full extents of the impact can only be determined by the consideration of a full Transport Assessment’. No Transport Assessment has been submitted by the objector. The focus on growth within this area is at the allocated Strategic Site, Warren Hall. The Warren Hall site has been identified as the focus for growth and is central to the North Wales Growth Deal, receiving considerable

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						public sector investment over recent years including junction improvements at the interchange of the A5104 and the A55. The site has outline planning permission as a business park however this will be extended through its strategic allocation within the LDP to incorporate a mixed use development which will include a business park, a commercial hub including leisure facilities, a hotel and some retail opportunities. The Warren Hall site provides a unique opportunity to embody placemaking principles, and to develop a sustainable mixed use site that will bring significant economic benefits to the area. Consequently the land South of Old Warren has not been allocated within the plan as it is not needed in addition to the strategic allocation at Warren Hall. Broughton is a Tier 2 Local Service Centre and has seen a large amount of development during the Plan period with 189 units completed on the site to the south of the Retail Park in 2017/18, 24 units completed on the 'compound site' immediately to the west of the retail park (adjacent to Aldi) in 2017/18, and 36 units completed on Chester Road (Park Jasmine) also in 2017/18. In addition there are also 300 dwellings planned on the allocated strategic site at Warren Hall. This is considered sufficient provision for the Plan period, particularly as the Plan Strategy

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						does not prescribe set amounts or targets to each settlement. The development of the site would also result in the loss of grades 2 and 3a agricultural land. Despite the objector criticizing the Council's background paper on agricultural land, they have not even submitted an on-site assessment to establish what grade the site actually is. In conclusion, the Plan has made provision for growth at Warren Hall and there is considered to be no need for a further housing allocation, particularly where it relates poorly to the built form of the settlement. The site is not considered appropriate to be allocated in the Plan.
1202	HN1: New Housing Development Proposals	HOL018 North of Moor Lane, Holywell	Object	Land-Use and Description The land is currently in agricultural use. It extends to c. 4.3 hectares. Existing trees and vegetation on the land are limited to the field boundaries which border it. Access into the land is currently provided via Moor Lane.	Deletion of allocations at Well Street Buckley and Highmere Drive, Connah's Quay due to issues around deliverability. These should be replaced with alternative sites with more certainty around	Not accepted. The site forms part of the open countryside to the north of the existing Holywell settlement boundary. In this part of Holywell there is a well-defined block of residential development at Holway which is dissected by Moor Lane. The existing built development at Nant Eos and Meadowbank result in a firm and defensible boundary to this part of Holywell. The development of the site would represent a large intrusion into the open countryside,

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				Location The land is located to the north-east of existing residential development on Nant Eos. It is bounded by agricultural land at all other sides, with the existing Moor Farm access road lying immediately adjacent to the eastern boundary. The development of the land would provide for a logical and natural extension to the built-up area. Designation The land is located outwith the adopted settlement boundary of Holywell and is within the open countryside. It is not subject to any formal ecological, landscape, recreational, or historical designation. It is located within an area of low probability for flood risk. Potential Uses and Capacity The land has the potential to accommodate affordable housing together with	delivery such as candidate site HOL018 Moor Lane, Holywell.	poorly related to the existing settlement pattern and built form. It would have open countryside on three sides and not be a logical extension of the settlement boundary and would result in significant harm to the open countryside. As detailed below, there is sufficient growth already planned within Holywell, therefore this site is not required. Holywell is a Tier 1 Main Service Centre, on account of its size, character and level of services and facilities and represents a sustainable location for development. The LDP does not seek to apportion development spatially by the use of numerical methods or growth bands. The plan seeks to distribute growth in a sustainable manner having regard to the settlement hierarchy, this means that not all settlements will have allocated sites, including the Tier 1 Main Service Centres such as Holywell. As part of this approach it is necessary to have regard to the character and role of each settlement and the circumstances prevailing at the present time. In this context it does not mean that, in the absence of an allocation, Holywell will not experience growth during the plan period, as completions in the first three years of the Plan period of 36 units and committed sites which already have planning permission will provide sufficient growth for the town. The Lluesty Hospital site is committed for 89 dwellings, with permission for a further 69 units on the southern part of the former hospital site, the

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				associated landscaping and public open space. Assuming a net developable area of 80% and a density of 35 dwellings per hectare, the land could accommodate in the region of 115 - 135 dwellings. The allocation of the land for housing is considered by our Client to be responsive to Holywell's identification as a Main Service Centre within the settlement hierarchy, and the scope provided within the Deposit Plan for new housing development to be delivered in the settlement during the Plan period. Any development on the land is capable of meeting spacing standards, high quality design, a mix of house types, and delivering new public open space and landscaping (including a landscape buffer). The scale of development and potential to phase delivery would ensure		Ysgol Fabanod site at Perth Y Terfyn will provide 55 units and the land East of Halkyn Road will provide 45 dwellings. This will provide a total of 294 dwellings over the plan period, which is sufficient growth for Holywell without the need for a further allocation. A further consideration is that the Lluesty Hospital site is an important listed building and gateway to the town. The refurbishment and conversion of the listed buildings and redevelopment of other parts of the site will not be aided by a further greenfield allocation which would only serve to divert market interest away from the hospital site. Noted. Highways Development Management Officers have identified the need for a detailed assessment of Moor Lane and the Moor Lane Junction with Holway Road. Officers point out that the site would result in additional traffic onto Moor Lane which appears excessively steep. The Moor Lane / Holway Rd junction is the only means of access for approximately 300 additional properties. No Transport Assessment or other technical assessment of the road network has been undertaken to establish whether Moor Lane is suitable to accommodate additional traffic. Noted. However, the detailed Development Advice Map shows a significant band of surface water flood risk running north

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				that the area is not overwhelmed by new development and residents. The scale of development which can be accommodated on the land is proportionate to the wider settlement, ensuring that the settlement is not subject to overdevelopment over the duration of the Plan period. The development of this land would contribute towards the sustainable distribution of development, whilst also supporting the vitality of Holywell's services and facilities. Accessibility Vehicular and pedestrian access into the land can be secured from Moor Lane and Nant Eos. The land's proximity to public transport services on Moor Lane provide any future residents with an alternative to the private car to access local shops, services and education.		eastwards down to the bottom of Moor Lane and then a further band of surface water flood risk running along the bottom of the slope . The confluence of these two bands is at the proposed point of vehicular access. No evidence has been provided to demonstrate whether this constraint can be overcome. It is disappointing that, despite claiming the site is viable and deliverable, no background evidence has been provided in respect of ecology. From the A5026 Holway Road, the land slopes down to Nant Eos and Meadowbank which sit at the bottom of that slope. The objection site then rises upwards in a northerly direction and is clearly visible when viewed from higher ground to the south. Development would be extremely visible and prominent in the landscape. The site is not entirely free from constraints, Environmental Health have reported that the site contains lead and other heavy metals, therefore a land contamination assessment would be required but has not been provided. The development of the site is considered to be unacceptable in terms of its poor relationship with the form and pattern of built development and the significant intrusion into open countryside where built development would be visually prominent and harmful. Furthermore there are technical uncertainties

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				Highways/Traffic The land could be served by access from Moor Lane at its south-east corner. Any access road from Vounog Hill would provide for a 5.5m wide carriageway, with 2m footways on both sides. Visibility standards would be consistent with Manual for Streets. The highways impact of any development on the land would not be significant. Flood-Risk and Drainage The land is located wholly within Flood Zone A as defined on the Development Advice Map. Sustainable Urban Drainage Systems would be applied across the Site where feasible. Ecology The land is not subject to any formal international, national or local ecology designation which might prevent or limit its suitability for housing. It is distant from designations in the wider area, with only the		relating to the site in terms of ecology, surface water and access and these cause doubt that the site is viable and deliverable. In conclusion, sufficient provision for growth has been made for Holywell in the Plan period and a further allocation is not necessary or appropriate particularly when it would have a negative impact on open countryside and has a lack of evidence with regard to a number of constraints.

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				potential for indirect effects (as with any location). The land holds limited ecological value, albeit a detailed Habitat Survey would need to be undertaken. The key ecological features of the land are the hedgerows and trees within and bordering it; the majority of these features should be capable of retention as part of any development. Where removal of any features is required, this loss could be compensated for by replacement planting. Landscape and Visual Impact The land does not sit within a designated landscape area. The land is considered to have a moderate impact taking into account the relationship of its built surroundings and potential for mitigation once planting matures within any landscape buffers, particularly along		

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				the northern perimeter of the Site. Any adverse effects on visual receptors would likely be limited to those nearest to the land. Deliverability Our Client's land interests have been subject to previous promotion through the LDP process, as demonstrated by its inclusion as a Candidate Site. The land is in single ownership, and is immediately available and deliverable within the Plan period (over a phased basis), or indeed within a five-year period in its entirety. It is estimated by our Client that the land could be developed in its entirety within 24 months of a grant of planning permission. There are no overriding technical or land assembly constraints which would preclude its development.		

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				In view of the above, it is our Client's consideration that their land interests should be allocated for housing in the LDP for up to 135 dwellings.		
1203	HN1: New Housing Development Proposals	HCAC029	Object	Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please refer to attached document	Land at Bryn Tirion, Caergwrle, Candidate Site HCAC029 for inclusion as a housing allocation. Objection to HCAC004. Please refer to attached document	Not accepted. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. It should be noted that there is presently no pavement fronting the site, nor is there a pavement fronting the lodge and adjoining stone constructed dwellings. This would necessitate pedestrians having to cross the road to reach the pavement opposite in order to walk into Caergwrle to access facilities and services. The access to Bryn Tirion is difficult as it is located just beyond a bed, in front of the adjacent lodge, and requires the provision of a 'mirror' on the lamppost opposite. It is accepted that the reference to 'ribbon development' in the Council's response on the candidate site assessment is not fully reflective of the proposal. As confirmed by the objector, the proposed site has 'depth' extending to the access track, and would result in 'estate type' development. However, this block of development would not represent a logical extension to the existing form and pattern of development in the settlement. Firstly, there is a gap comprising the land on the south side of the curved access track,

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						which falls outside the boundary of the objection site. Secondly, the only built development linkage between the settlement and the site is the short ribbon of stone constructed dwellings to the south of the site. These form a distinct character break between the public sector housing and the open countryside to the north. The site does not therefore read as a logical urban extension but as a divorced block of development, poorly related to the settlement. The site is at the extreme northern edge of Hope. It is separated from the settlement boundary by a narrow access road leading to Bryntirion Hall and alongside which there is a belt of mature trees. To the north it is bounded by an access track which leads to Bryntirion Farm to the west. A well-established hedgerow, with trees, characterises the whole length of the eastern boundary which fronts the A541 Mold Road. The land rises up gently from the A541 to the Hall and Farm. The proposed site is located between the access track leading to the Hall is a tapering intervening gap of land before reaching the well-defined settlement boundary which is formed by the residential development at Edinburgh Avenue and alongside the A541 to the south of the site. The lodge located alongside the existing access track was clearly associated with and serving the former Bryn Tirion Hall and the tree lined curved

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						access track gives a sense of a large country house with grounds. The proposed development does not sit comfortable with the character of the site and open countryside. The Council's Highways Development Management Team have raised objections to development at this site on the basis that the site is in a relatively remote location and limited/substandard pedestrian connectivity. This is commented on further above. The horizontal alignment of the road and bounding hedges, restricts forward visibility along the road. It would be possible to provide an appropriate junction layout (right turn lane potentially required) however this would require the full removal of the hedgerow fronting the site. Significantly impacting the character of the surrounding area. Although it is recognised that there are services and facilities within the settlement it is considered that there are negative factors which outweigh this, particularly the poor pedestrian linkages to and from the site. The objector claims that there are no known protected species on the land at this present time, but has provided no ecological survey to establish whether this is the case or not. The proposed development is agricultural grazing land which Welsh Government has categorized as a predicted loss of 0.77ha grade 2 and 0.37ha grade 3a providing a total predicted loss of 1.14 BMV land. Again, the

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						objector has submitted no site-survey to demonstrate what grade the land actually is. The Plans allocation at Wrexham Road, Abermorddu is backed up by and informed by a large number of background and technical studies which demonstrate that the site is viable and deliverable. Despite the objector's statement that the site is preferable to the allocated site, there is no submitted background / technical evidence to show that this is the case. Development of this prominent site would result in a detached block of residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site is not considered to be necessary or appropriate as an allocation either to replace or be in addition to the Wrexham Rd allocation. In conclusion, the Plan has made provision for growth in HCAC with the allocated site. The objection site is not appropriate to be allocated as it relates poorly with the built form of the settlement and would harm open countryside, and also is not backed up by any evidence.
1207	HN1: New Housing Development Proposals	FLI008	Object	Strategic Sites: The two strategic sites Northern Gateway and	There are serious concerns regarding the deliverability and timing of the two	Not accepted. The objector is concerned about the track record of poor delivery on both the strategic sites in terms of housing and how the Plan is over-reliant on them. However, it is worth noting that the Warren

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				Warren Hall have historically not delivered, and there is no certainty that they will deliver over the LDP period. This will result in a significant shortfall in housing which cannot be filled by windfall alone. In such circumstances the logical and sensible approach would be to allocate a contingency site that could be brought forward if necessary. Site Context & Accessibility This site was put forward for mixed use of primarily residential development incorporating a retirement village and a limited amount of employment land adjacent to the existing Aber Park Industrial Estate.	major housing land allocations as contained in STR3(A) and STR3(B). There is a high risk of a shortfall in the housing land requirement. The advice in the Development Plans Manual should be followed in these circumstances and Candidate Site FLI008 should be allocated as a contingency site	Hall site has not previously had a housing element. The North Wales Growth Deal clearly identifies the Warren Hall site as forming a key part of the strategy. The initial projects include 'primary infrastructure, to include a new access road and on site access, electricity, drainage and other services at Warren Hall'. This is referenced in the Welsh Government representations on the Deposit LDP wherein Welsh Government support in principle the economic growth strategy in terms of the scale and location of homes and jobs. It is not considered that the Plan is over reliant on the two strategic sites in terms of housing or employment growth. Turning first to housing, it is worth stressing that the Plan is already delivering, in terms of completions to date, what the Plan seeks to provide. If the Council were in the position whereby it had built up a deficit of under-delivery in the first few years of the Plan period, then there might be greater concern about reliance on two strategic sites. Nevertheless, despite Warren Hall being a strategic site, the housing element is not strategic as it is 300 dwellings which is on a par with the other housing allocations in the Plan. It is not considered that there are any evidenced concerns about the ability to deliver 300 dwellings at Warren Hall within the Plan period.

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				The proposed candidate site FLI008 is the best option to fulfil this role given the sustainability of its location and its compliance with the preferred strategy. Flint is the most sustainable settlement of the Tier 1 Main Service Centres which are the main locations for growth. It has excellent public transport links in having the only railway station in Flintshire linked to main line national rail network with good bus routes to Deeside, Holywell, Mold and Chester. It has well established housing and employment areas and a good retail sector providing a range of goods. It has primary and secondary schools, medical services and a leisure centre. There is good access to the open countryside and River Dee with the national and regional cycle and footpath routes pass through the area.		The Plan is not reliant on windfalls given that the small site allowance of 60 units per annum and large sites allowance of 50 units per annum, is conservative when comparted with past trends and also having regard to the findings of the Urban Capacity Study. The HBF are supportive of these modest allowances. In line with advice contained within Development Plan Manual 3 (DPM3), the LDP incorporates a flexibility allowance of 14.4%. DPM3 states that LDPs must include a minimum flexibility allowance of 10%. There is no requirement from Welsh Government to include within the Plan contingency or reserve sites. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514) for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of

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				One of the reasons that the authority consider the site not suitable for development is that it is separated from the town centre by the adjacent industrial area. This is hardly a reason for considering it unsuitable when, through good design and developer contributions, the development can provide for good cycle and footpath links. It is all the more bizarre given that the authority supports and proposes a 300 dwelling housing allocation of Warren Hall which is separated from Broughton by green barrier and the A55. Evidence of constraints There are no major constraints to development as evidenced by the site's employment allocation in the former Delyn and		site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress, albeit slightly behind. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is has been approved for 129 homes for Keepmoat Homes. Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further phases of development. The Council has enquiries from other developers about further phases of the development. It is quite normal

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				draft North Flintshire local plans. Retirement Village The candidate site includes an area of the site being set aside for a retirement village. Not only does no other candidate site or allocation make such provision, the Plan has no policy upon which any such proposal can be considered. This is a major shortcoming in not addressing a pressing and significant need. Older people's housing needs are frequently overlooked in the drive to develop affordable housing for younger people. Much of the housing stock in the UK is not suitable for the needs of older people, not only in terms of being accessible for people with disabilities, but also in terms of size, energy efficiency and		on a strategic site of this size to have several housebuilders on site at the same time. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The provision of 300 units at Warren Hall is not considered excessive given its sustainable location relative to the focus for growth. In totality it is not considered that the Plan is over-reliant on the strategic sites. It is unclear from the objector's submission where the 'shortfall in housing land' is actually arising from given the size of the housing element at Warren Hall and the emerging picture of delivery at Northern Gateway. Flint is a Tier 1 Settlement which is recognised as a sustainable location for growth in both the UDP and the LDP, Tier 1 settlements have a strategic role in the delivery of facilities and services across Flintshire. Flint has already seen growth in the earlier years of the plan period with 308 dwellings completed in the early years of the plan period (2016, 2017 and 2018). There are also committed sites in Flint which will provide further growth for the town including an additional 378 dwellings on the Croes Atti site, 73 units on the Earl Lea site, 19 units at Ystrad Goffa Court and 15 units on the Flint

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				requirements for ongoing maintenance. The development of a retirement village provides the opportunity to create a significant pool of housing with a range of different types of tenure that is purpose designed to meet the needs of older people and to increase the amount of local provision to accommodate the future needs of an increasingly ageing population. Green Barrier The planning authority is also inconsistent in extending the green barrier up to the edge of Flint, presumably to prevent coalescence, when it takes out the area of green barrier fronting the A548. This appears to send out		Working Men's Club site. In addition to these commitments the allocated site at Northop Road will provide 170 dwellings which is a logical extension in a sustainable location. Collectively the committed sites and Northop Road will deliver a further 655 dwellings in Flint over the plan period, this is sufficient growth for the town therefore candidate site FLI008 is not needed. Situated on the western edge of Flint outside but adjacent to the settlement boundary which for the majority of its length runs along the eastern boundary of the site. The site includes the Bryn Farm complex of buildings beyond which is the A548 Coast Road which forms the northern boundary of the site. Aber Park Industrial Estate and an area of mature woodland (Red Wood) lies to the east of the site. This large roughly L shaped area of land was initially put forward as a mixed use scheme consisting of retirement village of approximately 55 units together with employment land if required. With regards to the employment element of the candidate site, the findings of the Employment Land Review (undertaken as part of preparing the LDP) has indicated that no new additional employment sites are required for the Plan period. In view of this the promoter of the site is now seeking all of the land to be allocated for residential use.

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				clear message that the intervening land between Bagillt and the Reynolds Road/Manor Drive clustered settlement is suitable for development thus converging the two areas and adding to the impression of coalescence. It acknowledges this in the reasoning for its exclusion from the green barrier and effectively invites development proposals outside of the settlement boundary.		Despite this site lying adjacent to the settlement boundary it is separated from the bulk of the town center facilities by the Aber Park Industrial Estate and the edge of center Flintshire Retail Park. Similarly the site is poorly related to the well established residential areas of the town again by the intervening Kimberley Clark complex, a mature woodland and the Cemetery to the North of Royal Drive. Consequently it is considered that this large site relates better to the area of open countryside to the west of the town. The Employment Land Review has concluded that there is no need for additional employment land allocations in the Plan period, and the need for a north westwards expansion of employment land does not presently exist. This area of land on the edge of the industrial estate is open in character and undeveloped, with the exception of Bryn Farm, which sits comfortably within its agricultural landscape setting. Being alongside the A548 Coast Road it is also prominent and open in character. The Council's Highway Development Management Team have been consulted on the development of the site and concluded that the site had potential for development subject to a Transport Assessment, they also stated that "the site is relatively isolated from community facilities however a development of this scale may generate new facilities. It

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						would appear possible to provide access from a traffic signal controlled junction however this would benefit from a lowering of the speed limit' highlighted it is remote from facilities and would require a new traffic light controlled junction onto A549. But, no Transport Assessment provided with objection to demonstrate how this can be achieved." Candidate site FLI008 was previously allocated for employment use in the former Delyn plan. It was also put forward as a UDP omission site (1119/1520 re EM1). As part of the UDP process the site was the subject of investigative work by the former Welsh Development Agency prior to the publication of the deposit plan to establish the feasibility of bringing the site forward for development. Apart from the differing views of the owners of the site about whether the site should be developed or not, the former WDA found that the site development costs would be unduly prohibitive due to the need for a major new access from the A548, the likely need for storage lagoons and terracing of the northern part of the site. At the time of the UDP inquiry the Council were of the view that without public funding to overcome some of the constraints and infrastructure problems there was no prospect of the site coming forward for development

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						during the UDP period, therefore the site was not allocated within the plan. The UDP Inspector commented: "13.30.2. PPW indicates that local planning authorities should review existing allocations when preparing their UDP. This land was allocated in the Delyn Local Plan, was assessed for its suitability for rolling forward but was not included due to site constraints. The Council takes the view that there is no prospect of the site coming forward for development during the plan period. No substantive evidence has been produced to convince me otherwise. Adequate land has been allocated in the UDP for employment needs and I do not support this objection." The objector has not provided any evidence that the site is now free from these previous constraints. The UDP inquiry concluded that the site was unviable due to high development costs, therefore it could not be considered suitable for allocation within the LDP without evidence that these constraints could be overcome. The objector has not provided any evidence to demonstrate the viability of the site given these previous concerns. Policy HN2 of the LDP deals specifically with the mix of housing, including the need for housing by the older population. Paragraph 11.6 of the reasoned justification states that

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						"The Local Housing Market Assessment identified a particular need for smaller one and two bedroom units to meet the increasing need from single person households. A significant part of this need is driven by the growing older population (65+), therefore the housing needs of older people should be reflected in residential development proposals, which could include the development of bungalows. To ensure that mixed and balanced communities are created the Council will expect developers to provide an appropriate mix of dwelling size and type to meet local housing needs, making reference to the evidence within the latest Local Housing Market Assessment." Proposals for specialist types of housing such as retirement villages can be determined using policy HN2, supported by evidence of that particular need within the proposed location. A policy specifically for retirement villages is not required. The objector clearly sets out that the site would include an element for a retirement village, although there are concerns as to whether this is an appropriate location for such a use in the context of the distance to facilities and provision of walking and cycling routes. However the objector does not go into detail on what the remainder of the site will be used for. This is a 28.4Ha site, significant

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						background work and detail is required to consider it as a realistic strategic allocation. As part of a strategic review of the green barrier it is clear that the green barrier, as presently defined, does not reflect its title in that it does not extend up to the edge of Flint, it therefore will be extended to include candidate site FLI008. This will protect the open countryside from encroachment and prevent the coalescence of Flint and Bagilt. For this reason the candidate site FLI008 has not been allocated within the LDP. For further information please see response to EN11 Green Barrier rep number 93. The LDP has provided for a substantial amount of growth in Flint over the Plan period and it is not considered that an additional allocation is either necessary or appropriate. Given the size of the site and the lack of any supporting background or technical evidence it is not considered that the site is viable or deliverable, particularly in the light of previous concerns about viability. The site is also considered inappropriate given that it would represent a major urban encroachment into the green barrier designation which seeks to retain a gap between Flint and Bagillt.
1208	HN1: New Housing Development Proposals	EWL007 Land off Old Aston Hill/Church Lane Ewloe		Land-Use and Description The land is not currently in active use. It extends to c. 8.3 hectares. There	It is our Client's consideration that their land interests should be allocated for housing in the	Not accepted. The site may not be actively used at present but Welsh Government has provided information which identifies a predicted loss of 0.28ha of grade 2 and 5.85ha of grade 3A. In the absence of a site specific survey to determine the actual quality

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				are existing trees and hedgerows within and around the land, including a strong landscape buffer along the southern edge of the land separating it from the A494 slip road. This landscape buffer would be retained and strengthened where necessary as part of any development scheme on the land. Location The land is somewhat triangular in nature, with residential development to the west and north on Old Aston Hill and Church Lane respectively, with the A494 slip road forming the eastern boundary. The land is naturally well-contained, and is disconnected from the wider countryside (Green Barrier) land located to the west of Old Aston Hill. Designation The land is located outwith the adopted settlement	LDP for up to 180 dwellings. on land off Old Aston Hill / Church Lane, Ewloe.	of the agricultural and whether it represents BMV it is not considered appropriate to allocate the site. It is acknowledged that the site lies adjacent to the A494(T) and has arms of built development to the north and west. However the site has a sense of openness and has the appearance and character of open countryside. The site was promoted for development in the form of an omission site in the UDP and the Inspector commented 'Although the land is separated from open countryside it is open in character' and that 'The settlement boundary in this area reflects the existing built development and forms a strong and defensible boundary. The land is generally open in character and it is not necessary to include this area within the settlement boundary'. CPAT has identified that the site overlies the line of the former Ewloe Railway and may require prior assessment. The northern part of the site also lies within a 250m boundary of landfill sites at Sea View Farm. The submission is lacking in terms of detail as to how various constraints including noise, air pollution, vehicular access, ecology and trees would impact on the suitability and capacity of

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				boundary of Ewloe and is within the Open Countryside. It is not subject to any formal ecological, landscape, recreational, or historical designation. It is located within an area of low probability for flood risk. Potential Uses and Capacity The land has the potential to accommodate affordable housing together with associated landscaping and public open space. Assuming a net developable area of 75% and a density of 30 dwellings per hectare, the land could accommodate in the region of 140 - 180 dwellings. The allocation of the land for housing is considered by our Client to be responsive to Ewloe's identification as a Local Service Centre within the settlement hierarchy, and the scope provided within the		the site for residential development. The submission also lacks an indicative or schematic layout to indicate the broad principle of how 140-180 units would be accommodated on the site. The Council has accepted that Ewloe is a sustainable location for growth given the allocation of land between Holywell Rd and Green Lane. Nevertheless, the objection site is not considered to be necessary or appropriate to be allocated. It is unclear why the objector is referencing the potential phasing of development on the site yet elsewhere is claiming the site could be fully built out in just 2 years. The submission provides no detail as to the proposed access arrangements. The candidate site submission explains that access will be improved at Bali Hai and 1 Ferry Hill off Old Aston Hill at the western extreme of the site and at Holly House and Moorwood off Old Aston Hill at the north eastern edge of the site. The candidate site submission also refers to a new 'A' road alongside the A494(T) which is not considered to be feasible or acceptable. Highways Development Management Officers consider that i) Church Lane is unsuitable to serve additional development and ii) there is limited opportunity for access onto Old Aston

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				Deposit Plan for new housing development to be delivered in the settlement during the Plan period. Any development on the land is capable of meeting spacing standards, high quality design, a mix of house types, and delivering new public open space and landscaping (including a landscape buffer). The scale of development and potential to phase delivery would ensure that the area is not overwhelmed by new development and residents. The scale of development which can be accommodated on the land is proportionate to the wider settlement, ensuring that the settlement is not subject to overdevelopment over the duration of the Plan period. The development of this land would contribute towards the		Hill and that will restrict the layout of junctions and ultimately the number of dwellings. The proposed development appears to involve the acquisition and demolition of up to four existing dwellings as part of access arrangements which will surely have an impact on the viability and deliverability of the site. The Highways Development Management Officer has commented below: 'Initial comments made in relation to this site remain valid however if the land owner/developer can provide details of an access, as suggested, the site could be given further consideration. Any further consideration of a site of the proposed size will require the submission of a Transport Assessment with particular reference to potential impacts on the operation of junctions with the A494; Welsh Government as highway authority for the trunk road should be informed. It is evident from previous correspondence of concerns regarding the operation of the St David's/Ewloe roundabout. The requirements of Active Travel Wales legislation must be considered and the provision for cycle access included; this may require at least one of the footways entering

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				sustainable distribution of development, whilst also supporting the vitality of Ewloe's services and facilities. Accessibility Vehicular and pedestrian access into the land can be secured from Old Aston Hill. Lane End Developments Construction Ltd and the landowners have reached an agreement which will provide for the land to be accessed from Old Aston Hill following the acquisition of an existing residential dwellings and associated curtilage. The land's proximity to public transport services on Old Aston Hill will provide any future residents with an alternative to the private car, and with it good access to local shops, services and education. Highways/Traffic The land could be served by		the site to be provided as a 3m wide shared facility. Dependent upon the site layout, a development of 180 dwellings will potentially require two points of access or the provision of an emergency access. And, depending upon the access location, the minimum spacing between junctions onto Old Aston Hill may be significant'. The objection has not been accompanied by a Transport Assessment in order to determine whether the site can be accessed and whether the local highway network can accommodate the development. Noted. COFNOD data identifies that the majority of the site has a 50-70% likelihood of the presence of Great Crested Newts. Parts of the site also include wooded areas which are of landscape and ecological importance. In the absence of an ecological and arboricultural survey it is not possible to determine whether the sites limited ecological value is the case. It would be inappropriate to allocate land in the absence of having some robust evidence about ecology and trees. Welsh Government Noise maps show daytime noise levels on the site of between 55 and 69.9dB, and evening noise levels of 50 to 64.9dB increasing with proximity to the

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				access from Old Aston Hill. Any access road would provide for a 5.5m wide carriageway, with 2m footways on both sides. Visibility standards would be consistent with Manual for Streets. The highways impact of any development on the land would not be significant. Flood-Risk and Drainage The land is located wholly within Flood Zone A as defined on the Development Advice Map. Sustainable Urban Drainage Systems would be applied across the Site where feasible. Ecology The land is not subject to any formal international, national or local ecology designation which might prevent or limit its suitability for housing. It is distant from designations in the wider area, with only the potential for indirect effects (as with any location).		A494(T). The advice in TAN11 Noise gives rise to serious concerns about the appropriateness of residential development in such locations. It would be inappropriate to allocate land in the absence of evidence about actual noise levels on the site and whether these can be mitigated within the development. Welsh Government roadside monitoring has identified levels of air pollution alongside the A494(T) and has installed 50mph speed restrictions to reduce emissions. The site is immediately adjacent to the A494(T) and it would be inappropriate to allocate the site without evidence as to pollution levels and whether mitigation measures can be put in place to address this. Despite the proposed site being bounded by built development, the site has an open character akin to open countryside, as recognized by the UDP Inspector. In terms of visual receptors the objector ignores the public footpath which dissects the site. The Red route has been safeguarded within the Plan by virtue of policy PC10. However there is no update on the route in terms of timescale and it will need to proceed through a public inquiry. If the Red route were not to proceed there would be a need to consider alternative options including improvements to the A494(T).

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				The land holds limited ecological value, albeit a detailed Habitat Survey would need to be undertaken. The key ecological features of the land are the hedgerows and trees within and bordering it; the majority of these features should be capable of retention as part of any development. Where removal of any features is required, this loss could be compensated for by replacement planting. Noise Given the location of the land adjacent to the A494 slip-road, there may be the need for noise mitigation measures to be implemented as part of any future development. These could take the form of double glazing, additional landscaping, and/or acoustic fencing dependent on the conclusions of a Noise		The objector fails to mention that the site was previously promoted for development as part of the UDP but was not recommended for inclusion by the Inspector. The objector provides no firm evidence of an agreement between the landowners in terms of deliverability. The suggestion that 180 units could be developed within two years of a planning permission is out of step with the housing trajectory in Background Paper 10 Housing Land Supply which identifies a maximum yearly build of 53 units on a non-strategic housing allocation. The objectors proposed build rate of 80 units per annum, is significantly higher but without any evidence that this is realistic. In the context of uncertainty as to a number of constraints which might affect the site, as well as concerns over securing a suitable access into the site, it is not considered to be a viable and deliverable allocation. Furthermore, an additional allocation in Ewloe is not considered necessary or appropriate. In conclusion, provision for growth in Ewloe has been made with the allocated site which is sustainable, viable and deliverable. An additional allocation is not considered necessary or appropriate in Ewloe, particularly given that there are a number of constraints on the objection site which have not been addressed.

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				Impact Assessment. Landscape and Visual Impact The land does not sit within a designated landscape area. The land is considered to have a moderate impact taking into account the relationship of its built surroundings and potential for mitigation once planting matures within any landscape buffers, particularly along the eastern perimeter of the Site to the A494. Any adverse effects on visual receptors would likely be limited to those nearest to the land. Deliverability Our Client's land interests have been subject to previous promotion through the LDP process, as demonstrated by its inclusion as a Candidate Site. Whilst the land is in		

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				multiple ownerships, our Client has now secured a promotional agreement across the whole of the land, with a collaboration agreement between the landowners. The land is immediately available and deliverable within the Plan period (over a phased basis), or indeed within a fiveyear period in its entirety. None of the land is now required for any highway works to the A494 slip road, and there are no scheme details to suggest that this is the case. It is estimated by our Client that the land could be developed in its entirety within 24 months of a grant of planning permission. There are no overriding technical or land assembly constraints which would preclude its development.		
1210	HN1: New Housing Development Proposals	HCAC 025 Land off Huxleys Lane Hope	Object	Land off Huxleys Lane, Hope, 36 houses	Allocate land at HCAC Huxley Lane Hope instead of HCAC	Not accepted. The Preferred Strategy colour coded assessment of candidate sites illustrated that the site was colour coded amber and mentioned that further

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				It is noteworthy that the methodology table was in favour for building on this site. We would therefore rely upon all the reasons set out by the Council in that table to support building on this land instead of the proposed site HCAC004. There are further reasons that we site below in support of this site for development in the LDP: This site would form an extension of Ty Carreg housing commitment with existing access through the Beeches and Almond Way. Therefore it would be building where houses already are. This site is for 36 houses which presents as a large development but, smaller than the 80 proposed on the Bluebell Fields in Abermorddu. It is submitted that this smaller development	004 Land at Wrexham Road Abermorddu	investigations were needed specifically regarding access to the site. This site abuts the settlement boundary on two sides - to the west and to the south where there is existing residential development at The Beeches and Almond Way. The site is considered to relate well to the urban form of the settlement where there is a large area of residential development to the south and which is well contained by by Sryt Isa to the west and the A550 Wrexham Road to the east. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. It is considered that by allocating two smaller sites in comparison to one site at Wrexham Road will not be more deliverable or viable when HCAC025 is not deemed deliverable as set out by the concerns below. There is no evidence to illustrate that smaller sites would have less of an impact and would be more viable and deliverable. In this instance, the proposed site backs onto existing dwellings whereas the allocated site does not. Therefore the proposed site may have more of an impact on the surrounding residents. Additionally, due to the uncertainty over access, there is doubt about the deliverability of this site.

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				would therefore lessen the impact on the community with 2 smaller developments of 30-40 being utilised in two locations. This would also make these sites more appropriate, viable and deliverable. No permitted use of the land by the public. Flat land. If thought necessary, the road could be adapted e.g. roundabout to actually improve that area and access to the road for more than just this site as it would slow traffic down to allow people to exit side roads easier onto the main road e.g. Mountain View etc. Due to it's location, this site would have a low/no impact on the surrounding area as it is behind existing development and a natural progression of		The objector is comparing this proposed site with the Wrexham Rd Abermorddu allocation where there is an alleged permitted public access. This is not an appropriate way in which to be informing the suitability of sites. There is no public right of way across the site although it is understood that the public do walk across the site to gain access to the hillside, but the Council is unaware whether this is with the consent of the land owner. However Wat's Dyke and a footpath is situated within the eastern edge of the proposed site HCAC025 which would require measures to safeguard these should the site be developed. Previously the site was allocated in the UDP but removed on account of access concerns, and the de-allocation of the site was also recommended by Inspector, who also expressed concerns about access constraints. Similarly the Highways Officer considers this site to be unsuitable as there is no direct access to a public highway and a transport assessment would be required in terms of access through The Beeches. At the time of writing no such Transport Assessment has been provided and the site has not been resubmitted by the landowner in the form of a representation at Deposit consultation stage. However, It could be considered further if a vehicular access could be secured through land to the southwest which has outline

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				existing and commitment housing. The general infrastructure for such a development is already in place and easy access to nearby shops and schools and other amenities and activities. There are already dwellings around this location. The site would therefore associate with development on three sides. Essentially development on this site would be filling in a gap in the existing housing as there is Ty Carreg on one side, houses on Huxleys Lane on the second side and two large dwellings with access and frontage onto the main road on the third side (see general area photograph at Appendix 4 HCAC025).		planning permission for housing (053445 – land at Ty Carreg for 19 dwellings). Although discussions have taken place to achieve this, no agreement has been made known to the LPA and the latest application for reserved matters approval on the site (060970) show a layout which makes no provision for vehicular access through to HCAC025. Although the development of the site is considered appropriate in terms of relationship with settlement and open countryside, it is not appropriate to allocate land for housing when there is no certainty of securing a suitable vehicular access. A holistic view includes the implications on highway safety and does not justify allocating land with known access constraints. Although it is recognised that there are services and facilities within the settlement it is considered that there are negative factors which outweigh the few factors which meet the criteria. The Plan's allocation at Wrexham Road, Abermorddu is backed up by and informed by a large number of background and technical studies which demonstrate that the site is viable and deliverable. Despite the objector's statement that the site is preferable to the allocated site, there is no submitted background / technical evidence to show that this is the case. The site is not considered to be necessary or appropriate as an allocation

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						either to replace or be in addition to the Wrexham Rd allocation. In conclusion, it is evident that there are long standing concerns about the lack of vehicular access to the site and in the light of this constraint it is not appropriate to be allocated.
1211	HN1: New Housing Development Proposals	HCAC 021 Land West of Gwalia, Bryn Yorkin	Object	Land west of Gwalia / Bryn Yorkin - 40 houses. Our reasons for putting forward this site for development in the LDP are as outlined below: The owners are in a position to begin building, therefore making this site viable and deliverable having a builder on board. This land runs alongside the settlement boundary. It runs alongside existing dwellings. The owner has vehicular access to the site therefore there is a means of access that can be altered and utilised accordingly. The	Alllocate HCAC 021 Land West of Gwalia, Bryn Yorkin instead of HCAC004	Not accepted. Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, the objectors' assertion that the owners are in a position to begin building, and that the site is viable and deliverable appears unfounded. The site is not a suitable replacement, either in whole or in part, for the allocated site. Despite the objector's statement that the site is preferable to the allocated site, there is no submitted background / technical evidence to show that this is the case. Despite the entire eastern boundary adjoining the settlement boundary the site relates better to the open countryside as the site slopes upwards to the heavily wooded steeply sloping Alyn Valley sides. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. In any event the Council's highways development management officer objects to the development of this site due to there being no

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				owners have looked into how to gain access to such a development on their site. There has been a dwelling on the site in the past. The family have used it for personal recreational purposes but now wish to develop the site. Therefore the public have not had lawful or permitted access to the site. This land runs alongside the settlement boundary. It runs alongside existing dwellings. The site is not wooded and is simply fields bounded on one side by housing and on the other by woods leading steeply up to Hope Mountain. There are already dwellings around this location. The site would therefore associate with development on three sides. - Any development on this site		direct access to the adopted highway, and furthermore roads in the vicinity are generally inadequate to serve a development of this size. Additionally, Gwalia is narrow in width with dwellings immediately abutting the highway, parked cars and the lack of footway illustrate this is unsuitable to accommodate additional traffic. The fact that there may have previously been a dwelling on site does not mean it is suitable to be allocated for housing, as it is necessary to look at a wide range of considerations relating to the site. The objector is comparing this proposed site with the Wrexham Rd Abermorddu allocation where there is an alleged permitted public access. This is not an appropriate way in which to be informing the suitability of sites. There is no public right of way across the site although it is understood that the public do walk across the site to gain access to the hillside, but the Council is unaware whether this is with the consent of the land owner. The site may adjoin the settlement boundary along its eastern edge but the site does not relate well to the form and pattern of existing development. The fields are crossed by a footpath which leads to an extensive network of footpaths in the wooded area beyond the site. Removal of trees on the fringes of the north western part of the site to accommodate approximately 40 dwellings would have a

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				would not exceed the boundary line of existing housing on Bryn Yorkin and Gwalia. It would in fact bring it into line and fill in the gap. It is submitted that this site is ideal and appropriate for housing. This site is for 40 houses which presents as a large development as but smaller than the 80 proposed on the Bluebell Fields in Abermorddu. It is submitted that this smaller development would therefore lessen the impact on the community with 2 smaller developments of 30-40 being utilised in two locations. This would also make these sites more appropriate, viable and deliverable. - Due to its location, this site would have a low/no impact on the surrounding area as it is behind existing development and a natural progression of		significant visual adverse impact on this elevated and prominent site. Built development would not integrate well with the existing form and pattern of development in this part of the settlement. The proposed site is located within open country and does not form part of the settlement. The surrounding area is heavily wooded with numerous footpaths for public to enjoy the open countryside. The land is graded highly for agricultural use and there is a predicted loss of 0.18ha grade 3a. Additionally, due to the heavily wooded area there potentially may be bats in the area and further assessments would be required. The site, given its rising and prominent location, and the existing pattern of development would not represent a logical extension to the settlement. Instead, as outlined above, it harm the character and appearance of the locality. It is too simplistic to a make an assertion that a site will have a lesser impact than another site just because it is smaller. It is necessary to look at the particular merits of each site and its particular surroundings. It is also not necessarily the case that two sites each of 40 will have any less impact on services, facilities, or the highway network overall, than one site for 80. Although it is recognised that there are services and facilities within the settlement and in close proximity to the site, it is

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				existing and commitment housing. The general infrastructure for such a development is already in place and easy access to nearby shops and schools and other amenities and activities. - In relation to 40 houses on this site, there are 86 dwellings on Bryn Yorkin Lane, Conway Close, Plas Yn Bwl, 45 on Bryn Yorkin. At present a total of 130 houses using the entrance to the main road. This site would either be accessed at the top of Bryn Yorkin or from Bryn Yorkin Line via Conway Close. Therefore there is a good filter system for traffic rather than all coming out on one road before meeting the main road. If one were to add 40 on this site that would take the total to 170. Such an overall development is not		considered that there are negative factors associated with the site which outweigh this. As commented above Highways Development Management Officers note that there is no direct access to the adopted highway and that the roads are generally inadequate to serve the development. The site is physically separated from both Bryn Yorkin and Conway Close by existing houses and intervening land. There is no clear means of securing an acceptable vehicular access. In conclusion, development of this prominent site would result in a detached block of residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site is not considered to be necessary or appropriate as an allocation either to replace or be in addition to the Wrexham Rd allocation.

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				excessive for the infrastructure particularly when you compare with other sites eg. Chester Road, Penyffordd • 186 houses and one entrance; Silverbirch Way, Penyffordd • 200 houses and one entrance.		
1212	HN1: New Housing Development Proposals	HCAC 026 Gresford Road Hope	Object	Land north of Bryn Isa, Gresford Rd, Hope - Our reasons for putting forward this site for development in the LDP are as outlined below: This site is a smaller development than HCAC004 and therefore would have a low impact on the surrounding area. Also smaller development would be more viable and deliverable. There are already dwellings on this side of the main road from the top of the photograph of the general area down to the bungalows that	Allocate HCAC 026 Gresford Road Hope instead of HCAC 004 Wrexham Road Abermorddu	Not accepted. A summary response has already been provided with the objection to HN1.9 (ID: 658) It is considered that allocating two smaller sites in comparison to one site at Wrexham Road will not be more deliverable or viable when HCAC026 is not deemed deliverable as set out by the concerns below. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. It is a simplistic view that smaller sites have a lower impact, as all sites are assessed on their specific merits. In this instance, the proposed site would add to a detached small ribbon of development whereas the allocated site is considered to be better positioned to the settlement. Additionally, due to the uncertainty over access, this site is not preferable in comparison to the allocated site.

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				would abut this development and Hope Motors at the end of that line. It would therefore associate with development on one side, the main road with dwellings opposite on one side (who don't have driveways opening onto the main road but gain access via Mountain View/Pen Y Bryn) and two sides of open countryside to the rear but one field of agricultural land between this location and the farm on at the top of the general area photograph (Appendix 4 HCAC026). Essentially development on this site would be filling in a gap in the existing housing. No permitted use of the land by the public. Relatively flat land after initial incline from the road of grass verge		Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, is not considered to be a viable and deliverable site. The site is not considered to be necessary or appropriate as an allocation either to replace or be in addition to the Wrexham Rd allocation. With the exception of the 4 bungalows to the south of the site the bulk of the settlement form at this location is on the opposite side of the A55O Wrexham Road. This long straight road marks a strong physical demarcation between the built up area and the open countryside. Development of the site would result in urban encroachment extending beyond a well-defined and defensible edge. It is considered that the proposed site does not follow the physical settlement boundary as it merely follows an artificial line across the field. The objector is comparing this proposed site with the Wrexham Rd Abermorddu allocation where there is an alleged permitted public access. This is not an appropriate way in which to be informing the suitability of sites. There is no public right of way across the allocated site although it is understood that the public do walk across the site to gain access to the hillside, but the Council is unaware whether this is with the consent of the land owner.

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				No different to access to bungalows abutting the site. The site is located On the straight main road which could be adapted to actually improve that area and access to the road for more than just this site as it would slow traffic down to allow people to exit side roads easier onto the main road eg. Mountain View. The general infrastructure for such a development is already in place with easy access to nearby shops and schools and other amenities and activities;		The Council's Highways Development Management Officer has raised objections to development at this site on the basis that the access would be unsuitable as there is inadequate junction visibility to the right on exit due to the horizontal and vertical profile of the road. The Plan's allocation at Wrexham Road, Abermorddu is backed up by and informed by a large number of background and technical studies which demonstrate that the site is viable and deliverable. Despite the objector's statement that the site is preferable to the allocated site, there is no submitted background / technical evidence to show that this is the case. Although it is recognised that there are services and facilities within the settlement and in close pro9ximity to the site, it is considered that there are negative factors with the site which outweigh this. In conclusion, the site relates poorly to the built form of the settlement and would result in ribbon development which would harm open countryside. The site is not appropriate to be allocated or included in the settlement boundary.
1213	HN1: New Housing Development Proposals	Gresford Rd, Hope HCAC028	Object	Land on south side of junction of Gresford Rd and Hope Hall Drive, Hope - Our reasons for putting forward this site for development in the	Allocate Gresford Rd, Hope HCAC028 instead of HCAC004	Not accepted. It is considered that by allocating two smaller sites in comparison to one site at Wrexham Road will not be more deliverable or viable when HCAC02 is not deemed deliverable as set out by the concerns below. A key principle in PPW is

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				LDP are as outlined below: Smaller development than HCAC004 and therefore would have a lower impact on the surrounding area. Also a smaller development would be more viable and deliverable. Due to it's location, this site would have a low impact on the surrounding area. On the straight main road with good access. Hope Hall Drive already opens onto the main road next to that location. The road could be adapted to actually improve that area and access to the road for more than just this site as it would slow traffic down to allow people to exit side roads easier onto the main road eg. The lane next to The Rectory which comes out		that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. It should be noted that there is presently no pavement fronting the site. It is a simplistic view that smaller sites have a lower impact, as all sites are assessed on their specific merits. In this instance, the proposed site would result in urban encroachment in the form of a large block of development extending beyond a well-defined and defensible edge. Whereas the allocated site is considered to be better positioned to the settlement. Additionally, due to the lack of background / technical studies there is no evidence to show that the site is viable or deliverable. Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, is not considered to be a viable and deliverable site. The land is currently agricultural grazing land. The site is not located within the settlement boundary and is therefore greenfield land classed and open countryside. With the exception of the ribbon development to the south of the site the bulk of the settlement pattern and form at this location is on the opposite side of the B5373 Gresford Road. This together with the long straight A55O Wrexham Road to the north marks a

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				near to Hope Hall Drive and Kiln Lane. No permitted use of the land by the public. Flat land. The general infrastructure for such a development is already in place and easy access to nearby shops and schools and other amenities and activities. There are already dwellings on this side of the main road further back than this site and bungalows on that side. The site would therefore associate with development on two sides, the main road with dwellings opposite on one side (none of these dwellings have openings onto the main road and gain access onto Kiln Lane) and on the opposite side of a driveway are two fields of agricultural land (Appendix 4 HCAC028). Essentially development		strong physical demarcation between the built up area to the west and the open countryside to the east. The site relates poorly to the main built form of the settlement and is better related to the open countryside to the north and east. The eastern boundary of the proposed site follows no physical features on the ground and is not a firm and defensible boundary. Development of the site would result in urban encroachment in the form of a large block of development extending beyond a well-defined and defensible edge. Although there are no detrimental issues with regards to highways, careful detailing of the site access and pedestrian facilities (possible central refuge or right turn lane) will be required due to the nature of traffic using the B5373 past the site. Potential off-site footway improvements. 2.4x120 is available to the right into the 40mph restricted area and 2.4x215 to the left. The character of any development is likely to require a speed limit review. The objector is comparing this proposed site with the Wrexham Rd Abermorddu allocation where there is an alleged permitted public access. This is not an appropriate way in which to be informing the suitability of sites. There is no public right of way across the site although it is understood that the public do walk across the site to gain access to the

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				on this site would be filling in a gap in the existing housing.		hillside, but the Council is unaware whether this is with the consent of the land owner. Although it is recognised that there are services and facilities within the settlement in close proximity to the site it is considered that there are negative factors associated with the site which outweigh this. As discussed above, although there are some dwellings nearby it is considered that the site relates poorly to the main built form of the settlement and is better related to the open countryside to the north and east. In conclusion, development of this prominent site would result in a detached block of residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site is not considered to be necessary or appropriate as an allocation either to replace or be in addition to the Wrexham Rd allocation.
1214	HN1: New Housing Development Proposals	HCAC023 Land rear of 17 Plas Yn Bwl	Object	Land rear of 17 Plas y Bwl, Caergwrle - Our reasons for putting forward this site for development in the LDP are as outlined below:	Allocate HCAC023 Land rear of 17 Plas Yn Bwl instead of HCAC004 Wrexham Road Abermorddu	Not accepted. The site is not located within the settlement boundary. The site is located outside the settlement boundary, however adjoins the boundary from the rear of 17 Plas Y Bwl. Due to its small size and likely maximum number of dwellings being 6 units, this site is

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				within the settlement boundary flat land, Forms part of the curtilage of an existing dwellings. This is effectively someone's garden. It is also within the settlement boundary. Due to its location, this site would have no impact on the surrounding area. There are already dwellings / development around this site and the building line is also in line with other development parallel to it further down on the main road (see general area photograph at Appendix 4 HCAC005). This site doesn't readily associate with open countryside as it is an extension of someone's large garden area. Essentially development on this site would be filling in a gap in the existing housing.		classed as a Small Site and is not appropriate to be allocated in the Plan. The site is located at the southern end of dwellings on Plas y Bwl. The site lies in an elevated location and rises up from the rear of no. 17. The site sits behind existing houses which lie at the head of Plas y Bwl and is in an elevated position with land running steeply downward to the east to the A542 Wrexham Road therefore, the site is located within a prominent position The site has similar characteristics to the open countryside and is considered to have little relationship with the form and pattern of built development, given that there is housing only on its northern side. The inclusion of the site in the settlement boundary would result in a block of development in an elevated and prominent position which would be harmful to the character and appearance of open countryside and also relate poorly to existing built development. Although it is recognised that there are services and facilities within the settlement and in close proximity to the site, it is considered that there are negative factors with the site which outweigh this. Highways officers consider this site is unsuitable as there is no direct access to the

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				The general infrastructure for such a development is already in place and easy access to nearby shops and schools and other amenities and activities. Access already in place.		adopted highway. Plas y Bwl is considered unsuitable to cater for any additional traffic due to its alignment, limited width and inadequate junction with Bryn Yorkin Lane. Despite the objector's statement that the site is preferable to the allocated site, there is no submitted background / technical evidence to show that this is the case. A key principle in PPW is that allocations are viable and deliverable yet the objection provides no assurances or evidence that a satisfactory access can be provided. Despite the site being submitted as a candidate site, it has not been the subject of a representation to the Deposit LDP by the owners or a developer, and in this light, is not considered to be a viable and deliverable site. Development of this prominent site would result in a detached block of residential development which would be poorly related to existing development and visually damaging to an area of attractive open countryside. The site is not considered to be necessary or appropriate as an allocation either to replace or be in addition to the Wrexham Rd allocation. In conclusion, the site is too small to be allocated and inappropriate to be included in the settlement boundary on account of its access constraint and poor relationship with existing built form and associated impact on open countryside.

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1218	HN1: New Housing Development Proposals	FLI008	Object	The Plan has no specific policy or proposal to meet the needs of housing for an ageing population and those with dementia. please refer to attached document. Please note that 2 other files are being forwarded separately by email direct to Planning Policy. Paragraph 7.16 refers to the need to provide for more specialist needs housing. It makes particular reference to the ageing population. However, apart from reference to the need for bungalows, other forms of housing suited to meeting the general housing needs of elderly residents, and more specialist forms of accommodation such as sheltered housing, it gives no further direction. The Plan contains no specific development management policy or proposal in the Plan to actually take this forward and meet the	Have a specific policy and proposal site for housing for the elderly, namely a retirement village on candidate site FLI008.	Not accepted. The objector is concerned about the track record of poor delivery on both the strategic sites in terms of housing and how the Plan is over-reliant on them. However, it is worth noting that the Warren Hall site has not previously had a housing element. The North Wales Growth Deal clearly identifies the Warren Hall site as forming a key part of the strategy. The initial projects include 'primary infrastructure, to include a new access road and on site access, electricity, drainage and other services at Warren Hall'. This is referenced in the Welsh Government representations on the Deposit LDP wherein Welsh Government support in principle the economic growth strategy in terms of the scale and location of homes and jobs. It is not considered that the Plan is over reliant on the two strategic sites in terms of housing or employment growth. Turning first to housing, it is worth stressing that the Plan is already delivering, in terms of completions to date, what the Plan seeks to provide. If the Council were in the position whereby it had built up a deficit of under-delivery in the first few years of the Plan period, then there might be greater concern about reliance on two strategic sites. Nevertheless, despite Warren Hall being a strategic site, the housing element is not strategic as it is 300 dwellings which is on a par with the other housing

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				aims/outcomes of PPW and Well-being Act. The Plan fails to actively address these issues and has had no regard to the pressing evidence that has been emerging for the last 5 years and more.		allocations in the Plan. It is not considered that there are any evidenced concerns about the ability to deliver 300 dwellings at Warren Hall within the Plan period. The Plan is not reliant on windfalls given that the small site allowance of 60 units per annum and large sites allowance of 50 units per annum, is conservative when comparted with past trends and also having regard to the findings of the Urban Capacity Study. The HBF are supportive of these modest allowances. In line with advice contained within Development Plan Manual 3 (DPM3), the LDP incorporates a flexibility allowance of 14.4%. DPM3 states that LDPs must include a minimum flexibility allowance of 10%. There is no requirement from Welsh Government to include within the Plan contingency or reserve sites. The Northern Gateway is a strategic mixed use allocation in both the adopted UDP and the deposit LDP. Progress on the site was affected by the economic downturn but Welsh Government has now invested in flood defence works along the River Dee and a spine road, both of which have been implemented. The site is in two ownerships with Praxis promoting the northern part and Pochin the southern part. Good progress is now being made on the northern part of the site with enabling works and the reserved matters approval (059514)

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						for Countryside Properties for 283 units on plots H1, H2 and part of H8, who are presently on site. Following marketing of the site, developer interest has led to a planning application (060311) for a further phase of site enabling works and this application is under consideration. In January 2020 reserved matters approval was granted for a 10,000sqm warehouse development on plot A. On the southern part of the site, Pochin are also making progress, albeit slightly behind. A planning application (058868) is presently under consideration for site enabling works for phase 1 and a reserved matters application (060411) is has been approved for 129 homes for Keepmoat Homes. Although Pochin Construction went into administration it is not considered to affect the Northern Gateway development. In Aug 2019 a Welsh Government spokesman said 'We have been assured that the Pochin Goodman Joint Venture, which owns part of the Northern Gateway site, is not affected by Pochin's administration process and as such we do not expect any delay to work being carried out on the development'. Pochin Goodman is continuing in its work in delivering the southern part of the site. The evidence clearly demonstrates there is renewed developer interest in the site and the construction on site by Countryside Properties will result in developer confidence in further

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						phases of development. The Council has enquiries from other developers about further phases of the development. It is quite normal on a strategic site of this size to have several housebuilders on site at the same time. The two strategic sites form an integral part of the Growth Bid proposals for North Wales and will bring about major economic benefits to the region. Evidence clearly demonstrates that Northern gateway is now being delivered and on course to deliver the units within Plan period (as shown in the trajectory). The provision of 300 units at Warren Hall is not considered excessive given its sustainable location relative to the focus for growth. In totality it is not considered that the Plan is over-reliant on the strategic sites. It is unclear from the objector's submission where the 'shortfall in housing land' is actually arising from given the size of the housing element at Warren Hall and the emerging picture of delivery at Northern Gateway. Flint is a Tier 1 Settlement which is recognised as a sustainable location for growth in both the UDP and the LDP, Tier 1 settlements have a strategic role in the delivery of facilities and services across Flintshire. Flint has already seen growth in the earlier years of the plan period with 308 dwellings completed in the early years of the plan period (2016, 2017 and 2018). There are also committed sites in Flint which will provide further growth for the town including an

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						additional 378 dwellings on the Croes Atti site, 73 units on the Earl Lea site, 19 units at Ystrad Goffa Court and 15 units on the Flint Working Men's Club site. In addition to these commitments the allocated site at Northop Road will provide 170 dwellings which is a logical extension in a sustainable location. Collectively the committed sites and Northop Road will deliver a further 655 dwellings in Flint over the plan period, this is sufficient growth for the town therefore candidate site FLI008 is not needed. Situated on the western edge of Flint outside but adjacent to the settlement boundary which for the majority of its length runs along the eastern boundary of the site. The site includes the Bryn Farm complex of buildings beyond which is the A548 Coast Road which forms the northern boundary of the site. Aber Park Industrial Estate and an area of mature woodland (Red Wood) lies to the east of the site. This large roughly L shaped area of land was initially put forward as a mixed use scheme consisting of retirement village of approximately 55 units together with employment land if required. With regards to the employment element of the candidate site, the findings of the Employment Land Review (undertaken as part of preparing the LDP) has indicated that no new additional employment sites are required for the Plan period. In view of this the promoter of the site

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						is now seeking all of the land to be allocated for residential use. Despite this site lying adjacent to the settlement boundary it is separated from the bulk of the town center facilities by the Aber Park Industrial Estate and the edge of center Flintshire Retail Park. Similarly the site is poorly related to the well established residential areas of the town again by the intervening Kimberley Clark complex, a mature woodland and the Cemetery to the North of Royal Drive. Consequently it is considered that this large site relates better to the area of open countryside to the west of the town. The Employment Land Review has concluded that there is no need for additional employment land allocations in the Plan period, and the need for a north westwards expansion of employment land does not presently exist. This area of land on the edge of the industrial estate is open in character and undeveloped, with the exception of Bryn Farm, which sits comfortably within its agricultural landscape setting. Being alongside the A548 Coast Road it is also prominent and open in character. The Council's Highway Development Management Team have been consulted on the development of the site and concluded that the site had potential for development subject to a Transport Assessment, they also

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						stated that "the site is relatively isolated from community facilities however a development of this scale may generate new facilities. It would appear possible to provide access from a traffic signal controlled junction however this would benefit from a lowering of the speed limit' highlighted it is remote from facilities and would require a new traffic light controlled junction onto A549. But, no Transport Assessment provided with objection to demonstrate how this can be achieved." Candidate site FLI008 was previously allocated for employment use in the former Delyn plan. It was also put forward as a UDP omission site (1119/1520 re EM1). As part of the UDP process the site was the subject of investigative work by the former Welsh Development Agency prior to the publication of the deposit plan to establish the feasibility of bringing the site forward for development. Apart from the differing views of the owners of the site about whether the site should be developed or not, the former WDA found that the site development costs would be unduly prohibitive due to the need for a major new access from the A548, the likely need for storage lagoons and terracing of the northern part of the site. At the time of the UDP inquiry the Council were of the view that without public funding to overcome some of the constraints and infrastructure problems there was no prospect

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						of the site coming forward for development during the UDP period, therefore the site was not allocated within the plan. The UDP Inspector commented: "13.30.2. PPW indicates that local planning authorities should review existing allocations when preparing their UDP. This land was allocated in the Delyn Local Plan, was assessed for its suitability for rolling forward but was not included due to site constraints. The Council takes the view that there is no prospect of the site coming forward for development during the plan period. No substantive evidence has been produced to convince me otherwise. Adequate land has been allocated in the UDP for employment needs and I do not support this objection." The objector has not provided any evidence that the site is now free from these previous constraints. The UDP inquiry concluded that the site was unviable due to high development costs, therefore it could not be considered suitable for allocation within the LDP without evidence that these constraints could be overcome. The objector has not provided any evidence to demonstrate the viability of the site given these previous concerns. Policy HN2 of the LDP deals specifically with the mix of housing, including the need for housing by the older population. Paragraph

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						11.6 of the reasoned justification states that "The Local Housing Market Assessment identified a particular need for smaller one and two bedroom units to meet the increasing need from single person households. A significant part of this need is driven by the growing older population (65+), therefore the housing needs of older people should be reflected in residential development proposals, which could include the development of bungalows. To ensure that mixed and balanced communities are created the Council will expect developers to provide an appropriate mix of dwelling size and type to meet local housing needs, making reference to the evidence within the latest Local Housing Market Assessment." Proposals for specialist types of housing such as retirement villages can be determined using policy HN2, supported by evidence of that particular need within the proposed location. A policy specifically for retirement villages is not required. The objector clearly sets out that the site would include an element for a retirement village, although there are concerns as to whether this is an appropriate location for such a use in the context of the distance to facilities and provision of walking and cycling routes. However the objector does not go into detail on what the remainder of the site will be used for. This is a 28.4Ha site, significant

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						background work and detail is required to consider it as a realistic strategic allocation. As part of a strategic review of the green barrier it is clear that the green barrier, as presently defined, does not reflect its title in that it does not extend up to the edge of Flint, it therefore will be extended to include candidate site FLI008. This will protect the open countryside from encroachment and prevent the coalescence of Flint and Bagilt. For this reason the candidate site FLI008 has not been allocated within the LDP. For further information please see response to EN11 Green Barrier rep number 93. The LDP has provided for a substantial amount of growth in Flint over the Plan period and it is not considered that an additional allocation is either necessary or appropriate. Given the size of the site and the lack of any supporting background or technical evidence it is not considered that the site is viable or deliverable, particularly in the light of previous concerns about viability. The site is also considered inappropriate given that it would represent a major urban encroachment into the green barrier designation which seeks to retain a gap between Flint and Bagillt.
1251	HN1: New Housing Development Proposals	NEW001/3/9/11 Bryn Y Baal, New Brighton	Object	A private developer submitted candidate site NEW003 for inclusion in the LDP. It was classified as an amber candidate site. The IIA which	Inclusion of candidate site NEW003 Bryn Y Baal, New Brighton.	Not accepted. New Brighton lies to the North East of Mold and immediately to the North West of Mynydd Isa. New Brighton has been categorised as a sustainable village on account of its size, accessibility and level of facilities and services and because of its

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				supports the LDP includes the candidate site in the reasonable list of alternatives, which Anwyl welcomes. On analysing the conclusions with the IIA, it can be said that the site performs positive on several objectives. However, it is noted that the site performs negatively in terms flood risk, heritage and green infrastructure. From the technical evidence which has been provided to support this representation, it is clearly demonstrated that objectives which score negatively within the IAA can easily be overcome and should not contribute to the Council's justification for the Site not being allocated at this time. In addition, the allocated site at Cae Isa (HN1-10) does not perform any stronger in IAA terms compared with our client's site (NEW003). Each are balanced to have equal numbers of		proximity to larger settlements. The bulk of the village lies on the southern side of the A5119 although small residential developments and commercial development lies on the North side of the A5119. The site is located on the eastern side of New Brighton, the A5119 is to the north and the A494 to the east. The site is well defined by existing residential development to the West and by roads to the North, East and South. The site was previously included in the green barrier which has been removed as part of the LDP green barrier review. The site remains part of the open countryside but was removed from the green barrier to allow scope for future residential development without compromising the gap between Mynydd Isa and New Brighton. Although the site remains part of the open countryside it is a logical location for growth because the site has strong and defensible boundaries. The release of the site from the green barrier will not result in the coalescence of New Brighton and Mynydd Isa as there is still open land on the between the A494(T) and the edge of Mynydd isa. Clwyd Powys Archaeological Trust have advised that the northern part of the site is crossed by the line of Wat's Dyke, development within this area may need to be avoided or may require excavation as part of

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				positive and negative scores and indeed the conclusions drawn in relation to both are comparable. We do not agree the allocated site is any more preferable than site NEW003.		any development. It is therefore unlikely that the whole of this site can easily be developed. Although the site is considered suitable in principle as a housing allocation, it is sequentially less preferable compared to the site at Cae Isa which is located in the middle of the village where the UDP Inspector drew back the green barrier and included part of the site within the settlement boundary. The UDP Inspector's comments below highlight the preferable location of Cae Isa compared to NEW003. The northernmost field parcel within the objection site was submitted as an omission site for housing as part of the UDP, but it was not recommended favorably by the Inspector, who stated that; "The objection site has an area of almost 2ha which if it was allocated for housing would be likely to yield up to 60 dwellings. This would result in a further 18% or so growth which together with commitments and HSG1(47) would be more than the indicative level of the category A settlements. Whilst there may be a wide range of facilities within a 0.8-1.2km radius, for the most part distances would be further because of the road pattern and the physical barrier of the A494(T) bypass. Moreover because of the characteristics of the A5119, particularly its width and the proximity of houses to the road between the A494(T) roundabout and the crossroads in

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						the village, a pavement would more than likely to have to be to the north of the A5119 meaning walkers from the village would have to cross a busy road twice to use most of these facilities. 11.131.8. The objection site is rectangular in shape and fronts the A5119 on its northern side. It is at present grassed fields and seen as part of the open countryside. Because of its topography and proximity to the main road, it is highly prominent. Moreover where the site does abut houses, on its shorter western boundary, it is the rear of properties and development of the objection site would be a self contained entity with no vehicular link. Development on it would be seen as a significant encroachment into the rural area. It seems to me that together these factors illustrate the poor relationship both physically and visually with the main body of the village. 11.131.9. In addition, if the allocation were to go ahead, it would leave a substantial area of open land to the south which would in effect be enclosed on 3 sides by housing and the fourth by the bypass. There would therefore be likely to be pressure for further development on this land. 11.131.10. Finally the problems I have identified with the objection site mean that I do not consider it to be preferable to HSG1(47) which is part brownfield and to

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						my mind better related to the facilities in the village despite its location further from the crossroads. Whilst I recommend that HSG1(48) be deleted, I have nevertheless looked at it in comparison to the objection site and notwithstanding its constraints, it seems to me that because of its proximity to the centre of the village and its more secluded location, that it could be seen as more of a rounding off of the settlement and not an extension to it. Highway matters appear to be capable of resolution, particularly for pedestrians. The combination of these factors lead me to conclude that the omission site should not be allocated for housing'. The Council has acknowledged that the site may have future development potential and this is demonstrated by the drawing back of the green barrier to the line of the A494(T). It is also acknowledged that the inclusion of the whole site addresses the Inspectors comments about pedestrian linkages by facilitating pedestrian access onto Bryn y Baal Road. The Council are of the view that the allocated site at Cae Isa offers a more sustainable location in the centre of the village which is partly within the settlement boundary. The objector has provided their own assessment of the candidate site against the allocated site at Cae Isa, however this fails to demonstrate that candidate site

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						NEW001/003/009/011 performs sequentially higher than the allocated site. The Council have assessed all of the candidate sites and concludes that the development of the allocated site at Cae Isa ahead of candidate site NEW001/003/009/011 provides a more logical extension to the built form of the settlement, and is more preferable due to its central location within the village. It is not the purpose of the development plan to simply feed developer's long term land banks and if the site has future merit it can be considered as part of a plan review. The allocation at Cae Isa will provide 105 new dwellings for New Brighton, in addition there is a commitment of 23 dwellings on the former New Brighton Service Station, there has also been 13 units completed at Rock Bank. This will provide sufficient growth for the settlement therefore an additional site in New Brighton is not needed. Furthermore, development is taking place only a short distance away at Bryn y Baal where MacBryde Homes are developing a scheme for 59 dwellings. In conclusion, it is considered that sufficient provision for growth has been in New Brighton in the Plan and that further allocation, particularly given the size of the site is not necessary or appropriate.
1265	HN1: New Housing	PEN005 Land South of Rhos Road,	Object	- The, supposedly, 15-year Plan already has only just over 10 years	Allocate site PEN005	Noted. Outline planning permission was granted on appeal on 27/04/20 for an over 55's retirement development comprising

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	Development Proposals	Penyffordd, Nr Chester		remaining and even if the above timetable goes to plan it will only have 8.5 years remaining and, possibly even less, if there is further delay. Consequently, there should be an extension to the Plan period [Policy STR1 refers]. - The overall housing land figure does not provide for a sufficient amount of development [Policy STR1 refers]. - it is disputed that a sufficient range and choice of sites are provided for in the Plan - further releases of sites are necessary. - There is an over-reliance on just two large-scale Key Strategic Sites [Policies STR3A and STR3B refer] in that there exists some uncertainty in the delivery over the Plan Period. - There is an insufficient number of other		apartments. The Design and Access Statement specifies 37 units. The development of the site can clearly now proceed separate to the LDP preparation. At present, given that the Plans Housing Balance Sheet has a date of April 2018, it is not possible for the site to be included as a commitment. The appeal decision was dated 27/04/20 so will not be picked up in the April 2020 Housing Land Monitoring Study and will not feature until the April 2021 Study. Although not formally at present recognized in the Plans Housing Balance Sheet, clearly this site will add, in effect, to the Plans overall flexibility in the form of a large windfall site.

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				allocations [Policy HN1 refers]. It is considered that a significant number of [deliverable] small to medium sites are required to be allocated in order to ensure that the Plan can deliver upon housing targets [thereby creating a deliverable, effective, and 'sound' Plan]. - There is an over-reliance on the total Windfall [Policies STR2 and STR11 refer] estimate of 1320. Windfall sites are a finite resource. There needs to be a subsequent reduction in the Windfall estimate. - There is a need for minor extensions to settlement limits [Policy PC1] to increase a significant number of (deliverable) Windfall sites to meet the shortfall identified and to ensure that the Deposit LDP can deliver upon housing targets - thereby creating a deliverable, effective,		

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				and 'sound' Plan. - The flexible allowance of 1000 units [14.4%] is insufficient in light of the above shortcomings and should be increased to 20%. - The land south of Rhos Road, Penyffordd should be accepted as an additional allocation for housing.		
1266	HN1: New Housing Development Proposals	TREU001 Land adjacent to Bryn Tirion, Ffordd Y Rhos, Treuddyn, Flintshire	Object	General: Include new housing allocation on land adjacent to Bryn Tirion, Ffordd Y Rhos, Treuddyn in the list of Tier 3: Sustainable Village Allocations.	Allocate site are part of LDP	Not accepted. General: Treuddyn is a small village located some 9 km (by road) from Mold. The village is in a relatively isolated and undeveloped part of the County and benefits from an attractive rural setting. The built form of the village is relatively easily defined. The proposed site is approximately 1.8ha, comprising a roughly square shaped parcel of land located adjacent to Bryn Tirion immediately north-west of Ffordd Y Rhos which is a main route through Treuddyn. The proposal is sought for approximately up to 40 units.

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				The overall housing land figure does not provide for a sufficient amount of development [Policy STR1 refers]. There is an insufficient number of other allocations [Policy HN1 refers]. It is considered that a significant number of [deliverable] small to medium sites are required to be allocated in order to ensure that the Plan can deliver upon housing targets [thereby creating a deliverable, effective, and 'sound' Plan]. It is disputed that a sufficient range and choice of sites are provided for in the Plan further releases of sites are necessary. There is an over-reliance on just two large-scale Key Strategic Sites [Policies STR3A and STR3B refer] in that there exists some uncertainty in the		The Council has provided a robust evidence base to support the policies and proposals in the deposit LDP and to demonstrate the deliverability of the sites in the plan, and its overall soundness. The Plan's housing requirement figure is higher than Welsh Government projections, as it is based on a growth led strategy. The objector does not specify how much higher the housing requirement should be. The Housing Balance Sheet demonstrates how the Plan can meet its housing requirement figure through various sources of 'supply' and part of this is to incorporate a flexibility allowance. The 'over-allocation' element is in effect the 'flexibility' allowance. The LDP does not seek to apportion development spatially in an even manner across the County. Rather, it seeks to distribute growth towards the most sustainable settlements and sites in accordance with the settlement hierarchy which is embodied in policy STR2. The Plan has provided a good mix of strategic sites in STR3 and further allocations in HN1. The allocations are considered to be sustainable, viable and deliverable in accordance with the trajectory set out in the Housing land Supply background paper. The LDP aims to steer development within the first three tiers, within a hierarchy system

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				delivery over the Plan Period. There is an over-reliance on the total Windfall [Policies STR2 and STR11 refer] estimate of 1320. Windfall sites are a finite resource. There needs to be a subsequent reduction in the Windfall estimate. There is a need for minor extensions to settlement limits [Policy PC1] to increase a significant number of (deliverable) Windfall sites to meet the shortfall identified and to ensure that the Deposit LDP can deliver upon housing targets - thereby creating a deliverable, effective, and 'sound' Plan. The flexible allowance of 1000 units [14.4%] is insufficient in light of the above shortcomings and should be increased to 20%. Designation:		whereby the plan seeks to distribute development in a sustainable way having regards for the settlement hierarchy and by identifying the most sustainable settlements and sites. In this case Tier 3 settlements will be the location for housing that are related to the scale, character and role of the settlement in this case small scale development. The spatial strategy is not based on every settlement having an allocation. Growth can also occur through completions, commitments, windfalls and small scale exceptions schemes. In the case of Treuddyn, the UDP period saw considerable growth with 76 completions over the 15 year period amounting to 19% which was in excess of the 8-15% indicative growth band. It is not considered necessary for a housing allocation to be made in this Plan especially when provision for development exists in nearby Coedtalon / Pontybodkin and Leeswood. The Plan has sought to provide a balanced housing land supply comprising two strategic mixed use sites and 11 housing allocations in sustainable locations. The two strategic sites at Northern Gateway and Warren Hall both form part of the North Wales Growth Deal. The Northern gateway site has now seen the granting of reserved matters approvals on both housing and employment development

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				Specific extension of the settlement boundary to Treuddyn for the inclusion of a new [alternative] site on land adjacent to Bryn Tirion, Ffordd y Rhos, Treuddyn Site would not be an extension into the open countryside but would be a logical expansion / 'rounding off' to the village, well integrated to the existing settlement pattern. Services: It is considered that the site relates well to the existing pattern of development in the area and lies in a sustainable location on the edge of the settlement of Treuddyn, within easy walking distance to bus routes and community facilities and would offer a firm prospect of delivery.		and one developer Countryside Properties has commenced construction on site. In relation to the Warren Hall strategic site this is in Welsh Government ownership and a significant amount of background work has and continues to be done to evidence and justify the developability and delivery of this site. This is assisted by the site's priority status as part of the North Wales Growth deal where significant funding is available to provide the necessary infrastructure to prime the delivery of development on this site. In addition, the housing element of this site will be fed into the Welsh Government project to accelerate the provision of affordable housing on sites in its ownership working in conjunction with Registered Social Landlords to facilitate this. This provides added certainty of the delivery of the housing element of this mixed use site, and the contribution this makes to the overall housing requirement of the Plan. Given the progress being made on the Northern gateway site and the fact that the Warren Hall site is for only 300 houses, it is not considered that the Plan's housing provision is over-reliant on strategic sites. No objection along these lines has been made by Welsh Government. The Council does not accept that too much reliance is placed on the contribution of large and small windfall sites in the LDP housing

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				The village is also served by regular bus services including Bus Route 40 which connects to Mold and Wrexham and Route DB1 linking the Village to Mold and Chester. A part-time GP Surgery is based in the village. There are a number of pharmacies and other GP practices offering a full-time service within the vicinity, the closest being approx. 2miles away in Mold. Highways: There is an existing gated access to the Representation Site, leading directly off Ffordd Y Rhos. Viability and Delivery: There are no social, economic or physical constraints which will affect the development of the site within the Deposit LDP plan period. In putting forward the		land Council response supply. With reference to the background evidence provided to support the LDP, the allowances made for small and windfall sites are set at 50% of the 18 year trend for development in these categories and therefore take a modest and conservative approach to the future delivery from these sources. BP10 (section 2.5) explains that an analysis of past trends has been carried out and this is detailed in Section 4.3 of the Flintshire Urban Capacity Study (June 2019) undertaken by Arcadis. This approach accords with the latest National guidance as contained in Development Plans Manual Edition 3: Consultation Draft (June2019). The Draft Manual advises (para. 5.63) that 'an urban capacity study can inform the identification of site allocations and assist to demonstrate delivery of windfall allowance in the Plan'. Both the Arcadis Study and BP10 explain that large and small windfall site contributions used in the Plan are significantly lower than the level of past completions achieved from these sources. It is also the case that the representative body of the development industry, the HBF, agree that the allowances are appropriate. This confirms that there is a realistic future supply of both potential small and windfall sites to support the assumptions made. No objection has been made by Welsh Government.

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				Representation Site, the following factors demonstrating its deliverability have been considered: Site ownership The Representation Site is in the ownership of promoters of the site. Restrictive covenants There are no restrictive covenants affecting the development of the site. Other land uses and users on the site There are no other land uses or users on the site. Need for infrastructure to support the development There are no infrastructure constraints, the site can be served by existing utilities infrastructure. Remediation and Issues relating to Site Viability		As discussed above the future supply of windfall sites shows a reasonable and healthy potential supply within existing settlements to support the allowances made. Therefore there is no need to further alter settlement boundaries and extend any areas to allow more land to be developed. The Council's flexibility allowance of 14.4% has already exceeded the minimum 10% required by Welsh Government in the Development Plans Manual 3. Designation: The site sits between a short ribbon of development and a detached dwelling. However, the site is separated from the ribbon by a narrow tarmac lane. The bulk of built development in the settlement lies to the south of Ffordd y Rhos. Along the northern side of Ffordd y Rhos the pattern of development is that of ribbon development. The site forms part of a larger open gap between Jerusalem Chapel to the south and Ebeneezer Chapel to the north, with this gap interrupted only by a single dwelling Bryntirion. The site clearly forms part of the open countryside setting to the settlement. The development of the site would result in a large ribbon / block of land which would relate poorly to the built form and pattern of development in Treuddyn. Development

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				There are no contamination / remediation issues that will limit the viability of the development.		would result in harm to the locality and potentially to the grade II two listed buildings adjacent to the site Jerusalem Chapel and former school room. Furthermore, 130m north-west of the site is the Scheduled Monument 'Bryntirion Round Barrow'. Development at the large greenfield site could potentially alter views from this Scheduled Monument and the character of its surrounding area. The southern part of the site was promoted as an omission site in the UDP and the Inspector commented '9926 – The objection site is a frontage strip of land to the west of Ffordd-y-Rhos. Whilst there is development in depth to the east of the road, to the west the site forms part of a large gap between a short stretch of ribbon development to the south and a longer run to the north up to the cross roads with Ffordd Carreg-y-Llech. The settlement already has firm defensible boundaries in this vicinity which would not be improved by inclusion of part of a field. The land appears to be part of the open countryside and I see no reason in the present policy context why it should be included within the settlement boundary and houses erected on it'. Services: Although it is considered that the site is located within 400m from an adequate regular bus service. The proposed site is located

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						approximately 800m to convenience store / post office. Therefore it is considered that there are an insufficient amount of services located in close proximity. Highways: The Council's highways development management team have been consulted and it is considered that access can be provided. Adequate visibility is available; footway and street lighting improvements required. However the submission provides no detail as to the proposed access arrangements. Other constraints which have arisen from stakeholders consultation include: Ecology: The site on one side is bounded by trees and it is considered that the site may affect priority or protected species, as it is greenfield (e.g. breeding birds) and contains existing structures (e.g. bats). Site is a large (>0.4ha) greenfield site and development here could adversely affect habitat connectivity due to the loss of trees. Development should seek to preserve tree canopy as much as feasible, including GI delineating the site perimeter. GI should be incorporated into the development in order to achieve biodiversity net gains, with a focus on preserving or enhancing local habitat

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						connectivity. Appropriate ecological surveys of the site should be completed prior to development taking place. Site would result in the loss of a greenfield site.. Development here could have an adverse effect on character and result in the loss of important features such as Green Infrastructure. Additionally, the site is bounded by trees on one site and no ecological survey has been submitted. The objector has not provided ecological survey to establish the impact the development may have on the ecology of the area and any mitigation procedures. Viability and Delivery: Despite the objector's statement that the site is deliverable no background and technical studies have been submitted which demonstrate that the site is viable and deliverable. There are no background studies or technical reports provided to illustrate how the development may overcome the above mentioned constraints. Additionally, the objector has not provided an indicative layout or even a masterplan type outline for the site in order for the Council to properly assess impacts. A key principle in PPW is that allocations are viable and deliverable yet the objection

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						provides no assurances or evidence that a satisfactory access can be provided. Public protection advise that a Land Contamination Assessment is required to identify if there are any metals and chemicals within the soil. Additionally, the northern part of the site is within a Coal Authority Standing Advice Area. Therefore, it is considered that development of this prominent site would result in residential development which would be poorly related to existing development and visually damaging to open countryside. There is also uncertainty relating to a number of constraints, specifically regarding ecology and potential impact on listed buildings as well as potential; contamination. In conclusion, the site is not considered to be necessary or appropriate as an allocation.
1267	HN1: New Housing Development Proposals	NH008/020 Wellfield Farm, Northop Hall	Object	Our Client has a number of land interests across Flintshire all of which are considered to be suitable, including land at Wellfield Farm, Northop Hall, which is identified as a Sustainable Village in the Deposit Plan. It is our Client's consideration that their	Allocation of additional residential sites to increase supply, including candidate site NH008/02 Wellfield Farm Northop Hall.	Not accepted. Northop Hall is a tier 3 settlement where housing development should be related to the scale, character and role of the settlement. Allocations have not been made in all settlements as the LDP does not seek to apportion development spatially by the use of numerical methods or growth bands. The plan seeks to distribute growth in a sustainable manner having regard to the settlement hierarchy. As part of this approach it is necessary to have regard to the character and role of each settlement and the circumstances prevailing at the present time.

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				land interests at Northop Hall should be allocated for housing in the Flintshire LDP for up to 140 dwellings. The release and allocation of this Site would not result in over-development in Northop Hall. Site Designation, use & Location - The Site is designated as Open Countryside on the Flintshire UDP Proposals Map. It is not subject to any other statutory designations. It is one of few opportunities for housing growth around Northop Hall in view of the Green Barrier constraints to the north-east/east of the settlement, as well as topographical/landscape constraints on the land to the north of the settlement. The gross Site area extends to 6.11 hectares. The Site comprises greenfield land. The current use of		In this context it does not mean that, in the absence of an allocation, Northop Hall will not experience growth during the plan period, the village has already seen the completion of 85 dwellings in the early years of the LDP (2015-2018) and further growth is planned on the committed site at Cae Eithin for a further 9 dwellings. This will provide sufficient growth for the settlement over the plan period. The site could accommodate almost 200 dwellings, it is the Council's view that this would not be appropriate for the scale, character and role of the settlement given the growth it has already accommodated. Given this is a relatively large site, the lack of sufficient detail with the somewhat superficial assessment presented with the objection has highlighted the lack of supporting evidence for this proposal. This large square shaped site would result in the predicted loss of 6.43ha of grade 3a agricultural land situated on the western edge of the settlement. It lies to the south of the B5125 Village road and extends in a southerly direction where it abuts the A55 expressway. Wellfield farmhouse and its curtilage is situated on the northern edge of the site, whilst the remainder consists of four fields. The southern edge of the site is characterised by a mature woodland and a brook. It forms part of a swathe of land extending from the

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				the Site is agricultural. The Site is gently sloping in nature from its northern boundary down to the A55. There are existing trees and hedgerows at the perimeter of the Site. There are no Tree Preservation Orders within or at the perimeter of the Site. The Site is located at the edge of the large settlement of Northop Hall. In respect of its surroundings, to the north and east of the Site lies existing residential development (beyond the B5125 and Brookside respectively as 30mph roads). The A55 dual-carriageway forms the southern boundary, with countryside to the east beyond the existing Wellfield Farm and woodland (which provide a physical and visual separation between the Site and the wider countryside). By virtue of		western edge of Northop Hall, which comprises a series of fields of varying sizes. Highways Development Management Officers have stated that the site is suitable subject to a Transport Assessment as there is potential access from either Village Road (may require re-location of the bus stop) or Brookside. Improved junction visibility from Brookside across the corner of the site would be required. However, the objector has not provided a Transport Assessment to evidence that the site can be satisfactorily accessed or that the traffic it would generate could be accommodated on the network. Noted. The Council's Strategic Flood Consequence Assessment identifies this site as 'red' on account of part of the two southern field parcels being within a C2 area of flood risk, where in principle highly vulnerable development such as housing should not take place. The objector has not submitted a flood consequence assessment in support of this site therefore the Council cannot fully assess the implications of highly vulnerable development on this site. The objector has not submitted an ecological survey, therefore the impact cannot be fully assessed.

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				its surroundings and boundaries, the Site is generally well-contained and a logical extension to the existing built-up area of Northop Hall. Accessibility - Access to the Site, both vehicular and pedestrian, can be secured from the B5125 with appropriate visibility splays achievable. The access road would be 5.5m in width, with 2m internal footways through the Site. A further pedestrian connection can be provided to Brookside to the east of the Site. The internal footways can provide for the safe movement of pedestrians, and to encourage non-car travel in view of the Site's locational sustainability and access to public transport services. The Site is sustainably located benefiting from excellent access to local primary education, shops and services, open space and recreation,		The development of the site would result in the predicted loss of 6.43ha of grade 3a agricultural land. The site is well screened from the A55 by the strip of woodland at the bottom of the site but is very visible from village road, with extensive views across the site to wider open countryside. The development of this site would be harmful to this area of open countryside, and it is unlikely that a landscaping scheme would be sufficient to mitigate against this. The objector states that the development of the site would result in the loss of trees and hedgerows which would increase the negative visual impact of the development. A planning application (060292) for 24 dwellings was recently submitted on land adjacent to the objector's site (Plas Ifan Hotel). The application was refused and is currently pending appeal. If this appeal is granted then the scale of the two adjoining sites would have a significant impact upon the village, particularly given the level of growth Northop Hall has already seen, which would be harmful to the character and role of this tier 3 settlement. The objector does not present sufficient justification that candidate site NH008/020 should be allocated within the plan. The development of this site in its entirety would

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				and bus services all of which are within an acceptable walking distance. Highways - The development of the Site would have a negligible impact on the safety and operation of the local highway network. There are no highway or road safety reasons why the Site could not be developed. A policy compliant quantum of car parking would be provided within the Site. Noise - The proposed development of the Site would be designed such that it would not result in unacceptable living conditions for any future residents, particularly those dwellings located towards the southern edge of the Site in closest proximity to the A55 Dual Carriageway. This would include the use of measures such as double glazing, windows with closed and trickle		represent a very large extension to the settlement by taking all of the land between the B5125 Village Road and the A55. In the light of development at the Cae Eithin site taking place both during the UDP plan period, and the early part of the LDP plan period, it is not considered that a site of this size is not necessary or appropriate for Northop Hall at this time, particularly as there are uncertainties regarding vehicular access and flood risk. In conclusion, growth has occurred in Northop Hall and it is not necessary or appropriate to make an allocation, particularly such a large site and where there are constraints which have not been addressed.

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				ventilation, and a solid wall/proprietary timber acoustic fence(s) where necessary. Trees & Hedgerows - The development of the Site would require the loss of some existing landscape features in the forms of trees and hedgerows. Any loss would be kept to a minimum; replacement tree and hedgerow planting could be implemented across the Site as part of a comprehensive scheme of soft landscaping. Flood Risk & Drainage - The majority of the Site lies within Flood Zone 1. However, the southern part of the Site does lies in Flood Zone C2. Accordingly, no built development would be located in that part of the Site. Sustainable Urban Drainage Systems would be utilised across the Site to manage surface water run-off, and would		

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				not exacerbate flood-risk elsewhere. Foul water would be managed by connecting into the existing public foul sewer along the B5125, together with a pumping station and rising main. Ecology - The development of the Site would not give rise to any significant adverse ecological impact; there would be the potential to employ mitigation measures where necessary some of which could deliver net gains in biodiversity. Landscape & Visual Impact - The Landscape Impact associated with the development of the Site would be Moderate to Slight Adverse at most. The Visual Impacts associated with the development of the Site would be Moderate to Moderate to Slight adverse post-construction, and provided that a robust		

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				landscape scheme is implemented across the Site and once it becomes established Deliverability - The Site is being actively promoted by MacBryde Homes. As a leading housebuilder in North Wales, MacBryde Homes would advance a detailed planning application with a view to delivering in the region of 50 dwellings per annum on the Site, subject to market conditions. Accordingly, the Site is deliverable in its entirety within five years. There are no land ownership/land assembly constraints which would preclude its development, and MacBryde Homes has entered into a formal Option Agreement with the landowners to purchase the Site on the successful grant of planning permission.		
1268	HN1: New Housing	DRU009 Woodside	Object	Our Client has land interests on land at	Allocate additional land for housing,	Noted. A recent application ref 058212 for the demolition of 1 and 2 Woodside Cottages and

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	Development Proposals	Cottages, Drury		Woodside Cottages in Drury, which is identified as a Sustainable Village in the Deposit Plan. The Site is located within the settlement boundary of Drury as shown on the Flintshire UDP Proposals Map. It is not subject to any other designations. The Site is located within the settlement boundary of Drury. It is surrounded by existing residential dwellings to the north, south and west, with agricultural land (Green Barrier) located to the east beyond a further existing residential property. By virtue of its surroundings and boundaries, the Site is well-contained and represents a logical development opportunity. Access to the Site, both vehicular and pedestrian, can be secured from Peny-y-Coed Road with appropriate visibility splays achievable. The access road would be	including candidate site DRU009 Woodside Cottages, Drury.	erection of 23 new dwellings, on the candidate site and land to the north of it, was refused by Planning Committee and subsequently allowed on appeal. The site cannot be included as a housing commitment as planning permission was granted after the base date of 01/04/18 for the Plans housing balance sheet. The site therefore represents a windfall site and will form part of the Plans overall housing land supply for the Plan period. The site has planning permission and can therefore be developed, without it being allocated in the Plan.

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				5.5m in width, with 2m internal footways through the Site. The internal footways can provide for the safe movement of pedestrians, and to encourage non-car travel in view of the The Site is sustainably located benefiting from good access to local primary education, local services and public transport all of which are within an acceptable walking distance. The development of the Site would have a negligible impact on the safety and operation of the local highway network. There are no highway or road safety reasons why the Site could not be developed. A policy compliant quantum of car parking would be provided within the Site. The development of the Site would require the loss of some existing landscape features in the forms of trees and		

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				hedgerows. Any loss would be kept to a minimum; replacement tree and hedgerow planting could be implemented across the Site as part of a comprehensive scheme of soft landscaping. The Site lies within Flood Zone 1. Sustainable Urban Drainage Systems would be utilised across the Site to manage surface water run-off, and would not exacerbate flood-risk elsewhere. Foul water would be managed by connecting into the existing public foul sewer where possible. The development of the Site would not give rise to any significant adverse ecological impact; there would be the potential to employ mitigation measures where necessary some of which could deliver net gains in biodiversity. In view of the above, it is		

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				our Client's consideration that their land interests at Drury should be allocated for housing in the Flintshire LDP for up to 24 dwellings. The release and allocation of this Site would not result in over-development in Drury.		
1269	HN1: New Housing Development Proposals	CON 096AS Kelsterton Farm	Object	We consider that an allocation for mixed-use development on the owners land would help to align the ambitions of the Deposit Plan with the Welsh Government's Draft National Development Framework 2020-2040 Spatial Strategy for Wales which identifies Wrexham and Deeside as a 'National Growth Area' Major developments such as the A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement scheme are ensuring that Connah's Quay remains a fundamental part of the North Wales Economy.	Include Kelsterton Farm allocation within LDP.	Not accepted. The objector proposes a mixed use development on 40ha of land on the north western edge of Connahs Quay. The objection is lacking in any background or technical documentation to demonstrate that it is appropriate, viable, free from constraint and deliverable. The submission is also lacking in any detail as to the quantums of development proposed other than a 'Proposed Uses layout Map' which shows broad locations for housing, employment and roadside. In the context of the importance in PPW10 and Development Plan Manual 3, of development plan proposals being evidenced in terms of viability and deliverability, the objection is lacking any evidenced that it is necessary, appropriate, viable or deliverable. There is also no requirement in PPW10 for sites to be 'safeguarded' for future uses. The Plan has sought to incorporate a growth based employment and housing strategy and the housing element is considerably in excess of the Welsh Government projections. No objection has been made to the level of

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				• Inevitably this will lead to a major change in the ability of the land required to perform its role as green barrier effectively. We consider that careful landscaping around the site would minimise the potential impact of such development on the remaining green barrier. • New Kelsterton junction will provide excellent access to Connah's Quay and the proposed road. Furthermore the proximity to the new Kelsterton junction will provide excellent access to Connah's Quay, Flint and North Wales and will provide opportunities for increased economic development in the immediate area, including residential, employment and roadside uses. • Our view is that this presents a major opportunity to allocate development land for a		growth in the Plan by Welsh Government, who broadly support the Plan's amount and spatial distribution of development and consider that it broadly accords with the draft NDF. The Plan has identified two strategic mixed use sites and a range of other employment and housing locations in sustainable locations. The two strategic sites at Northern Gateway and Warren Hall are both key elements of the North Wales Growth Deal and there is considered to be no need for a further strategic site. Connah's Quay is located in the north east of the County and it is the largest settlement in the Plan Area. Connah's Quay has been classified as a Tier 1 Main Service Centre in the LDP because of its size, role, character and level of services and facilities. The settlement has housing allocations at Highmere Drive and Broad Oak Holding as well as a large Principal Employment Area and is in close proximity to key existing and proposed employment in and around Deeside Industrial Park. There is presently no need for further greenfield employment or housing land in this location. The candidate site is located on the north western edge of Connah's Quay and although the site is adjacent to the existing settlement boundary it is situated within the Flint - Connah's Quay green barrier, GEN4(4) which

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				range of land uses. What remains clear is that planning policy must be able to keep up with this change and we believe that our suggestions outlined above will help contribute to making this happen. • Changes to Green Barrier Policy EN11 are essential as currently it contradicts the Welsh Government's National Development Framework and our recommended changes to Policy STR5 will ensure that the area is adequately provisioned for the increased HGV traffic that future improvements at Holyhead Port will bring.		has been reviewed as part of the LDP process and found to meet the objectives of PPW. The objectors comments in respect of the green barrier are addressed in respect of policy EN11 (id 555). The site forms part of a large swathe of open countryside to the north west of the settlement. It is considered that the site is better related to the open countryside than to the form and pattern of development within the settlement of Connah's Quay. The inclusion of this site within the settlement boundary, or its allocation would result in an illogically drawn settlement boundary, a significant incursion into open countryside and a scale of development which would be unsustainable particularly when there are sequentially preferable sites within the settlement boundary to cater for growth. The developer puts forward the case that the Welsh Government Red Route provides a context for the proposed allocation. However only broad line of the route is safeguarded in the Deposit LDP and there is no firm indication of timescales for the route to the completed, particularly as it still has to go through a public inquiry. The consideration of large scale development proposals is clearly premature until such time as there is more certainty as to the Red Route in terms of alignment, design and timescales. The proposed development is more appropriately

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						considered in a review of the LDP, following adoption. The Welsh Government Predictive Agricultural Land Classification Map shows the site as being grade 3a which represents Best and Most Versatile agricultural land. In the context of advice in PPW10 about the protection of BMV the objection is lacking in a supporting agricultural land survey to demonstrate the actual grade of agricultural land. Given the size of the site and the number of hedgerows and mature trees as well as its location adjoining and in close proximity to two wildlife sites, it is disappointing that the objection is not accompanied by an ecological survey. Highways Development Management Officers have been consulted and responded with the following: 'The site is affected by the "Red Route," the preferred route for the Welsh Government A548 road improvement scheme; Although not fully developable, a Transport Assessment is required in order to provide a fully detailed highway response in regard to the remainder of the site. Direct access to the site from the future trunk road or roundabout is unlikely to be practical (the land owner may wish to discuss that with

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						Welsh Government. The site is isolated and remote from community facilities although a development of this scale would justify the provision of additional facilities on site. It is important to note that there is no evidence yet that the new road scheme will be delivered within the Plan period'. Given the size of the site and the mixed use nature, it is noted that the objection is not accompanied by a Transport Assessment. In conclusion, it is considered that there is no need for the removal of a significant portion of a Green Barrier between two of the County's largest settlements and given that the Plan makes provision for growth at both a strategic and local level. The allocation of a large mixed use development on the back of a major new road, for which there is a lack of certainty in terms of detail and timing, combined with the lack of any technical evidence to support the objection, is considered to be premature and inappropriate. Therefore the proposed site should not be allocated within the LDP.
1286	HN1: New Housing Development Proposals	LEE001 Land adj Queens Farm Dingle Rd Leeswood	Object	The above named site needs to be included as an allocated site for the following reasons: - The proposed Candidate Site LEE001 is a logical extension to Leeswood providing up	The above named site needs to be included as an allocated site for the following reasons: - The proposed Candidate Site	Not accepted. The proposed allocation of this site has been addressed within the Council's response on STR2 (id659).

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				to 5ha developable area for housing which would provide for up to rely 150 units over the plan period. - Leeswood is a sustainable settlement which requires an appropriate level of growth to sustain it. - Sites have only been allocated within 9 settlements on large sites of 32-298houses (nine of the total eleven allocated sites are for over 100houses). This is not considered a sustainable approach and more small to medium sized sites should be allocated in other settlements. - Leeswood does require growth and it is considered that the site is the most appropriate candidate site for this purpose.	LEE001 is a logical extension to Leeswood providing up to 5ha developable area for housing which would provide for up to rely 150 units over the plan period. - Leeswood is a sustainable settlement which requires an appropriate level of growth to sustain it. - Sites have only been allocated within 9 settlements on large sites of 32-298houses (nine of the total eleven allocated sites are for over 100houses). This is not considered a sustainable approach and more small to medium sized sites should be allocated in other	

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					settlements. - Leeswood does require growth and it is considered that the site is the most appropriate candidate site for this purpose.	
1287	HN1: New Housing Development Proposals	GFD001 Coppy Farm Gwernaffield Road	Object	The site needs to be included as an allocated site for the following reasons: - The proposed Candidate Site GFD001 is a logical extension to Gwernaffield providing approximately 3ha developable area for housing which would provide up to 80 dwellings over the plan period. - Gwernaffield is a sustainable settlement which requires an appropriate level of growth to sustain it. - Sites have only been allocated within 9 settlements on large	The above named site needs to be included as an allocated site for the following reasons: - The proposed Candidate Site GFD001 is a logical extension to Gwernaffield providing approximately 3ha developable area for housing which would provide up to 80 dwellings over the plan period. - Gwernaffield is a sustainable settlement which requires an	Not accepted. This representation has been fully responded to under policy STR2

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				sites of 32-298houses (nine of the total eleven allocated sites are for over 100houses). This is not considered a sustainable approach and more small to medium sized sites should be allocated in other settlements - Gwernaffield does require growth and it is considered that the site is the most appropriate candidate site for this purpose.	appropriate level of growth to sustain it. - Sites have only been allocated within 9 settlements on large sites of 32-298houses (nine of the total eleven allocated sites are for over 100houses). This is not considered a sustainable approach and more small to medium sized sites should be allocated in other settlements. - Gwernaffield does require growth and it is considered that the site is the most appropriate candidate site for this purpose.	
1296	HN1: New Housing Development Proposals	BUC021	Object	Consideration of the overall site (former Dimplex factory and associated vacant land),	Allocate site at former Dimplex Factory	Not accepted. The objections regarding policy PE1 (id879) and PE2 (id880) have been responded to separately. The objector has

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				extending to 3.4 ha, for a residential allocation (under Policy 43 – HN1). It is submitted that the delivery of the some of the proposed residential allocations in the Deposit LDP is questioned on a number of grounds, details of which would be examined in more detail at the Examination. Planning Policy Wales (10th Edition) makes it very clear that the deliverability of sites is paramount in ensuring the soundness of a Local Development Plan and the associated allocation of sites for residential development. It is submitted that the Little Mountain site is 100% deliverable, free from any major constraints and, most importantly, capable of early delivery. • Change to Proposals Map • Addition (or substitution of alternative allocated		also referenced the sites allocation under policy HN1. The Plan has met its housing requirement figure through a variety of sources of supply and this includes a suite of housing allocations under policy HSG1. The Plan's housing allocations are all in sustainable locations and backed up by background and technical studies and are considered to be available, viable and deliverable. The objector's assertion that the objection site should be substituted for one of the existing allocations or included as an additional allocation is not supported, as no evidence is provided as to which sites are questioned in terms of delivery, nor the reasons why. The objection was not accompanied by any technical studies to demonstrate that the site is suitable and appropriate to be allocated, particularly given the sites sensitive location in respect of the Buckley Claypits and Commons SAC. The objection site is predominantly included within the settlement boundary in the adopted UDP, with the exception of the northern part of the objection site. The Council is aware that a pre-application enquiry has been submitted in respect of the site and it is also noted that the objector has now submitted an outline planning application (061507) for the erection of 94 dwellings.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				site if housing numbers do not allow additional sites) of site as residential allocation under Policy 43 – H1. It is submitted that the allocation of the site for residential purposes would have the ability to meet a number of the aims and objectives of national policy as set in the above documents as follows: • To provide a greater choice for people over the type of housing and the location within which they live. • To provide appropriate edge of settlement developments with a mix of affordable and market housing. • To locate development where it is easily accessible by public transport/walking/ cycling		The Plan includes an allowance for windfall sites as part of its Housing Balance Sheet. The site is considered to be more appropriately addressed in the context of the planning application, as part of which, detailed technical and background evidence can be assessed. The proposals can be assessed against the framework of policies in the UDP including policy PE6 which sets out texts in respect of the loss of employment land and buildings. This allows the proposer to deliver on the stated intention that this site is capable of early housing delivery which, by definition, can be sooner than the adoption date for the LDP, as indicated by the now submitted planning application. Consideration of the application will allow the principle of the reuse of this former employment site for housing to be assessed and determined as a windfall contribution towards housing supply. In conclusion it is considered that broadly speaking the site is in a sustainable location and represents brownfield land and is predominantly within the existing settlement boundary. It is not considered necessary or appropriate for the site to be allocated until appropriate evidence can be provided and assessed in respect of key constraints. It is more appropriately considered as part of the Plan's windfall allowance.

ID	Title	new or resubmitted site:	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				to local facilities. • To assimilate development into the landscape through appropriate mitigation measures. • To enhance biodiversity. • To make an efficient use of land through the provision of a mix of house types at a density appropriate to the surrounding locality and character of the area. • The site represents a sustainable location and is well related to wider area containing a number of local service centres and extensive employment sources.		

Policies HN2 to HN6

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
429	HN2: Density and Mix of Development	Support	support the caveat to the density policy relating to site constraints and harm to character of the site and surroundings.		The Council welcome your support for Policy HN2 and the aim to provide at least 30 dwellings per hectare.
598	HN2: Density and Mix of Development	Support	SUPPORTS to Policy HN2 with particular reference to the exception criteria contained within the policy which set out circumstances where development below 30 dwellings per hectare will be permitted.		The Council welcome your support for Policy HN2 and the aim to provide at least 30 dwellings per hectare.
647	HN2: Density and Mix of Development	Support	Policy HN2 sets out the required density for new developments and the requirement to include for a mix of housing tenure to maximise land use and ensure development positively contributes to the socially inclusive communities. TW broadly supports the principles set out in Policy HN2 in relation to development density and mix; and acknowledges the Council's efforts to ensure the efficient use of land. However, as currently worded, the Policy is unclear whether this density applies to the net developable or gross areas of sites. In the case of large-scale developments, consideration needs to be given to the provision of infrastructure and how this might impact on development densities. Approximately 60-70% of medium to large scale sites are developable depending on infrastructure requirement; this must be factored in when calculating the development densities of	Recommended Change TW recommends that the Council provides clarity on whether the density applies to the net developable or gross area of the site. the Policy is unclear whether this density applies to the net developable or gross areas of sites. In the case of large-scale developments, consideration needs to be given to the provision of infrastructure and how this might	Noted. Whilst the objector queries whether 30 dph is a gross or net developable area, the written statement does clarify this. With reference to paragraph 11.5 of the reasoned justification to policy HN2, the plan states that "On all sites of 10 units or more a general minimum net housing density of 30 dwellings per hectare is required but it is acknowledged that individual circumstances will vary according to the site location and the character of the surrounding area". The specific part highlighted confirms the emphasis on density being assumed as a "net minimum", which in turn reflects the Council's aim of ensuring compliance with relevant principles in PPW10. These principles are key threads throughout PPW10 and in relation to density, one of the national place making outcomes is 'Making Best Use of Resources'. This states very clearly that "the efficient use of resources, including land, underpins sustainable development"[the Council's emphasis

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			sites. Policy HN2 states that new developments will be expected to provide a mix of housing unit types and tenures to meet the needs of the borough. TW acknowledges the importance of delivering a wide choice of high-quality homes and the need to widen opportunities for home ownership and create sustainable, inclusive and mixed communities. TW therefore supports the provisions of the Policy which requires new developments to deliver a mix of housing to meet local demand. Tests of Soundness TW considers the Policy to be sound.	impact on development densities. Approximately 60-70% of medium to large scale sites are developable depending on infrastructure requirement; this must be factored in when calculating the development densities of sites.	in bold]. This in turn is compatible with many of the Well-Being Objectives. In terms of density of development and allocating sustainable sites, PPW10 states that "Planning authorities should reassess development sites which are highly accessible to non-car modes and allocate them for travel intensive uses such as offices, shopping, leisure, hospitals and housing of sufficient density to fully utilise their accessibility potential. Sites which are unlikely to be well served by walking, cycling and public transport should not be allocated for development". It then goes on to advise that "Planning authorities must ensure the layout, density and mix of uses of new development support the use of public transport and maximises accessibility potential. In particular, higher densities and mixed-use development should be encouraged in areas highly accessible by public transport". The Council has therefore endeavoured to follow these principles in allocating the most sustainable and accessible housing sites, where the expectation of achieving a net density of 30 dph is therefore not an unreasonable one. This approach is corroborated by evidence from recent reserve matters permissions granted for housing on the Northern Gateway strategic site allocated under policy STR3. Permissions granted to Countryside Homes (300 units) and Keep Moat (120 units) on early phases of the residential elements of the mixed use site, show respective development densities of 38.5 dph and 37 dph respectively, and where the site wide outline

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					permission allowed for a range of residential densities of between 25-40 dph. In this context the Council's expectation of achieving a minimum net density of 30 dph on its sustainable allocations is more than reasonable. In contrast, and in the context of promoting 36 ha of green barrier land as an alternative site, the objector only seeks to provide 580 units relative to this area of land, representing a gross area of just 16 dph. This is hardly an efficient use of land or sustainable development, and does not suggest that their proposed site is a location envisaged by PPW10 that would support the use of public transport and maximize accessibility potential, that could therefore deliver more efficient densities. The challenge for all developers of sites is to provide an appropriate balance and mix of house types and sizes that relate to the site and locational context is targeted at meeting housing needs and is not simply based on maximizing site returns. If the former were achieved then this would make a site compliant with the aims of PPW10, and if not then it would not be sustainable development and should not be allocated.
810	HN2: Density and Mix of Development	Object	Housing Mix. There has to be clear direction on the mix of houses, too many developments are revenue-driven and some control is needed to ensure the correct mix of properties to maintain communities.	Housing Mix. There has to be clear direction on the mix of houses, too many developments are revenue-driven	Not accepted. Under Policy HN2, paragraph 11.6 states "To ensure that mixed and balanced communities are created the Council will expect developers to provide an appropriate mix of dwelling size and type to meet local housing needs, making reference to the evidence within the latest

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				and some control is needed to ensure the correct mix of properties to maintain communities.	Local Housing Market Assessment and avoiding residential schemes that are dominated by larger properties with four or more bedrooms" This will ensure developments achieve a good mix of property type and sizes to cater for all needs and demands.
714	HN2: Density and Mix of Development	Support	Policy HN2: Density and Mix of Development We support the Council's aspiration to achieve a minimum density of 30 dwellings per hectare on new housing sites in order to provide for the efficient use of land. Equally, there will be occasions where site specific considerations (constraints, surroundings etc) necessitate a lower density; accordingly, we welcome the recognition of this within parts a) and b) of the Policy to provide sufficient flexibility. It is noted that paragraph 11.6 refers to the need for more bungalows to cater for the County's older population. Bungalows naturally take up a larger plot area than a standard family house, and as such would impact on the density of a site. This would therefore need to be considered by Officers as part of the development management process on a site-by-site basis. The financial viability of delivering bungalows as part of development proposals is a further consideration. It is noted that no specific housing mix requirements are imposed through this Policy, which we welcome. Instead, there is flexibility for this to be discussed between Applicant's and		The Council welcomes your support for Policy HN2 and the aim to provide at least 30 dwellings per hectare.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			Officers at the time of anyplanning application.		
869	HN2: Density and Mix of Development	Support	Housing Mix. I may have missed the policies relating to housing mix. There has to be clear direction on the mix of houses, too many developments are revenue-driven and some control is needed to ensure the correct mix of properties to maintain communities.		Noted. Under Policy HN2, paragraph 11.6 states "To ensure that mixed and balanced communities are created the Council will expect developers to provide an appropriate mix of dwelling size and type to meet local housing needs, making reference to the evidence within the latest Local Housing Market Assessment and avoiding residential schemes that are dominated by larger properties with four or more bedrooms" This will ensure developments achieve a good mix of property type and sizes to cater for all needs and demands.
767	HN2: Density and Mix of Development	Support	Policy HN2: Density and Mix of Development Our Client supports the Council's aspiration to achieve a minimum density of 30 dwellings per hectare on new housing sites in order to provide for the efficient use of land. Equally, there will be occasions where site-specific considerations (constraints, surroundings etc) necessitate a lower density; accordingly, our Client welcomes the recognition of this within parts a) and b) of the Policy to provide sufficient flexibility. It is noted that paragraph 11.6 refers to the need for more bungalows to cater for the County's older population. Bungalows naturally take up a larger plot area than a standard family house, and as such would impact on the density of a site. This would therefore need to be considered by Officers as part of the development		The Council welcomes your support for Policy HN2 and the aim to provide at least 30 dwellings per hectare.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			management process on a site-by-site basis. The financial viability of delivering bungalows as part of development proposals is a further consideration.It is noted that no specific housing mix requirements are imposed through this Policy, which our Client welcomes. Instead, there is flexibility for this to be discussed between Applicant's and Officers at the time of any planning application.		
992	HN2: Density and Mix of Development	Object	We are concerned that not 30 dph will be achievable on all (draft) housing allocation sites and windfalls.		Not accepted. Policy HN2 allows sufficient flexibility to deal with applications where they clearly demonstrate they cannot achieve at least 30dph; "A lower density of development will only be permitted where: a. site constraints prevent the minimum density from being achieved b. the minimum density would harm the character and appearance of the sites surroundings"
1180	HN2: Density and Mix of Development	Support	Policy HN2: Density and Mix of Development Our Client supports the Council's aspiration to achieve a minimum density of 30 dwellings per hectare on new housing sites in order to provide for the efficient use of land. Equally, there will be occasions where site-specific considerations (constraints, surroundings etc) necessitate a lower density; accordingly, our Client welcomes the recognition of this within parts a) and b) of the Policy to provide sufficient flexibility. It is noted that paragraph 11.6 refers to the		The Council welcome your support for Policy HN2 and the aim to provide at least 30 dwellings per hectare.

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			need for more bungalows to cater for the County's older population. Bungalows naturally take up a larger plot area than a standard family house, and as such would impact on the density of a site. This would therefore need to be considered by Officers as part of the development management process on a site-by-site basis. The financial viability of delivering bungalows as part of development proposals is a further consideration. It is noted that no specific housing mix requirements are imposed through this Policy, which our Client welcomes. Instead, there is flexibility for this to be discussed between Applicant's and Officers at the time of any planning application.		
930	HN2: Density and Mix of Development	Support	HN2: Density and Mix of Development Whilst policy STR4 did not specify a specific density that new development should achieve, the policy stipulates that new development should aim to provide a density of at least 30 dph and to incorporate a mix of dwellings whilst making efficient use of land. We support the objective of new development having to achieve a minimum density of 30dph. Furthermore, we contend that there are instances where an even higher density on sites may be appropriate and that developers should be encouraged to explore these through the use of innovative design, form and layout. In		The Council welcome your support for Policy HN2. 30dph is the minimum, and we would support higher densities where appropriate for the site location and character of the surrounding area, these will be assessed on a case by case basis to ensure they are sustainable and protect amenity.

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			doing so, higher density can be achieved, thereby making more efficient use of land and reducing the pressure on sites outside of development boundaries		
960	HN2: Density and Mix of Development	Object	We are concerned that 30 dph will not be achievable on all (draft) housing allocation sites and windfalls.		Not accepted. Policy HN2 allows sufficient flexibility to deal with applications where they clearly demonstrate they cannot achieve at least 30dph; “A lower density of development will only be permitted where: a. site constraints prevent the minimum density from being achieved b. the minimum density would harm the character and appearance of the sites surroundings”
975	HN2: Density and Mix of Development	Object	We are concerned that 30 dph will not be achievable on all (draft) housing allocation sites and windfalls.		Not accepted. Policy HN2 allows sufficient flexibility to deal with applications where they clearly demonstrate they cannot achieve at least 30dph; “A lower density of development will only be permitted where: a. site constraints prevent the minimum density from being achieved b. the minimum density would harm the character and appearance of the sites surroundings”
1023	HN2: Density and Mix of Development	Object	We are concerned that 30 dph will not be achievable on all (draft) housing allocation sites and windfalls.		Not accepted. Policy HN2 allows sufficient flexibility to deal with applications where they clearly demonstrate they cannot achieve at least 30dph; “A lower density of development will only be permitted where: a. site constraints prevent the minimum density from being achieved b. the minimum density would harm the character and appearance of the sites surroundings”

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72	HN3: Affordable Housing	Object	Viability Study Allowances - The HBF notes that the document states at para 2.6 'No allowance has been made for ecological factors (bats, newts etc) or other potential site remediation costs, as these will be very site-specific issues. We would suggest that any such matters on specific sites, coming forward for development, would be taken account of in a specific viability test.' However, the same report notes that most allocations are on green field sites where the issues listed above are more likely to encountered. In view of the plan's heavy reliance on green field sites it is considered appropriate to include an allowance for abnormal's associated with such sites. Further PPW10 advises against relying on individual site viability testing as referenced in our comment to the affordable housing policy HN3. PPW10 states at para. 4.2.21 Where up-to-date development plan policies have set out the community benefits expected from development, planning applications which comply with them should be assumed to be viable and it should not be necessary for viability issues to be considered further. It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage. This is repeated in the soon to be published WG Development Plan Led Manual 3, the HBF suggests that the		Not accepted. The SHARP programme is principally concerned with the delivery of social housing therefore the requirement for 50% social housing or higher on sites would not be unusual, and is unlikely to cause a delay to the delivery or viability of SHARP sites. SHARP has predominantly used council owned land in the past but may look towards privately owned sites in the future to ensure the supply of affordable homes continues. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. The viability assessment does not make an allowance for abnormal costs as this would be highly speculative, and not appropriate for the majority of sites. Abnormal costs are not the 'norm' therefore if would be unreasonable to apply an element of abnormal costs to all sites. Site specific viability assessments can be carried out as part of the planning application process where abnormal costs can be evidenced and justified. The LHMA shows a requirement for 30% social housing, 30% intermediate rent and 40% low cost home ownership. It had previously grouped social and intermediate rent together showing a need for '60% affordable rent', this has caused some confusion and will be clarified within the affordable housing background paper and viability study ahead of the examination. This change in wording is to assist with clarity and has no impact on the affordable housing calculation

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			fundamental matters of viability should not be left to the individual application stage as suggested in the report. Although flexibility does need to allow for such site by site assessments due to the nature and risks associated with development. Any comments on site mix used? Tenure Mix The Affordable Housing Paper states – 'The tenure split required is 60% affordable rent (of which 60% social and 40% intermediate) and 40% intermediate ownership. The tables below detail the tenure split.' Whereas the Viability study states – 'this assessment has adopted a policy position of 30% social units, 30% intermediate rent and 40% intermediate for sale for the purposes of calculating affordable housing contribution viability…' Paragraph at the end of page 8 and top of page 9 seem to contradict each other/ cause confusing over how and who will deliver the social rented housing.		
324	HN3: Affordable Housing	Object	The affordable housing percentage requirements should not be referred to as a starting point for negotiations as this provides little certainty to developers. The wording within the policy should instead refer to a target. The policy wording in relation to viability should be expanded to allow sufficient flexibility. We support the need for site specific viability testing to reflect the individual nature of development sites and consider that this more appropriate to be undertaken at the	The affordable housing percentage requirements should not be referred to as a starting point for negotiations as this provides little certainty to developers. The wording within the policy should instead refer to a	Partly accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. The policy wording does not mean that the Council will be looking for a higher percentage than those specified within Policy HN3, these are simply the starting position for negotiation where the levels are a maximum and which may reduce downwards subject to detailed viability considerations

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			planning application stage as market conditions change over time We would therefore expect there to be review mechanism provisions within the VA or annual updates to account for this to ensure the delivery of housing over the plan period. Indeed, Background Paper 7, Affordable Housing (para 3.6) notes that the viability assessment of individual allocations within the LDP has not been undertaken and that site specific viability assessments may need to be carried out at the planning application stage where developers feel there are abnormal costs that may impede the delivery of affordable housing on the site. Further to a previous representation made by Savills on behalf of Anwyl Homes, Redrow Homes and MacBryde Homes to the Council's Viability Appraisal by the District Value Services (DVS) in May 2019, Anwyl wish to reiterate that they continue to have strong objections to the proposal for 40% affordable housing within the Mold and Buckley sub market area. A detailed review of the VA could not be fully undertaken by Savills because supporting market information and the full appraisals have not been disclosed by FCC. Based on the details set out within the response by Savills to the Council's Viability Assessment Consultation, we continue to struggle to see how the proposed affordable housing requirements are	target. The policy wording in relation to viability should be expanded to allow sufficient flexibility. We support the need for site specific viability testing to reflect the individual nature of development sites and consider that this more appropriate to be undertaken at the planning application stage as market conditions change over time We would therefore expect there to be review mechanism provisions within the VA or annual updates to account for this to ensure the delivery of housing over the plan period.	supported by clear and robust evidence. If the Inspector considers that further clarity could be added to the wording of the reasoned justification, then the Council would have no objection to the following additional wording being included: "The viability assessment has shown that the affordable housing percentages are the maximum levels of affordable housing that can viably be delivered across each of the housing market areas. Developers are therefore expected to start negotiation from these percentages if they believe there to be significant viability considerations on their particular site. This must be supported by a robust and credible evidence base to sufficiently demonstrate a reduction in the affordable housing delivered by the scheme." The Viability Assessment includes the following statement; "It may be recommended that a simple monitoring of House Price Index movements across Flintshire on a year to year basis is measured against BCIS rates, and that if a divergence of 5% either way against a sample 100 unit scheme residual value in comparison to current levels is detected that this triggers a fuller review. Where the rate changes cancel one another out then a full review may not be required." The Viability assessment will therefore be monitored along these lines. Prior to the start of the Deposit LDP public consultation, the Council shared the DVS viability assessment with local developers and RSLs for

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			viable, particularly in the case of Mold and Buckley and the Central HMA where 40% is suggested and would welcome the opportunity for this issue to be discussed at the future Examination of the Plan.		their initial feedback. Savills produced a response on behalf of Anwyl, Redrow and MacBryde Homes. The response from Savills criticized the availability of market information within the study in order for them to conduct their own appraisals. The DVS is an independent consultant with extensive experience of conducting viability assessments using robust and up to date evidence. The evidence used within the study is clearly explained throughout the DVS report. Savills have been free to provide their own data to substantiate their concerns, and themselves fully explain and justify their approach. Whilst the objector states that 40% is not viable in the Mold and Buckley sub market area they have not explained to the Council why this is the case, nor have they identified an affordable housing figure that they consider to be viable.
350	HN3: Affordable Housing	Support	It is not clear what is meant by "Affordable Housing contributions" Are the affordable home to be built on the same site ? and represent a percentage of the total site development? My view is that the affordable houses as part of a private developer site should be 30% of the development built on the same site where the building of 20 properties or more are proposed to be built. Subsequent Applications on development sites must count toward the overall threshold (20) for affordable housing. This is to prevent developers for example if the threshold was 20 to have 2 x applications for 19	My view is that the affordable houses as part of a private developer site should be 30% of the development built on the same site where the building of 20 properties or more are proposed to be built. Subsequent Applications on development sites	Noted. All sites with 10 or more dwellings are expected to provide the affordable dwellings on site in the first instance. In exceptional circumstances the Authority will consider permitting the off-site provision of affordable housing, which must be clearly justified with supporting evidence. Policy HN3 resists applications to deliberately phase sites to avoid meeting the threshold of 10 for affordable housing contributions. The viability assessment has shown that a higher level of affordable housing is achievable in some market areas, namely 40% within the Mold & Buckley market area. and this has been agreed by the

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			houses. If one application was for 19 houses the second application on the same site for 2 or more would trigger the 30% affordable housing requirement.	must count toward the overall threshold (20) for affordable housing. This is to prevent developers for example if the threshold was 20 to have 2 x applications for 19 houses. If one application was for 19 houses the second application on the same site for 2 or more would trigger the 30% affordable housing requirement.	Council as part of its sound development plan. This will be tested at the LDP examination subject to there being evidence that demonstrates why the higher levels of affordable housing are not viable or deliverable.
409	HN3: Affordable Housing	Object	The affordable housing percentage requirements should not be referred to as a 'starting point' for negotiations as this provided no certainty to landowners or developers and could result in the site not coming forward. They should instead as in other LDPs be described as a target. The viability work has identified the level at which development is likely to be viable and set the level of percentage requirement, if this is described as a target then anything above this is unlikely to be viable and a request for a higher affordable percentage will cause delays in delivery and at worst could stop land coming forward all together. Further PPW 10	The words 'as a starting point' should be deleted from the policy and the percentage requirements should be referred to as a 'target'. The policy should include a reference to the preferred tenure mix on which the viability work was based yet allow flexibility for this to be varied by	Partly accepted. The policy wording does not mean that the Council will be looking for a higher percentage than those specified within Policy HN3, these are simply the starting position for negotiation downwards subject to detailed viability considerations supported by clear and robust evidence. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has set the levels at which affordable housing should be viable and so by

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			states at para. 4.2.21 'Where up-to-date development plan policies have set out the community benefits expected from development, planning applications which comply with them should be assumed to be viable and it should not be necessary for viability issues to be considered further. It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage.' The current policy wording does not comply with this as it suggests viability studies should be required on a site by site basis. However, the policy does need to retain the flexibility to allow for site viability to take place as circumstances do change over time and unknows can be discovered on sites. The policy or support text provides no detail on how off-site provision or payment in lieu will be dealt with or the Councils required tenure mix. tenure mix. The HBF challenges the 40 % requirement for the Mold are based on two recent planning consents which dd not achieve this level of affordable housing [Maes Gwern- 30%, Penymynydd - 15%]. Please see additional comments on affordable housing contained in separate emailed comments.	agreement. The supporting text needs to provide some guidance on how off-site provision or payment in lieu of affordable housing will be dealt with and at worst reference an Affordable Housing SPG which will be needed to provide greater detailed support to this policy.	definition, and with reference to the Study itself, are the upper limit of potential affordability. If the Inspector considers that further clarity could be added to the wording of the reasoned justification, then the Council would have no objection to the following additional wording being included: "The viability assessment has shown that the affordable housing percentages are the maximum levels of affordable housing that can viably be delivered across each of the housing market areas. Developers are therefore expected to start negotiation from these percentages if they believe there to be significant viability considerations on their particular site. This must be supported by a robust and credible evidence base to sufficiently demonstrate a reduction in the affordable housing delivered by the scheme." The mix of affordable dwellings will be negotiated with the Housing Strategy team in line with the latest needs on the register. A policy setting the mix of affordables would be restrictive, and unable to reflect the specific needs of each location. Whilst the objector quotes from PPW in relation to establishing viability at the LDP stage thereby removing the need to assess at the application stage, they at least recognise as the Council has that the Plan cannot envisage all circumstances which vary from site to site. That is why the policy sets out the percentages recognising they are a negotiating point and therefore there is flexibility in the policy to cater for specific circumstances.

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432	HN3: Affordable Housing	Support	Whilst agree that on-site provisions is preferable, we support the inclusion of caveat for those exceptional cases where this is not appropriate.		This support is welcomed. The policy is intended to be flexible to ensure deliverability.
599	HN3: Affordable Housing	Object	OBJECTS to Policy HN3. The comments below should also read in conjunction with those made in Chapter 11 about the Council's viability study. JUSTIFICATION The affordable housing percentage requirements should not be referred to as a starting point for negotiations as this provides no certainty to developers. They should instead as in all other LDPs be a target. Policy HN3 requires 40% in the Mold and Buckley sub market area subject to detailed viability considerations. This is a significant increase from the UDP Policy HSG10 which required 30% affordable housing on suitable and appropriate schemes within settlement limits. Table 2 on Pages 5 & 6 of the Council's Background Paper 7: Affordable Housing sets out the potential affordable housing numbers that can be achieved on the proposed allocated sites and expects 40% affordable housing to be delivered at HN10 (3) which is under our client's control. Stewart Milne's current planning application is proposing 30% affordable housing in accordance with the UDP Policy HSG10. This has been supported by the Council's Housing Strategy Manager in their consultation response dated 10 September 2019. 40% affordable housing	Policy HN3 is unsound as it will not deliver. The affordable housing requirement for the Mold and Buckley sub market area should be reduced to 30% and this should be a target not a starting point.	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. The policy wording does not mean that the Council will be looking for a higher percentage than those specified within Policy HN3, these are simply the starting position for negotiation downwards subject to detailed viability considerations supported by clear and robust evidence. If the Inspector considers that further clarity could be added to the wording of the reasoned justification, then the Council would have no objection to the following additional wording being included: "The viability assessment has shown that the affordable housing percentages are the maximum levels of affordable housing that can viably be delivered across each of the housing market areas. Developers are therefore expected to start negotiation from these percentages if they believe there to be significant viability considerations on their particular site. This must be supported by a robust and credible evidence base to sufficiently demonstrate a

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			would not to be achievable on this site due to the large area of SuDs and ecological mitigation that is required in order to secure the support of statutory consultees together with the suit of Section 106 Agreement contributions required. AMENDMENTS SOUGHT Policy HN3 is unsound as it will not deliver. The affordable housing requirement for the Mold and Buckley sub market area should be reduced to 30% and this should be a target not a starting point.		reduction in the affordable housing delivered by the scheme." It is a concern that the objectors do not appear to consider that their site which is allocated in the Plan is not deliverable under LDP policy requirements. The objector has provided no evidence to show how the differential of 10% affordable housing affects the viability of the site, but with the policy clarification above would be a point for consideration at the development management stage.
601	HN3: Affordable Housing	Object	OBJECTS to the Viability Study. JUSTIFICATIONThe Viability Study states the following at Paragraph 2.6: "No allowance has been made for ecological factors (bats, newts etc) or other potential site remediation costs, as these will be very site-specific issues. We would suggest that any such matters on specific sites, coming forward for development, would be taken account of in a specific viability test." The Viability Study also notes that the majority of allocations are on greenfield sites where ecological issues are more likely to encountered. This is the case with Stewart Milne's site at New Brighton where ecological mitigation is required as mentioned previously in Chapters 6 & 9. A	AMENDMENTS SOUGHT The Viability Study is considered unsound as it does not fit with national policy. The Viability Study should be reworded to allow for all abnormal costs including appropriate ecological mitigation.	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. The viability study is a high level assessment and does not make an allowance for abnormal or site specific costs as this would be highly site specific, and not appropriate for the majority of sites. Abnormal costs are not the 'norm' therefore if would be unreasonable to apply an element of abnormal costs to all sites. Site specific viability assessments can be carried out as part of the planning application process where abnormal or site specific costs can be evidenced and justified.

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			new ecological pond has resulted in a reduction in the net developable area and these factors need to be considered now as part of the site's viability. Paragraph 4.2.21 of PPW10 is also relevant in this regard: "Where up-to-date development plan policies have set out the community benefits expected from development, planning applications which comply with them should be assumed to be viable and it should not be necessary for viability issues to be considered further. It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage." This is repeated in the soon to be published DPM (see Paragraph 5.85). This suggests that fundamental matters of viability should not be left to the individual application stage as suggested in the Viability Study.		
613	HN3: Affordable Housing	Object	The delivery of the proposed housing sites are at risk due to the high proportion of affordable housing requirement being proposed. Many landowners have owned the land within generations of their family and will not be incentivised to sell when development costs and the currently proposed	Reduce affordable housing requirement.	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. Development Plans Manual 3 (DPM3) produced by the Welsh Government to inform the production of

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			affordable housing requirements are applied. The quantum of affordable housing proposed has been informed by the Background Paper Flintshire Viability Study Sept 2019 produced by the DVS. It is felt that while the methodology applied to assess the level of affordable housing for each site is appropriate, the parameters and assumptions made in terms of what is a reasonable return to landowners, sales prices of completed dwellings to be received by the developer (for both affordable and open market dwellings) and developers profit are too generalised and as such are producing distorted figures. For example, Table 4 of the Viability Study states various 'typical prices' for market housing, however, these appear to be at the higher range of what has been achieved and are not representative of the market within the immediate area of Highmere Drive. The benchmark Greenfield figure of £300,000 per hectare will not incentivise landowners to sell. It is our experience that landowners within the area are seeking net returns, after affordable housing and abnormal development costs are taken into account, of between £750,000 - £1,000,000 per hectare.		LDPs across Wales advises that Local Authorities should undertake a "high level viability appraisal to assess the broad levels of development viability at housing market areas." This involves making informed assumptions on house prices and build costs based upon robust evidence of recent transactions from Land Registry Data and build costs compiled by RICS. High level testing such is reflective of the wider market area (for example Connah's Quay, Broughton and Queensfeery area as shown on the map in the appendices of the viability assessment) and not site specific. Developers are still able to submit a site specific viability assessment alongside planning applications where they feel viability is an issue. This must be supported by evidence such as sale prices or abnormal costs to justify a departure from the percentages set out within policy HN3. The benchmark figure of £300,000 per hectare for green field land (without planning permission) is supported by evidence of recent transactions. Paragraph 4.16 of the viability assessment explains that "The land values adopted reflect an opinion of the level required for the land to be released onto the market for residential development. This may well be lower than transactions in the recent past, but our appraisals are based on current market conditions, with the affordable housing requirements as expected at the time and assuming the land is acquired at the date of valuation. It must be borne in mind that the sites we are assessing here do not have current planning in place - so we are assessing an amount which

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			It is our view that the Viability Study that has set the proposed affordable housing percentages needs to be based upon a higher benchmark figure and more a more accurate assessment of the house prices within the immediate vicinity of a site need to be applied as values can vary widely within a settlement area.		would convince a landowner to release land for development from its current use. This is not the same as a value for the transaction of a site which has planning agreed." The objector does not include any evidence of greenfield sites without planning permission selling for £750,000 - £1,000,000 per hectare within Flintshire.
768	HN3: Affordable Housing	Object	It is noted that this Policy is only applicable to schemes of 10 or more dwellings. We support this approach, as it is typically more challenging for smaller sites to support affordable housing without adversely impacting on the economic viability of sites. It is noted that the Policy is proposing a sub-market area approach/threshold to affordable housing delivery, with different thresholds across the County. It is welcoming to note that the stated quotas are only intended to serve as a "starting point' for negotiation on a site-by-site basis subject to detailed viability considerations. Paragraph 11.9 of the Deposit Plan states that the quotas themselves have been informed by the Council's Local Housing Market Assessment and the District Valuer Study concerning the 'Economic Viability of Providing Affordable Housing Across Flintshire.' The different affordable housing requirements are understood to be based on the relative strengths of the housing	On review of the Council's supporting evidence, we have the following observations: - Flintshire is recognised within the LHMA to be a self-contained housing market area. The Sub-Areas identified in the LHMA are documented in paragraph 3.14 to be based on an out-of-date Local Housing Strategy and previous LHMA's. We are concerned that these Sub-Area boundaries may no longer be an	Not accepted. The LHMA sub market areas have been identified by following the LHMA guidance produced by Welsh Government. There are various factors which inform the identification of these housing market areas including travel to work patterns, house prices and affordability. The housing market areas have been reviewed as part of the LHMA update with no changes required. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. The viability assessment has included costs for open space, education etc. in line with recent trends for developer contributions within Flintshire. Therefore the results of the viability assessment are robust.

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			sub-market areas in terms of their viability, and ability to support affordable housing provision.	accurate reflection of the housing market in Flintshire. The robustness of these boundaries should be reviewed prior to imposing a Sub-Area approach to the provision of affordable housing; and - On review of Table 3.1 of the LHMA, and the requirements set out under Policy HN3, it is considered that the affordable housing requirement in the Connah's Quay, Queensferry and Broughton Sub-Market Area should be no more than 30%, consistent with that of the South Border Sub-Market Area given the relative house prices. Given the potential requirement for other developer contributions (such	In terms of the objectors point that the Connah's Quay, Queensferry and Broughton affordable housing level should be no more that 30%, no viability or other evidence is provided to substantiate this , making it difficult for the Council to accept the case being made. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. In terms of the objectors point about obligations those mentioned are all reasonably standard requirements for new development and the objector's objection to their provision would render a site (including any they are promoting) as unsustainable and undeliverable. Conversely, if a site is viable and deliverable then the requirement to secure such obligations should not be an issue. S106 legal agreements provide greater protection for affordable dwellings to ensure they do not resort to market dwellings. They are also more easily recorded and flagged by Land Charges when carrying out searches.

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				as education, recreation/open space, health) on a site-by-site basis, it is imperative that the affordability thresholds set out in this Policy are robustly evidenced and will not serve to frustrate housing delivery across the County. It is noted that reference is made in paragraph 11.9 of the Deposit Plan to the fact that affordable housing delivery will be secured by way of a planning obligation. Based on recent experience elsewhere, there is the potential for such provision to be secured by way of a planning condition which in turn would reduce time and expense on the preparation of a S106 Agreement for	

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				those sites where no other obligations are being sought. The Council may wish to give consideration to the use of planning conditions to secure affordable housing delivery moving forward.	
649	HN3: Affordable Housing	Object	TW does not agree with the findings of the LHMA Update 2018 and has concerns regarding the methodology adopted. Furthermore, TW objects to the lack of consistency between the findings of the LHMA and the requirement stipulated in Policy HN3. However, TW does not agree with the findings of the LHMA Update 2018 and has concerns regarding the methodology adopted. Furthermore, TW objects to the lack of consistency between the findings of the LHMA and the requirement stipulated in Policy HN3. Table B5 identifies the Mold and Buckley HMA as needing to deliver 22 of the 238 affordable units annually. This equates to just over 9% of the affordable housing requirement within the borough. To put this into context, Connah's Quay, Queensferry and Broughton HMA is expected to deliver 186 units per annum which equates to 78% of the affordable housing requirement of the borough. TW has concerns with a	The Council amends the affordable housing requirement in line with the findings of the LHMA Update 2018 and ensure that the delivery of affordable housing units is directed to those areas in Flintshire with clear need, and that the Council can meet its target of 238 dpa.	Not accepted. The LHMA has been carried out by independent consultants ARC4, following Welsh Government guidance on how to produce an LHMA. The objector does not specify what their concerns relate to therefore the Council can offer no further feedback on this matter. We believe the findings of the LHMA are robust and that it has followed the recommended methodology set by Welsh Government. The strategic distribution of allocations cannot be simply aligned to the areas with a higher need for affordable housing as this approach would be unsustainable. Other sustainability criteria must be taken into consideration when distributing growth, including local infrastructure, accessibility to public transport etc. The objector also ignores the fact that the LHMA methodology produces an inflated need as it assesses the backlog of need but only has a

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			focus of delivery in just one HMA. Alternative strategies such as directing a proportion of additional housing towards sustainable, higher order settlements such as Mynydd Isa will ensure the delivery of much needed affordable housing, particularly in the early years of the Plan. Notwithstanding the above, TW objects to the requirement of the Mold and Buckley sub market area to provide 40% affordable housing as it is not based on robust and sound evidence and is contrary to the findings of the LHMA Update 2018. TW also has concerns over the assumptions set out within the Viability Study, in particular the allocated developer's profit of 17.5%, which is too low and would not provide a sufficient return to incentivise development and investment in Flintshire		lifespan of 5 years. It is therefore incorrect to transpose the annual need over the Plan period. The viability assessment has been carried out using robust and up to date evidence complied by independent consultants. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. Given the scale of the objectors alternative site, and the robustness of the assumptions made in the viability study, it would appear from what the objector is saying, is that their site at Mynydd Isa, which is within the 40% affordable housing market area (Mold & Buckley) is not viable to deliver 40%, it is therefore neither sustainable nor deliverable.
716	HN3: Affordable Housing	Object	It is noted that this Policy is only applicable to schemes of 10 or more dwellings. We support this approach, as it is typically more challenging for smaller sites to support affordable housing without adversely impacting on the economic viability of sites. It is noted that the Policy is proposing a sub-market area approach/threshold to affordable housing delivery, with different thresholds across the County. It is welcoming to note that the stated quotas are only intended to serve as a "starting point' for negotiation on a site-by-site basis subject to detailed viability considerations. Paragraph 11.9 of	On review of the Council's supporting evidence, we have the following observations: - Flintshire is recognised within the LHMA to be a self-contained housing market area. The Sub-Areas identified in the LHMA are documented in paragraph 3.14 to	Not accepted. The LHMA sub market areas have been identified by following the LHMA guidance produced by Welsh Government. There are various factors which inform the identification of these housing market areas including travel to work patterns, house prices and affordability. The housing market areas have been reviewed as part of the LHMA update with no changes required. The objector criticises the 'accuracy' of the sub market area boundaries but these have been derived from the LHMA work and found to be still relevant in the 2018 Update. They are also to a degree not absolute but nevertheless provide guidance on affordable variability resulting from differences in viability. In light of the objector's inability to draw

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			the Deposit Plan states that the quotas themselves have been informed by the Council's Local Housing Market Assessment and the District Valuer Study concerning the 'Economic Viability of Providing Affordable Housing Across Flintshire.' The different affordable housing requirements are understood to be based on the relative strengths of the housing sub-market areas in terms of their viability, and ability to support affordable housing provision. The Affordable Housing Background Paper offers further guidance on this matter.	be based on an out-of-date Local Housing Strategy and previous LHMA's. We are concerned that these Sub-Area boundaries may no longer be an accurate reflection of the housing market in Flintshire. The robustness of these boundaries should be reviewed prior to imposing a Sub-Area approach to the provision of affordable housing; and - On review of Table 3.1 of the LHMA, and the requirements set out under Policy HN3, it is considered that the affordable housing requirement in the Connah's Quay, Queensferry and Broughton Sub-Market Area should be no more than 30%, consistent with	more accurate areas or evidence their concerns, the Council consider that they are fit for purpose. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. The viability assessment has included costs for open space, education etc. in line with recent trends for developer contributions within Flintshire. Therefore the results of the viability assessment are robust. S106 legal agreements provide greater protection for affordable dwellings to ensure they do not resort to market dwellings. They are also more easily recorded and flagged by Land Charges when carrying out searches. In terms of the objectors point that the Connah's Quay, Queensferry and Broughton affordable housing level should be no more that 30%, no viability or other evidence is provided to substantiate this , making it difficult for the Council to accept the case being made. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office

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				that of the South Border Sub-Market Area given the relative house prices. Given the potential requirement for other developer contributions (such as education, recreation/open space, health) on a site-by-site basis, it is imperative that the affordability thresholds set out in this Policy are robustly evidenced and will not serve to frustrate housing delivery across the County. It is noted that reference is made in paragraph 11.9 of the Deposit Plan to the fact that affordable housing delivery will be secured by way of a planning obligation. Based on recent experience elsewhere, there is	Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. In terms of the objectors point about obligations those mentioned are all reasonably standard requirements for new development and the objector's objection to their provision would render a site (including any they are promoting) as unsustainable and undeliverable. Conversely, if a site is viable and deliverable then the requirement to secure such obligations should not be an issue.

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				the potential for such provision to be secured by way of a planning condition which in turn would reduce time and expense on the preparation of a S106 Agreement for those sites where no other obligations are being sought. The Council may wish to give consideration to the use of planning conditions to secure affordable housing delivery moving forward.	
753	HN3: Affordable Housing	Support	It is noted that this Policy is only applicable to schemes of 10 or more dwellings. Our Client supports this approach, as it is typically more challenging for smaller sites to support affordable housing without adversely impacting on the economic viability of sites.		We welcome your support to the threshold of 10 or more dwellings for the application of the affordable housing percentages.
777	HN3: Affordable Housing	Support	In relation to the FCC's Development Management Policy for Affordable Housing the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LPD process	a) With an aging population nationally and locally, serious consideration needs to be given on how housing should be	Policy HN2 sets out the criteria for the density and mix of new dwellings, paragraph 11.6 of the reasoned justification states "In order to meet the variety of needs in Flintshire, a range of housing must be provided on sites. The Local Housing Market Assessment identified a particular need for

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			are as follows: a) With an aging population nationally and locally, serious consideration needs to be given on how housing should be provided for this section of our community, as well as the provision of affordable housing to encourage younger people to settle in Higher Kinnerton. This to ensure that we have a balanced mix of accommodation types available to provide for the newly enlarged community. b) Given the situation which arose with the affordable housing units at Babylon Fields in Higher Kinnerton, the criteria for affordable housing needs to ensure affordable housing is genuinely affordable for those in need of housing and whose needs are not met by the open market.	provided for this section of our community, as well as the provision of affordable housing to encourage younger people to settle in Higher Kinnerton. This to ensure that we have a balanced mix of accommodation types available to provide for the newly enlarged community. b) Given the situation which arose with the affordable housing units at Babylon Fields in Higher Kinnerton, the criteria for affordable housing needs to ensure affordable housing is genuinely affordable for those in need of housing and whose needs are not met by the open market.	smaller one and two bed units to meet the increasing need from single person households. A significant part of this need is driven by the growing older population (65+), therefore the housing needs of older people should be reflected in residential development proposals, which could include the development of bungalows. To ensure that mixed and balanced communities are created the Council will expect developers to provide an appropriate mix of dwelling size and type to meet local housing needs, making reference to the evidence within the latest Local Housing Market Assessment and avoiding residential schemes that are dominated by larger properties with four or more bedrooms" This will ensure developments achieve a good mix of property types and sizes to cater for all housing needs and demands. Affordable Housing will be delivered at 70% market value for low cost home ownership dwellings to eligible applicants from the Tai Teg register. Intermediate rental dwellings will be let at no more than 80% of private rental values. Applicants must meet specific eligibility criteria in terms of their income and any local connection criteria. This will ensure that only applicants who cannot afford to buy or rent on the open market are offered a property, and that they can afford to live in the property.

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897	HN3: Affordable Housing	Object	PGNL is concerned that the requirement for affordable housing for the Garden City Area has been set high relative to the findings and assumptions used within the viability study. PGNGL supports the provision of affordable housing however PGNGL is concerned that the policy requirements for affordable housing are high. The September 2019 viability Study indicates for Garden City that the majority of typologies become viable at 15% rather than 20% where three of the five typologies are marginal or unviable. The viability study has been set up to determine the viability of the requirements for affordable housing provision, however it is unclear what regard has been given to any of the other policy requirements, established within the Local Development Plan, and the associated impact on affordable housing targets. Nor is it clear what abnormals have been considered for the site specific testing. Thus, it is considered that the requirement is set at a level that is likely to necessitate site specific viability assessments and protracted negotiations at Planning Application stage. PGNGL is concerned that with all the policy requirements the Local Development Plan details this could undermine the delivery of housing through the need for a viability assessment of schemes on a regular basis. The Council must be aware of the impact that viability	To overcome the objection and address soundness matters, the Council should: Review the viability study to ensure that it reflects the requirements of the Plan as a whole and the abnormals likely to be present at STR3A. Amend the affordable housing requirement for the Garden City Area accordingly.	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. It is a little disappointing that having taken so long to advance the site, the objector only now considers viability an issue. As the site already has planning permission the objector will know that the 30% required by the UDP has been reduced in the first phases of permitting residential reserved matters given viability issues related to on-going infrastructure works and costs. The first phase of Northern Gateway has received planning permission with 10% affordable housing on site. The viability of the scheme was independently tested to ensure the right level of affordable housing could be achieved. It is expected that subsequent applications will achieve higher levels of affordable housing provision as viability on the site improves as the development of the site progresses and upfront costs for initial infrastructure are absorbed. Therefore the affordable housing percentage of 20% for the Garden City sub market area is realistic for this site. The existing permission has review points within the consent to examine viability at later phases which is only appropriate for a strategic site of this

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			assessments and subsequent negotiation of obligations can have on the delivery of development. This could impact on the delivery of the housing. Instead, the Council should ensure this policy is well tested to ensure the sites identified and allocated are deliverable.		scale where significant public money was provided in relation to key flood mitigation works and transport infrastructure. The viability assessment does not make an allowance for abnormal costs as this would be highly speculative, and not appropriate for the majority of sites. Abnormal costs are not the 'norm' therefore if would be unreasonable to apply an element of abnormal costs to all sites. Site specific viability assessments can be carried out as part of the planning application process where abnormal costs can be evidenced and justified.
923	HN3: Affordable Housing	Support	It is encouraging to see the prominence and weight given to the need to provide for affordable housing within the county over the plan period. It is commended that a target of 238 affordable homes are sought each year, which equates to approximately 50% of the total housing required to be delivered in the authority per annum. However, as a key delivery partner in providing this affordable housing, concern is raised with regards to the ability to deliver this proportion of housing, especially with the existing levels of funding available for the delivery of affordable housing and the very limited numbers of units being delivered and secured by the market house builders through s.106 agreements. It is also highly likely that developers will continue to use affordable housing as the flexibility factor		We welcome the support for the affordable housing percentages. Whilst the Council recognises the objector's general support for policy HN3 the LHMA need of 238 dwellings per annum is not the LDP affordable target and this is fully explained in background Paper & and specifically in paras 3.3 and 3.4. Clearly the funding of the delivery of affordable housing via Social Housing Grant is outside the remit of the LDP and it is also the case there are a number of sources of supply of affordable housing in Flintshire than just via the planning system, including the Councils own SHARP building programme. The objector, as a Registered Social Landlord, states the only way to increase supply is to allocate affordable only sites but this must also rely on RSL's making better informed and less

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			to argue viability on developments as has happened with Croes Atti (105) and Northern Gateway. The only way this would be delivered with more security is if specific affordable housing sites were allocated and if other housing tenures models such as affordable sales products are accepted as 'affordable housing'. Furthermore in the absence of dedicated sites for affordable housing (which has been intimated in the NDF currently out for consultation) and the tightly drawn settlement boundaries it is extremely difficult for affordable housing partners to compete with house builders for the allocated sites, even windfall sites. Policy HN4-D 'Affordable Housing Exception Schemes' permits exception sites adjacent to settlements in tier 2,3 and 4 settlements in 'rural' areas however tier 2 settlements in particular are not 'rural' by nature. It would be hard to demonstrate that alternative sites are not available to meet criterion b, however it may be that RSL's cannot compete for those sites in the settlement boundary and only sites outside the settlement are economically viable in terms of land values. Again this supports the allocation of specific affordable sites. Therefore whilst we support the targets for affordable housing, concerns are raised with regards to the ability to deliver on this level per annum, especially with existing		speculative decisions on the acquisition of suitable sites. Whilst reference is made to the need indicated in the draft NDF, the objector fails to note that this is not a specific policy requirement and like the LHMA methodology, represents an inflated view of need based on a methodology that calculates a backlog and from this which it tries to deliver over a short time period. The objector has also failed to reconcile their own capacity to deliver as on the one hand they propose new allocations, whilst on the other hand doubt the ability to achieve the affordable target. The Council has found it difficult to understand the position of the objector.

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			funding levels and the under provision of s.106 units by housebuilders.		
931	HN3: Affordable Housing	Object	The policy is unclear as it does not define what the sub areas are and where they apply. We object to the differing levels of contributions that would be sought in the different sub-areas as we do not consider that these have been established having regard to a robust evidence base. The Affordable Housing Background Paper at paragraph 3.7 states: "The viability assessment is a high level appraisal therefore it didn't involve the assessment of individual allocations within the LDP, site specific viability assessments may need to be carried out at the planning application stage where developers feel there are abnormal costs that may impede the delivery of affordable housing on the site." We do not consider that a high level appraisal provides sufficient rigour to justify the differing thresholds and contributions that will be sought. Furthermore, it is not clear what the requirements will be on those sites that do not fall within any of the identified sub-areas. The policy is therefore unsound as it is not founded on a credible evidence base and therefore will not be effective. It fails Test 3.	Need to clearly define sub market areas. Viability Assessment needs to be more robust.	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. The draft viability assessment was made available to key agents and developers in August 2019 for initial consultation ahead of the Deposit LDP formal consultation in September 2019. The LHMA Sub Market areas are mapped within the LHMA Update 2018. If the Inspector is minded that the implementation of the policy would be improved by adding the LHMA sub-areas to the LDP proposals map then the Council would have no objection to this. Also, the objector queries what the % would be on any site that does not fall within a sub market area but as the sub market areas subdivide the entire County, any site outside would not be in Flintshire. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within

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					each housing market area, therefore the percentages do not need to be reduced. The draft viability assessment was made available to key agents and developers in August 2019 for initial consultation ahead of the Deposit LDP formal consultation in September 2019. The LHMA Sub Market areas are mapped within the LHMA Update 2018. If the Inspector is minded that the implementation of the policy would be improved by adding the LHMA sub-areas to the LDP proposals map then the Council would have no objection to this. Also, the objector queries what the % would be on any site that does not fall within a sub market area but as the sub market areas subdivide the entire County, any site outside would not be in Flintshire .
976	HN3: Affordable Housing	Object	This has pre-determined the outcome of any DVS assessment by the DVS or evidence that might have come forward to demonstrate (draft) housing site viability as required by PPW10. The sub-market areas are not defined on any constraints map and detailed definition of boundaries will be needed to avoid errors. As it stands the increase over the Adopted UDP rate of 30% is considered to be far too challenging and unviable. The level of affordable housing delivered by STR3 and	This has pre-determined the outcome of any DVS assessment by the DVS or evidence that might have come forward to demonstrate (draft) housing site viability as required by PPW10. The sub-market	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. The draft viability assessment was made available to key agents and developers (including the

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			HN1 (and any other windfall or exception site policy) will not reflect the LHMA identified need. Comments on Flintshire Viability Study (DVS) May 2019 This was published before the Background Paper into Affordable Housing was made available in September 2019; before the Deposit Version of the LDP was published for Members in July 2019 and before the Arc4 LMHA report of August 2019. It identifies affordable thresholds, so we can only imagine that a combination of the above documents / reports were fashioned around one another; yet it is strange that the Authority did not present any of the evidence base before its Members at Full Council. Notwithstanding the procedural order and/or the accessibility of such publications to Members and the wider general public we do wish to briefly comment on the main findings of this report. There will need to be a much more forensic assessment of its methodology but in brief our concerns lie with the percentile levels of affordable being suggested and the tenure split neither of which are reflective of current rates. Developer profit at 17.5% is low (should be	areas are not defined on any constraints map and detailed definition of boundaries will be needed to avoid errors. As it stands the increase over the Adopted UDP rate of 30% is considered to be far too challenging and unviable. We do not believe that the required affordable housing contributions are founded on a credible assessment of viability; particularly given that the level of affordable housing ought to commensurate and proportionate to the anticipated viability of delivering housing in any given location.	objector) in August 2019 for initial consultation ahead of the Deposit LDP formal consultation in September 2019. This is not a statutory part of the consultation process therefore the Council do not have to adhere to specific timescales for this consultation process. The Council had limited time in which to conduct this consultation ahead of the Deposit LDP formal consultation, therefore participants were given just over two weeks to submit their comments. Whilst the objector considers the 40% to be 'far too challenging and unviable' they do not provide any analytical evidence to substantiate this. Equally the objector was part of an early release of the viability study to industry representatives and agents to allow any queries or challenges to be put forward prior to deposit but none were received at this time from the objector. Whilst the objector subsequently criticizes the Viability Study and affordable housing policy at the deposit stage, where the relationship between the two is clear, they have failed to submit an alternative study based on the assumptions they feel are correct. The objector's opportunity to submit such a 'forensic' assessment was at the 'deposit' stage but they failed to do so. The Viability Assessment includes the following statement; "It may be recommended that a simple monitoring of House Price Index movements across Flintshire on a year to year basis is measured against BCIS rates, and that if a divergence of 5% either way against a sample 100 unit scheme residual value in comparison to current levels is

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			20%); construction build cost is estimated at almost £100/sqft (generally £125/sqft is common) and that is without any contingency (of say 5%) being applied; net to gross development areas vary massively site by site; benchmark land values are too low and landowners will not release land for housing if they are not incentivised in doing so; We are concerned that despite the availability of this report none of the draft allocation sites have had this applied to them to determine their viability.		detected that this triggers a fuller review. Where the rate changes cancel one another out then a full review may not be required." The Viability assessment will therefore be monitored along these lines. Land Value – The DVS have used land values that in their opinion reflect the level required for the land to be released onto the market for residential development. This may well be lower than transactions in the recent past, but the DVS appraisals are based on current market conditions, with the affordable housing requirements as expected at the time and assuming the land is acquired at the date of valuation. It must be borne in mind that the sites the DVS are assessing do not have planning permission - so they are assessing an amount which would convince a landowner to release land for development from its current use. This is not the same as a value for the transaction of a site which has planning agreed. On this basis the DVS have adopted a base Greenfield land value of £300,000 per hectare. It is the DVS opinion that these figures are sufficient to incentivise a landowner to sell and provides accurately for the reality in the market place, if compared to the existing use value (for example £18,000 per hectare for agricultural land). Construction Costs – The DVS are an independent consultant with extensive experience of conducting viability appraisals. The DVS have used information from their internal quantity surveyors and the BCIS data to establish a current base price per square

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					metre for residential development within the Flintshire area. The DVS have included a 2.5% uplift for contingencies as per paragraph 4.11 of the report. Developer Profit - The DVS have used a profit level of 17.5% which is considered reasonable based upon the nature of the developments and their perceived associated risks. If the Inspector is minded that the implementation of the policy would be improved by adding the LHMA sub-areas to the proposals map then the Council would have no objection to this.
858	HN3: Affordable Housing	Object	40% affordable housing in the Mold and Buckley sub market area is considerably less than the 51% over the initial five years in the emerging NDF for the North Wales region. Should the FCC figure be re-visited in line with the NDF?	40% in the Mold and Buckley sub market area is considerably less than the 51% over the initial five years in the emerging NDF for the North Wales region. Should the FCC figure be re-visited in line with the NDF?	Not accepted. The objector has failed to acknowledge that the % quoted is not part of any policy wording in the draft NDF and reflects a general backlog of affordable need that is artificially inflated by the short term focus on delivery. It would not be viable for developers to provide such levels without Welsh Government subsidy of some sort but the NDF is silent on the provision of such a subsidy. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown the maximum affordable housing percentages which are viable within each housing market area, if the Council were to increase these percentages without regard to the evidence within the viability assessment then

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					this would be unsound. In the absence of any evidence to contrary, it is assumed that the NDF has not carried out bespoke viability assessments within Flintshire therefore the Council cannot apply this percentage and ignore its own viability assessment results.
864	HN3: Affordable Housing	Object	Object to the wording of Policy HN3. Whilst it is noted that the level of affordable housing to be sought in different parts of the County is stated to be a "starting point" for negotiation and should, therefore, be capable of being viewed flexibly, the fact that the levels of provision are set out at all implies that the figures are, at least initially, justified. In our view, notwithstanding a willingness to be flexible and to consider site specific circumstances, if specific targets are to be included within the Policy, then those targets should be properly justified, we do not consider this to be the case. Various issues have been highlighted with the Viability Assessment, objections relate to: Typology approach – no differentiation has been made in respect of benchmark land values across the sub market areas. This is key because the release of land is fundamental to the delivery of the LDP. If landowners are not incentivised to release land, this will undermine the delivery of housing. Development land in higher value locations typically sells for higher values to reflect this. Gross Site Are Assumptions - too low, particularly for larger sites. Housing Mix -	Amendment to Policy in light of detail review of viability justification. Furthermore, and without prejudice to the above, as presently drafted, the Policy does not appear to acknowledge that the targets must be viewed as maximum requirements, the Policy should make clear that the LPA will not seek to negotiate for levels of provision in excess of the stated targets, otherwise, there would be serious problems for developers and landowners when negotiating land values.	Partly accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. The policy wording does not mean that the Council will be looking for a higher percentage than those specified within Policy HN3, these are simply the starting position for negotiation where the levels are a maximum and which may reduce downwards subject to detailed viability considerations supported by clear and robust evidence. If the Inspector considers that further clarity could be added to the wording of the reasoned justification, then the Council would have no objection to the following additional wording being included: "The viability assessment has shown that the affordable housing percentages are the maximum levels of affordable housing that can viably be delivered across each of the housing market areas. Developers are therefore expected to start negotiation from these percentages if they believe there to be significant viability considerations on their particular site. This must be supported by a robust and credible evidence base

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			Concerns over the amount of 2 beds included in the private housing mix, with actual delivery weighted towards 3 and 4 bedroom properties Affordable Housing Tenure – Concerned that affordable housing requirement has increased from 30% to 40% in the Central and Mold and Buckley HMA. Construction Costs - Note that our BCIS figures are different for Q1 2019, which seems to be a result of a larger sample size. This data is enclosed at Appendix 1 and details a median cost of £1,074 per sq m for estate housing generally. This equates to £99.78 per sq ft. This is more reflective of larger regional and national housebuilder cost information we receive from various sources and our market knowledge. We do not believe it is appropriate to reduce the build costs by £5 per sq ft (£52 per sq m) for sites of 150 units and 300 units respectively. We would also note that smaller local developers attract higher costs than this and that a scenario for sites below 10 units should also be tested so that these developers are not excluded from the market on viability grounds. Developers Profit – Too low Appraisal analysis - A series of tables have been provided that show the viability scenario testing results as 'viable', 'marginal' or 'unviable'. We note that the 'viable' results show a reduced % in some HMAs.	Need to review viability assessment.	to sufficiently demonstrate a reduction in the affordable housing delivered by the scheme ." The Viability Assessment includes the following statement; "It may be recommended that a simple monitoring of House Price Index movements across Flintshire on a year to year basis is measured against BCIS rates, and that if a divergence of 5% either way against a sample 100 unit scheme residual value in comparison to current levels is detected that this triggers a fuller review. Where the rate changes cancel one another out then a full review may not be required." The Viability assessment will therefore be monitored along these lines. Land Value – The DVS have used land values that in their opinion reflect the level required for the land to be released onto the market for residential development. This may well be lower than transactions in the recent past, but the DVS appraisals are based on current market conditions, with the affordable housing requirements as expected at the time and assuming the land is acquired at the date of valuation. It must be borne in mind that the sites the DVS are assessing do not have planning permission - so they are assessing an amount which would convince a landowner to release land for development from its current use. This is not the same as a value for the transaction of a site which has planning agreed. On this basis the DVS have adopted a base Greenfield land value of £300,000 per hectare. It is the DVS opinion that these figures are sufficient to incentivise a

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					landowner to sell and provides accurately for the reality in the market place, if compared to the existing use value (for example £18,000 per hectare for agricultural land). Housing Mix – The DVS looked at the housing mix on recent developments within Flintshire to reach this mix, therefore the Council do not accept that actual delivery was weighted towards more 3 and 4 bedroom homes. The need for new dwellings is actually weighted towards smaller properties as identified within the LHMA, rather than for 4 bedroom properties. The aspiration is for these larger properties not the need. Construction Costs – The DVS are an independent consultant with extensive experience of conducting viability appraisals. The DVS have used information from their internal quantity surveyors and the BCIS data to establish a current base price per square metre for residential development within the Flintshire area. The DVS reduced the build cost for larger schemes with more than 150 dwellings to reflect the economies of scale achieved by developments of this size. This is based upon the DVS evidence and experience of using build costs when carrying out viability assessments. Developer Profit - The DVS have used a profit level of 17.5% which is considered reasonable based upon the nature of the developments and their perceived associated risks.

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1158	HN3: Affordable Housing	Support	HN3 Affordable Housing. These percentages must be enforced other than by exception. It is too easy for developers to claim commercial reasons not to do it. The LDP needs to provide the authority with teeth or we will continue to make the housing problems worse.		Noted. Policy HN3 will enable the Authority to maximise affordable housing delivery on viable sites across Flintshire.
1279	HN3: Affordable Housing	Object	Object to HN3 as currently drafted as it is unsound. Affordable housing requirements should not be referred to as a starting point for negotiations as this provides no certainty to developers on the level of affordable housing required in a policy compliant position. The policy should be revised to state affordable housing percentages as a target, acknowledging there are instances where a lower affordable housing provision is entirely justified and reasonable.	The policy should be revised to state affordable housing percentages as a target, acknowledging there are instances where a lower affordable housing provision is entirely justified and reasonable.	Not accepted. The policy wording does not mean that the Council will be looking for a higher percentage than those specified within Policy HN3. These requirements are simply the starting position for negotiation downwards subject to detailed viability considerations supported by clear and robust evidence. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has set the levels at which affordable housing should be viable and so by definition, and with reference to the Study itself, are the upper limit of potential affordability. Having regard to the findings of the Viability Study it is unlikely that situations would arise where new housing schemes would have sufficient viability to warrant higher figures being considered. If the Inspector considers that further clarity could be added to the wording of the reasoned justification, then the Council would have no objection to the following additional wording being included: “The viability assessment has shown that

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					the affordable housing percentages are the maximum levels of affordable housing that can viably be delivered across each of the housing market areas. Developers are therefore expected to start negotiation from these percentages if they believe there to be significant viability considerations on their particular site. This must be supported by a robust and credible evidence base to sufficiently demonstrate a reduction in the affordable housing delivered by the scheme."
993	HN3: Affordable Housing	Object	This has pre-determined the outcome of any DVS assessment by the DVS or evidence that might have come forward to demonstrate (draft) housing site viability as required by PPW10. The sub-market areas are not defined on any constraints map and detailed definition of boundaries will be needed to avoid errors. As it stands the increase over the Adopted UDP rate of 30% is considered to be far too challenging and unviable. The level of affordable housing delivered by STR3 and HN1 (and any other windfall or exception site policy) will not reflect the LHMA identified need. Comments on Flintshire Viability Study (DVS) May 2019. This was published before the Background Paper into Affordable Housing was made available in September 2019; before the Deposit Version of the LDP was published for Members in July 2019 and before the Arc4	The sub-market areas are not defined on any constraints map and detailed definition of boundaries will be needed to avoid errors. As it stands the increase over the Adopted UDP rate of 30% is considered to be far too challenging and unviable.	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. The draft viability assessment was made available to key agents and developers (including the objector) in August 2019 for initial consultation ahead of the Deposit LDP formal consultation in September 2019. This is not a statutory part of the consultation process therefore the Council do not have to adhere to specific timescales for this consultation process. The Council had limited time in which to conduct this consultation ahead of the Deposit LDP formal consultation, therefore participants were given just over two weeks to submit their comments.

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			LMHA report of August 2019. It identifies affordable thresholds, so we can only imagine that a combination of the above documents / reports were fashioned around one another; yet it is strange that the Authority did not present any of the evidence base before its Members at Full Council. Notwithstanding the procedural order and/or the accessibility of such publications to Members and the wider general public we do wish to briefly comment on the main findings of this report. There will need to be a much more forensic assessment of its methodology but in brief our concerns lie with the percentile levels of affordable being suggested and the tenure split neither of which are reflective of current rates. Developer profit at 17.5% is low (should be 20%); construction build cost is estimated at almost £100/sqft (generally £125/sqft is common) and that is without any contingency (of say 5%) being applied; net to gross development areas vary massively site by site; benchmark land values are too low and landowners will not release land for housing if they are not incentivised in doing so; We are concerned that despite the		Whilst the objector considers the 40% to be 'far too challenging and unviable' they do not provide any analytical evidence to substantiate this. Equally the objector was part of an early release of the viability study to industry representatives and agents to allow any queries or challenges to be put forward prior to deposit but none were received at this time from the objector. Whilst the objector subsequently criticizes the Viability Study and affordable housing policy at the deposit stage, where the relationship between the two is clear, they have failed to submit an alternative study based on the assumptions they feel are correct. The objector's opportunity to submit such a 'forensic' assessment was at the 'deposit' stage but they failed to do so. The Viability Assessment includes the following statement; "It may be recommended that a simple monitoring of House Price Index movements across Flintshire on a year to year basis is measured against BCIS rates, and that if a divergence of 5% either way against a sample 100 unit scheme residual value in comparison to current levels is detected that this triggers a fuller review. Where the rate changes cancel one another out then a full review may not be required." The Viability assessment will therefore be monitored along these lines. Land Value – The DVS have used land values that in their opinion reflect the level required for the land to be released onto the market for residential development. This may well be lower than transactions in the recent past, but the DVS

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			availability of this report none of the draft allocation sites have had this applied to them to determine their viability.		appraisals are based on current market conditions, with the affordable housing requirements as expected at the time and assuming the land is acquired at the date of valuation. It must be borne in mind that the sites the DVS are assessing do not have planning permission - so they are assessing an amount which would convince a landowner to release land for development from its current use. This is not the same as a value for the transaction of a site which has planning agreed. On this basis the DVS have adopted a base Greenfield land value of £300,000 per hectare. It is the DVS opinion that these figures are sufficient to incentivise a landowner to sell and provides accurately for the reality in the market place, if compared to the existing use value (for example £18,000 per hectare for agricultural land). Construction Costs – The DVS are an independent consultant with extensive experience of conducting viability appraisals. The DVS have used information from their internal quantity surveyors and the BCIS data to establish a current base price per square metre for residential development within the Flintshire area. The DVS have included a 2.5% uplift for contingencies as per paragraph 4.11 of the report. Developer Profit - The DVS have used a profit level of 17.5% which is considered reasonable based upon the nature of the developments and their perceived associated risks.

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					If the Inspector is minded that the implementation of the policy would be improved by adding the LHMA sub-areas to the proposals map then the Council would have no objection to this.
1025	HN3: Affordable Housing	Object	This has pre-determined the outcome of any DVS assessment by the DVS or evidence that might have come forward to demonstrate (draft) housing site viability as required by PPW10. The sub-market areas are not defined on any constraints map and detailed definition of boundaries will be needed to avoid errors. As it stands the increase over the Adopted UDP rate of 30% is considered to be far too challenging and unviable. The level of affordable housing delivered by STR3 and HN1 (and any other windfall or exception site policy) will not reflect the LHMA identified need. Comments on Flintshire Viability Study (DVS) May 2019: This was published before the Background Paper into Affordable Housing was made available in September 2019; before the Deposit Version of the LDP was published for Members in July 2019 and before the Arc4 LMHA report of August 2019. It identifies affordable thresholds, so we can only imagine that a combination of the above documents / reports were fashioned around one another; yet it is strange that the Authority did not present any of the evidence base before its Members at Full	This has pre-determined the outcome of any DVS assessment by the DVS or evidence that might have come forward to demonstrate (draft) housing site viability as required by PPW10. The sub-market areas are not defined on any constraints map and detailed definition of boundaries will be needed to avoid errors. As it stands the increase over the Adopted UDP rate of 30% is considered to be far too challenging and unviable. We do not believe that the required affordable housing contributions are	Not accepted. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. The draft viability assessment was made available to key agents and developers (including the objector) in August 2019 for initial consultation ahead of the Deposit LDP formal consultation in September 2019. This is not a statutory part of the consultation process therefore the Council do not have to adhere to specific timescales for this consultation process. The Council had limited time in which to conduct this consultation ahead of the Deposit LDP formal consultation, therefore participants were given just over two weeks to submit their comments. Whilst the objector considers the 40% to be 'far too challenging and unviable' they do not provide any analytical evidence to substantiate this. Equally the objector was part of an early release of the viability study to industry representatives and agents to allow any queries or challenges to be put forward prior to deposit but none were received at this time

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			Council. Notwithstanding the procedural order and/or the accessibility of such publications to Members and the wider general public we do wish to briefly comment on the main findings of this report. There will need to be a much more forensic assessment of its methodology but in brief our concerns lie with the percentile levels of affordable being suggested and the tenure split neither of which are reflective of current rates. Developer profit at 17.5% is low (should be 20%); construction build cost is estimated at almost £100/sqft (generally £125/sqft is common) and that is without any contingency (of say 5%) being applied; net to gross development areas vary massively site by site; benchmark land values are too low and landowners will not release land for housing if they are not incentivised in doing so; We are concerned that despite the availability of this report none of the draft allocation sites have had this applied to them to determine their viability .	founded on a credible assessment of viability; particularly given that the level of affordable housing ought to commensurate and proportionate to the anticipated viability of delivering housing in any given location.	from the objector. Whilst the objector subsequently criticizes the Viability Study and affordable housing policy at the deposit stage, where the relationship between the two is clear, they have failed to submit an alternative study based on the assumptions they feel are correct. The objector's opportunity to submit such a 'forensic' assessment was at the 'deposit' stage but they failed to do so. The Viability Assessment includes the following statement; "It may be recommended that a simple monitoring of House Price Index movements across Flintshire on a year to year basis is measured against BCIS rates, and that if a divergence of 5% either way against a sample 100 unit scheme residual value in comparison to current levels is detected that this triggers a fuller review. Where the rate changes cancel one another out then a full review may not be required." The Viability assessment will therefore be monitored along these lines. Land Value – The DVS have used land values that in their opinion reflect the level required for the land to be released onto the market for residential development. This may well be lower than transactions in the recent past, but the DVS appraisals are based on current market conditions, with the affordable housing requirements as expected at the time and assuming the land is acquired at the date of valuation. It must be borne in mind that the sites the DVS are assessing do not have planning permission - so they are assessing an amount which would convince a landowner to

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					release land for development from its current use. This is not the same as a value for the transaction of a site which has planning agreed. On this basis the DVS have adopted a base Greenfield land value of £300,000 per hectare. It is the DVS opinion that these figures are sufficient to incentivise a landowner to sell and provides accurately for the reality in the market place, if compared to the existing use value (for example £18,000 per hectare for agricultural land). Construction Costs – The DVS are an independent consultant with extensive experience of conducting viability appraisals. The DVS have used information from their internal quantity surveyors and the BCIS data to establish a current base price per square metre for residential development within the Flintshire area. The DVS have included a 2.5% uplift for contingencies as per paragraph 4.11 of the report. Developer Profit - The DVS have used a profit level of 17.5% which is considered reasonable based upon the nature of the developments and their perceived associated risks. If the Inspector is minded that the implementation of the policy would be improved by adding the LHMA sub-areas to the proposals map then the Council would have no objection to this.
1139	HN3: Affordable Housing	Object	Local Housing Market Assessment: clarity and consistency with evidence base – implications for affordable housing targets	PPW (paragraph 4.26) states the importance of the	Accepted. The LHMA has been clarified to show the tenure split between social and intermediate rental. This has shown that the tenure split used

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			and the viability of sites The LHMA concludes an annual need of 238 affordable homes p/a over the plan period. The tenure split shows a predominate need for social rented homes (60%) to intermediate (40%). The Council's Affordable Housing Viably Report (DVS) section 2.21 states the affordable housing targets in the plan are based on a 70% intermediate and 30% social housing split. This is a significant deviation from the LHMA tenure split and requires robust justification and explanation. The Council's explanation is that the majority of social housing is delivered outside of planning gain; the Affordable Housing Background Paper referencing the Councils own initiatives in this respect. While this is not disputed, PPW (paragraph 4.26) states the importance of the LHMA being a fundamental part of the evidence base for plans. The LPA should be seeking to deliver affordable housing, both in scale, type and tenure split in line with the LHMA. DPM (Edition 3) highlights the importance of ensuring the plans evidence base is internally consistent. In particular the tenure split from the LHMA forming a core input to the viability work underpinning the plan. It is imperative the assumptions underpinning the viability assessment are consistent with the LHMA to ensure affordable housing targets and percentages are robust. The more	LHMA being a fundamental part of the evidence base for plans. The LPA should be seeking to deliver affordable housing, both in scale, type and tenure split in line with the LHMA. The tenure mix from the LHMA should be referenced in the LDP reasoned justification in order to form the starting point for effective negotiations on planning applications.	within the viability assessment is in line with the findings of the LHMA. If the Inspector considers that the affordable housing target should be added to Policy STR1 then the Council would have no objection to this. The target for affordable housing delivery can also be seen in the affordable housing background paper LDP07. The affordable housing Background Paper will be updated with a table showing the anticipated affordable housing supply by settlement tier, and will include the expected contribution from windfall sites with ten or more units in line with the guidance set out within DPM3. The affordable housing target will also be revised to include the expected contribution from windfall sites with ten or more units.

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			intermediate housing on a scheme, the more viability improves. While it is appropriate to undertake sensitivity testing on key aspects of the viability model, the baseline scenario should be the LHMA as the starting point. The DPM (Table 24) states the LHMA is a core piece of evidence in this respect with policies/targets matching as far as possible/reasonable the latest LHMA findings with regards to tenure split. Deviation from the LHMA tenure split to this degree is potentially high risk unless this can be robustly justified and explained by the LPA. The tenure mix from the LHMA should be referenced in the LDP reasoned justification in order to form the starting point for effective negotiations on planning applications. Category C Affordable Housing - general. Affordable Housing Authority Wide Target - The Affordable Housing Background Paper states the affordable housing target for the plan is 1,981 homes. This should be included within a policy in the plan. Policy STR1: Strategic Growth could be amended to state “7,950 homes are provided of which xxx are affordable”. The target does not include the contribution from windfall sites (Table 6). It should do. The affordable housing target in the plan should be derived from all components of supply to ensure it is realistic in its aspiration and for		

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			monitoring purposes. ? Spatial Distribution of Affordable Housing Supply – the Affordable Housing Background Paper includes an analysis of affordable housing contributions by housing component. A table setting out anticipated affordable housing contributions by settlement tier and component of supply in line with guidance in the DPM (Ed. 3) would be helpful aiding clarity of the plan and effective monitoring.		
1145	HN3: Affordable Housing	Support	HN3 Affordable Housing. These percentages must be enforced other than by exception. It is too easy for developers to claim commercial reasons not to do it. The LDP needs to provide the authority with teeth or we will continue to make the housing problems worse.		Noted. Policy HN3 will enable the Authority to maximise affordable housing delivery on viable sites across Flintshire.
1173	HN3: Affordable Housing	Object	The Council's Local Housing Market Assessment Update (January 2019) has identified a need for 238 units per annum across Flintshire; whilst not a target, it is a clear indication of significant affordability issues across the County. This need should be provided for through the LDP housing requirement in order to meet the needs of current and future generations; this will require an affordability uplift to be applied to the overall housing requirement (alongside economic, population and household projections). The Affordable Housing Background Paper states that the LDP is planning to deliver 132 affordable	A significant reliance on housebuilders alone to deliver affordable provision as part of market-led schemes will not address this need; instead, there is a need for the Council to identify and release sufficient land to meet both market and affordable housing needs	Not accepted. The objector fails to acknowledge that the LHMA figure is a snapshot of housing need over a five year period and cannot be simply extrapolated over the fifteen year period of the LDP. The LHMA figure of 238 is an inflated need owing to the LHMA methodology which includes a calculation of the backlog of need as well as future need predicted over a short time period, which is the 5 year lifetime of the Study. It is not correct to extrapolate this at the level identified, across the whole Plan period as the backlog of affordable need should be met within the five years of the LHMA.

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			homes per annum, 1,980 dwellings over the LDP period. This is just 55% of the actual need, which at 238 dwellings per annum stands at 3,570 dwellings over the LDP period. Furthermore, recent affordable housing delivery rates in Flintshire have averaged 249 dwellings in 2017/18, 181 units in 2018/19, and a projected 284 units in 2019/20. As such, there is the ability to deliver much more than just 132 affordable dwellings per annum provided that sufficient land is made available to deliver them. A significant reliance on housebuilders alone to deliver affordable provision as part of market-led schemes will not address this need; instead, there is a need for the Council to identify and release sufficient land to meet both market and affordable housing needs through the LDP, and to plan positively to meet this need. This is in addition to a specific affordable housing policy requirement on sites which we comment on later in this Representation.	through the LDP, and to plan positively to meet this need.	The objector also fails to acknowledge that there are other sources of affordable housing delivery other than the allocated residential development sites. For example the Council have a successful track record of developing affordable housing via the SHARP (Strategic Housing and Regeneration Programme) and NEW Homes (North East Wales Homes and Property Management). These two schemes specialise in the delivery of social and intermediate rental homes, the SHARP programme has a commitment to deliver 500 new affordable dwellings by 2021, please see details of completed and forthcoming schemes on the Flintshire Council website. In addition to this the Council will continue to work with its Registered Social Landlord partners to deliver more affordable housing in Flintshire as part of the Social Housing Grant (SHG) programme funded by Welsh Government. Collectively these mechanisms of delivery alongside the development of affordable housing by private developers has resulted in Flintshire achieving the highest average annual delivery rate in North Wales over the last ten years. The majority of this delivery comes from RSLs and schemes such as the SHARP programme rather than private developers, therefore we do not rely on allocated LDP sites to deliver all of the affordable housing that Flintshire needs The LHMA methodology also includes a mechanism to deduct the supply of new affordable housing as part of the calculation. As the LDP

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					allocated sites are developed and new affordable housing is delivered this would need to be deducted from the LHMA overall need figure, therefore it wouldn't be correct to simply extrapolate the 238 figure forward past the five year period of the LHMA as it wouldn't reflect this significant supply of new affordable housing. The LHMA will need to be refreshed during the lifetime of the LDP and any undersupply will be monitored through the AMR process.
1181	HN3: Affordable Housing	Object	The different affordable housing requirements are understood to be based on the relative strengths of the housing sub-market areas in terms of their viability, and ability to support affordable housing provision. The Affordable Housing Background Paper offers further guidance on this matter. On review of the Council's supporting evidence, our Client has the following observations: - Flintshire is recognised within the LHMA to be a self-contained housing market area. The Sub-Areas identified in the LHMA are documented in paragraph 3.14 to be based on an out-of-date Local Housing Strategy and previous LHMA's. Our Client is concerned that these Sub-Area boundaries may no longer be an accurate reflection of the housing market in Flintshire. The robustness of these boundaries should be reviewed prior to imposing a Sub-Area approach to the provision of affordable housing; and - On review of Table 3.1 of the LHMA, and the	The Council may wish to give consideration to the use of planning conditions to secure affordable housing delivery moving forward.	Not accepted. S106 legal agreements provide greater protection for affordable dwellings to ensure they do not resort to market dwellings. They are also more easily recorded and flagged by Land Charges when carrying out searches. The objector criticises the 'accuracy' of the sub market area boundaries but these have been derived from the LHMA work and found to be still relevant in the 2018 Update. They are also to a degree not absolute but nevertheless provide guidance on affordable variability resulting from differences in viability. In light of the objectors inability to draw more accurate areas or evidence their concerns, the Council consider that they are fit for purpose. In terms of the objectors point that the Connah's Quay, Queensferry and Broughton affordable housing level should be no more that 30%, no viability or other evidence is provided to substantiate this , making it difficult for the Council to accept the case being made. The viability

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			requirements set out under Policy HN3, it is considered that the affordable housing requirement in the Connah's Quay, Queensferry and Broughton Sub- Market Area should be no more than 30%, consistent with that of the South Border Sub-Market Area given the relative house prices. Given the potential requirement for other developer contributions (such as education, recreation/open space, health) on a site-by-site basis, it is imperative that the affordability thresholds set out in this Policy are robustly evidenced and will not serve to frustrate housing delivery across the County. It is noted that reference is made in paragraph 11.9 of the Deposit Plan to the fact that affordable housing delivery will be secured by way of a planning obligation. Based on recent experience elsewhere, there is the potential for such provision to be secured by way of a planning condition which in turn would reduce time and expense on the preparation of a S106 Agreement for those sites where no other obligations are being sought. The Council may wish to give consideration to the use of planning conditions to secure affordable housing delivery moving forward.		assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has shown that the affordable housing percentages are viable within each housing market area, therefore the percentages do not need to be reduced. In terms of the objectors point about obligations those mentioned are all reasonably standard requirements for new development and the objector's objection to their provision would render a site (including any they are promoting) as unsustainable and undeliverable. Conversely, if a site is viable and deliverable then the requirement to secure such obligations should not be an issue.
1264	HN3: Affordable Housing	Object	Object to HN3 as currently drafted as it is unsound. Affordable housing requirements should not be referred to as a starting point for negotiations as this provides no certainty to developers on the level of	The policy should be revised to state affordable housing percentages as a target,	Partly accepted. The policy wording does not mean that the Council will be looking for a higher percentage than those specified within Policy HN3. These requirements are simply the starting position for negotiation downwards subject to detailed

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			affordable housing required in a policy compliant position. The policy should be revised to state affordable housing percentages as a target, acknowledging there are instances where a lower affordable housing provision is entirely justified and reasonable.	acknowledging there are instances where a lower affordable housing provision is entirely justified and reasonable.	viability considerations supported by clear and robust evidence. The viability assessment has been carried out using robust and up to date evidence complied by the District Valuer Services who are part of the Valuation Office Agency who operate on an independent basis. This has set the levels at which affordable housing should be viable and so by definition, and with reference to the Study itself, are the upper limit of potential affordability. Having regard to the findings of the Viability Study it is unlikely that situations would arise where new housing schemes would have sufficient viability to warrant higher figures being considered. If the Inspector considers that further clarity could be added to the wording of the reasoned justification, then the Council would have no objection to the following additional wording being included: “The viability assessment has shown that the affordable housing percentages are the maximum levels of affordable housing that can viably be delivered across each of the housing market areas. Developers are therefore expected to start negotiation from these percentages if they believe there to be significant viability considerations on their particular site. This must be supported by a robust and credible evidence base to sufficiently demonstrate a reduction in the affordable housing delivered by the scheme.”

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6	HN4: Housing in the Countryside	Object	Planning Policy Wales Edition 10 | December 2018 Definition of Previously Developed Land Previously developed (also known as brownfield) land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure. The curtilage (see note 1 below) of the development is included, as are defence buildings and land used for mineral extraction and waste disposal (see note 2 below) where provision for restoration has not been made through development management procedures. Note 2. This relates to minerals and waste sites which would otherwise remain unrestored after use because the planning permission allowing them did not include a restoration condition.	The reintroduction of development of brownfield sites even if their location is percived as open countryside.	Not accepted. Policy HN4 aims to protect the open countryside from inappropriate development, but enable housing to meet specific needs in exceptional circumstances only. The policy allows the consideration of brownfield sites through criteria b. c. and d. therefore these is no need to add an additional criteria specifically for brownfield land. Each application will be assessed on their individual merits and the circumstances of the applicant and their need for a dwelling in that particular area .
114	HN4: Housing in the Countryside	Support	We support this policy especially in Northop on the Holywell Road. There are currently fields bordering the edge of the village and providing a break between the edge of the village and Maes Celyn		The Council welcome your support to protect the open countryside from inappropriate housing development, but to ensure the delivery of specific types of new housing in exceptional circumstances only.
355	HN4: Housing in the Countryside	Support	I support these policies to retain green areas as much as possible.		The Council welcome your support to protect the open countryside from inappropriate housing development, but to ensure the delivery of specific types of new housing in exceptional circumstances only.
433	HN4: Housing in the Countryside	Object	object to the restrictive approach to growth proposed through HN4. Sustainable development on the edge of settlements	Sustainable development on the edge of settlements	Not accepted. The Plan seeks to meet its housing requirement in a sustainable manner through completions, commitments, strategic sites,

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			should be capable of being brought forward.	should be capable of being brought forward.	allowances for windfall sites and small sites and new allocations, with settlement boundaries adjusted accordingly. Given that the Plan is providing for sustainable development, it is not understood why policy HN4 should seek to enable further housing development on the edge of settlements unless it is related to specific circumstances. Policy HN4 aims to protect the open countryside from inappropriate development, but enable housing to meet specific needs in exceptional circumstances only. Therefore the policy will allow appropriate residential development within the open countryside where it meets the criteria.
63	HN4-B: Residential Conversion of Rural Buildings	Support	CPAT welcomes the intent of this policy to retain any inherent traditional architectural and historic features which merit retention aspart of development schemes		The Council welcome your support for Policy HN4-B.
289	HN4-B: Residential Conversion of Rural Buildings	Object	Criteria a) and b) are unreasonable and unnecessary in a Flintshire context. Firstly, it is not logical to advertise premises for an employment use in the absence of planning permission for an employment use. It simply does not generate any interest as prospective purchasers/tenants will occupy existing available premises of which there are plenty in Flintshire. The Plan acknowledges that it has more employment land and premises that it needs to meet the projected jobs requirement. A freedom of information request to identify how many barn	Delete criteria a), b) and c).	Not accepted. PPW10 states that “A strong rural economy is essential to support sustainable and vibrant rural communities. The establishment of new enterprises and the expansion of existing business is crucial to the growth and stability of rural areas.” Therefore we must enable this type of development through the conversion of existing rural buildings, if they are not initially advertised for business use for a minimum period of twelve months they would have to complete with the demand for residential. This could stifle the opportunity to convert these buildings into business uses and restrict the opportunity to support the rural economy.

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			conversions to employment use have been consented/implemented over the last 10 years failed to identify any. Also the planning authority acknowledged that it did not record this information and consequently is unable to review and monitor whether or not the policy is working. None of the 65 properties subject to applications for conversion from 2007 to January 2017 were for commercial/employment use. This requirement of the policy therefore serves no useful purpose and only serves to unnecessarily delay development. The situation is different in other rural areas such as the affluent areas of Cheshire where land values are significantly higher and allocated employment land is further away. here the policy works well but in Flintshire it clearly does not. Criterion c) is also unreasonable. Firstly, conversion costs are almost in every case significantly higher than new build and therefore are very unlikely to be affordable. Secondly, rural conversion properties are generally more isolated from local services such as shops, schools, medical facilities and public transport and so are not a sustainable form of development for those on lower incomes.		
275	HN4-C: Infill Development in Groups of Houses	Object	This policy has failed in delivering any affordable housing in over 15 years. Consequently, in its present form it is meaningless and has no planning purpose.	Allow market housing or a 50/50% mix with an affordable unit	Not accepted. The aim of policy HN4C is to protect the open countryside from inappropriate residential development, but to enable dwellings for proven local housing needs such as affordable housing or

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					essential workers where required. There are limited opportunities within rural areas for residential development therefore it is important that small infill plots outside of settlement boundaries are directed towards residential development for those with local housing needs only. If these were made available for market dwellings then local need affordable housing would struggle to compete, and the opportunity to deliver such dwellings could be stifled. Preserving infill plots for local housing needs only also reduces the pressure for sporadic and isolated development within the open countryside . Allowing market housing on these sites undermines the objective of this policy.
273	HN4-D: Affordable Housing Exceptions Schemes	Object	The policy is a repeat of an existing failed policy. See attached document. The rural exceptions policy is fatally flawed policy and has provided no meaningful affordable housing contribution in the rural areas. Attempts have been made to elicit a response from the local planning authority as to how many rural exception dwellings have been provided in Flintshire since its introduction over 15 years ago. These have included Freedom of Information requests but no evidence has been produced regarding the numbers, if any, of exceptional site dwellings that have been either approved or built. The only such development is the Maes Y Goron site at Lixwm. This 25 unit site was granted in 2007 and, although the cooperation and negotiation between the developer and the planning authority was well intentioned, it	It should be amended to allow for on site market housing to cross subsidise the affordable housing	Not accepted. Policy HN4D recognizes that the need for affordable housing in rural areas is particularly important. The aim of this policy is to protect the open countryside from inappropriate residential development, but to enable small scale affordable housing development where required. PPW10 paragraph 4.2.34 states “Affordable housing exception sites are not appropriate for market housing.” Therefore no market housing will be permitted on exception sites.

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			has been fraught with difficulty ever since. It represented the first and only attempt to bring forward a rural exception site in the county. The lessons learned have demonstrated that the exceptions Policy HSG11 of the UDP is an ineffective mechanism to bring forward local needs housing in the rural area.		
623	HN4-D: Affordable Housing Exceptions Schemes	Support	Strongly support the controls on necessary affordable housing within the defined settlement boundary of Pantymwyn, and on small scale affordable housing outside/adjoining the settlement boundary. Urge that no changes are made to these controls in Pantymwyn, or to the defined settlement boundary		The Council welcome your support for Policy HN4D.
1132	HN4-D: Affordable Housing Exceptions Schemes	Object	HN4D. Reference to acceptance the addition of developments of affordable homes adjacent, but outside, settlement boundaries. This is not qualified, either in scale, number of developments or site specific locations considered acceptable for affordable development. 9.2 says that development must be controlled which contradicts this wording and leaves site open to potential exploitation.	Reword policy.	Not accepted. PPW10 paragraph 4.2.34 supports the release of “small” affordable housing sites adjoining settlement boundaries for the provision of affordable housing where a need has been identified. Affordable Housing delivered on exception sites must meet the needs of local people in perpetuity and will be secured accordingly with Section 106 legal agreements and/or planning conditions. The scheme must also meet all the other criteria against which a housing development will be assessed. In particular the scale of the scheme must be sympathetic and proportionate to the size of the settlement and its landscape setting. The criteria in policy HN4D provides sufficient control over the development of exception sites for affordable

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					housing, and leaves no room for potential exploitation through market development.
1185	HN4-D: Affordable Housing Exceptions Schemes	Object	Exception Sites – Affordable housing exception sites are permissible under policy STR2: Location of Development and HN4 (criteria f). It is unclear why small scale exception sites are only allowed in Tiers 2-5 and not Tier 1 which are the most sustainable settlements? The approach requires justification and clarification given affordable housing need across Flintshire is significant.	Exception Sites – Affordable housing exception sites are permissible under policy STR2: Location of Development and HN4 (criteria f). It is unclear why small scale exception sites are only allowed in Tiers 2-5 and not Tier 1 which are the most sustainable settlements? The approach requires justification and clarification given affordable housing need across Flintshire is significant.	Accepted. The Deposit Plans exclusion of Tier 1 Main Service Centres reflects a carry over from the adopted UDP whereby policy HSG11 applied 'rural' exceptions schemes as was defined in PPW at that time. Therefore adopted policy did not allow small scale exceptions schemes in the larger category A settlements as they were not rural settlements. It is noted that PPW describes such development as 'Affordable Housing Exceptions Schemes' and that reference to 'rural' settlements no longer applies. It is accepted that as Tier 1 settlements are considered to be most sustainable settlements then provision for small scale affordable housing exceptions development would be appropriate in principle. The Council would therefore offer no objection to the Inspector recommending that policy HN4-D be amended to allow 'Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries', within criteria a. re Tier 1 Main Service Centres.
122	HN6: Annex Accommodation	Object	While I do not object to the wording of the policy itself, I am objecting (in a purely personal capacity as a planning consultant and not on behalf of any client) to the following sentences in the supporting text, at paragraph 11.27: "An annexe should not contain a full range of facilities which would enable it to be used as a self-	The supporting text should be revised to explain that the use of an existing building within the curtilage of an existing dwellinghouse for	Not accepted. Policy HN6 supports the creation of annex accommodation where it is an extension to an existing dwelling or a conversion of an existing building within the curtilage of an existing dwelling, provided that its usage is ancillary to the residential use of the existing dwelling and is reliant in part on the main dwelling for facilities. If the building does not rely on the main dwelling for some facilities then

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			contained dwelling. If the facilities in the annex (sic) are such that it can be used separately from the original dwelling the Council will assess it as a separate dwelling". This implies that a material change of use might have occurred in the eyes of the LPA, whereas the courts have held that the use of an outbuilding in the curtilage of an existing dwellinghouse for primary residential purposes does not involve a material change of use where it is used in conjunction with the dwelling. This has been upheld by inspectors on appeal. The LPA is therefore respectfully requested to look again carefully at the wording to the supporting text to draft policy HN6 to make this clear.	primary residential purposes does not involve a material change of use where it is used in conjunction with the dwelling. Use by family members does not constitute a sufficient degree of 'separateness' (viz. create a separate dwelling), even where such a person lives independently from those occupying the main dwelling.	it would be an entirely separate dwelling and not annex accommodation, and would need to be assessed accordingly.
290	HN6: Annex Accommodation	Object	Criteria i) and iii) of the policy are unreasonable and unnecessary. Annex accommodation is generally required for family members who are either getting older and want to stay close to family where there will be an opportunity for help and care when their physical or mental health deteriorates. However it is extremely important for their dignity and well being that that they retain a significant element of independence. Criterion i) requires the annex to be reliant in part on the main dwelling for facilities and this will have a negative impact on their independence which they will want to retain for as long as possible. There is a	Delete criteria i) and iii) of the policy	Not accepted. Policy HN6 supports the creation of annex accommodation where it is an extension to an existing dwelling or a conversion of an existing building within the curtilage of an existing dwelling, provided that its usage is ancillary to the residential use of the existing dwelling and is reliant in part on the main dwelling for facilities. If the building does not rely on the main dwelling for some facilities then it would be an entirely separate dwelling and not annex accommodation, and would need to be assessed accordingly. Criteria i and iii are important to ensure the annex is not self-contained, and is used ancillary to the existing dwelling house as intended.

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			wealth of reports and studies which confirm the beneficial effect of such independence but with the security that they can have help close at hand if required. Given the lack of affordable housing there are so many young family members having to live at home for much longer and often trying to raise a family of their own in a similar circumstances. With regard to criterion iii) this is rather too prescriptive and can be dealt with by sensitive design and layout as part of any planning application and subsequent permission. Separate vehicle access would seldom be required but again is controlled through the development management process as can a separate garden /sitting out area without affecting the character of the dwelling. Criterion iv) provides the strong and enforceable control to ensure that the annex does not become an entirely separate dwelling.		

Policy HN7

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1144	HN7: Houses in Multiple Occupation	Object	Category C Homes in Multiple Occupation (Policy HN7) The Council will need to ensure that the proposed policy provides an effective basis for determining applications for HMOs in line with the evidence and relevant legislation. In order for a policy of this nature to be effective and implementable in practice 'over concentration' should be defined in the policy. The policy would be strengthened if criterion (b) and (e) clearly detailed what the LPA considers to be an "over concentration" and "cumulative impact". It will be for the LPA to justify its approach based on evidence, and ensure it will deliver on the aims of the policy and can be implemented in practice.	In order for a policy of this nature to be effective and implementable in practice 'over concentration' should be defined in the policy. The policy would be strengthened if criterion (b) and (e) clearly detailed what the LPA considers to be an "over concentration" and "cumulative impact". It will be for the LPA to justify its approach based on evidence, and ensure it will deliver on the aims of the policy and can be implemented in practice.	Accepted. Flintshire County Council, (unlike all the other LA's in North Wales), does not have the power to license all HMO's at the present time. Work is in hand to survey where the existing HMO's are located in order to provide an evidence base against which to consider future registration options as well as support the policy in the LDP. This evidence base can be used to assess whether an area has an over concentration of HMO's using the level of 10% HMO's within a 50m radius of a new HMO, to measure concentration and impact against as a benchmark. Work on an HMO Advice Note, which can inform future SPG is ongoing at the present time and this will add the specific details to the implementation of the Policy. The policy has been written in this way because in the absence of a complete registration system which is not in the LPAs control, each application will need to be assessed using evidence from whatever secondary sources of information are available. Work is underway to collate and map information about known and suspected HMOs both to inform the need for a full registration process, and to assist in identifying areas with particular concentrations which could raise issues of cumulative impact. This work will continue and will need to be reported to the examination by means of a further statement.

Policy HN8

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
91	HN8: Gypsy and Traveller Sites	Object	Objects to sites HN8-1 (magazine Lane, Ewloe), HN8-2 (Gwern Lane, Hope) and HN8-3 (Riverside, Queensferry) as they do not comply with the requirements set out in Circular 005/2018 and in the criteria set out in the existing UDP (HSG14) and in the Deposit LDP (HN9). In particular HN8-3 is located on contaminated land, is in a C1 flood risk area, is adjacent to a major sewage works and is severed from local services by a principle main trunk road linking North Wales and the North West of England which is scheduled for upgrading. Detailed objection provided in the attached document. Proposes an alternative allocation at Bryn y Baal, Mynydd Isa.	Delete sites HN8-1, HN8-2 and HN8-3. Rely on criteria based policy HN9 for determination of planning applications on alternative sites. Allocate candidate site MYN006 at Bryn Y Baal and identified in the document attached above.	Not accepted. The objections relating to allocated sites have been recorded separately • HN8-1 (magazine Lane, Ewloe (id1215) • EN8-2 (Gwern Lane, Hope (id1216) • HN8-3 (Riverside, Queensferry (id1216) and these are dealt with in a comprehensive response on each site which also take into account other representations. The objector has made the following points in support of the site using a number of headings (in bold) and each will be responded to in turn: Adjacent to settlement boundary: The settlement boundary in this part of Mynydd Isa is well defined by existing estate type residential development. On the south side of Bryn Y Baal Rd this includes the farmhouse 'Bryn Derw' and the cul de sac Yr Ydlan. The objection site is quite different in character and appearance from the development within the settlement boundary. On the north side of Bryn y Baal Rd the settlement boundary includes the cul de sac development at Rockcliffe but excludes the buildings associated with Bryn Farm. The settlement boundary on this north western edge of Mynydd Isa is considered to be well defined and defensible. Well defined site boundaries: The triangular shaped site is bounded by Bryn y Baal Rd on its outer edge with a substantial hedgerow boundary and by the line of a former road on the other two sides. The former road is not now particularly visible as it has grassed over. In general, the site is considered to form part and parcel of the wider open countryside. Logical extension to urban form: The modern development at Yr Ydlan is set back from the road by grassed amenity areas on either side of the access road. This helps soften the appearance of built development. Similarly the farmhouse Bryn Derw is also set back from the road. Given that

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					built development is set back and has an 'open' setting, it is not considered that the development of the site represents a logical extension to the settlement boundary or to urban form. Well related to local community and services: It is noted that the site is in close proximity to services and facilities but this on its own is not sufficient to overcome the many site constraints that exist. Site location in green barrier no impediment to use as a gypsy / traveller site as seen by appeal decisions: The objector refers to appeal decisions at Magazine Lane, Ewloe and Oakehnolt where gypsy and traveller sites were allowed within green barriers. The planning application (053290) for the Oakenholt site was allowed on appeal on 08/10/15 for 2 pitches. It is the case that the Inspector considered that the need for accommodation and the lack of sites outweighed the fact it represented inappropriate development within a green barrier. However, the Inspector also looked at the specifics of the appeal site in terms of the purpose of the green barrier, noting that '…the site itself is largely enclosed by trees, many of which are mature and evergreen. As a result of this, there are very limited views into the site from the surrounding area. This, together with the presence of the adjacent housing and papermill, mean that the site as it was prior to its occupation…. would have made a limited contribution to the openness of the green barrier. Further, due to the location of the site adjacent to the row of dwellings and the papermill, the proposal would not appear to extend the developed area any further into the countryside…'. This contrasts sharply with the objection site which is open in character, is highly visible from the adjacent road and where it would extend development into open countryside. In any event, the Deposit LDP has identified allocated sites in the form of extensions to existing authorised sites and it is not necessary for a new site to be allocated where it would harm a

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					green barrier. A separate objection has been made in respect of EN11 and this is responded to separately. The site has previously been put forward for development as an omission site for housing in the UDP and the Inspector commented 'The site forms a small part (0.2ha) of 5963 adjacent to existing development and fronting Bryn-y-Baal Road. The settlement boundary in this location is firm and defensible following the line of built development. The objections site is open land screened by hedgerows and the track along its north western side is overgrown. At the time of my visit it was used as a storage compound. Despite the storage use, in appearance it has more in common with the countryside to the north and I consider it is appropriately located in the undeveloped area outside the settlement boundary. The Inspector also commented 'The site, albeit in a small way contributes to the strategic green barrier between New Brighton and Mynydd Isa'. The objector puts forward the argument, by objecting to the Plans allocated sites that there is an unmet need and this overrides the green barrier designation. The objector recently put forward similar arguments as part of a planning application (056672) for residential development in which the need to increase housing land housing supply outweighed the green barrier. However, the appeal was dismissed with the Inspector commenting 'My conclusions are that the development would be harmful to the openness of the green barrier and to the character and appearance of the area and would erode the gap between Mynydd Isa and New Brighton. These harmful effects warrant considerable weight. I also conclude that there is a lack of a 5 year supply of housing land, and that the need to increase the supply of housing land warrants considerable weight, provided the development would comply with development plan and national policies. If the site was not located in a green barrier, these arguments would be finely balanced. However, the proposal is for inappropriate development in the green barrier, and PPW advises that such development should not be granted planning permission except in very exceptional circumstances where other considerations clearly outweigh the harm the development would do to the green barrier. That demanding

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					balance would not be achieved in this case, and I conclude that the development would be contrary to development plan and national policy'. Turning to the issue as to whether this is an appropriate location and site it is not considered that the location is suitable. There is no history of encampments in this area and it is not located on the known traveller routes. In terms of the site itself the site area is only 0.13ha and is considered to be too small to accommodate a well laid out development. The site has previously been considered by the UDP Inspector who found that it formed part of the open countryside and green barrier and did not relate to the well defined settlement boundary. A subsequent appeal Inspector also considered that it formed part of the green barrier and that the increase in housing land supply did not outweigh the harm to the green barrier. The site is not considered to be in a suitable location nor does it have the size to meet the needs of the gypsy and traveller community. The Plan has sought to allocate extensions to existing lawful sites to meet the need arising over the Plan period. The objector's suggestion of deleting those allocations and replacing them with a single small site allocation, backed up by a criteria based policy does not meet national planning guidance nor the requirements of the Housing (Wales) Act. The Plans approach of seeking to extend sites which have a lawful use and planning permission is not considered to be unsound. However, the Objectors suggested approach of a single small allocation, backed up by a criteria based approach is simply not sound.
21	HN8: Gypsy and Traveller Sites	Object	I wish to object to the proposed traveller transit site in Castle Park Ind Est Flint. This site is not suitable for many reasons. This area is on contaminated ground from the previous use as a domestic waste site but before this it was an Alkali works which was	Please investigate above concerns.	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector.

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			capped but still requires monitoring for leaks from underground chemical activity. To the West of the site is an area of gutters and ditches which flood on a high tide, Not ideal for children who don't know the area to live next to. Also from a residents point of view the increased traffic over the Swan Bridge would be dangerous as there is no footpath. The local infrastructure simply could not cope. Also this plan contradicts what we were told by the local council the site would be used for, Which was to use the area for Flint Coastal Volunteers, Which is much safer than using the site as even a temporary home for someone. Has the council considered the old amenity site in Greenfield which is much larger and extends to the dock area and has better access and is closer to the A55 via the important traveller visiting place of The Well in Holywell. There is also the site on Dock road Connahs Quay where the skip site was but I believe is now closed and this area does not directly affect residential dwellings. Please take into account these concerns and think about the residents of this part of Flint who thought that things were starting to look up for us but we had the "Controversial" Iron Ring taken from us and there is still no sign of the castle visitors centre. This area surely deserves something positive to show off the natural beauty of the Estuary and the first castle built by King Edward I Please consider all of this and prove that the Council does listen.		Based on Incomplete Data: The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government guidance 'Designing Gypsy and Traveller Sites' in terms of appropriate pitch sizes. A draft layout shows 6 pitches plus a site manager's office which will provide communal facilities. The draft site layout in Background Paper 6 shows 6 pitches and a site manager's office which will provide communal facilities. The design of the site will need to comply with para 6.17 of Welsh Government guidance 'Designing Gypsy and Traveller Sites' which states 'Instead of individual amenity blocks on each pitch, sites should include shared amenities featuring toilets, washbasins and shower facilities with hot and cold water supply. At least one male and one female amenity block are required'. The provision of public toilets elsewhere in Flint is not within the remit of the LDP. No proposals have been received for a base for the Flint Coastal Volunteers on the site of the former Civic Amenity Site. By contrast

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					there is a statutory duty placed on the Council's Housing function, to deliver gypsy and traveller sites. The need for a Transit site has been identified and following an assessment of Council owned land, this site has been identified as being available and suitable to be allocated for a transit site. Area Wide Issues: The recreational use of the Flint Dock and the surrounding area is noted given the network of paths and the Coast Path. The gypsy site is set back from the public highway behind gates and is well screened by existing woodland. Its use as a transit site will not harm views of the estuary. The transit site will be carefully managed and have an onsite manager office. Residents will be on site for a temporary period and will need to abide by site rules and regulations. The site would be fully serviced in terms of water electricity, sewage facilities and waste disposal. Given that it is has no public access and is well screened it is not considered that the proposal would harm recreational use of the area. The site was not previously used as an industrial unit or site, but as a former civic amenity site for recycling. It is separated from the industrial estate by woodland and landscaped open areas and the dock. With appropriate design and management there is no reason why the proposed use should be inappropriate or harmful to the industrial estate. The planning permission for the adjacent solar park includes security fencing and security gate and all generating and inverter infrastructure will be located within the secure fenced boundary of that site. It is not considered that there is any inherent conflict between a managed transit site and a solar farm / grid connection. Contamination and related Issues: Although the site was previously used as a civic amenity site it has a concrete slab and its operation as a waste site would have complied with all environmental licensing arrangements. Nevertheless, a contamination study has been commissioned to establish the existence of any contamination and what mitigation measures might be necessary. The adjoining former landfill site now has planning permission for a solar park and this will have security fencing and will not have public access. There are a number of gutters and ditches which

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					flood at high tide but these are clearly visible and accessible from the main footpath link between the retail park and Castle Park. The presence of these features is something that could be pointed out to travellers on site as part of the site management arrangements and signage. Conflict with Flint Masterplan: The Flint Masterplan 2021 has a base date of 2012 and covers the period to 2021. On p30 the Masterplan shows no particular proposals for the former Civic Amenity Site, but does show an improved pedestrian link from Flint Retail Park to Flint Dock and the coastal path, which runs either side of Flint Dock. It also shows proposed landscaping work in the area around Flint Dock. The Masterplan maps show a pedestrian route to the rear (south) of the former Civic Amenity Site, but not along the access road which leads to the site. Having checked the Council's public rights of way maps, there is no lawful public access along the access road to the site, and public access is presently prevented by locked gates. Given that the former Civic Amenity Site sits within, and is well screened by woodland, it is unclear how the sites use as a transit site will have a negative effect on the use of nearby public rights of way and the area around the Dock, nor prevent proposals which seek to enhance the recreational potential of the area. The Masterplan identifies the land opposite the former Civic Amenity site, (adjacent industrial unit 26 at Castle Park Industrial Estate) as a site for proposed greenspace. This proposal has not been delivered and a planning application (059397) has now been approved for a fenced open storage compound. No objection to this proposal has been made by local Members, the Town Council or the public on the basis that the proposal is contrary to the recommendations in the Flint Masterplan. The Flint Masterplan is not adopted supplementary planning guidance as part of the Council's planning policy framework. Infrastructure The site is allocated as a transit site for 6 pitches and is intended for occupation for a temporary period of up to 12 weeks. Any residential occupation by families with children will not place a pressure on schools to create a permanent place. The usual procedure is for Education Officers to complete a welfare assessment for any new family staying temporarily in the County

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					with the assistance of BCUHB. Families would not be allowed to stay within a transit site for longer than 12 weeks which is the national agreement and if the families asked for their children to attend school then this would need to be assessed. Experience to date is that this has never happened as families will usually have school places in their home town. Highways Issues Castle Park Industrial Estate presently has two means of access which are via Evans Way which has a height restriction of 2.8m and via Castle Dyke Street and Swan Bridge. These two access points provide satisfactory vehicular access to the Castle, foreshore and Industrial Estate. Also the use of the site as a transit site must be considered in the context of its previous use as a recycling centre, in terms of the amount and type of vehicular traffic. In this context it is considered that the existing road network is quite capable of serving a transit site of 6 pitches in this location. The Highways Development Management Officer has commented 'The site was formerly used as a household waste/recycling site; a change of use to a Transit Site is likely to generate a reduction in vehicular movements and a lesser highway impact'. The local highway network is considered appropriate in terms of accommodating the likely traffic generation from the transit site. Soundness Issues: As explained above, the former civic amenity site is not designated for any particular use or proposals in the Flint Masterplan and neither does the masterplan have any planning status in terms of supplementary planning guidance. The site is separated from the industrial estate (and nearby residents) by woodland and the dock. It is not clear how the site could "inhibit existing industrial operations". A contamination report has been commissioned and clearly the site has been more recently used as a civic amenity site where hardstanding and servicing was provided to the site. Given this, the amount of ground disturbance that would be required to facilitate the sites transit use would be minimal. Transit sites, where residents will only be present for a temporary period, would be unlikely to place pressure on schools for additional places. This is commented on further above. The industrial estate is served by two vehicular access routes. The

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					use of site for a 6 pitch transit site must also be considered against the traffic arising from the previous waste recycling centres which have involved visiting customers and operational HGV's and was far greater in size and volume than is likely to be the case with a periodic use for just a six pitch transit site. There is no inherent conflict between a transit site and solar park. In terms of the allegations that the Plan is unsound in respect of this allocation it is necessary to look at the tests of soundness in detail: i) Does the Plan fit? (is it clear that the LDP is consistent with other Plans) – in line with the Housing (Wales) Act, PPW10 and the findings of the GTAA as well as on-going problems with encampments, the Plan seeks to make provision for a transit site. The approach is not 'unsound'. ii) Is the Plan appropriate? (Is the Plan appropriate for the area in the light of the evidence) – The site is self-contained and is capable of being developed and operated in a manner which does not harm the locality. There is no conflict with the Flint Masterplan in terms of recreational uses in the area given the site configuration and relationship. iii) Will the Plan deliver? (is it likely to be effective) – The site is in Council ownership and this enables the Council to secure Welsh Government funding to develop the site. The site is both viable and deliverable. In conclusion, the site meets an identified need and is in a sustainable location off a main travelling route, on the edge of a Tier 1 Main Service Centre which provides a wide range of services and facilities. The site is self contained and can be developed and operated in a manner which does not harm the amenity and use of the local area. The site is viable and deliverable and should be retained as an allocation in the Plan.
241	HN8: Gypsy and Traveller Sites	Object	Land on Rhyddyn Hill, next to the 10 acres of land has been used by residents of Gwern Travellers Caravan Site for grazing horses and other activities, for many years. From the outset we tried to be welcoming & tolerant. We were to have this tolerance well & truly thrown back in our faces. On occasion there have been up to 21 horses	Permissions should be time limited to 5 years with renewal dependent on performance. (Previous agreements with the Authority regarding anti-social	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on

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			on this land & in 2014 the horses were neglected to the point where they stripped the bark from the trees, and ate through the hedge onto our land. The horses ended up on the Rhyddyn Hill after eating their way through my hedge & the Police issued a Fixed Penalty, I sought the help of the RSPCA; who were very effective at dealing with the problems caused by the Travellers. This year a white Transit Van and 2 off road motorcycles have been racing up & down on that land close to our land, regularly on Sundays, for up to 8 hours a day. If a vehicle or motorcycle lost control and travelled through the hedge the consequences would be dire. (We have had to consider a disaster plan following the recent tragedy at Rhyd y Galen Caravan Park, where a women was tragically killed in similar circumstances.) Gypsies & Travellers make applications on green belt land, to enlarge their site citing the fact that they are persecuted, and yet do not reveal the fact that they use local agricultural land for "recreation" in order to persecute others. The Police were too busy on ALL of the occasions we sought assistance this year & in desperation, I tried to reason with the group of 10 adolescents who were riding the motorcycles, I received verbal abuse & death threats. I expect Enforcement officers will receive many inquiries in 2020..... The Gwern Lane residents use Rhyddyn Hill to access Hope by foot and car, beyond, as it offers the shortest route. Rhyddyn Hill is already congested & any planning application for Gwern Lane will have to address the access via Rhyddyn Hill. I have received abuse on Rhyddyn Hill from a Traveller because I did	behaviour, have, I believe been ignored.) If residents on the Gwern Lane site really want to integrate with our community, & planning is to be granted, then it should be conditional & time limited. After all, a Caravan Park licence is subject to it being run in a proper, safe & correct way or a licence could be withdrawn. Surely the same should apply to Gypsy & Traveller Caravan sites too? The design and access statement attached to any Gwern Lane planning application must address access via Rhyddyn Hill & recreational intentions relating to the land adjacent to Little Rhyddyn Farm, as the use of this land is now entrenched with the occupiers of Gwern Lane Caravan Site.	11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The

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			not move out of his way quick enough. Others have also received abuse.		use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site

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					and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together

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					with other provision identified in the plan is sufficient to meet established identified need.
30	HN8: Gypsy and Traveller Sites	Object	Please see the attached file for my comments about this policy. I object to the proposal to extend the Gypsy and Traveller site in Gwern Lane because I believe that the site is neither appropriate nor suitable and my reasons are detailed below. Road Safety Gwern Lane is a derestricted, narrow, country lane with blind bends, no footpaths and limited passing places. The lane is very popular for ramblers, dog walkers, people on horseback, cyclists and children playing. My wife and I are extremely cautious when travelling by car along the lane, especially at the blind bend near the northern boundary of the Gypsy and Traveller Site. In recent years, the local traffic using Gwern Lane has increased considerably. Unfortunately, many vehicles speed excessively along the lane and present a significant risk to other users, particulary to those mentioned above who are not protected by a vehicle. The extra vehicular traffic using the lane as a result of the proposed expansion of the Gypsy and Travellers Site would significantly increase the risk to other users of the lane. Proportionality The number of dwellings in the settled community of Gwern Lane including those dwellings at the junction with Gresford Road, is 10. The current total number of people occupying these dwellings is 12. The Gypsy and Traveller Site in Gwern Lane currently has planning consent for 2 static vans and 2 touring vans. There is currently 1 static van and there are usually several occupied touring vans also on site. If the proposed extension to the site is realised there would be 10 static vans and 10 touring	Removal of allocation from LDP.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling ‘Gwern House’ being some 40m to the south of the existing site. The extension to the site is located on the north side

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			vans on the site. I believe that if the proposals were realised, the number of people occupying the Gypsy and Traveller Site in Gwern Lane would dominate the local settled community and not be in proportion to it. This situation would hinder and not promote 'peaceful and integrated co-existence between the site and the local community' as required in identifying Gypsy and Traveller Sites in Paragraph 37 of Document 'F'.		of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs.

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					Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents' concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and

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					relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveler community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
33	HN8: Gypsy and Traveller Sites	Object	The location conflicts with the Flint Master plan and the use of the sire for recreation, leisure and walking. The proposal are therefor in conflict with the councils own proposals for the development of the area. The Swan Bridge does not have the capacity to deal with the increase in traffic as the road does not have a footpath in place for a considerable length. There is a lack of appropriate school places in the vicinity the sire was proposed as a base for the Flint Coastal Volunteers, a group which could assist the management of the paths and land around the site. This use of the site, which would have complemented the councils existing Master plan for the area, has not been given adequate consideration. This could also have been a base for schools visiting the area. Possible contamination of the land the site is on due to previous uses. The area around the site is used for recreation and this proposal conflicts with that use. It is adjacent to the proposed National Grid connection to the Solar Park.		Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data: The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy

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					agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government guidance 'Designing Gypsy and Traveller Sites' in terms of appropriate pitch sizes. A draft layout shows 6 pitches plus a site manager's office which will provide communal facilities. The draft site layout in Background Paper 6 shows 6 pitches and a site manager's office which will provide communal facilities. The design of the site will need to comply with para 6.17 of Welsh Government guidance 'Designing Gypsy and Traveller Sites' which states 'Instead of individual amenity blocks on each pitch, sites should include shared amenities featuring toilets, washbasins and shower facilities with hot and cold water supply. At least one male and one female amenity block are required'. The provision of public toilets elsewhere in Flint is not within the remit of the LDP. No proposals have been received for a base for the Flint Coastal Volunteers on the site of the former Civic Amenity Site. By contrast there is a statutory duty placed on the Council's Housing function, to deliver gypsy and traveller sites. The need for a Transit site has been identified and following an assessment of Council owned land, this site has been identified as being available and suitable to be allocated for a transit site. Area Wide Issues: The recreational use of the Flint Dock and the surrounding area is noted given the network of paths and the Coast Path. The gypsy site is set back from the public highway behind gates and is well screened by existing woodland. Its use as a transit site will not harm views of the estuary. The transit site will be carefully managed and have an onsite manager office. Residents will be on site for a temporary period and will need to abide by site rules and regulations. The site would be fully serviced in terms of water electricity, sewage facilities and waste disposal. Given that it is has no public access and is well screened it is not considered that the proposal would harm recreational use of the area. The site was not previously used as an industrial unit or site, but as a former civic amenity site for recycling. It is separated from the industrial estate by woodland and landscaped open areas and the

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					dock. With appropriate design and management there is no reason why the proposed use should be inappropriate or harmful to the industrial estate. The planning permission for the adjacent solar park includes security fencing and security gate and all generating and inverter infrastructure will be located within the secure fenced boundary of that site. It is not considered that there is any inherent conflict between a managed transit site and a solar farm / grid connection. Contamination and related Issues: Although the site was previously used as a civic amenity site it has a concrete slab and its operation as a waste site would have complied with all environmental licensing arrangements. Nevertheless, a contamination study has been commissioned to establish the existence of any contamination and what mitigation measures might be necessary. The adjoining former landfill site now has planning permission for a solar park and this will have security fencing and will not have public access. There are a number of gutters and ditches which flood at high tide but these are clearly visible and accessible from the main footpath link between the retail park and Castle Park. The presence of these features is something that could be pointed out to travellers on site as part of the site management arrangements and signage. Conflict with Flint Masterplan: The Flint Masterplan 2021 has a base date of 2012 and covers the period to 2021. On p30 the Masterplan shows no particular proposals for the former Civic Amenity Site, but does show an improved pedestrian link from Flint Retail Park to Flint Dock and the coastal path, which runs either side of Flint Dock. It also shows proposed landscaping work in the area around Flint Dock. The Masterplan maps show a pedestrian route to the rear (south) of the former Civic Amenity Site, but not along the access road which leads to the site. Having checked the Council's public rights of way maps, there is no lawful public access along the access road to the site, and public access is presently prevented by locked gates. Given that the former Civic Amenity Site sits within, and is well screened by woodland, it is unclear how the sites use as a transit site will have a negative effect on the use of nearby public rights of way and the area around the Dock, nor prevent proposals which

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					seek to enhance the recreational potential of the area. The Masterplan identifies the land opposite the former Civic Amenity site, (adjacent industrial unit 26 at Castle Park Industrial Estate) as a site for proposed greenspace. This proposal has not been delivered and a planning application (059397) has now been approved for a fenced open storage compound. No objection to this proposal has been made by local Members, the Town Council or the public on the basis that the proposal is contrary to the recommendations in the Flint Masterplan. The Flint Masterplan is not adopted supplementary planning guidance as part of the Council's planning policy framework. Infrastructure The site is allocated as a transit site for 6 pitches and is intended for occupation for a temporary period of up to 12 weeks. Any residential occupation by families with children will not place a pressure on schools to create a permanent place. The usual procedure is for Education Officers to complete a welfare assessment for any new family staying temporarily in the County with the assistance of BCUHB. Families would not be allowed to stay within a transit site for longer than 12 weeks which is the national agreement and if the families asked for their children to attend school then this would need to be assessed. Experience to date is that this has never happened as families will usually have school places in their home town. Highways Issues Castle Park Industrial Estate presently has two means of access which are via Evans Way which has a height restriction of 2.8m and via Castle Dyke Street and Swan Bridge. These two access points provide satisfactory vehicular access to the Castle, foreshore and Industrial Estate. Also the use of the site as a transit site must be considered in the context of its previous use as a recycling centre, in terms of the amount and type of vehicular traffic. In this context it is considered that the existing road network is quite capable of serving a transit site of 6 pitches in this location. The Highways Development Management Officer has commented 'The site was formerly used as a household waste/recycling site; a change of use to a Transit Site is likely to generate a reduction in vehicular movements and a lesser highway impact'. The local highway network is considered appropriate in terms of

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					accommodating the likely traffic generation from the transit site. Soundness Issues: As explained above, the former civic amenity site is not designated for any particular use or proposals in the Flint Masterplan and neither does the masterplan have any planning status in terms of supplementary planning guidance. The site is separated from the industrial estate (and nearby residents) by woodland and the dock. It is not clear how the site could "inhibit existing industrial operations". A contamination report has been commissioned and clearly the site has been more recently used as a civic amenity site where hardstanding and servicing was provided to the site. Given this, the amount of ground disturbance that would be required to facilitate the sites transit use would be minimal. Transit sites, where residents will only be present for a temporary period, would be unlikely to place pressure on schools for additional places. This is commented on further above. The industrial estate is served by two vehicular access routes. The use of site for a 6 pitch transit site must also be considered against the traffic arising from the previous waste recycling centres which have involved visiting customers and operational HGV's and was far greater in size and volume than is likely to be the case with a periodic use for just a six pitch transit site. There is no inherent conflict between a transit site and solar park. In terms of the allegations that the Plan is unsound in respect of this allocation it is necessary to look at the tests of soundness in detail: i) Does the Plan fit? (is it clear that the LDP is consistent with other Plans) – in line with the Housing (Wales) Act, PPW10 and the findings of the GTAA as well as on-going problems with encampments, the Plan seeks to make provision for a transit site. The approach is not 'unsound'. ii) Is the Plan appropriate? (Is the Plan appropriate for the area in the light of the evidence) – The site is self-contained and is capable of being developed and operated in a manner which does not harm the locality. There is no conflict with the Flint Masterplan in terms of recreational uses in the area given the site configuration and relationship. iii) Will the Plan deliver? (is it likely to be effective) – The site is in

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					Council ownership and this enables the Council to secure Welsh Government funding to develop the site. The site is both viable and deliverable. In conclusion, the site meets an identified need and is in a sustainable location off a main travelling route, on the edge of a Tier 1 Main Service Centre which provides a wide range of services and facilities. The site is self contained and can be developed and operated in a manner which does not harm the amenity and use of the local area. The site is viable and deliverable and should be retained as an allocation in the Plan.
110	HN8: Gypsy and Traveller Sites	Object	Flint Traveller Site: Travellers have been camped in this area many times before and left a terrible mess for the council, at our expense to clean up after them. They did not use the toilets which were provided for them, but fouled the surrounding area. Why? should we provide these facilities for them when the town has none for the ratepayers. The dock area which has lovely views across the estuary is used by many elderly for it is a fairly level walk, many have told me that they will not be coming here while the travellers are here, it's a pity that we were not given the same consideration as the outsiders. My wife who as been picking up litter there for at least the last five years will not be doing it anymore, she was presented with a plaque for all her good work which will be to no avail if these people are allowed to stay.	Removal of allocation.	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data: The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site.

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101	HN8: Gypsy and Traveller Sites	Object	I am appalled to learn of your plans to create a Travellers site at Castle Park, Flint. This is an access area to a well used recreational facility. Many people, individuals , families and many elderly people walk along this route every day. At the moment people feel quite safe but if a Travellers site is developed here this will change. This will then reduce the opportunities for people to exercise to keep fit and well. A Travellers site already exists in Flint, behind Jones Motors garage! One such site is enough for a town of this size! Flint has few facilities. Unlike our neighbouring towns we have no hospital. Our schools are full, doctors' lists are full and we have no police station in operation! It is time that you as town planners realised the impact that your plans would have on the lives of the residents of Flint. Stop using our town as your dumping ground!	Removal of allocation.	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data: The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government

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168	HN8: Gypsy and Traveller Sites	Object	I wish to object to the planned gypsy transit site proposed for Flint Castle Park on the grounds it is A. an inappropriate use of an existing industrial site B. too small to use as a transit site C. based on incomplete data D. in an unsafe location for the proposed use. E. and Flintshire has already exceeded reasonable provision The enclosed document details why I believe this an inappropriate location for such a transit site.	Remove Gypsy Site at Flint	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data: The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government guidance 'Designing Gypsy and Traveller Sites' in terms of appropriate pitch sizes. A draft layout shows 6 pitches plus a site

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					manager's office which will provide communal facilities. The draft site layout in Background Paper 6 shows 6 pitches and a site manager's office which will provide communal facilities. The design of the site will need to comply with para 6.17 of Welsh Government guidance 'Designing Gypsy and Traveller Sites' which states 'Instead of individual amenity blocks on each pitch, sites should include shared amenities featuring toilets, washbasins and shower facilities with hot and cold water supply. At least one male and one female amenity block are required'. The provision of public toilets elsewhere in Flint is not within the remit of the LDP. No proposals have been received for a base for the Flint Coastal Volunteers on the site of the former Civic Amenity Site. By contrast there is a statutory duty placed on the Council's Housing function, to deliver gypsy and traveller sites. The need for a Transit site has been identified and following an assessment of Council owned land, this site has been identified as being available and suitable to be allocated for a transit site. Area Wide Issues: The recreational use of the Flint Dock and the surrounding area is noted given the network of paths and the Coast Path. The gypsy site is set back from the public highway behind gates and is well screened by existing woodland. Its use as a transit site will not harm views of the estuary. The transit site will be carefully managed and have an onsite manager office. Residents will be on site for a temporary period and will need to abide by site rules and regulations. The site would be fully serviced in terms of water electricity, sewage facilities and waste disposal. Given that it is has no public access and is well screened it is not considered that the proposal would harm recreational use of the area. The site was not previously used as an industrial unit or site, but as a former civic amenity site for recycling. It is separated from the industrial estate by woodland and landscaped open areas and the dock. With appropriate design and management there is no reason why the proposed use should be inappropriate or harmful to the industrial estate. The planning permission for the adjacent solar park includes security fencing and security gate and all generating and inverter infrastructure will be located within the secure fenced boundary of

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					that site. It is not considered that there is any inherent conflict between a managed transit site and a solar farm / grid connection. Contamination and related Issues: Although the site was previously used as a civic amenity site it has a concrete slab and its operation as a waste site would have complied with all environmental licensing arrangements. Nevertheless, a contamination study has been commissioned to establish the existence of any contamination and what mitigation measures might be necessary. The adjoining former landfill site now has planning permission for a solar park and this will have security fencing and will not have public access. There are a number of gutters and ditches which flood at high tide but these are clearly visible and accessible from the main footpath link between the retail park and Castle Park. The presence of these features is something that could be pointed out to travellers on site as part of the site management arrangements and signage. Conflict with Flint Masterplan: The Flint Masterplan 2021 has a base date of 2012 and covers the period to 2021. On p30 the Masterplan shows no particular proposals for the former Civic Amenity Site, but does show an improved pedestrian link from Flint Retail Park to Flint Dock and the coastal path, which runs either side of Flint Dock. It also shows proposed landscaping work in the area around Flint Dock. The Masterplan maps show a pedestrian route to the rear (south) of the former Civic Amenity Site, but not along the access road which leads to the site. Having checked the Council's public rights of way maps, there is no lawful public access along the access road to the site, and public access is presently prevented by locked gates. Given that the former Civic Amenity Site sits within, and is well screened by woodland, it is unclear how the sites use as a transit site will have a negative effect on the use of nearby public rights of way and the area around the Dock, nor prevent proposals which seek to enhance the recreational potential of the area. The Masterplan identifies the land opposite the former Civic Amenity site, (adjacent industrial unit 26 at Castle Park Industrial Estate) as a site for proposed greenspace. This proposal has not been delivered and a planning application (059397) has now been approved for a fenced open storage compound. No objection to

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					this proposal has been made by local Members, the Town Council or the public on the basis that the proposal is contrary to the recommendations in the Flint Masterplan. The Flint Masterplan is not adopted supplementary planning guidance as part of the Council's planning policy framework. Infrastructure The site is allocated as a transit site for 6 pitches and is intended for occupation for a temporary period of up to 12 weeks. Any residential occupation by families with children will not place a pressure on schools to create a permanent place. The usual procedure is for Education Officers to complete a welfare assessment for any new family staying temporarily in the County with the assistance of BCUHB. Families would not be allowed to stay within a transit site for longer than 12 weeks which is the national agreement and if the families asked for their children to attend school then this would need to be assessed. Experience to date is that this has never happened as families will usually have school places in their home town. Highways Issues Castle Park Industrial Estate presently has two means of access which are via Evans Way which has a height restriction of 2.8m and via Castle Dyke Street and Swan Bridge. These two access points provide satisfactory vehicular access to the Castle, foreshore and Industrial Estate. Also the use of the site as a transit site must be considered in the context of its previous use as a recycling centre, in terms of the amount and type of vehicular traffic. In this context it is considered that the existing road network is quite capable of serving a transit site of 6 pitches in this location. The Highways Development Management Officer has commented 'The site was formerly used as a household waste/recycling site; a change of use to a Transit Site is likely to generate a reduction in vehicular movements and a lesser highway impact'. The local highway network is considered appropriate in terms of accommodating the likely traffic generation from the transit site. Soundness Issues: As explained above, the former civic amenity site is not designated for any particular use or proposals in the Flint Masterplan and neither does the masterplan have any planning status in terms of supplementary planning guidance.

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					The site is separated from the industrial estate (and nearby residents) by woodland and the dock. It is not clear how the site could “inhibit existing industrial operations”. A contamination report has been commissioned and clearly the site has been more recently used as a civic amenity site where hardstanding and servicing was provided to the site. Given this, the amount of ground disturbance that would be required to facilitate the sites transit use would be minimal. Transit sites, where residents will only be present for a temporary period, would be unlikely to place pressure on schools for additional places. This is commented on further above. The industrial estate is served by two vehicular access routes. The use of site for a 6 pitch transit site must also be considered against the traffic arising from the previous waste recycling centres which have involved visiting customers and operational HGV’s and was far greater in size and volume than is likely to be the case with a periodic use for just a six pitch transit site. There is no inherent conflict between a transit site and solar park. In terms of the allegations that the Plan is unsound in respect of this allocation it is necessary to look at the tests of soundness in detail: i) Does the Plan fit? (is it clear that the LDP is consistent with other Plans) – in line with the Housing (Wales) Act, PPW10 and the findings of the GTAA as well as on-going problems with encampments, the Plan seeks to make provision for a transit site. The approach is not ‘unsound’. ii) Is the Plan appropriate? (Is the Plan appropriate for the area in the light of the evidence) – The site is self-contained and is capable of being developed and operated in a manner which does not harm the locality. There is no conflict with the Flint Masterplan in terms of recreational uses in the area given the site configuration and relationship. iii) Will the Plan deliver? (is it likely to be effective) – The site is in Council ownership and this enables the Council to secure Welsh Government funding to develop the site. The site is both viable and deliverable. In conclusion, the site meets an identified need and is in a sustainable location off a main travelling route, on the edge of a Tier 1 Main Service Centre which provides a wide range of

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					services and facilities. The site is self contained and can be developed and operated in a manner which does not harm the amenity and use of the local area. The site is viable and deliverable and should be retained as an allocation in the Plan.
278	HN8: Gypsy and Traveller Sites	Object	Objection to Castle Park FLint.	Removal of allocation	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data: The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government guidance 'Designing Gypsy and Traveller Sites' in terms of appropriate pitch sizes. A draft layout shows 6 pitches plus a site manager's office which will provide communal facilities. The draft site layout in Background Paper 6 shows 6 pitches and a

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					site manager's office which will provide communal facilities. The design of the site will need to comply with para 6.17 of Welsh Government guidance 'Designing Gypsy and Traveller Sites' which states 'Instead of individual amenity blocks on each pitch, sites should include shared amenities featuring toilets, washbasins and shower facilities with hot and cold water supply. At least one male and one female amenity block are required'. The provision of public toilets elsewhere in Flint is not within the remit of the LDP. No proposals have been received for a base for the Flint Coastal Volunteers on the site of the former Civic Amenity Site. By contrast there is a statutory duty placed on the Council's Housing function, to deliver gypsy and traveller sites. The need for a Transit site has been identified and following an assessment of Council owned land, this site has been identified as being available and suitable to be allocated for a transit site. Area Wide Issues: The recreational use of the Flint Dock and the surrounding area is noted given the network of paths and the Coast Path. The gypsy site is set back from the public highway behind gates and is well screened by existing woodland. Its use as a transit site will not harm views of the estuary. The transit site will be carefully managed and have an onsite manager office. Residents will be on site for a temporary period and will need to abide by site rules and regulations. The site would be fully serviced in terms of water electricity, sewage facilities and waste disposal. Given that it is has no public access and is well screened it is not considered that the proposal would harm recreational use of the area. The site was not previously used as an industrial unit or site, but as a former civic amenity site for recycling. It is separated from the industrial estate by woodland and landscaped open areas and the dock. With appropriate design and management there is no reason why the proposed use should be inappropriate or harmful to the industrial estate. The planning permission for the adjacent solar park includes security fencing and security gate and all generating and inverter infrastructure will be located within the secure fenced boundary of that site. It is not considered that there is any inherent conflict between a managed transit site and a solar farm / grid connection.

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					Contamination and related Issues: Although the site was previously used as a civic amenity site it has a concrete slab and its operation as a waste site would have complied with all environmental licensing arrangements. Nevertheless, a contamination study has been commissioned to establish the existence of any contamination and what mitigation measures might be necessary. The adjoining former landfill site now has planning permission for a solar park and this will have security fencing and will not have public access. There are a number of gutters and ditches which flood at high tide but these are clearly visible and accessible from the main footpath link between the retail park and Castle Park. The presence of these features is something that could be pointed out to travellers on site as part of the site management arrangements and signage. Conflict with Flint Masterplan: The Flint Masterplan 2021 has a base date of 2012 and covers the period to 2021. On p30 the Masterplan shows no particular proposals for the former Civic Amenity Site, but does show an improved pedestrian link from Flint Retail Park to Flint Dock and the coastal path, which runs either side of Flint Dock. It also shows proposed landscaping work in the area around Flint Dock. The Masterplan maps show a pedestrian route to the rear (south) of the former Civic Amenity Site, but not along the access road which leads to the site. Having checked the Council's public rights of way maps, there is no lawful public access along the access road to the site, and public access is presently prevented by locked gates. Given that the former Civic Amenity Site sits within, and is well screened by woodland, it is unclear how the sites use as a transit site will have a negative effect on the use of nearby public rights of way and the area around the Dock, nor prevent proposals which seek to enhance the recreational potential of the area. The Masterplan identifies the land opposite the former Civic Amenity site, (adjacent industrial unit 26 at Castle Park Industrial Estate) as a site for proposed greenspace. This proposal has not been delivered and a planning application (059397) has now been approved for a fenced open storage compound. No objection to this proposal has been made by local Members, the Town Council or the public on the basis that the proposal is contrary to the

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					recommendations in the Flint Masterplan. The Flint Masterplan is not adopted supplementary planning guidance as part of the Council's planning policy framework. Infrastructure The site is allocated as a transit site for 6 pitches and is intended for occupation for a temporary period of up to 12 weeks. Any residential occupation by families with children will not place a pressure on schools to create a permanent place. The usual procedure is for Education Officers to complete a welfare assessment for any new family staying temporarily in the County with the assistance of BCUHB. Families would not be allowed to stay within a transit site for longer than 12 weeks which is the national agreement and if the families asked for their children to attend school then this would need to be assessed. Experience to date is that this has never happened as families will usually have school places in their home town. Highways Issues Castle Park Industrial Estate presently has two means of access which are via Evans Way which has a height restriction of 2.8m and via Castle Dyke Street and Swan Bridge. These two access points provide satisfactory vehicular access to the Castle, foreshore and Industrial Estate. Also the use of the site as a transit site must be considered in the context of its previous use as a recycling centre, in terms of the amount and type of vehicular traffic. In this context it is considered that the existing road network is quite capable of serving a transit site of 6 pitches in this location. The Highways Development Management Officer has commented 'The site was formerly used as a household waste/recycling site; a change of use to a Transit Site is likely to generate a reduction in vehicular movements and a lesser highway impact'. The local highway network is considered appropriate in terms of accommodating the likely traffic generation from the transit site. Soundness Issues: As explained above, the former civic amenity site is not designated for any particular use or proposals in the Flint Masterplan and neither does the masterplan have any planning status in terms of supplementary planning guidance. The site is separated from the industrial estate (and nearby residents) by woodland and the dock. It is not clear how the site

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					could “inhibit existing industrial operations”. A contamination report has been commissioned and clearly the site has been more recently used as a civic amenity site where hardstanding and servicing was provided to the site. Given this, the amount of ground disturbance that would be required to facilitate the sites transit use would be minimal. Transit sites, where residents will only be present for a temporary period, would be unlikely to place pressure on schools for additional places. This is commented on further above. The industrial estate is served by two vehicular access routes. The use of site for a 6 pitch transit site must also be considered against the traffic arising from the previous waste recycling centres which have involved visiting customers and operational HGV’s and was far greater in size and volume than is likely to be the case with a periodic use for just a six pitch transit site. There is no inherent conflict between a transit site and solar park. In terms of the allegations that the Plan is unsound in respect of this allocation it is necessary to look at the tests of soundness in detail: i) Does the Plan fit? (is it clear that the LDP is consistent with other Plans) – in line with the Housing (Wales) Act, PPW10 and the findings of the GTAA as well as on-going problems with encampments, the Plan seeks to make provision for a transit site. The approach is not ‘unsound’. ii) Is the Plan appropriate? (Is the Plan appropriate for the area in the light of the evidence) – The site is self-contained and is capable of being developed and operated in a manner which does not harm the locality. There is no conflict with the Flint Masterplan in terms of recreational uses in the area given the site configuration and relationship. iii) Will the Plan deliver? (is it likely to be effective) – The site is in Council ownership and this enables the Council to secure Welsh Government funding to develop the site. The site is both viable and deliverable. In conclusion, the site meets an identified need and is in a sustainable location off a main travelling route, on the edge of a Tier 1 Main Service Centre which provides a wide range of services and facilities. The site is self contained and can be developed and operated in a manner which does not harm the

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					amenity and use of the local area. The site is viable and deliverable and should be retained as an allocation in the Plan.
315	HN8: Gypsy and Traveller Sites	Object	Reference Site HN8-2 1. Proportionality of this site with respect of the size of the immediate community of Caer Estyn is too large. This is site would not be in keeping with proportionality to allow for the promoting of peaceful and integrated co-existence of the site and local community. 2. The increase in traffic at the junction of Gwern Lane and Gresford Road would present a danger to existing road users. Gresford Road is a very busy road during peak times. 3. This site was only included after several calls for possible sites. Therefore it can not be considered a high priority site for this extension otherwise it would of come to light earlier. 4. The edge of this site borders directly on an existing footpath. If natural screening was installed as suggested this would encroach onto this footpath. 5. The existing site has a massive impact on the general noise and traffic levels in the area. Any extension would greatly increase these levels.	Remove Site HN8-2 1. Proportionality of this site with respect of the size of the immediate community of Caer Estyn is too large. This is site would not be in keeping with proportionality to allow for the promoting of peaceful and integrated co-existence of the site and local community.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling ‘Gwern House’ being some 40m to the south of the existing site. The extension to the site is located on the north side

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					of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs.

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					Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and

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					relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
251	HN8: Gypsy and Traveller Sites	Object	Objection to proposed extension at Gwern Lane . I feel that the site is too small for 6-8 static caravans that could mean at least 16 extra vehicles using a small single track that I and other residents use for walking dogs.There have been issues with speeding trucks and vans on the blind corner. The road is hazardous in winter with the potholes.I worry that as there have always been more caravans on the site than planned for tha 6-8 more caravans will become even more. I have concerns that more residents will involve more dogs. I am also concerned about the sewerage which overflows onto the next field. There ia also an issue with noise coming form the site. If this site is increased in size it will have a big impact on a small community.	Removal of allocation.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the

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					number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council

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					seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community.

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					Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveler community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
379	HN8: Gypsy and Traveller Sites	Object	Proportionality - the document WGC005/2018 makes clear reference to sites being in context and in relation to existing local settlements. The proposal HN8-2 would see the traveller community outnumber existing settled residents by a considerable amount. The question as to whether the site which is in open countryside is appropriate for such expansion must be considered. Had application for a leisure site been proposed, it is unlikely that planning would have supported this. Settled residents and the current traveller family have learned to co-exist, however an increase in traveller pitches could may lead to this relationship being upset. There are a number of	The policy needs to ensure equal consideration to both settled residential communities and travellers alike. There are a number of alternative sites which could accommodate the need, namely Llay & Queensferry. In addition travellers have recently taken possession of land on Rhyddyn Hill.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact

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			alternative sites which could accommodate the need, namely Llay & Queensferry. In addition travellers have recently taken possession of land on Rhyddyn Hill. There is also a large community in the neighbouring Wrexham settlement where the current family relocated from. Gwern lane is a single lane with an unstable surface, no speed restrictions/white lines and therefore cannot currently sustain an increase in traffic. In addition increased access to the main Gresford Road which is heavily used by commercial traffic may pose increased risk of accident, and there has been a number of near misses in recent years. The Planning Authority must satisfy itself that the application does relate to family expansion, the travellers have told us and neighbours a number of times that they intend to offer the pitches as a commercial concern. The planning authority has repeatedly to enforce the original terms of the current settlement (2x static/2x tourers), today there are approx. 6 caravans on the site (1 static/ 5 tourers). Whatever the outcome of the application, FCC must apply proper enforcement process so as not to negatively impact on the small local settled resident population. Finally, there is an environmental concern as raw sewage has been seen to seep onto the public footpath which crosses the field bordering the existing traveller settlement, an increase in residents will likely exacerbate this problem. The current dayroom is unlikely to be sufficient to support an increase in users.		on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations.

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					Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed

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					restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveler community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
287	HN8: Gypsy and Traveller Sites	Object	I wish to object to the planned gypsy transit site proposed for Flint Castle Park on the grounds it is A. an inappropriate use of an existing industrial site B. too small to use as a transit site C. based on incomplete data D. in an unsafe location for the proposed use	Removal of allocation	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data:

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			E. and Flintshire has already exceeded reasonable provision		The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government guidance 'Designing Gypsy and Traveller Sites' in terms of appropriate pitch sizes. A draft layout shows 6 pitches plus a site manager's office which will provide communal facilities. The draft site layout in Background Paper 6 shows 6 pitches and a site manager's office which will provide communal facilities. The design of the site will need to comply with para 6.17 of Welsh Government guidance 'Designing Gypsy and Traveller Sites' which states 'Instead of individual amenity blocks on each pitch, sites should include shared amenities featuring toilets, washbasins and shower facilities with hot and cold water supply. At least one male and one female amenity block are required'. The provision of public toilets elsewhere in Flint is not within the remit of the LDP. No proposals have been received for a base for the Flint Coastal Volunteers on the site of the former Civic Amenity Site. By contrast there is a statutory duty placed on the Council's Housing function,

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					to deliver gypsy and traveller sites. The need for a Transit site has been identified and following an assessment of Council owned land, this site has been identified as being available and suitable to be allocated for a transit site. Area Wide Issues: The recreational use of the Flint Dock and the surrounding area is noted given the network of paths and the Coast Path. The gypsy site is set back from the public highway behind gates and is well screened by existing woodland. Its use as a transit site will not harm views of the estuary. The transit site will be carefully managed and have an onsite manager office. Residents will be on site for a temporary period and will need to abide by site rules and regulations. The site would be fully serviced in terms of water electricity, sewage facilities and waste disposal. Given that it is has no public access and is well screened it is not considered that the proposal would harm recreational use of the area. The site was not previously used as an industrial unit or site, but as a former civic amenity site for recycling. It is separated from the industrial estate by woodland and landscaped open areas and the dock. With appropriate design and management there is no reason why the proposed use should be inappropriate or harmful to the industrial estate. The planning permission for the adjacent solar park includes security fencing and security gate and all generating and inverter infrastructure will be located within the secure fenced boundary of that site. It is not considered that there is any inherent conflict between a managed transit site and a solar farm / grid connection. Contamination and related Issues: Although the site was previously used as a civic amenity site it has a concrete slab and its operation as a waste site would have complied with all environmental licensing arrangements. Nevertheless, a contamination study has been commissioned to establish the existence of any contamination and what mitigation measures might be necessary. The adjoining former landfill site now has planning permission for a solar park and this will have security fencing and will not have public access. There are a number of gutters and ditches which flood at high tide but these are clearly visible and accessible from

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					the main footpath link between the retail park and Castle Park. The presence of these features is something that could be pointed out to travellers on site as part of the site management arrangements and signage. Conflict with Flint Masterplan: The Flint Masterplan 2021 has a base date of 2012 and covers the period to 2021. On p30 the Masterplan shows no particular proposals for the former Civic Amenity Site, but does show an improved pedestrian link from Flint Retail Park to Flint Dock and the coastal path, which runs either side of Flint Dock. It also shows proposed landscaping work in the area around Flint Dock. The Masterplan maps show a pedestrian route to the rear (south) of the former Civic Amenity Site, but not along the access road which leads to the site. Having checked the Council's public rights of way maps, there is no lawful public access along the access road to the site, and public access is presently prevented by locked gates. Given that the former Civic Amenity Site sits within, and is well screened by woodland, it is unclear how the sites use as a transit site will have a negative effect on the use of nearby public rights of way and the area around the Dock, nor prevent proposals which seek to enhance the recreational potential of the area. The Masterplan identifies the land opposite the former Civic Amenity site, (adjacent industrial unit 26 at Castle Park Industrial Estate) as a site for proposed greenspace. This proposal has not been delivered and a planning application (059397) has now been approved for a fenced open storage compound. No objection to this proposal has been made by local Members, the Town Council or the public on the basis that the proposal is contrary to the recommendations in the Flint Masterplan. The Flint Masterplan is not adopted supplementary planning guidance as part of the Council's planning policy framework. Infrastructure The site is allocated as a transit site for 6 pitches and is intended for occupation for a temporary period of up to 12 weeks. Any residential occupation by families with children will not place a pressure on schools to create a permanent place. The usual procedure is for Education Officers to complete a welfare assessment for any new family staying temporarily in the County with the assistance of BCUHB. Families would not be allowed to

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					stay within a transit site for longer than 12 weeks which is the national agreement and if the families asked for their children to attend school then this would need to be assessed. Experience to date is that this has never happened as families will usually have school places in their home town. Highways Issues Castle Park Industrial Estate presently has two means of access which are via Evans Way which has a height restriction of 2.8m and via Castle Dyke Street and Swan Bridge. These two access points provide satisfactory vehicular access to the Castle, foreshore and Industrial Estate. Also the use of the site as a transit site must be considered in the context of its previous use as a recycling centre, in terms of the amount and type of vehicular traffic. In this context it is considered that the existing road network is quite capable of serving a transit site of 6 pitches in this location. The Highways Development Management Officer has commented 'The site was formerly used as a household waste/recycling site; a change of use to a Transit Site is likely to generate a reduction in vehicular movements and a lesser highway impact'. The local highway network is considered appropriate in terms of accommodating the likely traffic generation from the transit site. Soundness Issues: As explained above, the former civic amenity site is not designated for any particular use or proposals in the Flint Masterplan and neither does the masterplan have any planning status in terms of supplementary planning guidance. The site is separated from the industrial estate (and nearby residents) by woodland and the dock. It is not clear how the site could "inhibit existing industrial operations". A contamination report has been commissioned and clearly the site has been more recently used as a civic amenity site where hardstanding and servicing was provided to the site. Given this, the amount of ground disturbance that would be required to facilitate the sites transit use would be minimal. Transit sites, where residents will only be present for a temporary period, would be unlikely to place pressure on schools for additional places. This is commented on further above. The industrial estate is served by two vehicular access routes. The use of site for a 6 pitch transit site must also be considered against

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					the traffic arising from the previous waste recycling centres which have involved visiting customers and operational HGV's and was far greater in size and volume than is likely to be the case with a periodic use for just a six pitch transit site. There is no inherent conflict between a transit site and solar park. In terms of the allegations that the Plan is unsound in respect of this allocation it is necessary to look at the tests of soundness in detail: i) Does the Plan fit? (is it clear that the LDP is consistent with other Plans) – in line with the Housing (Wales) Act, PPW10 and the findings of the GTAA as well as on-going problems with encampments, the Plan seeks to make provision for a transit site. The approach is not 'unsound'. ii) Is the Plan appropriate? (Is the Plan appropriate for the area in the light of the evidence) – The site is self-contained and is capable of being developed and operated in a manner which does not harm the locality. There is no conflict with the Flint Masterplan in terms of recreational uses in the area given the site configuration and relationship. iii) Will the Plan deliver? (is it likely to be effective) – The site is in Council ownership and this enables the Council to secure Welsh Government funding to develop the site. The site is both viable and deliverable. In conclusion, the site meets an identified need and is in a sustainable location off a main travelling route, on the edge of a Tier 1 Main Service Centre which provides a wide range of services and facilities. The site is self contained and can be developed and operated in a manner which does not harm the amenity and use of the local area. The site is viable and deliverable and should be retained as an allocation in the Plan.
460	HN8: Gypsy and Traveller Sites	Object	Traveller Site: Gwern Lane I would like to express my concerns regarding the impact of the increased traffic that an extension to the traveller site on Gwern Lane would make as regards safety. The Lane is a single track and very narrow in parts. There is a ditch at one side of part of the Lane. The Lane is regularly used by dog walkers cyclists and ramblers as a public footpath runs alongside	Removal of Gwern Lane, Gypsy Traveller Allocated site.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light

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			the site also. There is sometimes cycling races held in the area. There is a sign at the entrance to the Lane reporting it is not suitable for heavy vehicles due to very narrow bend. The Lane already has numerous pot holes and often high hedges making visibility poor. There are also children playing on their bikes and scooters and I have serious concerns for their safety as it is before a possible increase in traffic being generated. The area is totally inappropriate for the proposed extension and very small. The existing problems with the sewerage also will be increased which is an environmental health issue and is very concerning.		of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for

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					hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic

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					issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveler community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together

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					with other provision identified in the plan is sufficient to meet established identified need.
462	HN8: Gypsy and Traveller Sites	Object	Traveller site: Gwern Lane I would like to express my concerns regarding the impact of the increased traffic that an extension to the traveller site on Gwern Lane would make as regards safety. The Lane is a singlet track and very narrow in parts. There is a ditch at one side of part of the Lane. The Lane is regularly used by dog walkers cyclists and ramblers as a public footpath runs alongside the site also. There is sometimes cycling races held in the area. There is a sign at the entrance to the Lane reporting it is not suitable for heavy vehicles due to very narrow bend. The Lane already has numerous pot holes and often high hedges making visibility poor. There are also children playing on their bikes and scooters and I have serious concerns for their safety as it is before a possible increase in traffic being generated. The area is totally inappropriate for the proposed extension and very small. The existing problems with the sewerage also will be increased which is an environmental health issue and is very concerning.	Removal of Gwern Lane, Gypsy Traveller allocated site.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side

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					of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs.

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					Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and

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					relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
371	HN8: Gypsy and Traveller Sites	Object	Objection to Gwern Lane, Hope. I understand the need for additional pitches got travellers in Flintshire. My objection is not to the site itself in its current form but is to the additional number of pitches. I would have no objection if the number of pitches was limited to an additional 2 or 3. ON the current scale, my objections are: Site traffic - we already experience significant traffic movement exiting on to a main road, and living on the corner, I have heard many times, close calls with main road traffic. 6 to 8 additional pitches would mean 12 to 16 additional vehicles based on current site usage. Site use - one of the current travellers, has indicated that this extension is business use, not family, in that pitches will be rented to other travellers to produce an income Site use - no enforcement of current planning rules - there is a consistent overspill of waste water from the site into the adjacent field and over a public right of way Proportionality - I believe one of the principals of this type of planning is proportionality - extending the site by this number would mean neighbours in the immediate vicinity will be significantly	Reduction in number of pitches proposed on the site.	Not accepted. The Council have grouped together and summarised representations made on this Hn8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the

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			outnumbered by residents on the traveller site		number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council

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					seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community.

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					Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
431	HN8: Gypsy and Traveller Sites	Object	The proposed site in Gwern Lane for 6 to 8 more pitches for traveller families will substantially increase the previously small development in green belt/open countryside.1. The site should be considered in relation to the local infrastructure, population size and density to ensure they are in proportion to the local settled communities. There are 8 house in Gwern Lane, could there be a compromise of a lesser figure?. 2. The development lies in open countryside, is inappropriate development in the green barrier and will have a harmful urbanising effect with an increase in the site. 3. It is a single track lane with a blind bend already damaged by commercial vehicles. The lane is used by	Reduction in number of pitches on site.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact

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			walkers, dog walkers, horse riders and cyclists and is an historical walk in relation to Caergwrle Castle.4. General impact on the surrounding area in terms of noise, actions and community integration.		on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations.

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					Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed

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					restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
567	HN8: Gypsy and Traveller Sites	Object	I have been instructed by Flint Town Council to register an objection to the proposed allocation of a Gypsy and Traveller site on land at Castle Park Industrial Estate, Flint (Site Ref. HN8-4). The Town Council asserts that the proposed allocation would be in direct conflict with the adopted Flint	Removal of allocation.	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data:

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			Masterplan, which designates the site as a hard and soft landscaped area immediately adjacent to an existing/enhanced coastal footpath. An electronic version of the Flint Masterplan is appended to this submission for ease of reference. In summary, the Town Council considers that the proposed allocation for a Gypsy and Traveller Site at Castle Park Industrial Estate does not pass the 'tests of soundness' for the following reasons: • The proposal conflicts with the adopted Flint Masterplan which allocates the site for open space; • Siting a Gypsy and Traveller Site close to an industrial estate could adversely impact on the living conditions of future occupiers of the site and could inhibit the existing industrial operations; • There is a strong possibility that that the site will have suffered some degree of ground contamination given its industrial heritage and the cost of remediation could render the site unviable and therefore undeliverable; • It is not clear whether the local schools could absorb any additional demand generated by future occupiers of the site; • It is not clear whether the road access is of an adequate standard to serve the site; and • The implications of siting a Gypsy and Traveller site next to a potential solar park are also unclear.		The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government guidance 'Designing Gypsy and Traveller Sites' in terms of appropriate pitch sizes. A draft layout shows 6 pitches plus a site manager's office which will provide communal facilities. The draft site layout in Background Paper 6 shows 6 pitches and a site manager's office which will provide communal facilities. The design of the site will need to comply with para 6.17 of Welsh Government guidance 'Designing Gypsy and Traveller Sites' which states 'Instead of individual amenity blocks on each pitch, sites should include shared amenities featuring toilets, washbasins and shower facilities with hot and cold water supply. At least one male and one female amenity block are required'. The provision of public toilets elsewhere in Flint is not within the remit of the LDP. No proposals have been received for a base for the Flint Coastal Volunteers on the site of the former Civic Amenity Site. By contrast there is a statutory duty placed on the Council's Housing function,

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					to deliver gypsy and traveller sites. The need for a Transit site has been identified and following an assessment of Council owned land, this site has been identified as being available and suitable to be allocated for a transit site. Area Wide Issues: The recreational use of the Flint Dock and the surrounding area is noted given the network of paths and the Coast Path. The gypsy site is set back from the public highway behind gates and is well screened by existing woodland. Its use as a transit site will not harm views of the estuary. The transit site will be carefully managed and have an onsite manager office. Residents will be on site for a temporary period and will need to abide by site rules and regulations. The site would be fully serviced in terms of water electricity, sewage facilities and waste disposal. Given that it is has no public access and is well screened it is not considered that the proposal would harm recreational use of the area. The site was not previously used as an industrial unit or site, but as a former civic amenity site for recycling. It is separated from the industrial estate by woodland and landscaped open areas and the dock. With appropriate design and management there is no reason why the proposed use should be inappropriate or harmful to the industrial estate. The planning permission for the adjacent solar park includes security fencing and security gate and all generating and inverter infrastructure will be located within the secure fenced boundary of that site. It is not considered that there is any inherent conflict between a managed transit site and a solar farm / grid connection. Contamination and related Issues: Although the site was previously used as a civic amenity site it has a concrete slab and its operation as a waste site would have complied with all environmental licensing arrangements. Nevertheless, a contamination study has been commissioned to establish the existence of any contamination and what mitigation measures might be necessary. The adjoining former landfill site now has planning permission for a solar park and this will have security fencing and will not have public access. There are a number of gutters and ditches which flood at high tide but these are clearly visible and accessible from

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					the main footpath link between the retail park and Castle Park. The presence of these features is something that could be pointed out to travellers on site as part of the site management arrangements and signage. Conflict with Flint Masterplan: The Flint Masterplan 2021 has a base date of 2012 and covers the period to 2021. On p30 the Masterplan shows no particular proposals for the former Civic Amenity Site, but does show an improved pedestrian link from Flint Retail Park to Flint Dock and the coastal path, which runs either side of Flint Dock. It also shows proposed landscaping work in the area around Flint Dock. The Masterplan maps show a pedestrian route to the rear (south) of the former Civic Amenity Site, but not along the access road which leads to the site. Having checked the Council's public rights of way maps, there is no lawful public access along the access road to the site, and public access is presently prevented by locked gates. Given that the former Civic Amenity Site sits within, and is well screened by woodland, it is unclear how the sites use as a transit site will have a negative effect on the use of nearby public rights of way and the area around the Dock, nor prevent proposals which seek to enhance the recreational potential of the area. The Masterplan identifies the land opposite the former Civic Amenity site, (adjacent industrial unit 26 at Castle Park Industrial Estate) as a site for proposed greenspace. This proposal has not been delivered and a planning application (059397) has now been approved for a fenced open storage compound. No objection to this proposal has been made by local Members, the Town Council or the public on the basis that the proposal is contrary to the recommendations in the Flint Masterplan. The Flint Masterplan is not adopted supplementary planning guidance as part of the Council's planning policy framework. Infrastructure The site is allocated as a transit site for 6 pitches and is intended for occupation for a temporary period of up to 12 weeks. Any residential occupation by families with children will not place a pressure on schools to create a permanent place. The usual procedure is for Education Officers to complete a welfare assessment for any new family staying temporarily in the County with the assistance of BCUHB. Families would not be allowed to

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					stay within a transit site for longer than 12 weeks which is the national agreement and if the families asked for their children to attend school then this would need to be assessed. Experience to date is that this has never happened as families will usually have school places in their home town. Highways Issues Castle Park Industrial Estate presently has two means of access which are via Evans Way which has a height restriction of 2.8m and via Castle Dyke Street and Swan Bridge. These two access points provide satisfactory vehicular access to the Castle, foreshore and Industrial Estate. Also the use of the site as a transit site must be considered in the context of its previous use as a recycling centre, in terms of the amount and type of vehicular traffic. In this context it is considered that the existing road network is quite capable of serving a transit site of 6 pitches in this location. The Highways Development Management Officer has commented 'The site was formerly used as a household waste/recycling site; a change of use to a Transit Site is likely to generate a reduction in vehicular movements and a lesser highway impact'. The local highway network is considered appropriate in terms of accommodating the likely traffic generation from the transit site. Soundness Issues: As explained above, the former civic amenity site is not designated for any particular use or proposals in the Flint Masterplan and neither does the masterplan have any planning status in terms of supplementary planning guidance. The site is separated from the industrial estate (and nearby residents) by woodland and the dock. It is not clear how the site could "inhibit existing industrial operations". A contamination report has been commissioned and clearly the site has been more recently used as a civic amenity site where hardstanding and servicing was provided to the site. Given this, the amount of ground disturbance that would be required to facilitate the sites transit use would be minimal. Transit sites, where residents will only be present for a temporary period, would be unlikely to place pressure on schools for additional places. This is commented on further above. The industrial estate is served by two vehicular access routes. The use of site for a 6 pitch transit site must also be considered against

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					the traffic arising from the previous waste recycling centres which have involved visiting customers and operational HGV's and was far greater in size and volume than is likely to be the case with a periodic use for just a six pitch transit site. There is no inherent conflict between a transit site and solar park. In terms of the allegations that the Plan is unsound in respect of this allocation it is necessary to look at the tests of soundness in detail: i) Does the Plan fit? (is it clear that the LDP is consistent with other Plans) – in line with the Housing (Wales) Act, PPW10 and the findings of the GTAA as well as on-going problems with encampments, the Plan seeks to make provision for a transit site. The approach is not 'unsound'. ii) Is the Plan appropriate? (Is the Plan appropriate for the area in the light of the evidence) – The site is self-contained and is capable of being developed and operated in a manner which does not harm the locality. There is no conflict with the Flint Masterplan in terms of recreational uses in the area given the site configuration and relationship. iii) Will the Plan deliver? (is it likely to be effective) – The site is in Council ownership and this enables the Council to secure Welsh Government funding to develop the site. The site is both viable and deliverable. In conclusion, the site meets an identified need and is in a sustainable location off a main travelling route, on the edge of a Tier 1 Main Service Centre which provides a wide range of services and facilities. The site is self contained and can be developed and operated in a manner which does not harm the amenity and use of the local area. The site is viable and deliverable and should be retained as an allocation in the Plan.
469	HN8: Gypsy and Traveller Sites	Object	With reference to the proposal in Flintshire's Draft Local Development Plan for an extension of Traveller's Pitches at Gwern Lane, Hope."The proposal to increase the number of pitches by 6-8 to accommodate an increase in family size". Originally, Flintshire County Council refused planning permission for the existing small Traveller's Site at Gwern Lane, Hope, but permission	Removal of allocation.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light

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			was later granted by the Welsh Office on appeal. " The proposal to increase the number of pitches by 6-8 " would further exacerbate these conditions. Also, there would be increased noise and traffic entering/existing Gwern Lane and Caer Estyn Lane entering onto very busy B5373. It is a narrow lane and is deemed unsuitable for large vehicles. I trust my views will be taken into consideration.		of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling ‘Gwern House’ being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for

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					hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic

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					issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together

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					with other provision identified in the plan is sufficient to meet established identified need.
479	HN8: Gypsy and Traveller Sites	Object	Objects to Gwern Lane Travellers Site expansion for the following reasons:- There has been a lack of intervention from enforcement Officers on current planning infringes e.g. drainage, highways and number of caravans. This has worrying consequences if the expansion was to take place. Drainage - use of the nearby footpath is impossible due to the leaking septic tank. There are already issues with the traffic. It is a one track lane with a blind bend used by walkers, dog walkers, horses and cyclists, many houses front directly onto the lane making it dangerous for residents many of whom are over 60 years old. General impact on the surrounding community especially community integration.	Removal of allocation.	Not accepted. The Council have grouped together and summarised representations made on this Hn8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling ‘Gwern House’ being some 40m to the south of the existing site. The extension to the site is located on the north side

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					of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs.

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					Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and

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					relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
568	HN8: Gypsy and Traveller Sites	Object	Objection to Gypsy Traveller allocation Ewloe. The proposal is to more than double the site by the addition of 6 to 8 pitches which is disproportionate to the existing site of 5 which is not currently fully utilised. The pitches which are currently there have not been kept to their original planning permission.	Having a further potential eight pitches is not required an expansion is already available on the existing site where the current plots have not been used. Reconfigure the existing site.	Not accepted. The Council have grouped together and summarised representations made on this HN8.1 Magazine Lane, Ewloe allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Lies adjacent to A55(T) – noise and air pollution: Planning permission for the present use of the site for 5 pitches was allowed on appeal following the refusal of application 050463. The Inspector reported that the second reason for refusal regarding pollution was withdrawn by the Council following an addendum report produced by the appellant. In respect of noise the Inspector concluded 'On the balance of probabilities I conclude that the noise from traffic using the A55 would not materially harm the living conditions of the occupiers of the appeal site following the construction of the noise barrier subject to its retention thereafter'. In this context it is not considered that the allocation in the LDP would be likely to be unacceptable in terms of pollution and noise, particularly if similar noise attenuation measures (bund and fencing) are installed or are already in place. Isolated from Community: The site was granted planning permission on appeal and the distance of the site from facilities and services was not a decisive factor. The existing site is 1.3km from the school and 1.8km from the shops and take-aways at the junction of Mold Rd and Holywell Rd. The existing bus stop near the junction of Liverpool Rd and Mold Rd is 1km from the site and provides service 5 between Mold

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					and Ellesmere Port and service x4 between Mold and Chester. Breaches of Planning Permision: The site is closely monitored by Planning Enforcement Officers and is also visited regularly by the Council's Gypsy Traveller Liaison Officer. One pitch never occupied and used only for storage: Some representations point to the site being 'over-used' in terms of the level of caravans, vehicles and residents on each pitch yet other representations claim one pitch is not occupied for residential purposes and is used only for storage. However, the present families on site have expressed a need to the Council to have an extension to the site to accommodate the extended family needs. Expansion of Existing Site: Welsh Government guidance is contained in the guidance document (May 2015) 'Designing Gypsy and Traveller Sites' and there is no specific guidance on the size of a pitch. The guidance specifies in para 3.37 'As a minimum, each pitch should be capable of accommodating an amenity block, a mobile home, touring caravan and parking for two vehicles'. There are guidelines in respect of the size of parking spaces, the maximum size of a mobile home and separation distances between mobile homes and also between a mobile home and a pitch boundary. The guidance also specified what should be provided within an amenity block and other facilities on site such as hardstanding, electricity and water supply, and drainage arrangements for foul water and surface water. However, the guidance is clear that the 'layout of the pitch will depend on the overall site design'. The approved pitches on the site are rather generously proportioned and there is considered to be scope for a reconfiguration and remodelling of the present site to enable an additional 5 pitches within the existing site boundary. In effect, each existing pitch is capable of being split into two by a central vehicular access and separate accommodation to either side of the access road. In this scenario there is no need for the allocation for the site extension. Previous appeal decisions: This objection is made in the context of seeking an entirely new gypsy traveller residential site within a green barrier elsewhere in the County. The context in relation to the extension of an existing

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					site is different to that of developing a new site as are the respective site contexts and previous planning histories. Visual Impact: The visual impact of the existing site was considered as part of the first appeal decision and revisited as part of the second appeal decision. Deliverability and viability: Following the publication of the deposit Plan, the Council is now aware that the preference from the site owners is to increase the capacity of the site by reconfiguring the existing site within the red line of the present permission, and that this is in preference to the costs and viability of extending the site and required infrastructure into the extension land proposed in the deposit LDP. This has the potential to increase the certainty of delivery of more pitches at this location in a more viable and sustainable way than that proposed in the deposit LDP, thereby negating the need for the proposed site extension. Justification for expansion / Impact on Community: The Council has a statutory duty under the Housing Act to meet the needs for gypsy and traveller accommodation in the County, and has a general need for pitches identified in its approved GTAA. There is an expressed need from the present families on site for additional accommodation for their extended families that would contribute to meeting this need. Provision for site in Mold: Mold is not considered to be close to established traveller routes. No sites have been identified or suggested in Mold and furthermore no need has been identified for a site in Mold from the traveller community. Impact on green barrier: The site sits on the very southern edge of the green barrier, located between the A55(T) and Magazine Lane within the green barrier which sits between the settlements of Ewloe, Northop Hall, Connah's Quay and Shotton / Aston. In the first appeal decision the Inspector considered that a gypsy site was inappropriate development. In para 92 the Inspector noted 'In this case I have found that the open character and appearance of the green barrier would be adversely affected, but to a limited

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					extent. It would also make a marginal contribution to the coalescence of settlements as well as encroach into the countryside, another of the purposes of the green barrier'. In terms of the impact on the rural character and appearance the Inspector noted '…gypsy sites are acceptable in principle in rural locations and will inevitably have some impact on their surroundings. In this case that impact would not be unacceptable'. The Inspector's concluding comments were that 'For the reasons I have given, that harm is principally by way of inappropriateness. Otherwise the scheme has limited consequences for the open character and appearance of the green barrier and its purposes'. It is therefore evident that the impact of the existing site was considered by the Inspector to be limited in terms of green barrier and the character and appearance of open countryside. The extension site has natural screening to both Magazine Lane and the A55(T) and also on its western boundary. It is a physically well defined site and considered to represent logical extension to the site. It is clear that the extension site has a completely different character to the large linear field to the west. It is quite usual for green barrier designations in Flintshire to 'wash over' small scale built development in open countryside and this is the case with the existing site. In a similar manner to the Inspectors considerations, the Council does not consider that the proposed modest physical extension of the site would have such an impact on the purpose and openness of the green barrier, nor on the character and appearance of open countryside. However, as outlined above, an alternative approach has been tabled which involves the intensification of the existing site be the conversion of each pitch into separate pitches. This will inevitably involve an intensification of development within the existing site boundaries, but will remove the need for a physical extension of the site. The proposal would also involve less additional pitches with 5 new pitched rather than the 6-8 envisaged in the Deposit Plan. In conclusion, the proposed extension represents a modest physical extension of the existing consented and developed site which, despite its location within a green barrier, will not have an unacceptable impact on openness on the green barrier or the character and appearance of open countryside. The Inspector

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					though is requested to consider the appropriateness of an intensification of the existing site, to provide an additional 5 pitches, and to remove the extension allocation.
606	HN8: Gypsy and Traveller Sites	Object	Travellers have been camped in this area many times before and left a terrible mess for the council, at our expense to clean up after them. They did not use the toilets which were provided for them, but fouled the surrounding area. Why? should we provide these facilities for them when the town has none for the ratepayers. The dock area which has lovely views across the estuary is used by many elderly for it is a fairly level walk, many have told me that they will not be coming here while the travellers are here, it's a pity that we were not given the same consideration as the outsiders. My wife who as been picking up litter there for at least the last five years will not be doing it anymore, she was presented with a plaque for all her good work which will be to no avail if these people are allowed to stay.	Removal of allocation	Not accepted. The Council have grouped together and summarised representations made on this HN8.4 Castle Park, Flint allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Based on Incomplete Data: The need for a transit site has been identified through the GTAA and as a result of the Council's experience in dealing with unauthorised encampments and is not based on incomplete data. Flintshire Exceeded Reasonable Provision: Flintshire has a number of existing gypsy traveller sites, some granted planning permission on a permanent basis and some on a temporary basis. The GTAA which has been approved by Welsh Government, has identified a need for further 'residential' pitches and also the need for a transit site as there is presently no transit site in Flintshire. Nuisance From Previous Encampments in Area: The GTAA has established the need for a transit site in the County. The need has also been established as a result of unauthorised encampments in recent years throughout parts of the County. The provision of a transit site is in recognition of the impacts of unauthorised encampments on both communities and the environment. A transit site will provide the police and Council with a facility to temporarily accommodate travellers for a maximum of 12 weeks and the site will be closely managed by the Council with regular site management presence and short term tenancy agreements with those who are provided with temporary stay on the site. Site Specific Issues: The site will be designed in accordance with Welsh Government guidance 'Designing Gypsy and Traveller Sites' in terms of appropriate pitch sizes. A draft layout shows 6 pitches plus a site manager's office which will provide communal facilities. The draft site layout in Background Paper 6 shows 6 pitches and a site manager's office which will provide communal facilities. The

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					design of the site will need to comply with para 6.17 of Welsh Government guidance 'Designing Gypsy and Traveller Sites' which states 'Instead of individual amenity blocks on each pitch, sites should include shared amenities featuring toilets, washbasins and shower facilities with hot and cold water supply. At least one male and one female amenity block are required'. The provision of public toilets elsewhere in Flint is not within the remit of the LDP. No proposals have been received for a base for the Flint Coastal Volunteers on the site of the former Civic Amenity Site. By contrast there is a statutory duty placed on the Council's Housing function, to deliver gypsy and traveller sites. The need for a Transit site has been identified and following an assessment of Council owned land, this site has been identified as being available and suitable to be allocated for a transit site. Area Wide Issues: The recreational use of the Flint Dock and the surrounding area is noted given the network of paths and the Coast Path. The gypsy site is set back from the public highway behind gates and is well screened by existing woodland. Its use as a transit site will not harm views of the estuary. The transit site will be carefully managed and have an onsite manager office. Residents will be on site for a temporary period and will need to abide by site rules and regulations. The site would be fully serviced in terms of water electricity, sewage facilities and waste disposal. Given that it is has no public access and is well screened it is not considered that the proposal would harm recreational use of the area. The site was not previously used as an industrial unit or site, but as a former civic amenity site for recycling. It is separated from the industrial estate by woodland and landscaped open areas and the dock. With appropriate design and management there is no reason why the proposed use should be inappropriate or harmful to the industrial estate. The planning permission for the adjacent solar park includes security fencing and security gate and all generating and inverter infrastructure will be located within the secure fenced boundary of that site. It is not considered that there is any inherent conflict between a managed transit site and a solar farm / grid connection. Contamination and related Issues:

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					Although the site was previously used as a civic amenity site it has a concrete slab and its operation as a waste site would have complied with all environmental licensing arrangements. Nevertheless, a contamination study has been commissioned to establish the existence of any contamination and what mitigation measures might be necessary. The adjoining former landfill site now has planning permission for a solar park and this will have security fencing and will not have public access. There are a number of gutters and ditches which flood at high tide but these are clearly visible and accessible from the main footpath link between the retail park and Castle Park. The presence of these features is something that could be pointed out to travellers on site as part of the site management arrangements and signage. Conflict with Flint Masterplan: The Flint Masterplan 2021 has a base date of 2012 and covers the period to 2021. On p30 the Masterplan shows no particular proposals for the former Civic Amenity Site, but does show an improved pedestrian link from Flint Retail Park to Flint Dock and the coastal path, which runs either side of Flint Dock. It also shows proposed landscaping work in the area around Flint Dock. The Masterplan maps show a pedestrian route to the rear (south) of the former Civic Amenity Site, but not along the access road which leads to the site. Having checked the Council's public rights of way maps, there is no lawful public access along the access road to the site, and public access is presently prevented by locked gates. Given that the former Civic Amenity Site sits within, and is well screened by woodland, it is unclear how the sites use as a transit site will have a negative effect on the use of nearby public rights of way and the area around the Dock, nor prevent proposals which seek to enhance the recreational potential of the area. The Masterplan identifies the land opposite the former Civic Amenity site, (adjacent industrial unit 26 at Castle Park Industrial Estate) as a site for proposed greenspace. This proposal has not been delivered and a planning application (059397) has now been approved for a fenced open storage compound. No objection to this proposal has been made by local Members, the Town Council or the public on the basis that the proposal is contrary to the recommendations in the Flint Masterplan. The Flint Masterplan is

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					not adopted supplementary planning guidance as part of the Council's planning policy framework. Infrastructure The site is allocated as a transit site for 6 pitches and is intended for occupation for a temporary period of up to 12 weeks. Any residential occupation by families with children will not place a pressure on schools to create a permanent place. The usual procedure is for Education Officers to complete a welfare assessment for any new family staying temporarily in the County with the assistance of BCUHB. Families would not be allowed to stay within a transit site for longer than 12 weeks which is the national agreement and if the families asked for their children to attend school then this would need to be assessed. Experience to date is that this has never happened as families will usually have school places in their home town. Highways Issues Castle Park Industrial Estate presently has two means of access which are via Evans Way which has a height restriction of 2.8m and via Castle Dyke Street and Swan Bridge. These two access points provide satisfactory vehicular access to the Castle, foreshore and Industrial Estate. Also the use of the site as a transit site must be considered in the context of its previous use as a recycling centre, in terms of the amount and type of vehicular traffic. In this context it is considered that the existing road network is quite capable of serving a transit site of 6 pitches in this location. The Highways Development Management Officer has commented 'The site was formerly used as a household waste/recycling site; a change of use to a Transit Site is likely to generate a reduction in vehicular movements and a lesser highway impact'. The local highway network is considered appropriate in terms of accommodating the likely traffic generation from the transit site. Soundness Issues: As explained above, the former civic amenity site is not designated for any particular use or proposals in the Flint Masterplan and neither does the masterplan have any planning status in terms of supplementary planning guidance. The site is separated from the industrial estate (and nearby residents) by woodland and the dock. It is not clear how the site could "inhibit existing industrial operations".

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					A contamination report has been commissioned and clearly the site has been more recently used as a civic amenity site where hardstanding and servicing was provided to the site. Given this, the amount of ground disturbance that would be required to facilitate the sites transit use would be minimal. Transit sites, where residents will only be present for a temporary period, would be unlikely to place pressure on schools for additional places. This is commented on further above. The industrial estate is served by two vehicular access routes. The use of site for a 6 pitch transit site must also be considered against the traffic arising from the previous waste recycling centres which have involved visiting customers and operational HGV's and was far greater in size and volume than is likely to be the case with a periodic use for just a six pitch transit site. There is no inherent conflict between a transit site and solar park. In terms of the allegations that the Plan is unsound in respect of this allocation it is necessary to look at the tests of soundness in detail: i) Does the Plan fit? (is it clear that the LDP is consistent with other Plans) – in line with the Housing (Wales) Act, PPW10 and the findings of the GTAA as well as on-going problems with encampments, the Plan seeks to make provision for a transit site. The approach is not 'unsound'. ii) Is the Plan appropriate? (Is the Plan appropriate for the area in the light of the evidence) – The site is self-contained and is capable of being developed and operated in a manner which does not harm the locality. There is no conflict with the Flint Masterplan in terms of recreational uses in the area given the site configuration and relationship. iii) Will the Plan deliver? (is it likely to be effective) – The site is in Council ownership and this enables the Council to secure Welsh Government funding to develop the site. The site is both viable and deliverable. In conclusion, the site meets an identified need and is in a sustainable location off a main travelling route, on the edge of a Tier 1 Main Service Centre which provides a wide range of services and facilities. The site is self contained and can be developed and operated in a manner which does not harm the

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					amenity and use of the local area. The site is viable and deliverable and should be retained as an allocation in the Plan.
669	HN8: Gypsy and Traveller Sites	Object	TRAVELLERS SITE Gwern Lane - The Council wish to make the following observations: (i) Whether the land in question is appropriate for the land use proposed – the land Is situated on the green belt/open countryside; (ii) The effect on the open countryside and use of public footpaths; (iii) Proportionality - the proposed development needs to be taken into account in comparison to the immediate community it would be within. There are a minimal amount of other houses in Caer Estyn therefore it is questioned as to whether or not the scale of this development is appropriate. The effect on promoting peaceful and integrated co-existence between a site and the local community would not occur due to expansion due to there being larger amounts of travellers living at the site than in the surrounding community. Sites should be in context and in relation to the local infrastructure, population size and density to ensure they are in proportion to local settled communities (Planning for gypsy, traveller and showpeople sites WGC005/2018). (iv) Current facilities: there is a reason for the application cited as family expansion. However, this can be seen as positive discrimination, especially as there are currently large developments in Queensferry/Llay. (v) Sewerage/Environmental - impact on surroundings; there are current issues with sewage and drainage at the site regarding no appropriate drainage. (vi) Traffic issues - (a) nature of the lane - single lane, no white	Removal of allocation.	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling ‘Gwern House’ being some 40m to the south of the existing site. The extension to the site is located on the north side

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			line, no speed restriction, surface issues - regular resurfacing (b) main road - extremely busy can't take added site; (vii) Planning enforcement - it is understood that several complaints have been raised by neighbours relating to issues with the site containing things that it did not have planning permission for, e.g. 1 static caravan instead of the 2 + 2 travelling pitches. If what is already on the site is not being enforced, how will an enlarged site be managed? (vii) Possible commercial motive and impact on the community - there is evidence that there is an intention to use the extension for commercial purposes which is an unacceptable reason for any extension.		of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs.

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					Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents' concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
1040	HN8: Gypsy and Traveller Sites	Object	Objection to extension of existing travellers site at Gwern Lane, Hope. The existing site will more than double in size and is disproportionate to the local settled community. Sites should be in context and in relation to the local infrastructure, population size and density to ensure they are in proportion to local settled communities (Planning for Gypsy Traveller and Show people sites Wg005/2018) Traffic issues – site lies on a narrow country lane, despite efforts to slow traffic along this main road speed limits are not always adhered to. Sustainability – Sewage facilities are barely adequate for the existing residents, a larger site with inadequate sewage facilities would prove a significant health hazard. The development of the site to encroach further on to a green belt would cause greater environmental pollution. A larger traveller site in Llay or Queensferry would be more suitable No local shops or facilities near the site. No footpath to the nearest village of Hope. This is restricting for families and does not encourage co-existence between the site and the local community. Leads to	allocation of larger site at Llay or Queensferry	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			isolation and continued separate identities. Increased noise levels from the site.		number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council

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					seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community.

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					Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
1041	HN8: Gypsy and Traveller Sites	Object	Objection to extension of Gypsy Traveller site at Gwern Lane, Hope. This site is a narrow single track of questionable condition, with limited access for vehicles. Local people use this lane regularly for cycling, horse-riding and dog walking. The amount of extra vehicles the extra pitches would generate would be unacceptable for the road conditions/safety. This would be equally pertinent if the planning was for a housing estate and the traffic that would generate. Sewage issues – is there enough room to put this in place? I would draw to your attention WGC005/2018 which addresses the effect of promoting peaceful and integrated co-existence between a site and the local community. Sites should be in	Removal of allocation from LDP	Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact

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			context, and in relation to the local infrastructure, population size and density to ensure they are in proportion to local settled communities. At present it is, but the area is a small rural hamlet and is not suitable for expansion under this legislation. Detrimental impact on the Countryside		on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling 'Gwern House' being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations.

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					Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside. Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed

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					restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents' concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
1057	HN8: Gypsy and Traveller Sites	Object	HN8.3 - Riverside Park This site lies in a flood risk zone C1 and as this is Highly Vulnerable Development, we consider further assessment with regard to flood risk should be undertaken prior to allocation of this site to confirm suitability and deliverability. Your Authority's Strategic	Need to include FCA to support the allocation of Riverside extension.	Partly accepted. The Council have grouped together and summarised representations made on this HN8.3 Riverside, Queensferry allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Poor integration with community:

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			Flood Consequences Assessment (SFCA) also shows the site to be partially at risk when considering a breach event at Pentre and Queensferry, for the 0.5% AEP event, with an allowance for climate change. The proposed allocation would consist of land used for a gypsy/traveller sites and would therefore constitute highly vulnerable development. We understand from discussions with your Authority that a detailed FCA has been produced in support of this allocation. This should be submitted as part of the LDP process.		The site is an existing long standing and successfully run Council owned site. The rebuilding of the adjacent bridge over the R.Dee by Welsh Government will require additional land on the south side of the A494(T) which will impact further on the already substandard vehicular access from the existing site onto the A494(T). This has led to a new vehicular access being proposed along an existing track from Chemistry lane to the south of the site that will be provided by Welsh Government. In addition there is vacant land to the south of the existing traveller site. This provides the opportunity for a remodelling of the existing site, and extension to the site and a new and improved vehicular access. The site is located at the heart of the Deeside area, close to a large number of settlements and their associated services and facilities. The new access will improve the links between the site and the existing community at Pentre, Sandycroft and Queensferry, rather than the existing access which is straight out on to the A494(T). A planning application for a Coop convenience store at Queensferry Industrial Estate which, if approved, will be within walking distance of the site. There is presently a public right of way along the R Dee along the northern edge of the existing traveller site. This route will be retained and enhanced as part of the bridge rebuilding works and will ensure improved links with Queensferry and Garden City. The site is not divorced from the wider community. The site will be accessed by a new road from the south from the junction of Chemistry Lane and Factory Lane. The Highways Development Management Officer comments 'The use of Chemistry Lane by large vehicles is limited by the clearance under the rail bridge; alternative access via Factory Road is available. The two roads provide the only vehicular access to the Queensferry Industrial Estate; the additional traffic impact resulting from revised access to the Residential Site is unlikely to be significant'. Archaeology: This is a detailed matter that can be addressed as part of working up a planning application. Housing Strategy have contacted CPAT to establish how this can best be dealt with. Contaminated Land When the former chemical works was demolished a land

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					remediation programme was undertaken by FCC. A number of technical reports were produced in 1990/91 and 2012 and these were reviewed by Arcadis in 2018 in order to inform the development of the site extension. Arcadis concluded that: • no further investigation work is necessary to assess risk to human health from potential CoC at the Site. • Mitigation measures within the construction design for permanent buildings and transient utility 'hook up' points are recommended to reduce risk to site users. • Risk assessment by Smith Grant assumes that the redevelopment design includes total hardstanding coverage. Additional assessment of risk to human health may be appropriate if the final redevelopment design includes areas of soft standing. • Protective measures to ensure integrity of water pipes may be appropriate if the construction design requires pipes to be places below or close to the base of the capping layer. In the light of these findings the broader principle of a residential use is considered acceptable and that the remaining technical matters can be satisfactorily resolved at development management stage. Proximity to industry / sewage works: The Pentre and Sandycroft area has a mix of industrial estates and residential properties in close proximity to each other. The site falls within a 1000m consultation zone for the Owens-Corning Building Products site where NRW will need to be consulted and the south east corner of the site falls within the 500m consultation zone of the J Reid Trading site where NRW will need to be consulted. However, following consultation on the Plan, NRW have not objected to this proposal in terms of proximity to industrial operations. No objection has been received from Welsh Water in terms of proximity to Waste Water Treatment Works. Flood Risk: The site is located within a C1 flood risk zone based on the NRW Development Advice Map. A Flood Consequences Assessment undertaken by Weetwood for the site has demonstrated that the proposed development may be completed in accordance with the requirements of planning policy subject to the following: • Development platform level to be set at a minimum of 7.24 m AOD

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					• Finished floor levels to be set 0.15 m above the development platform level • Flood Plan to be developed in consultation with Flintshire County Council • The detailed drainage design to be submitted to and approved by the local planning authority prior to the commencement of development NRW have considered the FCA and their comments appear to amount to a single concern which is increased flood risk elsewhere during a tidal breach scenario afforded by raising the development platform. Weetwood state that the increase flood risk elsewhere is explained in section 5.3 of the FCA and concludes that the 10-35mm increases are not significant owing to those areas already flooding to considerable depths up to 1.4m. Weetwood consider that this is similar to many other sites assessed within the River Dee floodplain. Given the nature of flooding in tidal breach scenarios, it is extremely difficult to feasibly mitigate increased flood risk elsewhere to show “no detriment”, which would likely involve significantly scaling back the proposed development and allocating a portion of land specifically as compensatory flood storage – all for very little benefit given that flood risk elsewhere is hardly changing. Work is progressing in order to resolve this NRW concern in terms of identifying whether there is any adjoining Council owned land that could be utilised as mitigation for any flood water displaced as a result of the raised platform on the extension site. Vehicle Emissions: It is acknowledged that the existing and proposed site is in close proximity to the A494(T). However, there will be a betterment on the existing situation in that the site will not be dependent on the A494(T) for vehicular access and that, as part of the bridge rebuilding proposals there existing scope for structural landscaping and noise attenuation measures.
1216	HN8: Gypsy and Traveller Sites	Object	Objects to sites HN8-1 (magazine Lane, Ewloe), HN8-2 (Gwern Lane, Hope) and HN8-3 (Riverside, Queensferry) as they do not comply with the requirements set out in Circular 005/2018 and in the criteria set out in the existing UDP (HSG14) and in the		Not accepted. The Council have grouped together and summarised representations made on this HN8.2 Gwern Lane, Hope allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector.

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			Deposit LDP (HN9). In particular HN8-3 is located on contaminated land, is in a C1 flood risk area, is adjacent to a major sewage works and is severed from local services by a principle main trunk road linking North Wales and the North West of England which is scheduled for upgrading. Detailed objection provided in the attached document. Proposes an alternative allocation at Bryn y Baal, Mynydd Isa.		General: The existing site comprising two pitches was allowed on appeal on 11/05/11. Although the Inspector considered the appeal in the light of an identified need for pitches and a lack of existing sites, the inspector did not consider that any impacts on open countryside, were such as to warrant dismissing the appeal. The Inspector referred to the [applicable at the time] Circular 30/2007 which explained that land in rural or semi – rural settings are acceptable in principle for gypsy caravan sites where it is not subject to specific planning constraints. The Inspector noted that it is expected that gypsy sites in rural areas would have some impact on the local scene. The Inspector noted that the site had a good existing boundary hedge to Gwern Lane and to the former orchard behind Gwern House but that the site is conspicuous particularly from the north and even more so from the footpaths to the north corner of the site. The Inspector though concluded that the site does have a harmful impact on the local scene but considered that this could be mitigated with further natural screening. The Inspector therefore considered it to be an appropriate and suitable site. On any planning permission for this type of development a planning condition would be attached to control the number of pitches and caravans, in line with the details approved. This should not be interpreted as implying that an extension is unacceptable or that an absolute limit was imposed by the original decision. The site is outside any defined settlement boundary and in open countryside but it is not within a designated green barrier. Although there are clusters of dwellings in the area surrounding the site, the site does not directly adjoin a residential dwelling, with the nearest dwelling ‘Gwern House’ being some 40m to the south of the existing site. The extension to the site is located on the north side of the existing traveller site and away from this dwelling. The site is wedge shaped and is well bounded by Gwern Lane and a hedgerow to the east, by a hedgerow along the southern boundary and a post and rail fence along the western edge, alongside the public right of way. The site tapers towards the northern end at the point where two public rights of way join alongside the bend in Gwern Lane. The site is therefore well screened from Gwern lane and the B5373 Gresford Rd but has a

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					more open aspect to the west. However, the visual impact could be mitigated by hedgerow planting along the western boundary. The use of the existing vehicular access will prevent the need for hedgerow removal that would be necessary to create a new access. Breaches of Planning Permission: Regular liaison takes place between the residents and the Council's Gypsy Liaison Officer. Any alleged infringements relating to the planning permission and conditions should be reported to the Council's Planning Enforcement Officers who will undertake necessary investigations. Owners Intentions: The present families on site have expressed a need, via the Council's Gypsy Liaison Officer, to meet the additional accommodation needs of the family. Positive Discrimination: The site extension is allocated to meet an expressed need from the present family to meet their needs for additional accommodation. The LDP is merely seeking to meet the identified need for pitches in the GTAA through meeting the needs of an existing family. There is nothing discriminatory in the Council seeking to fulfil its statutory duty in the Housing (Wales) Act to meeting the needs of gypsies and travellers in the County. The Council is seeking to meet the need arising in the County as identified in the GTAA. The Council run site at Queensferry forms part of the existing site provision and an extension to this is proposed as an allocation in the LDP. The provision of sites in Llay, whether existing or proposed, is not relevant to the Flintshire LDP and consideration of this allocation as this lies in the adjacent County of Wrexham where the duty there is to meet their own identified needs. Scope for Smaller Proposal: In further discussions with the present family and their planning agent, the number of pitches to be provided on the site has been reviewed downwards to reflect the site size and characteristics and the family need. It is now proposed that the number of additional pitches to be provided is 4. This will enable a much less intensive use of the site and will reduce its impact on the character and appearance of the countryside.

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					Road Safety: In the appeal decision the Inspector did not consider that the site and approach roads presented any significant parking or traffic issues. The Highways Development Management Officer has considered the proposed extension and comments 'Gwern Lane is a 3m wide lane generally suitable for single lane operation however the road widens to a width of 4.5m in the vicinity of the junction with the B5373, sufficient to allow two vehicles to pass. Available visibility, in both directions, at the junction exceeds the minimum recommended 120m for a road subject to a 40mph speed restriction. On that basis I raise no objection to the proposed site increase'. Proportionality: As detailed above, the existing family and agent has revised their proposals to reduce the number of additional pitches to 4. Although the site area would remain the same, this allows for a lower density of development and scope for landscaping measures. The provision of 4 pitches would also help allay residents concerns about the size of the traveller community relative to the size of the settled community. Facilities / Services: Although the site sits in an open countryside location it is close to a number of settlements. It is close to the settlements of HCAC in Flintshire and Llay in Wrexham where there is education and health provision, and a range of employment and other services and facilities that serve the 'settled' community sufficiently as they do the Gypsy and Traveller site. It is in a broadly sustainable location. Amenity: Any matters relating to nuisance are the remit of the police and relevant Council Services. The Council's Gypsy Liaison Officer is in regular contact with the site residents and can monitor site conditions. Any breaches of the planning consent are a matter for the Council's Planning Enforcement Officers. In conclusion, the revised proposal for the site is a substantially reduced scheme in terms of the number of pitches (4 rather than 6-8) and addresses many of the objector's concerns in relation to impacts arising from the site of the traveller community relative to

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					the settled community. It is suggested that the Inspector have regard to a reduced number of pitches on the site which together with other provision identified in the plan is sufficient to meet established identified need.
1126	HN8: Gypsy and Traveller Sites	Object	The travellers site off Magazine lane should not be increased in capacity under any circumstances. There is no justification in the deposit LDP as it stands, why this group's accommodation needs to feature in it. It should be removed and dealt with as a separate issue. The traveller community attracts different levels of considerations both locally in Wales and Nationally. Reality is that this group regards itself as 'other' and their contributions to local communities is and has been questionable. There needs to be a thorough examination of the activity /activities on this site and the impact on the rest of the local community. Other residents are terrified in their own homes while the number of caravans have increased on this site.	Removal of allocation to extend Magazine Lane.	Not accepted. The Council have grouped together and summarised representations made on this HN8.1 Magazine Lane, Ewloe allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Lies adjacent to A55(T) – noise and air pollution: Planning permission for the present use of the site for 5 pitches was allowed on appeal following the refusal of application 050463. The Inspector reported that the second reason for refusal regarding pollution was withdrawn by the Council following an addendum report produced by the appellant. In respect of noise the Inspector concluded 'On the balance of probabilities I conclude that the noise from traffic using the A55 would not materially harm the living conditions of the occupiers of the appeal site following the construction of the noise barrier subject to its retention thereafter'. In this context it is not considered that the allocation in the LDP would be likely to be unacceptable in terms of pollution and noise, particularly if similar noise attenuation measures (bund and fencing) are installed or are already in place. Isolated from Community: The site was granted planning permission on appeal and the distance of the site from facilities and services was not a decisive factor. The existing site is 1.3km from the school and 1.8km from the shops and take-aways at the junction of Mold Rd and Holywell Rd. The existing bus stop near the junction of Liverpool Rd and Mold Rd is 1km from the site and provides service 5 between Mold and Ellesmere Port and service x4 between Mold and Chester. Breaches of Planning Permission: The site is closely monitored by Planning Enforcement Officers and is also visited regularly by the Council's Gypsy Traveller Liaison Officer. One pitch never occupied and used only for storage: Some representations point to the site being 'over-used' in terms of the level of caravans, vehicles and residents on each pitch yet

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					other representations claim one pitch is not occupied for residential purposes and is used only for storage. However, the present families on site have expressed a need to the Council to have an extension to the site to accommodate the extended family needs. Expansion of Existing Site: Welsh Government guidance is contained in the guidance document (May 2015) 'Designing Gypsy and Traveller Sites' and there is no specific guidance on the size of a pitch. The guidance specifies in para 3.37 'As a minimum, each pitch should be capable of accommodating an amenity block, a mobile home, touring caravan and parking for two vehicles'. There are guidelines in respect of the size of parking spaces, the maximum size of a mobile home and separation distances between mobile homes and also between a mobile home and a pitch boundary. The guidance also specified what should be provided within an amenity block and other facilities on site such as hardstanding, electricity and water supply, and drainage arrangements for foul water and surface water. However, the guidance is clear that the 'layout of the pitch will depend on the overall site design'. The approved pitches on the site are rather generously proportioned and there is considered to be scope for a reconfiguration and remodelling of the present site to enable an additional 5 pitches within the existing site boundary. In effect, each existing pitch is capable of being split into two by a central vehicular access and separate accommodation to either side of the access road. In this scenario there is no need for the allocation for the site extension. Previous appeal decisions: This objection is made in the context of seeking an entirely new gypsy traveller residential site within a green barrier elsewhere in the County. The context in relation to the extension of an existing site is different to that of developing a new site as are the respective site contexts and previous planning histories. Visual Impact: The visual impact of the existing site was considered as part of the first appeal decision and revisited as part of the second appeal decision. Deliverability and viability: Following the publication of the deposit Plan, the Council is now

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					aware that the preference from the site owners is to increase the capacity of the site by reconfiguring the existing site within the red line of the present permission, and that this is in preference to the costs and viability of extending the site and required infrastructure into the extension land proposed in the deposit LDP. This has the potential to increase the certainty of delivery of more pitches at this location in a more viable and sustainable way than that proposed in the deposit LDP, thereby negating the need for the proposed site extension. Justification for expansion / Impact on Community: The Council has a statutory duty under the Housing Act to meet the needs for gypsy and traveller accommodation in the County, and has a general need for pitches identified in its approved GTAA. There is an expressed need from the present families on site for additional accommodation for their extended families that would contribute to meeting this need. Provision for site in Mold: Mold is not considered to be close to established traveller routes. No sites have been identified or suggested in Mold and furthermore no need has been identified for a site in Mold from the traveller community. Impact on green barrier: The site sits on the very southern edge of the green barrier, located between the A55(T) and Magazine Lane within the green barrier which sits between the settlements of Ewloe, Northop Hall, Connah's Quay and Shotton / Aston. In the first appeal decision the Inspector considered that a gypsy site was inappropriate development. In para 92 the Inspector noted 'In this case I have found that the open character and appearance of the green barrier would be adversely affected, but to a limited extent. It would also make a marginal contribution to the coalescence of settlements as well as encroach into the countryside, another of the purposes of the green barrier'. In terms of the impact on the rural character and appearance the Inspector noted '…gypsy sites are acceptable in principle in rural locations and will inevitably have some impact on their surroundings. In this case that impact would not be unacceptable'. The Inspector's concluding comments were that 'For the reasons I

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					have given, that harm is principally by way of inappropriateness. Otherwise the scheme has limited consequences for the open character and appearance of the green barrier and its purposes'. It is therefore evident that the impact of the existing site was considered by the Inspector to be limited in terms of green barrier and the character and appearance of open countryside. The extension site has natural screening to both Magazine Lane and the A55(T) and also on its western boundary. It is a physically well defined site and considered to represent logical extension to the site. It is clear that the extension site has a completely different character to the large linear field to the west. It is quite usual for green barrier designations in Flintshire to 'wash over' small scale built development in open countryside and this is the case with the existing site. In a similar manner to the Inspectors considerations, the Council does not consider that the proposed modest physical extension of the site would have such an impact on the purpose and openness of the green barrier, nor on the character and appearance of open countryside. However, as outlined above, an alternative approach has been tabled which involves the intensification of the existing site be the conversion of each pitch into separate pitches. This will inevitably involve an intensification of development within the existing site boundaries, but will remove the need for a physical extension of the site. The proposal would also involve less additional pitches with 5 new pitched rather than the 6-8 envisaged in the Deposit Plan. In conclusion, the proposed extension represents a modest physical extension of the existing consented and developed site which, despite its location within a green barrier, will not have an unacceptable impact on openness on the green barrier or the character and appearance of open countryside. The Inspector though is requested to consider the appropriateness of an intensification of the existing site, to provide an additional 5 pitches, and to remove the extension allocation.
1140	HN8: Gypsy and Traveller Sites	Object	Gypsy & Travellers - Level of Need and Provision (Gypsy Traveller Accommodation Assessment (GTAA) / Site Deliverability / Policy HN8 - Allocations, and Policy HN9 Level of Need & Provision – The LDP	Need to finalise GTAA. Need to ensure all allocations are suitable and can be	Partly accepted. Whilst the Council considers the 2018 update to be a more up to date position in terms of need, it has been frustrated by long delays by the Welsh Government's Equalities Division in responding to the 2018 update. Having confirmed that as the 'update' is not a full GTAA it would not comply with the

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			evidence base comprises two GTAAs, both covering the plan period to 2030. The 2016 study has been agreed formally signed off by the relevant Minister. However, the 2018 study, which is considered by the Council to be a more robust and accurate picture of need in the County, has been used as the basis for the plan and the proposed allocations. The 2018 study has not yet been formally signed off/agreed by Welsh Government. To ensure compliance with the relevant legislation a GTAA must be prepared and agreed by Welsh Ministers in advance of the examination, with provision made for appropriate and deliverable site allocations to meet the need within identified timescales. The Council should work with Welsh Government - Equalities Division, to ensure the evidence is in place at the examination. Failure to gain Welsh Ministerial agreement for a GTAA and meet the required need (if appropriate) is likely to result in the plan being unable to be found 'sound'. The 2018 GTAA states the level of residential need over the plan period is for 8 permanent pitches by 2023/24 and a further 18 pitches by 2030, a total need of 26 pitches. The GTAA also recommends a need for a transit site of 5/6 pitches. Policy HN8: Gypsy and Traveller Sites allocates four separate sites to meet the need over the plan period. This is a positive response to the evidence base and is supported. The key issue is for the Authority to demonstrate all allocations are suitable and can be delivered in the required timescales. T	delivered in the required timescales. Which sites will accommodate the immediate need? Clarity is required on the delivery timescales of allocations. The allocations at Magazine Lane and Gwern Lane can accommodate 6-8 pitches. If the sites can only accommodate 6 pitches there would be a shortfall of 4 pitches over the plan period. The Council need to clarify the position in this respect. The proposed allocation at Magazine Lane is within a green wedge on the proposals map. Is this a mapping error? Housing allocations are not permissible in a green wedge (PPW para 3.65 and 3.71). The appropriateness of new allocations within a green wedge needs to be explained in light of PPW.	GTAA guidance and could not be approved by the Minister, the Equalities Division were then asked to confirm the status of the existing approved GTAA for use as an evidence base to support the LDP. In an email to the Council dated 6th March 2020 the Equalities Division of Welsh Government confirmed the following: "Having reviewed the extant approved GTAA (online link) I can confirm that in sections 5.48 and 5.49 the "plan period" calculations do refer explicitly to 2030. The current GTAA remains extant until a new GTAA is approved. I have consulted with colleagues in the Welsh Government Planning branch and I can confirm that the extant approved GTAA will suffice for LDP preparation. We agree that it is unfortunate that use of the extant approved GTAA means that the additional need set out in the update you provided will not form part of the LDP. However, we understand that the LDP will not prohibit site development to meet any additional need evidenced in a future GTAA". On the basis of this advice from the Welsh Government Equalities Division the Council considers that it has a compliant GTAA agreed by the Welsh Ministers to support the examination of the Flintshire LDP. The Plan makes three allocations for permanent sites and one allocation for a transit site. HN8.1 Magazine Lane, Ewloe This residential site is now proposed to be for a remodelling of the existing site to provide an additional 5 pitches rather than the proposed 6-8 pitches in the Deposit Plan. The site is in private ownership and the development will be privately funded. The Council is aware that the owners wish to progress with an increase in the capacity of this site in the short term (i.e. within 5 years of the GTAA base date) and intend to submit an application on this basis. HN1.2 Gwern Lane, Hope This residential site is now proposed to be for 4 pitches rather than for the 6-8 pitches in the Deposit Plan. The site is in private ownership and the development will be privately funded. The Council is aware that the owners wish to progress with an increase

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				Background Paper 6: Gypsy and Traveller Site Search sets out the planning history, issues and constraints on the proposed allocations. The Riverside allocation is located within a C1 flood zone. The Council will be commissioning a Flood Consequence Assessment to demonstrate that flooding can be managed in line with TAN This assessment, including advice from the statutory body, must be in place for the examination to demonstrate the site is suitable and can be delivered. Sites with outstanding objections from the relevant statutory body, NRW, is a high risk strategy. This also applies to HN8-1 Magazine Lane which overlaps with the land fill buffer zone (Policy EN20). Allocation HN8.4 - Castle Park, Industrial Estate, Flint, partly	in the capacity of this site in the short term (i.e. within 5 years of the GTAA base date) and intend to submit an application on this basis. HN8.3 Riverside, Queensferry The site is in Council ownership and its development will be linked to the rebuilding of the A494(T) bridge over the R. Dee. As a result of the land take associated with the bridge reconstruction, the present vehicular access into the site will be replaced by a new vehicular access off Chemistry Lane to the south. This new access for both the existing site and proposed extension will be funded by Welsh Government. Public funding will need to be secured for the development of the extension and it is anticipated that development will not take place until 2023 at the earliest. HN8.4 Castle Park Industrial Estate The transit site is in Council ownership, being a former civic amenity site. The Council has already secured funding for the development of the transit site and work is progressing on a request for pre-application advice ahead of applying for planning permission. The site allocations are clearly capable of being delivered over the Plan period. The need identified in the approved GTAA is -4 pitches over the 5 year period and 19 pitches over the Plan period and the revisions to the Plans allocations result in a pitch provision of 19 which exactly meets the need. Magazine Lane, Ewloe In the separate detailed response on HN8.1 it is proposed that the allocation in the form of an extension to the site is to be replaced by a remodelling of the existing permitted site. Rather than securing 6-8 pitches on the extension site, the proposed remodelling of the existing site will secure an additional 5 pitches. Gwern Lane, Hope In the separate detailed response on HN8.1 it is proposed that the

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				overlaps with solar allocation EN13: Castle Park Flint. Background Paper 6, Appendix 3, states the site has planning permission for a 2MW ground mounted solar farm and associated infrastructure which is under construction. This requires clarification. Can both allocations be developed for their intended use, or would one preclude the other? See previous comments regarding the deliverability of G&T sites.	number of pitches be reduced in scale from 6-8 pitches to 4 pitches. In total the proposed amendments to these two allocations will result in the loss of between 3 and 7 pitches. The allocations for permanent sites in policy HN8 will result in 19 pitches. Given the clarification provided by the Equalities Division of Welsh Government that the need identified in the 2016 GTAA is still extant as is the study overall, then there would not be a shortfall in provision if the sites extensions allocated were to be developed at either the lower end of the rages indicated, or indeed at the level more recently expressed by the respective site owners via submitted or planned planning applications or pre-app submissions. As explained above and in the detailed response on HN8.1 the Council is no longer proposing the extension to the site. Instead the allocation will on a remodelling of the existing permitted site. The green barrier washes over the permitted site and the appeal Inspector considered that '… the scheme has limited consequences for the open character and appearance of the green barrier and its purposes'. In this context the remodelling and intensification of the site is not considered to have a negative impact on openness of the green barrier. The existing permitted site already has 5 separate pitches which are generously proportioned and where each has its own vehicular access. Each pitch will be split into two pitches on either side of the access. Although there will be an increase in the amount of built development this is not considered to be of the scale that will harm the openness of the green barrier nor undermine its purpose given the clear physical boundaries and the opportunities presented by an improved layout and landscaping measures, as well as the backdrop of the site when viewed from across the extent of the green barrier from the north, which is the elevated alignment of the A55(T) trunk road. Riverside, Queensferry In response to this representation it should borne in mind that this

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					is an existing occupied site for Gypsies and Travellers and not a wholly new proposed allocation. In the separate detailed response on HN8.3 it is explained that a Flood Consequences Assessment has been undertaken for the proposed extension. The remaining concern of NRW in respect of the FCA is increased flood risk elsewhere during a tidal breach scenario afforded by raising the development platform but the Councils consultants do not consider that this is a significant issue. Discussions are on-going in respect of establishing whether compensatory mitigation can be provided on any adjacent Council owned land. It is not considered that there is an insurmountable constraint to the development of this extension. Magazine Lane The site lies within the 250m buffer zone to the Parrys Quarry Landill Site defined in policy EN20. The extension site is on the edge of the buffer zone and is separated from the landfill site by the A55(T) and by the Gateway to Wales Hotel complex. There is no objection from any statutory undertaker regarding this. As explained above it is now proposed to replace the extension site with a remodelling of the existing permitted site. Only the extreme north western corner of the existing site falls within the buffer zone, amounting to 0.06ha and this is not considered to be an overriding issue in terms of reconfiguring the existing site. The solar farm allocation EN13.2 does not overlap with the transit gypsy site allocation HN8.4. The two sites are separate mapped polygons and there is no overlap except that the vehicular access to the solar farm would also be the vehicular access to the transit site. The solar farm now has planning permission and the transit site is not considered to be in conflict in any way.
1192	HN8: Gypsy and Traveller Sites	Object	Objection to Gypsy traveller site extension Magazine Lane, Ewloe I note the proposal to allow the families living in Magazine to expand their current site into what was the ancient Ewloe Barn Wood. Having experienced and given evidence at the various Public Inquiries into the original site I	Removal of allocation to extend site.	Not accepted. The Council have grouped together and summarised representations made on this HN8.1 Magazine Lane, Ewloe allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Lies adjacent to A55(T) – noise and air pollution:

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			realise the pressure that Flintshire County Council are under to comply with National planning requirements for gypsy and traveller accommodation. However nearly every condition imposed on this site has been breached and far from blending in with the country location it occupies, it now stands out our garishly. The lane as predicted has become almost a 'no go' area. There was a planning stipulation of dog proof fencing which has never materialised or been enforced. The number of caravans is way above stipulations in the original plans and far more people are living on the site than originally permitted. Planning enforcement has been non existent and residents are left with the impression that Council Officials are too intimidated to take any action against gypsies because of their 'ethnic' status. It is noticeable that within the County of Flintshire, the one area that has not embraced diversity and made provision for gypsies is the county town of Mold. Is it not time that a site was set aside in that area where schools, shops, doctors and other facilities are more readily available than locations like this to better integrate the gypsy community into the county? The five families who applied for the original site claimed it was based on need, however one plot has never been occupied and is used for storage or transit purposes, so on what basis is the further extension needed? House dwellers and residents in the village cannot get permission to build yet the gypsy fraternity appear to be a law unto themselves doing what they want then getting permission retrospectively. If a further extension to this site is given the go		Planning permission for the present use of the site for 5 pitches was allowed on appeal following the refusal of application 050463. The Inspector reported that the second reason for refusal regarding pollution was withdrawn by the Council following an addendum report produced by the appellant. In respect of noise the Inspector concluded 'On the balance of probabilities I conclude that the noise from traffic using the A55 would not materially harm the living conditions of the occupiers of the appeal site following the construction of the noise barrier subject to its retention thereafter'. In this context it is not considered that the allocation in the LDP would be likely to be unacceptable in terms of pollution and noise, particularly if similar noise attenuation measures (bund and fencing) are installed or are already in place. Isolated from Community: The site was granted planning permission on appeal and the distance of the site from facilities and services was not a decisive factor. The existing site is 1.3km from the school and 1.8km from the shops and take-aways at the junction of Mold Rd and Holywell Rd. The existing bus stop near the junction of Liverpool Rd and Mold Rd is 1km from the site and provides service 5 between Mold and Ellesmere Port and service x4 between Mold and Chester. Breaches of Planning Permission: The site is closely monitored by Planning Enforcement Officers and is also visited regularly by the Council's Gypsy Traveller Liaison Officer. One pitch never occupied and used only for storage: Some representations point to the site being 'over-used' in terms of the level of caravans, vehicles and residents on each pitch yet other representations claim one pitch is not occupied for residential purposes and is used only for storage. However, the present families on site have expressed a need to the Council to have an extension to the site to accommodate the extended family needs. Expansion of Existing Site: Welsh Government guidance is contained in the guidance document (May 2015) 'Designing Gypsy and Traveller Sites' and there is no specific guidance on the size of a pitch. The guidance specifies in para 3.37 'As a minimum, each pitch should be capable of accommodating an amenity block, a mobile home, touring caravan and parking for two vehicles'. There are guidelines

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			ahead then Flintshire County Council need to get their act together and provide better planning enforcement support to local communities who if they develop a site or extend their house are subjected to rigorous inspection and enforcement procedures.		in respect of the size of parking spaces, the maximum size of a mobile home and separation distances between mobile homes and also between a mobile home and a pitch boundary. The guidance also specified what should be provided within an amenity block and other facilities on site such as hardstanding, electricity and water supply, and drainage arrangements for foul water and surface water. However, the guidance is clear that the 'layout of the pitch will depend on the overall site design'. The approved pitches on the site are rather generously proportioned and there is considered to be scope for a reconfiguration and remodelling of the present site to enable an additional 5 pitches within the existing site boundary. In effect, each existing pitch is capable of being split into two by a central vehicular access and separate accommodation to either side of the access road. In this scenario there is no need for the allocation for the site extension. Previous appeal decisions: This objection is made in the context of seeking an entirely new gypsy traveller residential site within a green barrier elsewhere in the County. The context in relation to the extension of an existing site is different to that of developing a new site as are the respective site contexts and previous planning histories. Visual Impact: The visual impact of the existing site was considered as part of the first appeal decision and revisited as part of the second appeal decision. Deliverability and viability: Following the publication of the deposit Plan, the Council is now aware that the preference from the site owners is to increase the capacity of the site by reconfiguring the existing site within the red line of the present permission, and that this is in preference to the costs and viability of extending the site and required infrastructure into the extension land proposed in the deposit LDP. This has the potential to increase the certainty of delivery of more pitches at this location in a more viable and sustainable way than that proposed in the deposit LDP, thereby negating the need for the proposed site extension. Justification for expansion / Impact on Community: The Council has a statutory duty under the Housing Act to meet

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					the needs for gypsy and traveller accommodation in the County, and has a general need for pitches identified in its approved GTAA. There is an expressed need from the present families on site for additional accommodation for their extended families that would contribute to meeting this need. Provision for site in Mold: Mold is not considered to be close to established traveller routes. No sites have been identified or suggested in Mold and furthermore no need has been identified for a site in Mold from the traveller community. Impact on green barrier: The site sits on the very southern edge of the green barrier, located between the A55(T) and Magazine Lane within the green barrier which sits between the settlements of Ewloe, Northop Hall, Connah's Quay and Shotton / Aston. In the first appeal decision the Inspector considered that a gypsy site was inappropriate development. In para 92 the Inspector noted 'In this case I have found that the open character and appearance of the green barrier would be adversely affected, but to a limited extent. It would also make a marginal contribution to the coalescence of settlements as well as encroach into the countryside, another of the purposes of the green barrier'. In terms of the impact on the rural character and appearance the Inspector noted '…gypsy sites are acceptable in principle in rural locations and will inevitably have some impact on their surroundings. In this case that impact would not be unacceptable'. The Inspector's concluding comments were that 'For the reasons I have given, that harm is principally by way of inappropriateness. Otherwise the scheme has limited consequences for the open character and appearance of the green barrier and its purposes'. It is therefore evident that the impact of the existing site was considered by the Inspector to be limited in terms of green barrier and the character and appearance of open countryside. The extension site has natural screening to both Magazine Lane and the A55(T) and also on its western boundary. It is a physically well defined site and considered to represent logical extension to the site. It is clear that the extension site has a completely different character to the large linear field to the west.

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					It is quite usual for green barrier designations in Flintshire to 'wash over' small scale built development in open countryside and this is the case with the existing site. In a similar manner to the Inspectors considerations, the Council does not consider that the proposed modest physical extension of the site would have such an impact on the purpose and openness of the green barrier, nor on the character and appearance of open countryside. However, as outlined above, an alternative approach has been tabled which involves the intensification of the existing site be the conversion of each pitch into separate pitches. This will inevitably involve an intensification of development within the existing site boundaries, but will remove the need for a physical extension of the site. The proposal would also involve less additional pitches with 5 new pitched rather than the 6-8 envisaged in the Deposit Plan. In conclusion, the proposed extension represents a modest physical extension of the existing consented and developed site which, despite its location within a green barrier, will not have an unacceptable impact on openness on the green barrier or the character and appearance of open countryside. The Inspector though is requested to consider the appropriateness of an intensification of the existing site, to provide an additional 5 pitches, and to remove the extension allocation.
1215	HN8: Gypsy and Traveller Sites	Object	Objects to sites HN8-1 (magazine Lane, Ewloe), HN8-2 (Gwern Lane, Hope) and HN8-3 (Riverside, Queensferry) as they do not comply with the requirements set out in Circular 005/2018 and in the criteria set out in the existing UDP (HSG14) and in the Deposit LDP (HN9). In particular HN8-3 is located on contaminated land, is in a C1 flood risk area, is adjacent to a major sewage works and is severed from local services by a principle main trunk road linking North Wales and the North West of England which is scheduled for upgrading. Detailed objection provided in the attached document. Proposes an alternative allocation at Bryn y Baal, Mynydd Isa.		Not accepted. The Council have grouped together and summarised representations made on this HN8.1 Magazine Lane, Ewloe allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Lies adjacent to A55(T) – noise and air pollution: Planning permission for the present use of the site for 5 pitches was allowed on appeal following the refusal of application 050463. The Inspector reported that the second reason for refusal regarding pollution was withdrawn by the Council following an addendum report produced by the appellant. In respect of noise the Inspector concluded 'On the balance of probabilities I conclude that the noise from traffic using the A55 would not materially harm the living conditions of the occupiers of the appeal site following the construction of the noise barrier subject to its retention

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					thereafter'. In this context it is not considered that the allocation in the LDP would be likely to be unacceptable in terms of pollution and noise, particularly if similar noise attenuation measures (bund and fencing) are installed or are already in place. Isolated from Community: The site was granted planning permission on appeal and the distance of the site from facilities and services was not a decisive factor. The existing site is 1.3km from the school and 1.8km from the shops and take-aways at the junction of Mold Rd and Holywell Rd. The existing bus stop near the junction of Liverpool Rd and Mold Rd is 1km from the site and provides service 5 between Mold and Ellesmere Port and service x4 between Mold and Chester. Breaches of Planning Permission: The site is closely monitored by Planning Enforcement Officers and is also visited regularly by the Council's Gypsy Traveller Liaison Officer. One pitch never occupied and used only for storage: Some representations point to the site being 'over-used' in terms of the level of caravans, vehicles and residents on each pitch yet other representations claim one pitch is not occupied for residential purposes and is used only for storage. However, the present families on site have expressed a need to the Council to have an extension to the site to accommodate the extended family needs. Expansion of Existing Site: Welsh Government guidance is contained in the guidance document (May 2015) 'Designing Gypsy and Traveller Sites' and there is no specific guidance on the size of a pitch. The guidance specifies in para 3.37 'As a minimum, each pitch should be capable of accommodating an amenity block, a mobile home, touring caravan and parking for two vehicles'. There are guidelines in respect of the size of parking spaces, the maximum size of a mobile home and separation distances between mobile homes and also between a mobile home and a pitch boundary. The guidance also specified what should be provided within an amenity block and other facilities on site such as hardstanding, electricity and water supply, and drainage arrangements for foul water and surface water. However, the guidance is clear that the 'layout of the pitch will depend on the overall site design'. The approved pitches on the site are rather generously

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					proportioned and there is considered to be scope for a reconfiguration and remodelling of the present site to enable an additional 5 pitches within the existing site boundary. In effect, each existing pitch is capable of being split into two by a central vehicular access and separate accommodation to either side of the access road. In this scenario there is no need for the allocation for the site extension. Previous appeal decisions: This objection is made in the context of seeking an entirely new gypsy traveller residential site within a green barrier elsewhere in the County. The context in relation to the extension of an existing site is different to that of developing a new site as are the respective site contexts and previous planning histories. Visual Impact: The visual impact of the existing site was considered as part of the first appeal decision and revisited as part of the second appeal decision. Deliverability and viability: Following the publication of the deposit Plan, the Council is now aware that the preference from the site owners is to increase the capacity of the site by reconfiguring the existing site within the red line of the present permission, and that this is in preference to the costs and viability of extending the site and required infrastructure into the extension land proposed in the deposit LDP. This has the potential to increase the certainty of delivery of more pitches at this location in a more viable and sustainable way than that proposed in the deposit LDP, thereby negating the need for the proposed site extension. Justification for expansion / Impact on Community: The Council has a statutory duty under the Housing Act to meet the needs for gypsy and traveller accommodation in the County, and has a general need for pitches identified in its approved GTAA. There is an expressed need from the present families on site for additional accommodation for their extended families that would contribute to meeting this need. Provision for site in Mold: Mold is not considered to be close to established traveller routes. No sites have been identified or suggested in Mold and

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					furthermore no need has been identified for a site in Mold from the traveller community. Impact on green barrier: The site sits on the very southern edge of the green barrier, located between the A55(T) and Magazine Lane within the green barrier which sits between the settlements of Ewloe, Northop Hall, Connah's Quay and Shotton / Aston. In the first appeal decision the Inspector considered that a gypsy site was inappropriate development. In para 92 the Inspector noted 'In this case I have found that the open character and appearance of the green barrier would be adversely affected, but to a limited extent. It would also make a marginal contribution to the coalescence of settlements as well as encroach into the countryside, another of the purposes of the green barrier'. In terms of the impact on the rural character and appearance the Inspector noted '…gypsy sites are acceptable in principle in rural locations and will inevitably have some impact on their surroundings. In this case that impact would not be unacceptable'. The Inspector's concluding comments were that 'For the reasons I have given, that harm is principally by way of inappropriateness. Otherwise the scheme has limited consequences for the open character and appearance of the green barrier and its purposes'. It is therefore evident that the impact of the existing site was considered by the Inspector to be limited in terms of green barrier and the character and appearance of open countryside. The extension site has natural screening to both Magazine Lane and the A55(T) and also on its western boundary. It is a physically well defined site and considered to represent logical extension to the site. It is clear that the extension site has a completely different character to the large linear field to the west. It is quite usual for green barrier designations in Flintshire to 'wash over' small scale built development in open countryside and this is the case with the existing site. In a similar manner to the Inspectors considerations, the Council does not consider that the proposed modest physical extension of the site would have such an impact on the purpose and openness of the green barrier, nor on the character and appearance of open countryside. However, as outlined above, an alternative approach has been tabled which involves the intensification of the existing site be the

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					conversion of each pitch into separate pitches. This will inevitably involve an intensification of development within the existing site boundaries, but will remove the need for a physical extension of the site. The proposal would also involve less additional pitches with 5 new pitched rather than the 6-8 envisaged in the Deposit Plan. In conclusion, the proposed extension represents a modest physical extension of the existing consented and developed site which, despite its location within a green barrier, will not have an unacceptable impact on openness on the green barrier or the character and appearance of open countryside. The Inspector though is requested to consider the appropriateness of an intensification of the existing site, to provide an additional 5 pitches, and to remove the extension allocation.
1217	HN8: Gypsy and Traveller Sites	Object	Objects to sites HN8-1 (magazine Lane, Ewloe), HN8-2 (Gwern Lane, Hope) and HN8-3 (Riverside, Queensferry) as they do not comply with the requirements set out in Circular 005/2018 and in the criteria set out in the existing UDP (HSG14) and in the Deposit LDP (HN9). In particular HN8-3 is located on contaminated land, is in a C1 flood risk area, is adjacent to a major sewage works and is severed from local services by a principle main trunk road linking North Wales and the North West of England which is scheduled for upgrading. Detailed objection provided in the attached document. Proposes an alternative allocation at Bryn y Baal, Mynydd Isa.		Not accepted. The Council have grouped together and summarised representations made on this HN8.3 Riverside, Queensferry allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Poor integration with community: The site is an existing long standing and successfully run Council owned site. The rebuilding of the adjacent bridge over the R.Dee by Welsh Government will require additional land on the south side of the A494(T) which will impact further on the already substandard vehicular access from the existing site onto the A494(T). This has led to a new vehicular access being proposed along an existing track from Chemistry lane to the south of the site that will be provided by Welsh Government. In addition there is vacant land to the south of the existing traveller site. This provides the opportunity for a remodelling of the existing site, and extension to the site and a new and improved vehicular access. The site is located at the heart of the Deeside area, close to a large number of settlements and their associated services and facilities. The new access will improve the links between the site and the existing community at Pentre, Sandycroft and Queensferry, rather than the existing access which is straight out on to the A494(T). A planning application for a Coop convenience store at Queensferry Industrial Estate which, if approved, will be

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					within walking distance of the site. There is presently a public right of way along the R Dee along the northern edge of the existing traveller site. This route will be retained and enhanced as part of the bridge rebuilding works and will ensure improved links with Queensferry and Garden City. The site is not divorced from the wider community. The site will be accessed by a new road from the south from the junction of Chemistry Lane and Factory Lane. The Highways Development Management Officer comments 'The use of Chemistry Lane by large vehicles is limited by the clearance under the rail bridge; alternative access via Factory Road is available. The two roads provide the only vehicular access to the Queensferry Industrial Estate; the additional traffic impact resulting from revised access to the Residential Site is unlikely to be significant'. Archaeology: This is a detailed matter that can be addressed as part of working up a planning application. Housing Strategy have contacted CPAT to establish how this can best be dealt with. Contaminated Land When the former chemical works was demolished a land remediation programme was undertaken by FCC. A number of technical reports were produced in 1990/91 and 2012 and these were reviewed by Arcadis in 2018 in order to inform the development of the site extension. Arcadis concluded that: • no further investigation work is necessary to assess risk to human health from potential CoC at the Site. • Mitigation measures within the construction design for permanent buildings and transient utility 'hook up' points are recommended to reduce risk to site users. • Risk assessment by Smith Grant assumes that the redevelopment design includes total hardstanding coverage. Additional assessment of risk to human health may be appropriate if the final redevelopment design includes areas of soft standing. • Protective measures to ensure integrity of water pipes may be appropriate if the construction design requires pipes to be places below or close to the base of the capping layer. In the light of these findings the broader principle of a residential use is considered acceptable and that the remaining technical

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					matters can be satisfactorily resolved at development management stage. Proximity to industry / sewage works: The Pentre and Sandycroft area has a mix of industrial estates and residential properties in close proximity to each other. The site falls within a 1000m consultation zone for the Owens-Corning Building Products site where NRW will need to be consulted and the south east corner of the site falls within the 500m consultation zone of the J Reid Trading site where NRW will need to be consulted. However, following consultation on the Plan, NRW have not objected to this proposal in terms of proximity to industrial operations. No objection has been received from Welsh Water in terms of proximity to Waste Water Treatment Works. Flood Risk: The site is located within a C1 flood risk zone based on the NRW Development Advice Map. A Flood Consequences Assessment undertaken by Weetwood for the site has demonstrated that the proposed development may be completed in accordance with the requirements of planning policy subject to the following: • Development platform level to be set at a minimum of 7.24 m AOD • Finished floor levels to be set 0.15 m above the development platform level • Flood Plan to be developed in consultation with Flintshire County Council • The detailed drainage design to be submitted to and approved by the local planning authority prior to the commencement of development NRW have considered the FCA and their comments appear to amount to a single concern which is increased flood risk elsewhere during a tidal breach scenario afforded by raising the development platform. Weetwood state that the increase flood risk elsewhere is explained in section 5.3 of the FCA and concludes that the 10-35mm increases are not significant owing to those areas already flooding to considerable depths up to 1.4m. Weetwood consider that this is similar to many other sites assessed within the River Dee floodplain. Given the nature of flooding in tidal breach scenarios, it is extremely difficult to feasibly mitigate increased flood risk elsewhere to show “no detriment”, which would likely

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					involve significantly scaling back the proposed development and allocating a portion of land specifically as compensatory flood storage – all for very little benefit given that flood risk elsewhere is hardly changing. Work is progressing in order to resolve this NRW concern in terms of identifying whether there is any adjoining Council owned land that could be utilised as mitigation for any flood water displaced as a result of the raised platform on the extension site. Vehicle Emissions: It is acknowledged that the existing and proposed site is in close proximity to the A494(T). However, there will be a betterment on the existing situation in that the site will not be dependent on the A494(T) for vehicular access and that, as part of the bridge rebuilding proposals there existing scope for structural landscaping and noise attenuation measures.
69	HN8: Gypsy and Traveller Sites	Support	However the proposed site at HN8.3 overlies the remains of the Queensferry Chemical works (https://www.archwilio.org.uk/arch/query/page.php?prn=CPAT103918&dbname=cpat&tbname=CORE) which may require e=assessment prior to development.		Noted. The Council have grouped together and summarised representations made on this HN8.3 Riverside, Queensferry allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Poor integration with community: The site is an existing long standing and successfully run Council owned site. The rebuilding of the adjacent bridge over the R.Dee by Welsh Government will require additional land on the south side of the A494(T) which will impact further on the already substandard vehicular access from the existing site onto the A494(T). This has led to a new vehicular access being proposed along an existing track from Chemistry lane to the south of the site that will be provided by Welsh Government. In addition there is vacant land to the south of the existing traveller site. This provides the opportunity for a remodelling of the existing site, and extension to the site and a new and improved vehicular access. The site is located at the heart of the Deeside area, close to a large number of settlements and their associated services and facilities. The new access will improve the links between the site and the existing community at Pentre, Sandycroft and Queensferry, rather than the existing access which is straight out on to the A494(T). A planning application for a Coop convenience

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					store at Queensferry Industrial Estate which, if approved, will be within walking distance of the site. There is presently a public right of way along the R Dee along the northern edge of the existing traveller site. This route will be retained and enhanced as part of the bridge rebuilding works and will ensure improved links with Queensferry and Garden City. The site is not divorced from the wider community. The site will be accessed by a new road from the south from the junction of Chemistry Lane and Factory Lane. The Highways Development Management Officer comments 'The use of Chemistry Lane by large vehicles is limited by the clearance under the rail bridge; alternative access via Factory Road is available. The two roads provide the only vehicular access to the Queensferry Industrial Estate; the additional traffic impact resulting from revised access to the Residential Site is unlikely to be significant'. Archaeology: This is a detailed matter that can be addressed as part of working up a planning application. Housing Strategy have contacted CPAT to establish how this can best be dealt with. Contaminated Land When the former chemical works was demolished a land remediation programme was undertaken by FCC. A number of technical reports were produced in 1990/91 and 2012 and these were reviewed by Arcadis in 2018 in order to inform the development of the site extension. Arcadis concluded that: • no further investigation work is necessary to assess risk to human health from potential CoC at the Site. • Mitigation measures within the construction design for permanent buildings and transient utility 'hook up' points are recommended to reduce risk to site users. • Risk assessment by Smith Grant assumes that the redevelopment design includes total hardstanding coverage. Additional assessment of risk to human health may be appropriate if the final redevelopment design includes areas of soft standing. • Protective measures to ensure integrity of water pipes may be appropriate if the construction design requires pipes to be places below or close to the base of the capping layer. In the light of these findings the broader principle of a residential

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					use is considered acceptable and that the remaining technical matters can be satisfactorily resolved at development management stage. Proximity to industry / sewage works: The Pentre and Sandycroft area has a mix of industrial estates and residential properties in close proximity to each other. The site falls within a 1000m consultation zone for the Owens-Corning Building Products site where NRW will need to be consulted and the south east corner of the site falls within the 500m consultation zone of the J Reid Trading site where NRW will need to be consulted. However, following consultation on the Plan, NRW have not objected to this proposal in terms of proximity to industrial operations. No objection has been received from Welsh Water in terms of proximity to Waste Water Treatment Works. Flood Risk: The site is located within a C1 flood risk zone based on the NRW Development Advice Map. A Flood Consequences Assessment undertaken by Weetwood for the site has demonstrated that the proposed development may be completed in accordance with the requirements of planning policy subject to the following: • Development platform level to be set at a minimum of 7.24 m AOD • Finished floor levels to be set 0.15 m above the development platform level • Flood Plan to be developed in consultation with Flintshire County Council • The detailed drainage design to be submitted to and approved by the local planning authority prior to the commencement of development NRW have considered the FCA and their comments appear to amount to a single concern which is increased flood risk elsewhere during a tidal breach scenario afforded by raising the development platform. Weetwood state that the increase flood risk elsewhere is explained in section 5.3 of the FCA and concludes that the 10-35mm increases are not significant owing to those areas already flooding to considerable depths up to 1.4m. Weetwood consider that this is similar to many other sites assessed within the River Dee floodplain. Given the nature of flooding in tidal breach scenarios, it is extremely difficult to feasibly mitigate increased

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					flood risk elsewhere to show “no detriment”, which would likely involve significantly scaling back the proposed development and allocating a portion of land specifically as compensatory flood storage – all for very little benefit given that flood risk elsewhere is hardly changing. Work is progressing in order to resolve this NRW concern in terms of identifying whether there is any adjoining Council owned land that could be utilised as mitigation for any flood water displaced as a result of the raised platform on the extension site. Vehicle Emissions: It is acknowledged that the existing and proposed site is in close proximity to the A494(T). However, there will be a betterment on the existing situation in that the site will not be dependent on the A494(T) for vehicular access and that, as part of the bridge rebuilding proposals there existing scope for structural landscaping and noise attenuation measures.
665	HN8: Gypsy and Traveller Sites	Support	Policy HN8: Gypsy and Traveller Sites 1. HN8-1, Magazine Lane, Ewloe • This site has planning permission and we have no further comment to make. Welsh Water made representations on this site through planning application 050463.		Noted.
1028	HN8: Gypsy and Traveller Sites	Support	Gypsy and Travellers The Council supports that the LDP contains allocations to meet Flintshire’s permanent need for gypsies and travellers.		Noted. The Council have grouped together and summarised representations made on this allocated site and prepared one response covering all points made in support and in objection to the site. Therefore the following response may cover additional issues to those raised by the objector. Lies adjacent to A55(T) – noise and air pollution: Planning permission for the present use of the site for 5 pitches was allowed on appeal following the refusal of application 050463. The Inspector reported that the second reason for refusal regarding pollution was withdrawn by the Council following an addendum report produced by the appellant. In respect of noise the Inspector concluded ‘On the balance of probabilities I conclude that the noise from traffic using the A55 would not materially harm the living conditions of the occupiers of the appeal site following the construction of the noise barrier subject to its retention thereafter’. In this context it is not considered that the allocation in

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					the LDP would be likely to be unacceptable in terms of pollution and noise, particularly if similar noise attenuation measures (bund and fencing) are installed or are already in place. Isolated from Community: The site was granted planning permission on appeal and the distance of the site from facilities and services was not a decisive factor. The existing site is 1.3km from the school and 1.8km from the shops and take-aways at the junction of Mold Rd and Holywell Rd. The existing bus stop near the junction of Liverpool Rd and Mold Rd is 1km from the site and provides service 5 between Mold and Ellesmere Port and service x4 between Mold and Chester. Breaches of Planning Permission: The site is closely monitored by Planning Enforcement Officers and is also visited regularly by the Council's Gypsy Traveller Liaison Officer. One pitch never occupied and used only for storage: Some representations point to the site being 'over-used' in terms of the level of caravans, vehicles and residents on each pitch yet other representations claim one pitch is not occupied for residential purposes and is used only for storage. However, the present families on site have expressed a need to the Council to have an extension to the site to accommodate the extended family needs. Expansion of Existing Site: Welsh Government guidance is contained in the guidance document (May 2015) 'Designing Gypsy and Traveller Sites' and there is no specific guidance on the size of a pitch. The guidance specifies in para 3.37 'As a minimum, each pitch should be capable of accommodating an amenity block, a mobile home, touring caravan and parking for two vehicles'. There are guidelines in respect of the size of parking spaces, the maximum size of a mobile home and separation distances between mobile homes and also between a mobile home and a pitch boundary. The guidance also specified what should be provided within an amenity block and other facilities on site such as hardstanding, electricity and water supply, and drainage arrangements for foul water and surface water. However, the guidance is clear that the 'layout of the pitch will depend on the overall site design'. The approved pitches on the site are rather generously proportioned and there is considered to be scope for a

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					reconfiguration and remodelling of the present site to enable an additional 5 pitches within the existing site boundary. In effect, each existing pitch is capable of being split into two by a central vehicular access and separate accommodation to either side of the access road. In this scenario there is no need for the allocation for the site extension. Previous appeal decisions: This objection is made in the context of seeking an entirely new gypsy traveller residential site within a green barrier elsewhere in the County. The context in relation to the extension of an existing site is different to that of developing a new site as are the respective site contexts and previous planning histories. Visual Impact: The visual impact of the existing site was considered as part of the first appeal decision and revisited as part of the second appeal decision. Deliverability and viability: Following the publication of the deposit Plan, the Council is now aware that the preference from the site owners is to increase the capacity of the site by reconfiguring the existing site within the red line of the present permission, and that this is in preference to the costs and viability of extending the site and required infrastructure into the extension land proposed in the deposit LDP. This has the potential to increase the certainty of delivery of more pitches at this location in a more viable and sustainable way than that proposed in the deposit LDP, thereby negating the need for the proposed site extension. Justification for expansion / Impact on Community: The Council has a statutory duty under the Housing Act to meet the needs for gypsy and traveller accommodation in the County, and has a general need for pitches identified in its approved GTAA. There is an expressed need from the present families on site for additional accommodation for their extended families that would contribute to meeting this need. Provision for site in Mold: Mold is not considered to be close to established traveller routes. No sites have been identified or suggested in Mold and furthermore no need has been identified for a site in Mold from the

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					traveller community. Impact on green barrier: The site sits on the very southern edge of the green barrier, located between the A55(T) and Magazine Lane within the green barrier which sits between the settlements of Ewloe, Northop Hall, Connah's Quay and Shotton / Aston. In the first appeal decision the Inspector considered that a gypsy site was inappropriate development. In para 92 the Inspector noted 'In this case I have found that the open character and appearance of the green barrier would be adversely affected, but to a limited extent. It would also make a marginal contribution to the coalescence of settlements as well as encroach into the countryside, another of the purposes of the green barrier'. In terms of the impact on the rural character and appearance the Inspector noted '…gypsy sites are acceptable in principle in rural locations and will inevitably have some impact on their surroundings. In this case that impact would not be unacceptable'. The Inspector's concluding comments were that 'For the reasons I have given, that harm is principally by way of inappropriateness. Otherwise the scheme has limited consequences for the open character and appearance of the green barrier and its purposes'. It is therefore evident that the impact of the existing site was considered by the Inspector to be limited in terms of green barrier and the character and appearance of open countryside. The extension site has natural screening to both Magazine Lane and the A55(T) and also on its western boundary. It is a physically well defined site and considered to represent logical extension to the site. It is clear that the extension site has a completely different character to the large linear field to the west. It is quite usual for green barrier designations in Flintshire to 'wash over' small scale built development in open countryside and this is the case with the existing site. In a similar manner to the Inspectors considerations, the Council does not consider that the proposed modest physical extension of the site would have such an impact on the purpose and openness of the green barrier, nor on the character and appearance of open countryside. However, as outlined above, an alternative approach has been tabled which involves the intensification of the existing site be the conversion of each pitch into separate pitches. This will inevitably

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					involve an intensification of development within the existing site boundaries, but will remove the need for a physical extension of the site. The proposal would also involve less additional pitches with 5 new pitched rather than the 6-8 envisaged in the Deposit Plan. In conclusion, the proposed extension represents a modest physical extension of the existing consented and developed site which, despite its location within a green barrier, will not have an unacceptable impact on openness on the green barrier or the character and appearance of open countryside. The Inspector though is requested to consider the appropriateness of an intensification of the existing site, to provide an additional 5 pitches, and to remove the extension allocation.
1220	HN8: Gypsy and Traveller Sites	Support	Gypsy and Travellers The Council supports that the LDP contains allocations to meet Flintshire's permanent need for gypsies and travellers.		Support noted
1234	HN8: Gypsy and Traveller Sites	Support	4. HN8-4, Castle Park Industrial Estate, Flint • A water supply can be provided for this site. • The public sewerage network can accept potential foul flows from this development site. • Flint Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site.		Noted.
1222	HN8: Gypsy and Traveller Sites	Support	Gypsy and Travellers The Council supports that the LDP contains allocations to meet Flintshire's permanent need for gypsies and travellers.		support noted.
1223	HN8: Gypsy and Traveller Sites	Support	Gypsy and Travellers The Council supports that the LDP contains allocations to meet Flintshire's permanent need for gypsies and travellers.		support noted.

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1231	HN8: Gypsy and Traveller Sites	Support	2. HN8-2, Gwern Lane, Cae Estyn, Hope • Welsh Water does not supply water to this area. • The public sewerage network can accept potential foul flows from this development site. • Hope Wastewater Treatment Works (WwTW) can accommodate the foul flows from the proposed development site		Noted.
1233	HN8: Gypsy and Traveller Sites	Support	3. HN8-3, Riverside, Queensferry • A water supply can be provided for this site. • The public sewerage network can accept potential foul flows from this development site. • The proposed growth being promoted for the Queensferry Wastewater Treatment Works (WwTW) catchment would require improvements which would need to be funded through our Asset Management Plan (AMP) or potentially earlier through developer contributions. • The site is located in close proximity to Queensferry WwTW and the LPA may wish to contact their Environmental Health Department for their views on whether there is the potential for odour nuisance on the proposed allocation.		Noted.

Policy HN9

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
240	HN9: Gypsy and Traveller Accommodation	Support	Policy HN9 – Gypsy and Traveller Accommodation: The equivalent policy in the adopted Denbighshire LDP (Policy BSC10) places restrictions on such development within the AONB. In the interests of cross boundary consistency in the AONB, the committee would suggest that a similar safeguard is included within policy HN9		Noted. The Plan should be read as a whole and any development proposals arising in the AONB would need to be assessed against policy EN5 regarding the AONB and EN4 landscape character as well as other relevant policies. These provide a policy framework with which to assess any gypsy or traveller site proposals which may arise in the AONB. The Council also has a statutory duty under the Countryside and Rights of Way Act to have regard to the purpose of AONB's in exercising or performing any functions in relation to so as to affect land in these areas. In this context, it is not necessary for the AONB to be specifically addressed in numerous policies. Rather, proposals can be assessed on their merits against the Plan as a whole alongside national planning guidance.
840	HN9: Gypsy and Traveller Accommodation	Object	Policy HN9 (Gypsy and Traveller Accommodation) Bourne Leisure recognises the need to and the importance of securing suitable sites for Gypsy and Traveller communities in Flintshire. Welsh Government Circular 005/2018 on Planning for Gypsy, Traveller and Showpeople recognises that in creating policies and determining planning applications there is a need to consider how such sites operate in order to ensure "the promotion of peaceful and integrated co-existence between the site and the local community" (Paragraph 37).	Policy HN9 of the Deposit Plan should be amended to: "Proposals for new Gypsy and Traveller sites, or the extension of existing sites, including land outside of defined settlement limits will be permitted provided: a. There is a clearly identified unmet	Not accepted. The objector is seeking to add the wording 'Where any adverse impacts cannot be suitably mitigated, planning permission will be refused' at the end of the existing criteria e. However, this policy is not read in isolation and any development proposal for a gypsy / traveller site will also have to be addressed against the Plans framework of policies. The assessment of a proposal against relevant policies will determine whether impacts can be suitably mitigated and it is not necessary for this to be added to the policy nor to add negative wording whereby sites will be refused.

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			Factors for consideration set out in the Circular include the types of use on-site, storage of equipment and materials, vehicle movements, the nature of Pg 11/14 17958241v6 business activity, visual amenity and privacy need to be taken into account for both travelling communities and the local settled community. Suggestions for mitigation are included in the Circular. On this basis, we suggest that a minor amendment to the policy is needed for consistency with national guidance. Policy HN9 of the Deposit Plan should be amended to: "Proposals for new Gypsy and Traveller sites, or the extension of existing sites, including land outside of defined settlement limits will be permitted provided: a. There is a clearly identified unmet need in accordance with the most recently undertaken Gypsy and Traveller Accommodation Assessment; b. There are no suitable alternative sites either with planning permission or allocated for such uses which could accommodate the need; c. The site is well related to suitable community facilities and services for the prospective occupants; d. The site is capable of being served by utilities including sustainable waste disposal and recovery and emergency	need in accordance with the most recently undertaken Gypsy and Traveller Accommodation Assessment; b. There are no suitable alternative sites either with planning permission or allocated for such uses which could accommodate the need; c. The site is well related to suitable community facilities and services for the prospective occupants; d. The site is capable of being served by utilities including sustainable waste disposal and recovery and emergency services; e. The site affords satisfactory amenity standards both for its occupants and for neighbouring	

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			services; e. The site affords satisfactory amenity standards both for its occupants and for neighbouring land uses. Where any adverse impacts cannot be suitably mitigated, planning permission will be refused; f. The site is not in an area at high risk of flooding given the particular vulnerability of caravans." The proposed amendment to draft Policy HN9 would mean that this element of the Plan would satisfy the tests of soundness.	land uses. Where any adverse impacts cannot be suitably mitigated, planning permission will be refused; f. The site is not in an area at high risk of flooding given the particular vulnerability of caravans." The proposed amendment to draft Policy HN9 would mean that this element of the Plan would satisfy the tests of soundness.	
1141	HN9: Gypsy and Traveller Accommodation	Object	Policy HN9 Gypsy and Traveller Accommodation - Criteria Based Policy - Criterion a) and b) and the reasoned justification para 11.37 are contrary to national policy. Annex B in the Circular notes that policy requirements to demonstrate 'unmet need in the Gypsy and Traveller Accommodation Assessment' would act against freedom of movement for Gypsies and Travellers who may wish to develop their own sites. Such restrictions should not be placed on Gypsies and Travellers. The circular is clear that criteria-based policies must	Amendments to policy wording. Criteria Based Policy - Criterion a) and b) and the reasoned justification para 11.37 are contrary to national policy. Annex B in the Circular notes that policy requirements to demonstrate 'unmet need in the Gypsy and Traveller	Accepted. It is accepted that within the context of advice in Annex B of the Circular, criteria a) and b) are inappropriate and part of the explanatory text in para 11.37 is also inappropriate. The Council would have no objection to the Inspector recommending the following changes to the Plan if the Inspector considers that they will ensure Policy HN9 is in conformity with PPW and supporting guidance: • Delete criteria a) • Delete criteria b) • Renumber criteria • Amend para 11.37 as follows: 'Despite provision being made in the Plan through allocations, there may be development proposals for Gypsy and Traveller sites submitted during the Plan period,

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			be fair, reasonable, realistic and effective in delivering sites and must not rule out or place undue constraints on the development of Gypsy and Traveller sites (paragraph 49). The reasoned justification (paragraph 11.38) states “Sites should be located on or close to main travelling routes for ease of access”. This would be more applicable to transit sites rather than those of a permanent nature.	Accommodation Assessment’ would act against freedom of movement for Gypsies and Travellers who may wish to develop their own sites. Such restrictions should not be placed on Gypsies and Travellers.	particularly in order to meet a specific need. This policy takes the form of a criteria based policy for assessing such proposals and should be read alongside the Plan’s framework of policies. It will be necessary for each applicant to demonstrate that there is a specific need which cannot be met on existing sites or sites with planning permission.’

Development Management Policies - Meeting Housing Needs - General

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
130	Development Management Policies - Meeting Housing Needs		Would FCC consider Ty Gwyn, The Catch, Halkyn for the Local Development plan		Not accepted. The site does not comply with the Preferred Strategy as Halkyn is a tier 5 Undefined Village which does not have a settlement boundary and where no new allocations will be made. The site was put forward as an omission site in the UDP but the Inspector did not see Halkyn as being a sustainable location to accommodate development. The Inspector commented ”Halkyn is a category C settlement with few facilities. It is a location where I recommend growth in general should be restricted to local needs only. Growth so far within the settlement has amounted to 6% and if the objection site were to be allocated and/or included within the settlement boundary it would potentially yield a further 25%. I consider this would be unacceptable and contrary to the plan’s sustainable principles which seek to concentrate growth in the larger settlements where there is better access to a wider range of services and facilities”. This has been reaffirmed by the work associated with the Settlement Audits carried out to inform the development of the LDP settlement hierarchy, whereby Halkyn is not considered to be a sustainable location as a result of its location, small size, scattered pattern of development and lack of facilities and services. The proposed site is located on greenfield land and is located in close proximity to Halkyn Mountain SAC and Halkyn Common and Holywell Grasslands SSSI. At 1.6ha in size it would result in a scale of development that would be out of proportion with the

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					scale, character and role of the settlement. Development would harm the character of the locality. The designation of Halkyn as a Tier 5 settlement does not mean that no development can take place over the Plan period. New development which provides for local needs based affordable housing can take place in line with policy STR2, provided that it represents sensitive small scale housing in the form of infill or rounding off. The proposed site is clearly out of step with the policy approach. In conclusion the proposal does not comply with the Preferred Strategy in terms of the position of Halkyn in the settlement hierarchy. The site would result in a level of growth that would be unsustainable and harm the character and appearance of the locality.

Development Management Policies - Valuing the Environment - General

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
539	Development Management Policies - Valuing the Environment		I write following receipt of your letter dated 19th September notifying the Maritime & Coastguard Agency of your public consultation on the Flintshire County Council Local Development Plan. The MCA's Navigation Safety Branch act as primary consultees to Natural Resources Wales for marine licence applications under the Marine & Coastal Access Act 2009; namely for works below the Mean High Water Springs, to consider potential hazards to the safety of navigation and marine users, including HM Coastguard and other Search & Rescue assets. Following consideration we then typically propose suitable mitigation measures to be added to the licence through conditions and advisories. We would expect any works detailed in your LDP below the Mean High Water Springs to require a marine licence on an individual basis. MCA are therefore content not to submit substantive comment at this time, and will respond on a case by case basis to any relevant works through the marine licence system via Natural Resources Wales. We can therefore safely be discounted from further consultation specific to the LDP.		The comments are noted. The LDP does not propose works below the Mean High Water Mark.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
686	Development Management Policies - Valuing the Environment	Object	We request the addition of a new policy known as “Locations for Transmission Connected Energy Generation and Storage Facilities” to provide support for such developments at suitable locations in employment areas where there is an established energy use or existing transmission infrastructure. While such projects may require consent from the Welsh Ministers or the Secretary of State it is considered relevant for the Local Plan to demonstrate preferred locations for such facilities, given their particular locational requirements, their contribution to the concentration of manufacturing skills in Flintshire, and their role in supporting wider energy needs. We suggest the following wording: ENxx: Locations for Transmission Connected Energy Generation and Storage Facilities “Proposals for energy generation and storage facilities that require a connection to national transmission systems will generally be permitted on allocated employment sites in locations where existing connection infrastructure is situated or an energy use is already established. Sites which are considered to be suitable in principle for energy generation and storage facilities include: • Former Deeside Power Station site, South of Flintshire Bridge, Connah’s Quay; • (…)” Accompanying text could explain the need for these this type of development in wider policy, and recognise that they require large sites, and may have visual impacts due to the scale of the structures required, but otherwise have low impacts on neighbouring uses or		Not accepted. The objection lacks any detail on the nature of such proposals nor technical evidence to demonstrate that the Connah’s Quay Power Station (and other unspecified sites throughout the County) might be suitable for the proposed (unspecified) use or development. The objector already recognises that such development proposals may fall outside the scope of the LPA as they constitute major infrastructure projects. The Plan should only include site specific proposals where there is evidence that the proposed development is viable, deliverable and sustainable and this is clearly not the case. It would be inappropriate for the Plan to include the policy wording proposed by the objector .

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			existing communities, particularly when located on larger, established, sites with transmission connections in place. We also request the following minor changes be made to other policies: STR7 and STR14.		
932	Development Management Policies - Valuing the Environment	Object	Para 9.5 is almost the only place in the LDP where mention is made of protecting high quality agricultural land; yet despite this and the fact PPW10 places significant weight on BMV the LDP is devoid of any policy and makes no mention of any assessment of how this might have influenced housing site selection.		Not accepted. It is unclear what para 9.5 the objector is referring to. Para 9.5 of the written statement is part of the explanatory text to policy PC2 'General Requirements for Development' and is not relevant to agricultural land The objector recognises that the protection of Best and Most Versatile Agricultural Land is clearly and fully set out in paras 3.54-3.55 of PPW10. It is not necessary or desirable for LDP's to slavishly repeat national guidance from PPW10. Indeed, para 3.11 of Development Plan Manual 3 states 'An LDP should not repeat national policy. Plans should not be a compendium of policies to cover every eventuality'. The adopted LDP will clearly need to be read in the context of LDP. There is no objection from Welsh Government in their representations on the Plan regarding the lack of a policy on agricultural land. The preparation of the LDP has involved close working with Welsh Government in identifying the predicted loss of BMV as part of the assessment of candidate and alternative sites. On all allocations involving the potential loss of BMV an on-site survey has been arranged and results verified by Welsh Government. In identifying

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					allocations the Council has sought to minimize the loss of BMV. The approach is set out in Background Paper 09 which has been supported in principle by Welsh Government.
995	Development Management Policies - Valuing the Environment		Para 9.5 is almost the only place in the LDP where mention is made of protecting high quality agricultural land; yet despite this and the fact PPW10 places significant weight on BMV the LDP is devoid of any policy and makes no mention of any assessment of how this might have influenced housing site selection.		Not accepted. It is unclear what para 9.5 the objector is referring to. Para 9.5 of the written statement is part of the explanatory text to policy PC2 'General Requirements for Development' and is not relevant to agricultural land The objector recognises that the protection of Best and Most Versatile Agricultural Land is clearly and fully set out in paras 3.54-3.55 of PPW10. It is not necessary or desirable for LDP's to slavishly repeat national guidance from PPW10. Indeed, para 3.11 of Development Plan Manual 3 states 'An LDP should not repeat national policy. Plans should not be a compendium of policies to cover every eventuality'. The adopted LDP will clearly need to be read in the context of LDP. There is no objection from Welsh Government in their representations on the Plan regarding the lack of a policy on agricultural land. The preparation of the LDP has involved close working with Welsh Government in identifying the predicted loss of BMV as part of the assessment of candidate and alternative sites. On all allocations involving the potential loss of BMV an on-site survey has been arranged and results verified by Welsh Government. In identifying allocations the Council has sought to minimize the

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					loss of BMV. The approach is set out in Background Paper 09 which has been supported in principle by Welsh Government.
949	Development Management Policies - Valuing the Environment		Para 9.5 is almost the only place in the LDP where mention is made of protecting high quality agricultural land; yet despite this and the fact PPW10 places significant weight on BMV the LDP is devoid of any policy and makes no mention of any assessment of how this might have influenced housing site selection.		Not accepted. It is unclear what para 9.5 the objector is referring to. Para 9.5 of the written statement is part of the explanatory text to policy PC2 'General Requirements for Development' and is not relevant to agricultural land The objector recognises that the protection of Best and Most Versatile Agricultural Land is clearly and fully set out in paras 3.54-3.55 of PPW10. It is not necessary or desirable for LDP's to slavishly repeat national guidance from PPW10. Indeed, para 3.11 of Development Plan Manual 3 states 'An LDP should not repeat national policy. Plans should not be a compendium of policies to cover every eventuality'. The adopted LDP will clearly need to be read in the context of LDP. There is no objection from Welsh Government in their representations on the Plan regarding the lack of a policy on agricultural land. The preparation of the LDP has involved close working with Welsh Government in identifying the predicted loss of BMV as part of the assessment of candidate and alternative sites. On all allocations involving the potential loss of BMV an on-site survey has been arranged and results verified by Welsh Government. In identifying allocations the Council has sought to minimize the loss of BMV. The approach is set out in

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					Background Paper 09 which has been supported in principle by Welsh Government.
964	Development Management Policies - Valuing the Environment		Para 9.5 is almost the only place in the LDP where mention is made of protecting high quality agricultural land; yet despite this and the fact PPW10 places significant weight on BMV the LDP is devoid of any policy and makes no mention of any assessment of how this might have influenced housing site selection.		Not accepted. It is unclear what para 9.5 the objector is referring to. Para 9.5 of the written statement is part of the explanatory text to policy PC2 'General Requirements for Development' and is not relevant to agricultural land The objector recognises that the protection of Best and Most Versatile Agricultural Land is clearly and fully set out in paras 3.54-3.55 of PPW10. It is not necessary or desirable for LDP's to slavishly repeat national guidance from PPW10. Indeed, para 3.11 of Development Plan Manual 3 states 'An LDP should not repeat national policy. Plans should not be a compendium of policies to cover every eventuality'. The adopted LDP will clearly need to be read in the context of LDP. There is no objection from Welsh Government in their representations on the Plan regarding the lack of a policy on agricultural land. The preparation of the LDP has involved close working with Welsh Government in identifying the predicted loss of BMV as part of the assessment of candidate and alternative sites. On all allocations involving the potential loss of BMV an on-site survey has been arranged and results verified by Welsh Government. In identifying allocations the Council has sought to minimize the loss of BMV. The approach is set out in

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					Background Paper 09 which has been supported in principle by Welsh Government.

Policies EN1 to EN27

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
322	EN1: Sports, Recreation and Cultural Facilities	Object	Policy EN1 seeks to protect existing open space, sports and recreation facilities and provide guidance on the Council's approach to new provision which should be provided as a result of new residential developments in the County. In this regard, the Policy specifically states that "All new residential developments will be required to include provision for public open space or sports and recreational facilities in accordance with the Council's adopted standards and be well related to the development it is intended to serve. Where it is not reasonably practical to meet these standards on site or where there is already sufficient provision, a financial contribution will be sought for off-site provision and / or the improvement of existing local provision." The Draft Deposit Plan does not include any prescriptive polices on open space standards and instead relies on the standards of provision set out in section 4 of the SPG. The supporting text to policy EN1 (paragraph 12.3) makes reference to "Further details on Open Space Requirements is set out in a Supplementary Planning Guidance Note". The SPG is still in draft form and only approved for development management purposes but carries less weight than the adopted Supplementary Planning Guidance Notes. The Open Space Requirements SPG has not subject to any public consultation or Council resolution to date and therefore has not been formally adopted by FCC. It is our view that this should be adopted prior to the EiP into the Deposit Local Plan to ensure clarity and certainty of the open space	The SPG is still in draft form and only approved for development management purposes but carries less weight than the adopted Supplementary Planning Guidance Notes. The Open Space Requirements SPG has not subject to any public consultation or Council resolution to date and therefore has not been formally adopted by FCC. It is our view that this should be adopted prior to the EiP into the Deposit Local Plan to ensure clarity and certainty of the open space requirements for future residential developments and that greater detail is provided within the actual policy or the supporting text. In addition, the standards of provision within the draft SPG for developments of over 200 dwellings to provide additional space for adult sized sports pitches (e.g.	Partly accepted. If the inspector thinks that further clarify should be added to Policy EN1 through the inclusion of open space thresholds then the Council would have no objection to this. The Open Space SPG will be updated and consulted on in due course.

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			requirements for future residential developments and that greater detail is provided within the actual policy or the supporting text. In addition, the standards of provision within the draft SPG for developments of over 200 dwellings to provide additional space for adult sized sports pitches (e.g. rugby, football, cricket) with changing facilities and car parking is very onerous on developers and the efficient use of land. Such matters should have the opportunity to be discussed through a formal consultation process.	rugby, football, cricket) with changing facilities and car parking is very onerous on developers and the efficient use of land. Such matters should have the opportunity to be discussed through a formal consultation process.	
323	EN1: Sports, Recreation and Cultural Facilities	Object	Policy EN1 seeks to protect existing open space, sports and recreation facilities and provide guidance on the Council's approach to new provision which should be provided as a result of new residential developments in the County. In this regard, the Policy specifically states that "All new residential developments will be required to include provision for public open space or sports and recreational facilities in accordance with the Council's adopted standards and be well related to the development it is intended to serve. Where it is not reasonably practical to meet these standards on site or where there is already sufficient provision, a financial contribution will be sought for off-site provision and / or the improvement of existing local provision." The Draft Deposit Plan does not include any prescriptive polices on open space standards and instead relies on the standards of provision set out in section 4 of the SPG. The supporting text to policy EN1 (paragraph 12.3) makes reference to "Further details on Open Space Requirements is set out in a Supplementary Planning Guidance Note".	The SPG is still in draft form and only approved for development management purposes but carries less weight than the adopted Supplementary Planning Guidance Notes. The Open Space Requirements SPG has not subject to any public consultation or Council resolution to date and therefore has not been formally adopted by FCC. It is our view that this should be adopted prior to the EiP into the Deposit Local Plan to ensure clarity and certainty of the open space requirements for future residential developments and that greater detail is	Partly accepted. If the inspector thinks that further clarify should be added to Policy EN1 through the inclusion of open space thresholds then the Council would have no objection to this. The Open Space SPG will be updated and consulted on in due course.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			The SPG is still in draft form and only approved for development management purposes but carries less weight than the adopted Supplementary Planning Guidance Notes. The Open Space Requirements SPG has not subject to any public consultation or Council resolution to date and therefore has not been formally adopted by FCC. It is our view that this should be adopted prior to the EiP into the Deposit Local Plan to ensure clarity and certainty of the open space requirements for future residential developments and that greater detail is provided within the actual policy or the supporting text. In addition, the standards of provision within the draft SPG for developments of over 200 dwellings to provide additional space for adult sized sports pitches (e.g. rugby, football, cricket) with changing facilities and car parking is very onerous on developers and the efficient use of land. Such matters should have the opportunity to be discussed through a formal consultation process.	provided within the actual policy or the supporting text. In addition, the standards of provision within the draft SPG for developments of over 200 dwellings to provide additional space for adult sized sports pitches (e.g. rugby, football, cricket) with changing facilities and car parking is very onerous on developers and the efficient use of land. Such matters should have the opportunity to be discussed through a formal consultation process.	
785	EN1: Sports, Recreation and Cultural Facilities	Object	In relation to the FCC's Development Management Policy for Sports, Recreation and Cultural Facilities the key comments in the context of the Village Plan thematics and objectives and from the Community Council's perspective as a key stakeholder in the LPD process are as follows: a) Higher Kinnerton Community Council has adopted the aims and ambitions set out in the Wellbeing of Future Generations Act, Flintshire County Council's "A Wales of Cohesive Communities" and a "Healthier Wales". However, there is concern that a major development of 300 new homes within the boundary of Higher Kinnerton presents a		Noted. The Strategic allocation at Warren Hall will include on site open space facilities in accordance with the Fields in Trust (FIT) standards, as well as a series of green infrastructure routes in the form of footpaths and cycleways. The guidance within policy STR3b refers to a commercial hub which could include hotel, leisure, local centre and retail but the exact mix and nature of these facilities are not yet known. It is expected though that the commercial hub would be available for use by employees at the business park, residents on the housing site, residents in nearby settlements as well as passers by on A55. It is unclear why the Plan needs to specify a planning obligation to secure a financial contribution to achieve this? The Masterplan which accompanied the Deposit Plan for Warren Hall identified the provision of an extensive green infrastructure network across the site to maximise opportunities to promote

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			serious challenge to maintaining social cohesion for the expanded community. Going forward, plans need to be developed for how Warren Hall can be integrated in a way that promotes cohesion and mitigates the potential for any negative impacts of such a large single development. Given a development on this scale will inevitably place significant extra pressure on the natural and built environment and the social, physical and economic infrastructure which already exists in local area which should either be moderated by means of conditions attached to a planning decision or alternatively via financial contributions from the developer via a S106 agreement to facilitate and maintain environmental assets and to facilitate well-being through amenity, recreation and leisure activities in order to balance the pressure created by the new development with improvements to the surrounding area ensuring that where possible the development will make a positive contribution to the local area and community and to mitigate any negative impact caused by the development.		community cohesion within the site and to enable sustainable linkages with nearby settlements.
648	EN1: Sports, Recreation and Cultural Facilities	Support	Policy EN1 recognises the importance of protecting and providing open space and sports and recreational facilities and ensuring that new development incorporates adequate provision of both. Consideration of Policy 14.2 TW acknowledges the need for new residential development to make a contribution towards open space. TW supports the provisions set out in the Council's adopted open space standards, on account with its accordance with National Policy. 14.3 Furthermore, TW supports the inclusion of the last paragraph of the policy		The Council welcomes support for Policy EN1.

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			and the degree of flexibility that that the Council has adopted whereby it will allow for off-site provision or financial contributions to be made where it can be demonstrated that there is no practical alternative. 14.4 Notwithstanding the above, it is important that any financial contributions made meet the tests set out in the CIL Regulations and avoid causing undue impact on the cost of delivering units. Tests of Soundness 14.5 TW considers Policy RD4 to be sound. Recommended Change 14.6 TW considers that no further change to the Policy is required.		
56	EN2: Green Infrastructure	Object	I wish to make a representation concerning the Mold Inset Plan allocation of land adjoining their existing factory at Maes Gwern as EN2 Green Space. This land was previous allocated as L3 Open Space in the UDP and is shown on the attached plan. In the light of the decision of Flintshire County Council's Planning Committee on the 2nd October 2019 to approve application 060270 relating to a major extension to their premises, the allocation of the part of the site as Green Space under policy EN2 should be deleted and instead replaced by an equivalent area of Green Space on the western part of the site as shown on the attached plan. This 'land swap' was agreed by your Planning Committee and maintains the integrity of the Green Infrastructure around this part of Mold, thereby meeting the objectives of policy EN2.	the allocation of the part of the site as Green Space under policy EN2 should be deleted and instead replaced by an equivalent area of Green Space on the western part of the site as shown on the attached plan. This 'land swap' was agreed by your Planning Committee and maintains the integrity of the Green Infrastructure around this part of Mold, thereby meeting the objectives of policy EN2.	Partly accepted. Application 060270 was approved following the publication of the Deposit LDP, therefore couldn't take into account the change in green space. The proposals maps reflect the position on the ground at the moment and protects the existing greenspace. Depending on progress with implementing the planning permission, the Inspector may consider that the change in green space designation at Maes Gwern, Mold would add clarity to the proposals map, then the Council would have no objections to the changes.
149	EN2: Green Infrastructure	Object	HWN005 - Ash Lane, Hawarden This disrupts the green infrastructure connectivity and mitigation of green corridor within the	Small area of development will impact less.	Not accepted. The public rights of way map shows no public footpaths through the site and there is no public access to agricultural land. The main green infrastructure / ecological feature

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			development will not adequately compensate for this.		are the hedgerows and trees, which the Local Authority will seek to retain wherever possible. There will also be a need to create new open space on the site, a SuDS area and a buffer to listed building, all of which can be designed to ensure a green infrastructure strategy / corridor within the site.
415	EN2: Green Infrastructure	Object	objects to the current wording as it is not clear and creates uncertainty for developers and landowners. Developers in the main can only control the impact of new development on the development sites its self and the immediate surroundings. Currently, the wording does not clarify what we presume it is trying to say which is the requirements relate to the site and its immediate surroundings rather than anywhere in the County Borough.	Amend the policy wording to make it clear that the requirement of the policy relate to the site and its immediate surroundings rather than anywhere in the County Borough.	Not accepted. The Policy aims to enhance existing green infrastructure, and increase the network across the County. Where applications need to mitigate against the loss of green infrastructure then S106 payments would need to be made to compensate, this funding could then be spent outside the immediate site boundaries if it was more effective to do so. Improving and extending green infrastructure cannot be limited to immediate site boundaries only as this will prevent a meaningful increase in the green infrastructure network. S106 agreements will be reasonably related to the development to ensure they mitigate against the impacts of that development, therefore they will relate to the site and its immediate surrounding area and generally not County wide.
843	EN2: Green Infrastructure	Object	Bourne Leisure endorses the Council's approach to ensuring that Flintshire has a high quality green infrastructure network. However, as drafted, Policy EN2 is more onerous than the wording of national policy and therefore fails the first test of soundness. PPW states that "planning authorities should ensure that features and elements of biodiversity or green infrastructure value are retained on site, and enhanced or created where ever possible, by adopting best practice site design and green infrastructure principles…." (paragraph 6.4.21 part 2). Furthermore, PPW also states that "when all other options have been exhausted, and where modifications, alternative sites, conditions or obligations are not sufficient to secure biodiversity outcomes, offsite compensation for unavoidable damage must be sought…"	Policy EN2 is more onerous than the wording of national policy and therefore fails the first test of soundness. As such, the following amendments to draft Policy EN2 to align this element of the Deposit Plan with national policy are proposed: Add in "Where Possible" after Development proposals will be required to protect, maintain and (insert Where possible here) enhance the extent, quality and	Not accepted. PPW10 strongly supports the need to enhance green infrastructure networks across Wales, objective 17 of the LDP is also to "Maintain and enhance green infrastructure networks". Therefore if the Council dilute the wording of Policy EN2 with "Where possible" it may limit the opportunities to enhance green infrastructure networks across Flintshire. There has been no objection to the policy from Welsh Government.

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			(paragraph 6.4.21 part 4). Taking a more onerous position than set out in PPW risks undermining the ability of businesses to invest in Flintshire and planning permission to be secured with the consequences that would have on the local economy. Further, the emerging plan has not demonstrated why taking a deviated approach is appropriate. As such, the following amendments to draft Policy EN2 to align this element of the Deposit Plan with national policy are proposed: "Development proposals will be required to protect, maintain and, where possible, enhance the extent, quality and connectivity of the green infrastructure network, including designated green spaces (as shown on the proposals maps), and where appropriate: a create new green infrastructure linkages from the proposed development to the existing network; b fill in gaps in the existing network to improve connectivity. Where the loss or damage of existing green infrastructure is unavoidable, appropriate mitigation and or compensation will be required." (proposed amendments underlined and with strikethrough). The proposed amendments to draft Policy EN2 would mean that this element of the Plan would satisfy the tests of soundness.	connectivity of the green infrastructure network, including designated green spaces (as shown on the proposals maps), and where appropriate: a create new green infrastructure linkages from the proposed development to the existing network; b fill in gaps in the existing network to improve connectivity. Where the loss or damage of existing green infrastructure is unavoidable, appropriate mitigation and or compensation will be required." (proposed amendments underlined and with strikethrough). The proposed amendments to draft Policy EN2 would mean that this element of the Plan would satisfy the tests of soundness.	
1155	EN2: Green Infrastructure	Object	The old school playing field Chester Road should be designated as a protected green space given the commitment made by the Local Authority to retain it as community open space.	The old school playing field Chester Road should be designated as a protected green space given the commitment made by the Local Authority to	Not accepted. The Plan does not as a matter of course safeguard all open space within settlement boundaries as there is a separate policy EN1 which will protect open space. Policy EN2 is concerned with whether land functions as a green space. Not all school playing fields will be open to the public and therefore, apart from their visual character, don't function as a green space. They will also be protected by EN1 and it is not necessary for a blanket

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				retain it as community open space.	approach to be adopted of designating all school playing fields as green space – rather, each should be assessed on their merits.
859	EN2: Green Infrastructure	Object	On the map, Mold Cemetery extension off Gas Lane is shown as a green space, it needs changing to be part of the cemetery Non of the school playing fields are indicated as green spaces, yet they are often important green infrastructure in our urban environments and should be protected as green spaces. The LDP lacks ambition in creating new green infrastructure as the list of places references across the county are existing sites. For instance the LDP could deliver the Mold Green Band (pages 48 and 49 of the Mold Town Plan).	On the map, Mold Cemetery extension off Gas Lane is shown as a green space, it needs changing to be part of the cemetery Non of the school playing fields are indicated as green spaces, yet they are often important green infrastructure in our urban environments and should be protected as green spaces. The LDP lacks ambition in creating new green infrastructure as the list of places references across the county are existing sites. For instance the LDP could deliver the Mold Green Band (pages 48 and 49 of the Mold Town Plan).	Not accepted. The Plan does not as a matter of course safeguard all open space within settlement boundaries as there is a separate policy EN1 which will protect open space. Policy EN2 is concerned with whether land functions as a green space. Not all school playing fields will be open to the public and therefore, apart from their visual character, don't function as a green space. They will also be protected by EN1 and it is not necessary for a blanket approach to be adopted of designating all school playing fields as green space – rather, each should be assessed on their merits. There is no inherent reason why a cemetery should not be designated as a green space on the proposals maps. Also there is no reason why the greenspace designation EN2.127 should prevent the extension of the existing cemetery. The cemetery provides visual relief to the local community, it has public access and complements the adjoining open land and has a particular cultural value. The Inspector may consider that there is benefit in extending greenspace EN1.127 to include all of the green space and ensure that this whole block of open land is treated in a similar manner. The Council would have no objection to this change. The LDP provides a framework of policies with which to protect, enhance and create new green infrastructure. The most recent version of PPW (10) attached greater importance to green infrastructure assessments and the Council is working on a green infrastructure network as explained in Background paper2. The appropriateness of designating or safeguarding particular green infrastructure projects such as the Mold Green band will depend on the status of each scheme in terms of consents, funding and a delivery programme. There will be numerous green infrastructure projects across the County but the inclusion of all of these would result in a development plan that was cluttered with individual projects, rather than being a more strategic framework of policies and proposals. Projects should only be safeguarded in a development plan where there is certainty about delivery.

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1136	EN2: Green Infrastructure	Object	The old school playing field Chester Road should be designated as a protected green space given the commitment made by the Local Authority to retain it as community open space.	The old school playing field Chester Road should be designated as a protected green space given the commitment made by the Local Authority to retain it as community open space.	Not accepted. The Plan does not as a matter of course safeguard all open space within settlement boundaries as there is a separate policy EN1 which will protect open space. Policy EN2 is concerned with whether land functions as a green space. Not all school playing fields will be open to the public and therefore, apart from their visual character, don't function as a green space. They will also be protected by EN1 and it is not necessary for a blanket approach to be adopted of designating all school playing fields as green space – rather, each should be assessed on their merits.
1148	EN2: Green Infrastructure	Object	GS 1,2 3 and 4 These locations noted on the map are village play spaces and need to be added to the plan. GS1 - Play area Ffordd Derwen - Particular attention needs to be paid to GS 1 that is a current play space that is being extended as part of the Rhos road development. This is important play space and needs identifying as such. GS2 - Play area adj Millstone ph - This is important play space and needs identifying as such. To remain white land could open the doors for speculative development. GS3 - Play area adjacent White Lion housing development , Chester Rd - This is important play space and needs identifying as such. To remain white land could open the doors for speculative development. GS4 - Play area West View - this is important play space and needs identifying as such. To remain white land could open the doors for speculative development. GS 5 - new school playing field, Abbots Lane - This is the shared community play space that need to be added to the plan for protection. It needs protection from potential development should the school need to be expanded. Pr 1 This is the old school site on Chester Rd and needs to be Protected from development.	GS 1,2 3 and 4 These locations noted on the map are village play spaces and need to be added to the plan. Particular attention needs to be paid to GS 1 that is a current play space that is being extended as part of the Rhos road development. • GS 5 This is the shared community play space that need to be added to the plan for protection. • Pr 1 This is the old school site as referenced at iii above and needs to be Protected from development.	Not accepted. The Plan does not as a matter of course safeguard all open space within settlement boundaries as there is a separate policy EN1 which will protect open space. Policy EN2 is concerned with whether land functions as a green space. Not all school playing fields will be open to the public and therefore, apart from their visual character, don't function as a green space. They will also be protected by EN1 and it is not necessary for a blanket approach to be adopted of designating all school playing fields as green space – rather, each should be assessed on their merits. GS1 – Play area Ffordd Derwen - Candidate Site submission PEN024 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than simply being a play area. This particular play area is well established but is small and located on the edge of a residential area and is poorly related to that development given its physical relationship with housing. It therefore has little landscape, visual or amenity value to the wider area and does not provide a link between the settlement and open countryside. It is not therefore considered to warrant designation as a green space. GS2 – Open Space south of Millstone PH - Candidate Site submission PEN023 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than

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					simply being a play area. The site comprises a play area, football pitch, allotments and the former bowling green. It is afforded protection from development on account of its location outside the settlement boundary and within open countryside and also on account of its open space function. It is not necessary or appropriate in these circumstances for any additional protection to be afforded to the site GS3 – Land East of White Lion - Candidate Site submission PEN022 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than simply being a play area. The site forms the open space and ecological mitigation area associated with the Redrow / Elan development. It is afforded protection from development on account of its location outside the settlement boundary and within open countryside and also on account of its open space and ecological function. It is not necessary or appropriate in these circumstances for any additional protection to be afforded to the site. GS4 – Play area rear of West View026 - Candidate Site submission PEN026 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than simply being a play area. Although the play area is well established it is small and located on the edge of a residential area and is poorly related to that development given its physical relationship with housing. It therefore has little landscape, visual or amenity value to the wider area and does not provide a link between the settlement and open countryside. It is not therefore considered to meet the criteria necessary for designation as a green space. The sites role as a play area is more appropriately protected by virtue of a criteria based policy, developed as part of the LDP and building on the approach in the UDP.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1160	EN2: Green Infrastructure	Object	GS 1,2 3 and 4. These locations noted on the map are village play spaces and need to be added to the plan. Particular attention needs to be paid to GS 1 that is a current play space that is being extended as part of the Rhos Road development. GS 5. This is the shared community play space that need to be added to the plan for protection. Pr 1. This is the old school site as referenced at iii above and needs to be Protected from development.	GS 1,2 3 and 4. These locations noted on the map are village play spaces and need to be added to the plan. Particular attention needs to be paid to GS 1 that is a current play space that is being extended as part of the Rhos Road development. GS 5. This is the shared community play space that need to be added to the plan for protection. Pr 1. This is the old school site as referenced at iii above and needs to be Protected from development.	Not accepted. GS1 – Play area Ffordd Derwen - Candidate Site submission PEN024 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than simply being a play area. This particular play area is well established but is small and located on the edge of a residential area and is poorly related to that development given its physical relationship with housing. It therefore has little landscape, visual or amenity value to the wider area and does not provide a link between the settlement and open countryside. It is not therefore considered to warrant designation as a green space. GS2 – Open Space south of Millstone PH - Candidate Site submission PEN023 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than simply being a play area. The site comprises a play area, football pitch, allotments and the former bowling green. It is afforded protection from development on account of its location outside the settlement boundary and within open countryside and also on account of its open space function. It is not necessary or appropriate in these circumstances for any additional protection to be afforded to the site GS3 – Land East of White Lion - Candidate Site submission PEN022 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than simply being a play area. The site forms the open space and ecological mitigation area associated with the Redrow / Elan

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					development. It is afforded protection from development on account of its location outside the settlement boundary and within open countryside and also on account of its open space and ecological function. It is not necessary or appropriate in these circumstances for any additional protection to be afforded to the site. GS4 – Play area rear of West View026 - Candidate Site submission PEN026 sought the protection of this site as open space. As explained in the Council's response on this candidate site, the Plan does not seek to designate on the proposals maps every parcel of open space, playing field or play area as these are protected by UDP policy SR4 and LDP policy EN1. Instead, the Plan designates green spaces which fulfil a broader function than simply being a play area. Although the play area is well established it is small and located on the edge of a residential area and is poorly related to that development given its physical relationship with housing. It therefore has little landscape, visual or amenity value to the wider area and does not provide a link between the settlement and open countryside. It is not therefore considered to meet the criteria necessary for designation as a green space. The sites role as a play area is more appropriately protected by virtue of a criteria based policy, developed as part of the LDP and building on the approach in the UDP.
229	EN2: Green Infrastructure	Support	Policy EN2 – Green Infrastructure: This policy has the full support of the Joint Committee. However, it is suggested that Country Parks should also be identified on the Proposals Map as an important component of the green infrastructure network. This would include those parts of Moel Famau and Loggerheads Country Parks located in Flintshire.		Noted. Primarily, green spaces within settlement boundaries have been included on the proposals maps. The plan doesn't as a matter of course designate all green infrastructure on the proposals map as i) the majority of these are within the open countryside and already protected by other policies, and ii) Green Infrastructure is mapped separately within Background Paper 2.
210	EN2: Green Infrastructure	Support			Flintshire Council welcomes support for policy EN2

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
391	EN2: Green Infrastructure	Support			Flintshire Council welcomes support for Policy EN2.
392	EN3: Undeveloped Coast and Dee Estuary Corridor	Support			Support is noted.
977	EN4: Landscape Character	Object	This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	Not accepted. The policy is not seeking to designate any landscape 'areas' and therefore the policy does not need to be accompanied by a landscape / character assessment. The policy is merely seeking to ensure that new development has regard to the character and appearance of the landscape in which it sits. The explanation to the policy in para 12.16 is clearly referenced in terms of being based on Landmap which is the all Wales landscape assessment resource. In the case of a determining a development proposal Landmap identifies the character and features of the landscape, its quality and its susceptibility to change. This will form part of the planning assessment of the landscape impacts of a development.
947	EN4: Landscape Character	Object	'New development, either individually or cumulatively, must not have a significant adverse impact on the character and appearance of the landscape. Landscaping and other mitigation measures should seek to reduce landscape impact and where possible bring about enhancement.' This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	'New development, either individually or cumulatively, must not have a significant adverse impact on the character and appearance of the landscape. Landscaping and other mitigation measures should seek to reduce landscape impact and where possible bring about enhancement.' This policy cannot stand as it is not	Not accepted. The policy is not seeking to designate any landscape 'areas' and therefore the policy does not need to be accompanied by a landscape / character assessment. The policy is merely seeking to ensure that new development has regard to the character and appearance of the landscape in which it sits. The explanation to the policy in para 12.16 is clearly referenced in terms of being based on Landmap which is the all Wales landscape assessment resource. In the case of a determining a development proposal Landmap identifies the character and features of the landscape, its quality and its susceptibility to change. This will form part of the planning assessment of the landscape impacts of a development.

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				justified by any evidence of any (special) landscape character assessment.	
962	EN4: Landscape Character	Object	'New development, either individually or cumulatively, must not have a significant adverse impact on the character and appearance of the landscape. Landscaping and other mitigation measures should seek to reduce landscape impact and where possible bring about enhancement.' This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	'New development, either individually or cumulatively, must not have a significant adverse impact on the character and appearance of the landscape. Landscaping and other mitigation measures should seek to reduce landscape impact and where possible bring about enhancement.'	Not accepted. The policy is not seeking to designate any landscape 'areas' and therefore the policy does not need to be accompanied by a landscape / character assessment. The policy is merely seeking to ensure that new development has regard to the character and appearance of the landscape in which it sits. The explanation to the policy in para 12.16 is clearly referenced in terms of being based on Landmap which is the all Wales landscape assessment resource. In the case of a determining a development proposal Landmap identifies the character and features of the landscape, its quality and its susceptibility to change. This will form part of the planning assessment of the landscape impacts of a development.
994	EN4: Landscape Character	Object	This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	Not accepted. The policy is not seeking to designate any landscape 'areas' and therefore the policy does not need to be accompanied by a landscape / character assessment. The policy is merely seeking to ensure that new development has regard to the character and appearance of the landscape in which it sits. The explanation to the policy in para 12.16 is clearly referenced in terms of being based on Landmap which is the all Wales landscape assessment resource. In the case of a determining a development proposal Landmap identifies the character and features of the landscape, its quality and its susceptibility to change. This will form part of the planning assessment of the landscape impacts of a development.
1026	EN4: Landscape Character	Object	This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	This policy cannot stand as it is not justified by any evidence of any (special) landscape character assessment.	Not accepted. The policy is not seeking to designate any landscape 'areas' and therefore the policy does not need to be accompanied by a landscape / character assessment. The policy is merely seeking to ensure that new development has regard to the character and appearance of the landscape in which it sits. The explanation to the policy in para 12.16 is clearly referenced in terms of being based on Landmap which is the all Wales

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					landscape assessment resource. In the case of a determining a development proposal Landmap identifies the character and features of the landscape, its quality and its susceptibility to change. This will form part of the planning assessment of the landscape impacts of a development.
230	EN4: Landscape Character	Support	Policy EN4 – Landscape Character: This policy has the full support of the Joint Committee.		Support is noted.
393	EN4: Landscape Character	Support	support policy		Support is noted.
834	EN4: Landscape Character	Support	Policy EN4 (Landscape Character) Policy EN4 of the Deposit Plan states: "New development, either individually or cumulatively, must not have a significant adverse impact on the character and appearance of the landscape. Landscaping and other mitigation measures should seek to reduce landscape impact and where possible bring about enhancement." Bourne Leisure endorses the Council's approach to the use of landscaping and other mitigation measure to reduce landscape impact and where possible bring about enhancement. The Company also endorses the Council's position that development must not have a significant adverse impact on the appearance and character of the landscape. As drafted, Policy EN4 is consistent with PPW which states that planning authorities should "…enable complementary development such as accommodation and access to be provided in ways which limit negative environmental impacts and consider the opportunities to enhance biodiversity." (paragraph 5.5.6). PPW also states that "in rural areas, tourism-related		Support is noted.

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			development is an essential element in providing for a healthy and diverse economy. Here development should be sympathetic in nature and scale to the local environment." (paragraph 5.5.3). The emerging policy also provides an effective solution to balancing the pillars of sustainability and delivering the objectives of the emerging Plan.		
1077	EN5: Area of Outstanding Natural Beauty	Object	EN5: Area of Outstanding Natural Beauty – We would recommend a minor amendment to this policy wording to ensure 'setting' is given due weight in the future: in regard to the Clwydian Range and Dee Valley AONB, development will only be permitted where it conserves or enhances the natural beauty of the designated area and its setting. In assessing the likely impact of development proposals on the natural beauty of the AONB, cumulative impact will also be taken into consideration.	We would recommend a minor amendment to this policy wording to ensure 'setting' is given due weight in the future: in regard to the Clwydian Range and Dee Valley AONB, development will only be permitted where it conserves or enhances the natural beauty of the designated area and its setting. In assessing the likely impact of development proposals on the natural beauty of the AONB, cumulative impact will also be taken into consideration.	Accepted. The intention of the policy is to consider proposals both within and close to the AONB, as it is recognized that both have the potential to harm the AONB. However, it is accepted that as written the opening part of the policy reads as only applying to the AONB itself. Accordingly, if the Inspector considers that the suggested change would improve the clarity and wording of the policy, then the Council would accept the addition of 'and its setting'' after 'AONB' in the first line of the policy wording.
231	EN5: Area of Outstanding Natural Beauty	Support	Policy EN5 - AONB: This policy has the full support of the Joint Committee. i) The intention to protect the setting of the AONB is welcomed but, despite the clarification set out in para 12.19, the first sentence of the policy could be interpreted as only applying		The general support for the policy is noted. i) The intention of the policy is to consider proposals both within and close to the AONB, as it is recognized that both have the potential to harm the AONB. However, it is accepted that as written the opening part of the policy reads as only applying to the

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			to development within the AONB. For the avoidance of doubt the committee would suggest that this be amended to 'Within the Clwydian Range and Dee Valley AONB and its setting, development will only be permitted where it conserves or enhances the natural beauty of the designated area.' ii) In addition, the committee would wish to give more emphasis to development proposals enhancing the AONB and would suggest that criterion c) be amended along the lines of 'be of an appropriately high standard of design, use appropriate materials that are compatible with the character of the AONB and seeks to enhance the character and appearance of the area.' iii) The reference to the AONB's special qualities in Criterion a) is fully supported, but it is suggested that supporting para 12.17 clarifies that these are defined in the AONB Management Plan. iv) For consistency with the adjoining LDP's which include part of the AONB and to ensure developer awareness of the designation, it is recommended that the AONB should be shown on both the printed and interactive Proposals Map.		AONB itself. Accordingly, if the Inspector considers that the suggested change would improve the clarity and wording of the policy, then the Council would accept the addition of 'and its setting'' after 'AONB' in the first line of the policy wording. ii) The policy already states that development will only be permitted where it conserves and enhances the natural beauty of the designated area. Repetition of this wording within criteria c as well is not considered to be necessary. iii) The explanatory text in para 12.21 has clearly reference the AONB Management Plan and the recently jointly adopted SPG for the AONB. Both of these documents outline the special qualities of the AONB and it is not considered that additional explanatory text in para 12.21 is necessary. iv) Proposals maps – The boundary of the AONB has been included in the accompanying 'Constraints Map' largely in recognition that it is a boundary that it is not set by the LPA but by NRW i.e. it is a statutory boundary. The same approach has been taken with the SPA, SAC and SSSI boundaries. Inclusion of these would result in a cluttered proposals map. Nevertheless, if the Inspector considers that greater clarity would be added to the proposals mas by showing the AONB boundary then the Council would have no objection to this as a mapping change.
148	EN6: Sites of Biodiversity Importance	Object	Site HWN005 - Ash Lane, Hawarden This land is not a plain grass field. It has multiple established hedgerows and elderly trees and is regularly used for hay making - really good for insect and small animal habitat/biodivserity. The Allocation area is right next to a conservation area which if housing goes on this site is likely to affect the wildlife of that conservation area. It has been seen that badgers use the fields, also there are Buzzards nesting in the central oak tree. Bats fly along the hedgerows.	Mitigation promises of green corridors and maintaining hedgerows is insufficient and would cause biodiversity disruption. Areas adjacent to Conservation areas need to remain as farming fields so as to not disturb the	Not accepted. The importance of the mature hedgerows and trees within the site are recognized as being both landscape and biodiversity features. These features, together with specific species and their habitats can be protected as part of an appropriate detailed layout for the site. The fields themselves, given that they have been used for agricultural purposes are not of high ecological value. There are no nature conservation designations within, adjacent or near to the site. No objection to the site has been made by NRW.

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			Swifts, swallows and lapwings have been seen in different seasons which would be detrimental to the local natural wildlife scene shared by this community if they relocated. The mitigation stated is to incorporate wildlife corridors to preserve connectivity which is definitely disruptive as these corridors would be significantly different to the open farm fields currently in place. Preserving hedgerows and major trees is stated as mitigation but their use by wildfire and so their essential biodiversity will be massively disrupted.	biodiversity of these areas.	
394	EN6: Sites of Biodiversity Importance	Object		Please add 'and priority habitats' after the word 'priority species' i.e., the policy should read: 'Development proposals that would have a significant adverse effect on locally designated sites or site with other biodiversity and / or geological interest, including priority species and priority habitats will only be permitted where:...'	Not accepted. The wording of the third part of the policy clearly refers to 'designated sites' and 'sites with other biodiversity and / or geological interest, including priority species'. The policy seeks to refer to both habitats and species and the opening part of the explanation in para 12.22 clearly refers to habitats and species. It is not considered that further amendment to the policy wording is necessary.
1078	EN6: Sites of Biodiversity Importance	Object	EN6: Sites of Biodiversity Importance – We welcome the reference to geodiversity in the text. We would welcome if EN6 more specifically referred to geodiversity e.g. EN6: Sites of Biodiversity and Geodiversity importance	EN6: Sites of Biodiversity Importance – We welcome the reference to geodiversity in the text. We would welcome if EN6 more specifically referred to geodiversity	Partly accepted. Reference is made in the policy wording to geological interest and geological importance. In the policy explanation Regionally Important Geological Geomorphological Sites RIGs is also included. However if the Inspector considers that Geodiversity should be added to the policy then the Council would not object to this change.

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				e.g. EN6: Sites of Biodiversity and Geodiversity importance	
177	EN7: Development Affecting Trees, Woodlands and Hedgerows	Object	Land at Fron Hall Fron Park Road Holywell CH8 7UT - I object to the current Flintshire Local Development Plan (FLDP) in respect to the above property. The FLDP shows the whole of the plan of 'the Fron', which includes the site of a building as well as woodland, is shown as all Reclaimed Ancient Woodland. This is incorrect, as there have been construction buildings on the site continuously since before 1870/71 when it is shown on the Ordinance Survey map. Currently there is an extensive concreted raised raft foundation in place with some building upon it together with a concrete drive leading up to it. I ask that the footprint of the building Fron Hall be reclassified as residential, and, the drive acknowledged as such.	The FLDP shows the whole of the plan of 'the Fron', which includes the site of a building as well as woodland, is shown as all Reclaimed Ancient Woodland. This is incorrect, as there have been construction buildings on the site continuously since before 1870/71 when it is shown on the Ordinance Survey map. Currently there is an extensive concreted raised raft foundation in place with some building upon it together with a concrete drive leading up to it. I ask that the footprint of the building Fron Hall be reclassified as residential, and, the drive acknowledged as such.	Not accepted. The settlement boundary in this part of Holywell runs along the rear of the ribbon of development on the south side of Fron Park Rd. The land to the south of the settlement boundary rises up and is heavily wooded, forming a distinct landscape backdrop to the ribbon development. It would be inappropriate to include any building or remain of a building within the settlement boundary as this would result in an illogically drawn settlement boundary. CPAT identifies Y Fron on its record of archaeological features as a post medieval house and its condition is described as 'near destroyed'. The Deposit LDP is accompanied by a constraints map which is not a formal part of the Plan. It seeks to provide a useful reference point for Plan readers by identifying key designations and constraints. Many of the datasets are not controlled by FCC but are the responsibility of other bodies. The woodland is designated on the constraints map as a wildlife site and the boundary of this excludes the actual footprint of the former dwelling. The site is also identified as a 'Restored Ancient Woodland' and the designation washes over the whole site including the site of the former house. The designation of ancient woodlands is not within the remit of the Council as they are designated by NRW. The LDP constraints map is merely representing the NRW ancient woodland dataset. Any concerns that the objector has about the boundary of the designation must be made by the objector to NRW.
416	EN7: Development Affecting Trees, Woodlands	Object	objects to the final criteria c which introduces the concept of 'net gain in biodiversity' which is is not supported by national policy. It is also not the appropriate term in relation to this policy which relates specifically to trees and hedgerows.	The word ' biodiversity ' should be deleted.	Not accepted. The aim of this policy is to protect trees, woodland or hedgerows from damaging impacts of development. Trees woodland and hedgerows particularly older hedgerows are of importance for a variety of reasons including historic, amenity and biodiversity. These features often contain a great diversity of plant and animal species so the use of the term biodiversity is

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	and Hedgerows				appropriate. It is also important to ensure that if there is an impact on trees woodlands or hedgerows that overall there is an improvement in the biodiversity of the site. The UK Government has already announced its requirement that the Environment Bill will make it mandatory for development to bring about a net gain in biodiversity. More specifically in Wales the Chief Planner at Welsh Government wrote to all local planning authorities in Wales on 23/10/19 in connection with para 6.4.5 of PPW which states 'planning authorities must seek to maintain and enhance biodiversity in the exercise of their functions. This means that development should not cause any significant loss of habitats or populations of species, locally or nationally and must provide a net benefit for biodiversity'. The letter reinforces 'The purpose of this letter is to clarify that in light of the legislation and Welsh Government policy outlined above, where biodiversity enhancement is not proposed as part of an application, significant weight will be given to its absence, and unless other significant material considerations indicate otherwise it will be necessary to refuse permission. In this context it is considered appropriate for the policy to seek a net gain in biodiversity.
279	EN7: Development Affecting Trees, Woodlands and Hedgerows	Object	Land at Fron Hall Fron Park Road Holywell CH8 7UT - I object to the uncritical assumptions made regarding classifying 'The Fron' as 'Reclaimed Ancient Woodland'. A completely new classification as 'Reclaimed Ancient Woodland' done without communication nor correspondence with the landowners. Done without any evidence. There are only about 6 trees probably older than 60 years old, scattered over 10 acres. The area covered does not	I object to the uncritical assumptions made regarding classifying 'The Fron' as 'Reclaimed Ancient Woodland'. A completely new classification as 'Reclaimed Ancient Woodland' done without communication nor correspondence	Not accepted. A detailed response is provided in id 177. The designation is 'restored' not 'reclaimed' ancient woodland and is a matter for Natural Resources Wales as they are the statutory body responsible for this designation. Any concerns that the objector has should be made directly to NRW. The Council has simply replicated this designation on the constraints map supporting the LDP.

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			include all the wooded area, rather it seems it is based more on ownership.	with the landowners. Done without any evidence. There are only about 6 trees probably older than 60 years old, scattered over 10 acres. The area covered does not include all the wooded area, rather it seems it is based more on ownership.	
600	EN7: Development Affecting Trees, Woodlands and Hedgerows	Object	OBJECTS to Policy EN7. JUSTIFICATION 10.2 The policy states that: “Development proposals that will result in significant loss of, or harm to, trees, woodlands or hedgerows of biodiversity, historic, and amenity value will not be permitted.” 10.3 This policy is worded too firmly and should be reworded to allow some flexibility for proposals where it can be demonstrated that the benefits outweigh the harm. AMENDMENTS SOUGHT 10.4 Policy EN7 is considered unsound in that it is not appropriate for the area as it sets an unreasonably high bar for applicants and should be reworded to allow some flexibility. It is suggested that it is reworded as follows: “Development proposals that will result in significant loss of, or harm to, trees, woodlands or hedgerows of biodiversity, historic, and amenity value will not be permitted unless it can be demonstrated that the benefits outweigh the harm.”	AMENDMENTS SOUGHT 10.4 Policy EN7 is considered unsound in that it is not appropriate for the area as it sets an unreasonably high bar for applicants and should be reworded to allow some flexibility. It is suggested that it is reworded as follows: “Development proposals that will result in significant loss of, or harm to, trees, woodlands or hedgerows of biodiversity, historic, and amenity value will not be permitted unless it can be demonstrated that the benefits outweigh the harm.”	Not accepted. The aim of this policy is to protect trees, woodland or hedgerows from damaging impacts of development and it is supported by a Supplementary Planning Guidance on Trees and Development which gives further explanation and more detail on what significant loss or harm means. The guidance note promotes the retention of trees, highlights their importance in the environment and sets out an approach that the Council will take when dealing with proposals that will affect trees on development sites. The policy is essentially split into two parts. The first part seeks to prevent the ‘significant’ loss of or harm to trees, woodland or hedgerows. However the second part of the policy recognizes that it some cases an impact on trees, woodland or hedgerows may be acceptable, provided that it satisfies the three criteria. This second part of the policy would appear to meet the concerns of the objector.

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781	EN7: Development Affecting Trees, Woodlands and Hedgerows	Object	Policy EN7: Development Affecting Trees, Woodlands and Hedgerows 7.18. It is noted that this Policy resists any development which will result in the “significant” loss of or harm to trees, woodlands and hedgerows. In this instance, it is unclear how “significant” will be measured by the Council and Applicants. It is further unclear given that the following part of the Policy allows for suitable replacement features and a net gain in biodiversity. Whilst our Client does not disagree with the need to seek to retain as many natural features as possible, sometimes this is simply unavoidable in order to accommodate new development. As such, it is considered that the first part of the Policy should be re-phrased or quantified such that there is clearer guidance on what extent of loss would be acceptable such it would not be significant (particularly as reference is made to features of amenity value, which is highly subjective and could be deemed to apply to the majority of landscape features).	7.18. It is noted that this Policy resists any development which will result in the “significant” loss of or harm to trees, woodlands and hedgerows. In this instance, it is unclear how “significant” will be measured by the Council and Applicants. It is further unclear given that the following part of the Policy allows for suitable replacement features and a net gain in biodiversity. Whilst our Client does not disagree with the need to seek to retain as many natural features as possible, sometimes this is simply unavoidable in order to accommodate new development. As such, it is considered that the first part of the Policy should be re-phrased or quantified such that there is clearer guidance on what extent of loss would be acceptable such it would not be significant (particularly as reference is made to features of amenity	Not accepted. The aim of this policy is to protect trees, woodland or hedgerows from damaging impacts of development. Supplementary Planning Guidance on Trees and Development is available to give further explanation and more detail on what significant loss or harm means. The guidance note promotes the retention of trees, highlights their importance in the environment and sets out an approach that the Council will take when dealing with proposals that will affect trees on development sites

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				value, which is highly subjective and could be deemed to apply to the majority of landscape features).	
721	EN7: Development Affecting Trees, Woodlands and Hedgerows	Object	It is noted that this Policy resists any development which will result in the "significant" loss of or harm to trees, woodlands and hedgerows. In this instance, it is unclear how "significant" will be measured by the Council and Applicants. It is further unclear given that the following part of the Policy allows for suitable replacement features and a net gain in biodiversity. Whilst we does not disagree with the need to seek to retain as many natural features as possible, sometimes this is simply unavoidable in order to accommodate new development. As such, it is considered that the first part of the Policy should be re-phrased or quantified such that there is clearer guidance on what extent of loss would be acceptable such that it would not be significant (particularly as reference is made to features of amenity value, which is highly subjective and could be deemed to apply to the majority of landscape features).	it is considered that the first part of the Policy should be re-phrased or quantified such that there is clearer guidance on what extent of loss would be acceptable such that it would not be significant (particularly as reference is made to features of amenity value, which is highly subjective and could be deemed to apply to the majority of landscape features).	Not accepted. The aim of this policy is to protect trees, woodland or hedgerows from damaging impacts of development and it is supported by a Supplementary Planning Guidance on Trees and Development which gives further explanation and more detail on what significant loss or harm means. The guidance note promotes the retention of trees, highlights their importance in the environment and sets out an approach that the Council will take when dealing with proposals that will affect trees on development sites. The policy is essentially split into two parts. The first part seeks to prevent the 'significant' loss of or harm to trees, woodland or hedgerows. However the second part of the policy recognizes that it some cases an impact on trees, woodland or hedgerows may be acceptable, provided that it satisfies the three criteria. This second part of the policy would appear to meet the concerns of the objector.
395	EN7: Development Affecting Trees, Woodlands and Hedgerows	Support	support policy		support is noted
396	EN7: Development Affecting	Support	support policy		support is noted

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	Trees, Woodlands and Hedgerows				
152	EN8: Built Historic Environment and Listed Buildings	Object	HWN005 - Ash Lane, Hawarden The Grade 1 lists Ash Deniols Farm building stands prominent amongst its green barrier fields and the aesthetic appeal of the old buildings would be ruined if it were seen adjacent to a newly built housing estate. It is a Farm building and unless it was surrounded by farm fields it's historical significance and character would be ruined,	Historic buildings must be kept within the surroundings that maintain their character.	Not accepted. In respect of the St Deiniols Ash Farm listed building a Heritage Assessment has been undertaken which recommends a landscape buffer to provide an open setting to the listed building (this forms part of the guidance for the site set out in policy HN1). The farmhouse will still have an open aspect to the south west, south and east and this will be unaffected by the development. In conjunction with the landscaped buffer within the allocated site, the listed building will still have an open setting.
64	EN8: Built Historic Environment and Listed Buildings	Support	CPAT supports this policy BUT would prefer to see the replacement of the phrase " . . . archaeological remains . . ." with " . . historic assets . . ." in EN8.b. This would better reflect accepted current terminology.	CPAT supports this policy BUT would prefer to see the replacement of the phrase " . . . archaeological remains . . ." with " . . historic assets . . ." in EN8.b. This would better reflect accepted current terminology.	Noted. It is accepted that PPW uses the term ‘historic assets’ as a general term for all the types of historical environment resources. However, in para 6.1.3 and 6.1.29 PPW also uses the term ‘archaeological remains` relating to a specific historic feature. In the context of the policy structure and the wording of criteria d. it is not considered that it is necessary or appropriate to replace "archaeological remains" with "historic assets" .
398	EN8: Built Historic Environment and Listed Buildings	Support	The Built Historic Environment and Listed Buildings often have elevated importance for wildlife, particularly synanthropic species such as bats, swifts and housemartins, which are of conservation concern. Whilst bat roosts and breeding sites might receive a high degree of protection, the nesting sites of other species, such as swifts and housemartins, are only protected whilst in use during the breeding season - so can be destroyed at other times. As these species are in decline partially due to the loss of historic nest sites, the North Wales Wildlife	The Built Historic Environment and Listed Buildings often have elevated importance for wildlife, particularly synanthropic species such as bats, swifts and housemartins, which are of conservation concern. Whilst bat roosts and breeding sites might receive a high degree	Noted. The Plan’s policies need to be read as whole. Therefore policy EN8 which provides guidance on the historic environment must be read in conjunction with policy EN6 which provides guidance on nature conservation. It is not considered necessary or appropriate for issues to be repeated throughout the Plan’s policies.

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			Trust would like to see a recognition in EN8 of the importance of Built Historic Environment and Listed Buildings to species of conservation concern and policy measures added to EN8 to ensure that historic nest sites in old structures are given special consideration in the planning process to ensure the preservation and enhancement of biodiversity.	of protection, the nesting sites of other species, such as swifts and housemartins, are only protected whilst in use during the breeding season - so can be destroyed at other times. As these species are in decline partially due to the loss of historic nest sites, the North Wales Wildlife Trust would like to see a recognition in EN8 of the importance of Built Historic Environment and Listed Buildings to species of conservation concern and policy measures added to EN8 to ensure that historic nest sites in old structures are given special consideration in the planning process to ensure the preservation and enhancement of biodiversity.	
151	EN9: Development In or Adjacent to Conservation Areas	Object	Site HWN005 - Ash Lane, Hawarden The Allocation area is right next to a conservation area which if housing goes on this site is likely to affect the wildlife of that conservation area. It has been seen that badgers use the fields, also there are Buzzards nesting in the central oak tree. Bats fly along the hedgerows. Swifts, swallows and lapwings have been seen in different seasons which would be	HWN005 The area around Ash Farm must be kept as farm land for the symbolic historic nature of the listed Ash FARM buildings as well as the adjacent area of a conservation area to	Not accepted. The Ash Lane housing allocation does not sit adjacent to a conservation area. The conservation area for Hawarden focuses on the historic core of the village and extends northwards along the eastern side of Gladstone Way and along the south side of Cross Tree Lane.

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			detrimental to the local natural wildlife scene shared by this community if they relocated. The mitigation stated is to encorporate wildlife corridors to preserve connectivity which is definitely disruptive as these corridors would be significantly different to the open farm fields currently in place. Preserving hedgerows and major trees is stated as mitigation but their use by wildfire and so their essential biodiversity will be massively disrupted. Adjacent to the conservation area is also the grade 1 list farm house of Ash Farm with surround farm buildings and surround farm land. Having an historic Farm House surrounded by residential building rather than farm land greatly diminishes the character and historic value of this building.	allow continuous green field for biodiversity.	At the Gladstone Way frontage of the allocation, the conservation area is some 330m to the south. At the Ash Lane frontage of the allocation the conservation area is some 360m to the south. The Plan retains a green barrier between the housing allocation and the settlement boundary / conservation area. This recognizes the need to retain the historic setting to the settlement of Hawarden and to retain the open character of the gap between the allocation and the edge of the village as this is the higher and most visible land. The objectors concerns regarding St Deiniols Ash farm are set out in policy EN8. The objectors concerns in respect of wildlife and ecology are dealt with in policy EN6.
298	EN10: Buildings of Local Interest	Object	Whilst the principle of buildings of local interest is supported the manner in which they are identified is unreasonable. There is no formal mechanism for consideration of buildings and their inclusion on the 'protected' list. There is no opportunity for owners or interested parties to object or otherwise contribute to the process. There should be a system similar in process to listed building identification and listing. Listed buildings are of significantly more importance and yet owners have more rights to respond and there is a greater transparency to the process where for buildings of local interest these do not exist. There is therefore a fundamental issue of an individual's right to have their views, opinions and objections taken into account.	It should refer to the process of identification and inclusion in the list and set this out in the explanatory text which should include the production of supplementary planning guidance.	Not accepted. The purpose of policy EN10 is to provide guidance on development proposals which would affect Buildings of Local Interest. The policy is in accordance with para 6.1.29 of PPW which allows development plans to consider including locally specific policies relevant to the historic environment. The paragraph specifically refers to historic assets of special local importance that do not have statutory protection, but that make an important contribution to local distinctiveness and have the potential to contribute to public knowledge. It is also the case that the majority of buildings on the local list are former grade 3 listed buildings which ceased to be formally listed when the grading structure was reviewed by Cadw. The objector supports the policy but is concerned with the process of designating such BLI's and not with the policy itself. The Council adopted a Procedure for Designating BLI's in 2013 but this had not been made available on the Council's website. Given that the Procedure note was prepared in the context of UDP policy and references (now) replaced Welsh Government guidance, it is

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					considered that the note is reviewed and reconsulted upon following adoption of the LDP. However, given that the designation of BLI's clearly falls outside the remit and scope of the LDP, this should not be referenced in the LDP.
93	EN11: Green Barriers		Objection to Policy EN11(3) - Green Barrier at Flint	Objection to Policy EN11(3) - Green Barrier at Flint	Not accepted. The site was previously allocated for employment in the Delyn Local Plan but never came forward in the form of a planning application. In the Deposit UDP the exclusion of the site as an employment allocation was objected to and considered by the UDP Inspector. The Inspector commented 'This land was allocated in the Delyn Local Plan, was assessed for its suitability for rolling forward but was not included due to site constraints. The Council takes the view that there is no prospect of the site coming forward for development during the plan period. No substantive evidence has been produced to convince me otherwise. Adequate land has been allocated in the UDP for employment needs and I do not support this Objection'. As part of preparing the LDP, an Employment Land Review was carried out which has concluded that, on the basis of existing portfolio of employment land there is no need for additional employment land allocations in the Plan period. The objector submitted the site as a candidate site (FLI008) as a mixed use site comprising 500 dwellings and employment land if required. At Preferred Strategy consultation stage the objector submitted a representation clarifying that the proposal was for residential only. The Council's consideration of the representation seeking housing in respect of HN1 (id1218) has concluded that the LDP has provided for a substantial amount of growth in Flint over the Plan period and it is not considered that an additional allocation is either necessary or appropriate. Given the size of the site and the lack of any supporting background or technical evidence it is not considered that the site is viable or deliverable, particularly in the light of previous concerns about viability.

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					In the UDP the green barrier did not extend up to the settlement boundary of Flint in this location. Whilst the UDP Inspector did not recommend allocating the site for development, she did not go so far as to extend the green barrier as there was no objection before her which proposed this. As part of reviewing the green barriers it was evident in this case that the green barrier sought to protect the gap between Bagillt and Flint but did not extend to the edge of the built part of Flint. As clearly set out in the Background Paper 1: Green Barrier Review, the purpose of the green barrier in this location is to prevent continuous built up frontage between Bagillt and Flint alongside the A548. The green barrier has therefore been reviewed and re-configured to focus on retaining the gap between the Manor Drive block of development and Flint and enabling a longer term development opportunity between Coleshill Road and Bagillt. The representor suggests that the UDP green barrier policy is likely to more permanently retain the open character of land than an open countryside policy, stating ''permanence beyond the life span of the Plan.'' This may be true for a Green Belt policy however PPW clearly states in paragraph 3.60 that green wedges should be reviewed as part of the development plan process as reflected in the LDP . PPW states ''The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.'' The site is not required as a contingency housing site as the plan already has enough allocated sites to provide 7950 new homes to meet a housing requirement of 6950 homes with a flexibility allowance over nearly 15%. In addition there is no requirement in PPW or the Development Plans Manual to make provision for 'contingency sites'. The representor also states that ''PPW has changed in what Welsh Government considers to be acceptable in green barriers

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					with the inclusion in paragraph 3.73 of "renewable and low carbon energy generation". The objector then seeks to use this to criticize the Council in respect of alleged inconsistences between previous decisions on large scale solar proposals elsewhere in the County yet there were ket material differences in the cases referred to and none of those decision were call in by the Welsh Ministers as being in conflict with national policy.
434	EN11: Green Barriers		Whilst do not object to the principle of designating Green Barriers it is important that these are necessary to serve the purpose and not used as a means of unnecessarily restricting development.		Support noted
819	EN11: Green Barriers		Planning Policy Wales set out (para 3.60) that Green Wedges should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. The Preferred Strategy set out a key message (page 22) of "The need to assess the comments of the UDP Inspector who considered that the…. time was rapidly approaching whereby a fundamental review of open countryside and green barriers in parts of the County was needed." The expectancy is that the LDP would consider, having regard to both tests of PPW 3.60, both the ongoing use of (and therefore as an option the very need for Green Barriers as a tool). My client considers that the LDP is unsound as Background Paper 01 (BP01) presupposes that Green Barriers previously defined in the UDP be used as the starting point for assessment. No part of the BP01 assesses if Green Barriers should no longer be used or are needed as a matter of strategy and compliance with the PPW tests or whether	The Preferred Strategy set out a key message (page 22) of "The need to assess the comments of the UDP Inspector who considered that the…. time was rapidly approaching whereby a fundamental review of open countryside and green barriers in parts of the County was needed." The expectancy is that the LDP would consider, having regard to both tests of PPW 3.60, both the ongoing use of (and therefore as an option the very need for Green Barriers as a tool). My client considers that the LDP is unsound as	Not accepted. The objector seeks the allocation of the site for housing and the Council's response in respect of HN1(id817) should be read in conjunction with this response on the green barrier. In terms of Green Belts and green barrier or wedges, Welsh Government clearly state in para 3.60 pf PPW10 that 'The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process'. Therefore as part of preparing the LDP the Council has undertaken a review of the existing green barriers. It is quite legitimate for existing green barriers in the adopted UDP to be the starting point for the review. However, the review also assessed green barriers which were put forward in Candidate Site submissions. Green barrier (wedges) are a legitimate planning tool as identified by the Welsh Government in PPW10. Welsh Government have not objected to the Plan's spatial strategy or green barriers, other than to seek a renaming of green barrier to 'green wedge'. The objector claims that the inclusion of the objection site in this green barrier runs contrary to para 3.68 of PPW. The Council's interpretation of para 3.68 of PPW10 is that it is specifically

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			they should as a matter of principle no longer be provided. The inclusion of site NH003 within a Green Wedge runs contrary to the requirement of PPW para 3.68 as designation of such a large extent of land as Green Barrier in the plan and this Green Barrier in particular does not provide for a sufficient range of land around the settlement of Northophall to be made available. Publication of the National Development Framework (NDF) for consultation proposes much of Flintshire as a National Growth Area and a Green Belt between Wrexham and Deeside. The expectancy is that the NDF will be adopted and become part of the Development Plan for Flintshire in Autumn 2020, prior to LDP examination completion and adoption. This will create significant challenges for adoption of the LPD given the NDF conformity duty. The allocation of vast tracts of land around the edges of Deeside Settlements as Green Barrier contradicts with the objectives of the NDF to deliver a National Growth Area and the Wrexham-Deeside Green Belt. The spatial implications of NDF conformity are highly likely to require additional land releases to facilitate the required levels of nationally led growth and my client considers the LDP will not be capable of being found sound at this stage unless a fundamental further review of Green Barriers - including their very need as a matter of principle - is undertaken and consulted upon.	Background Paper 01 (BP01) presupposes that Green Barriers previously defined in the UDP be used as the starting point for assessment. No part of the BP01 assesses if Green Barriers should no longer be used or are needed as a matter of strategy and compliance with the PPW tests or whether they should as a matter of principle no longer be provided. The inclusion of site NH003 within a Green Wedge runs contrary to the requirement of PPW para 3.68 as designation of such a large extent of land as Green Barrier in the plan and this Green Barrier in particular does not provide for a sufficient range of land around the settlement of Northophall to be made available. Publication of the National Development Framework (NDF) for consultation	concerned with green ‘belts’ as green ’wedges’ are not mentioned. The paragraph refers to the need to define green belts so that there is land available for development in the long terms. This is clearly not applicable to green barriers (wedges) as para 3,60 of PPW refers to the need for green barriers to be reviewed as part of the preparation of development plan. There is no requirement in PPW10 for the Council to make land available on the edge of every settlement / green barrier in order to provide for longer term needs. Rather, the Plan has met its housing requirement figure (as demonstrated in the Housing Balance Sheet) and it is not necessary to make provision in Northop Hall by drawing back a green barrier. FCC has submitted representations to the Welsh Government consultation on the draft NDF. If the requirement for a green belt in North East Wales remains in the document it will need to be designated through a Strategic Development Plan. This will clearly take time to be prepared, consulted upon and adopted. The most appropriate time to address this is through a first review of the LDP when a Strategic Development Plan can be translated into the LDP. The objector appears to be claiming that the designation of the Wrexham Deeside area as a growth zone in the draft NDF will require the LDP to provide for additional growth in this Plan period. However, the LDP has adopted a growth based approach in respect of employment and housing. Welsh Government representations indicate that the Plan is broadly in conformity with the draft NDF. The objector appears to be arguing that the adoption of the Plan should be put on hold pending a further review of green barriers / designation of green belt is undertaken. This would not be a responsible way to deliver the growth that the Plan and draft NDF seeks. The southern part of the green barrier (EN11.4) seeks to protect the narrow neck of land between Northop Hall and Connah’s Quay. This is the most important part of the green barrier given the narrow gap. There is clear development pressure as demonstrated by the objection site and candidate site CON011

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				proposes much of Flintshire as a National Growth Area and a Green Belt between Wrexham and Deeside. The expectancy is that the NDF will be adopted and become part of the Development Plan for Flintshire in Autumn 2020, prior to LDP examination completion and adoption. This will create significant challenges for adoption of the LPD given the NDF conformity duty. The allocation of vast tracts of land around the edges of Deeside Settlements as Green Barrier contradicts with the objectives of the NDF to deliver a National Growth Area and the Wrexham-Deeside Green Belt. The spatial implications of NDF conformity are highly likely to require additional land releases to facilitate the required levels of nationally led growth and my client considers the LDP will not be capable	and CON021 (the latter site has been submitted multiple times). The implication of these sites together would result in the direct coalescence of Connah's Quay and Northop Hall. The release of the objection site would significantly erode the gap and increase the likelihood of coalescence. The ribbon of development along Bryn Gwyn Lane marks a firm and defensible boundary for both the settlement boundary of Northop Hall and the green barrier. Only part of the settlement is constrained by a green barrier. Therefore, even if there were a need to make provision for planned growth in Northop Hall (which is not the Council's case) then there are other options on the western edge of the settlement. Adopting a sequential approach to site selection, it must be the case that a site outside of a green barrier is preferable to a site within a green barrier.

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				of being found sound at this stage unless a fundamental further review of Green Barriers - including their very need as a matter of principle - is undertaken and consulted upon.	
92	EN11: Green Barriers	Object	The green barrier in this location is relatively narrow but part of the rationale for extent of green barrier designation is that they should not be excessive both in number and extent. Paragraph 4.13 of the existing UDP explains: The green barriers in the Plan have therefore been reduced both in number and extent to ensure that they are more strategic in terms of protecting only key areas of land where it is essential to retain its open character and appearance". As part of the preparation of the LDP each green barrier was subject to an assessment that had regard to the need to make provision for development allocations where sites conformed with the Plan spatial strategy and detailed site assessment process. In considering this candidate site the key factor is whether or extending the settlement boundary would be materially harmful to green barrier purposes. The planning authority acknowledges that the site's contribution to the green barrier is small and seeks justification for this view by referring to 2 appeal decisions. The first appeal was in relation to an enforcement notice where the main issue related to the lawfulness of the use as a builder's yard	Land at Bryn Y Baal Candidate site MYN006 regarding extension to settlement boundary and roll back green barrier EN11(10). Please refer to attached document	Not accepted. The objector has proposed the inclusion of the site within the settlement boundary and to be allocated for a gypsy and traveller site and the Council's responses in respect of PC1 (id1206) and HN8 (id 91) should be read in conjunction with this green barrier objection. As part of the Deposit LDP green barriers have been reviewed and the conclusions have been set out in the Green Barrier Background Paper. This paper clearly shows that in some situations the green barrier has been drawn back where it is considered appropriate and the LDP has retained key areas of land where it is essential to retain its open character and appearance. In this case the paper does identify ''the land to the east and west of Bryn Y Baal Road forms part of a swathe of land which contributes to the objective of keeping separate the settlements of New Brighton, Mynydd Isa and Mold. This part of the green barrier should be retained'' The paper then goes on to delete parts of the green barrier. As the objector points out this process of assessment to make provision for development has therefore been carried out. At 0.12ha the size of the site is relatively small but the position of the site is important in an area of green barrier between Mynydd Isa and New Brighton which is dissected by the A494 and is a crucial gap between the settlements. The site is located on the edge of Mynydd Isa, along Bryn Road where there is a noticeable change in the character of the area from a densely built up area to farm buildings adjoining open fields on the right and on the left housing at Yr Ydlan is bounded by Bryn Derw Farm and out

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			over a period of time. This failed on the basis that there was insufficient evidence on the balance of probability that it had existed for 10 years although it was acknowledged that this only fell short by a matter of 2 months. The second appeal was in respect of the refusal of application reference 056672 for residential development where the Inspector concluded that harm to the green barrier designation outweighed the merits of residential development put forward at the appeal. It should be noted however that he also stated, “If the site was not located in a green barrier, these arguments would be finely balanced”. The critical issue here is that the Inspector’s decision was based on the policy that existed at the time. The difference now is that the green barrier is being reviewed as part of the development plan process and Inspectors’ comments should therefore be considered in this context. In declining to make a small change to the settlement boundary the planning authority consider that the site does not relate well to the form and pattern of nearby development. This is not the case and view of the physical form of the existing built settlement clearly shows that this is a logical extension and rounding off and fits with the principals that the authority has adopted in other new allocations adjacent to settlement boundaries. These include the much larger sites including the housing commitment at Mynydd Isa and new allocations at Abermorddu, Penyffordd, Ewloe Green, Mancot, Mold, New Brighton. All of these		buildings. This is followed by the site which is enclosed and well screened by mature hedgerows creating a natural feature in the wider open agricultural landscape. Within the site there is a small corrugated iron shed which is difficult to view as it is enclosed by mature hedgerow and there is very little actually stored on the site. The site was submitted as an Omission site and considered by the UDP Inspector who commented in paragraph 11.128.10. ‘’The settlement boundary in this location is firm and defensible following the line of built development. The objections site is open land screened by hedgerows and the track along its north western side is overgrown. At the time of my visit it was used as a storage compound. Despite the storage use, in appearance it has more in common with the countryside to the north and I consider it is appropriately located in the undeveloped area outside the settlement boundary.’’ Although the site is now barely used for storage, the conclusions are the same today. As the objector points out there have been two appeals in relation to this site the most recent in 2017 whereby the inspector concluded. ‘’The site lies within the Mold – Mynydd Isa/Sychdyn/New Brighton green barrier which was designated for the purpose of safeguarding the open countryside around these settlements and preventing the settlements from merging into one another. The development would comprise the construction of some 4 dwellings and associated works on a site that would protrude out into the rural gap between Mynydd Isa and New Brighton. As such it would be harmful to the rural character and appearance of the area and to the openness of the green barrier, and it would erode the gap between the 2 settlements,’’ These conclusions remain the same today. It is considered that the site is not ‘significantly different in character’ , as the UDP inspector pointed out ‘despite the storage use’ the appearance of the site is more in common with the countryside to the north’’. The fact that he site is enclosed by mature hedgerows means it fits in well with the surrounding agricultural landscape. It is also not considered to be a logical rounding off of the settlement as it extends out away from the

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			have substantially greater impact in terms of scale and character. The planning authority also state that the site has “greater association in character and appearance with the open land between the two settlements”. This is simply not true. The site is a triangular enclosed area with the well-defined former hard surfaced former highway between the site and the established hedgerow. The land beyond consists of open fields in agricultural production. Not only is it significantly different in character but it has no realistic beneficial use for agricultural purposes. The site is hard surfaced and, without substantial security fencing, is liable to incidents of fly tipping and other unauthorised activity. It is a matter of fact that extending the settlement boundary would narrow the gap which separates the Bryn Y Baal from New Brighton. This measures some 350m with the A494 Mold by-pass passing through the centre of this gap. The reduction in the gap if the settlement boundary were redrawn would be some 50m, i.e. 15%. This would not be visually significant and the perception of the green barrier and its role would not be damaging due to the existence of the strong defensible boundary. All development, by definition, has an effect but in this case that effect is not so damaging as to outweigh a very modest development in a highly sustainable location. 3.7 The site’s current status as green barrier should not be an impediment at this stage to development of the site. When producing a new plan it is incumbent on the authority to		settlement and forms part of the open agricultural landscape. Development of the site, the objectors admits, would narrow the gap between the two settlements, this is one of the main purposes of the green barrier designation and since New Brighton and Mynydd Isa are relatively close it is more imperative that the area remains open and free from development. Allocated land at Ewloe does extend into a former green barrier area but it also does not extend the settlement into a narrow gap between settlements so as to threaten coalescence as is the case here. The objector suggest that only two dwellings would be built on the site however it is capable of accommodating 4 dwellings as previously noted in the planning application. In conclusion although small, the site is in a prominent location between Mynydd Isa and New Brighton, development of which would erode the green barrier where it is crucial to maintain an open gap between the two settlements. It is not considered suitable for an allocation or a settlement boundary change and should remain as green barrier.

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			review the green barrier and make adjustments in the context of development need and sustainability. It has already done so at Ewloe where a large 10 ha site within the green barrier has been allocated to provide up to 300 dwellings. This is a major incursion into the green barrier with a substantially greater impact on landscape character than this small site at Bryn Y Baal which is well related to the existing settlement pattern. The site is close to open space sports facilities, schools, a shop, library and health clinic and access to public transport is excellent with a bus stop 50m away on the main road. In sustainability terms it is far superior to housing land allocations that the planning authority has proposed. This is merely a statement of fact rather than any argument that this site should in any way substitute for those allocations. The proposal to redraw the settlement boundary to allow for a very modest development of two dwellings constitutes a very sustainable form of development. This modest contribution to housing land supply would not result in any material harm to the character of the area and, in the context given above, would not prejudice or weaken the green barrier in terms of actual effect and the policy overall.		
150	EN11: Green Barriers	Object	Site HWN005 - Ash Lane, Hawarden We purchased our house on the edge of a village near green barrier land deliberately to avoid an area of continuous residential/urban landscape. Building on this Green barrier land will create a long urban	Green Barrier Land needs to be much more protected than it seems planned here. Welsh National policy is to protect Green Barrier	Not accepted. In terms of green belts and green barriers or wedges, Welsh Government clearly state in para 3.60 of PPW10 that 'The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan

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			strip from Ewloe - Hawarden - Mancot - Pentre - Queensferry - Sandycroft. This is far from the existing character of the area which is one of villages with green barrier surrounds. Although the policy wording suggests it is inappropriate to create housing in green barriers this Ash Lane Development flies against that by using a very large area of green barrier (green wedge) land. This is also against Planning Policy Wales Ed 10 Dec 2018: 3.71 The construction of new buildings in a Green Belt or green wedge is inappropriate development unless it is for the following purposes: • justi ed rural enterprise needs; • essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the Green Belt or green wedge and which do not con ict with the purpose of including land within it; • limited extension, alteration or replacement of existing dwellings; or • small scale diversification within farm complexes where this is run as part of the farm business.	fields but this has been chosen over many brown field sites because the brown field sites are not ideal. More effort needs to go to mitigation of the factors against those brown field sites first before dismissing them and going for the developers easy choice of green fields sites. This is a bad precedent to set and would lead the way to every future plan avoiding those potential brown field sites and using more and more green field sites. The HWN005 Ash Lane development needs to be much smaller to maintain the green barrier and avoid coalescence of Mancot to the Upperdale area of Hawarden.	review process'. Therefore as part of preparing the LDP the Council has undertaken a review of the existing green barriers as required by national planning guidance. Welsh Government explains in para 3.51 that 'Previously developed (also referred to as brownfield) land (see definition overleaf) should, wherever possible, be used in preference to greenfield sites where it is suitable for development'. However, Welsh Government goes on to say that 'It is recognised, however, that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated'. It is a fact that the County has large tracts of brownfield land but these are along the Dee Estuary where there is the presence of flood risk, contaminated land and proximity to the Dee Estuary ecological designations. These areas / sites are also divorced from sustainable settlements and are not suitable for residential development. The UDP Inspector did not consider that the drawing back of the green barrier as part of recommending the allocation of the site for housing, would harm the function of the green barrier. Although the site allocated in the LDP is slightly larger than that recommended by the UDP Inspector, the Green Barrier Background Paper demonstrates that it will not harm the function of the green barrier. The settlement boundaries of Hawarden and Mancot adjoin each other and there is already coalescence between the two settlements. The LDP seeks to retain the southern and higher land as green barrier on either side of Gladstone Way. This will ensure that the green barrier around the historic part of Hawarden remains intact to preserve the setting of the historic core. Both Hawarden and Mancot will still have an open countryside and green barrier setting. The Plan does not fail Test 1 as national planning guidance references the need to review green barriers. The Plan does not fail Test 2 as the Council is clearly aware of the green barrier context for the site having regard to the previous UDP Inspectors

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					report and the review of the green barrier as set out in the Green Barrier Background Paper.
195	EN11: Green Barriers	Object	The Green Barrier policy can be varied to allow Land at Megs Lane, Buckley to come forward for housing development without any prejudice to the principle of the policy in this location. See accompanying statement.	Amend the policy to exclude suitable land on the margins of Buckley in order to allow for longer term growth requirements.	Not accepted. The objector has promoted the site for housing in HN1 (id193) and that response should be read in conjunction with this response on the green barrier. The green barrier along the south eastern edge of Buckley is a well established green barrier that seeks, in line with PPW, to prevent encroachment of development into open countryside, to prevent coalescence of Buckley with built development at Padeswood and protecting the setting of an urban area. The Green Barrier is not being applied as a green belt in all but name as suggested by the objector. In line with advice in para 3.60 of PPW10, the Council has undertaken a review of existing Green Barriers as set out in Background Paper 1. The site was submitted for development as an 'omission site' as part of the UDP and the Inspector commented 'Whilst adjacent to HSG1(2) the site shares only a short boundary with it and is separated from it by a stream and a corridor of trees/vegetation. Although both are greenfield sites, visually there is not a strong relationship between the 2 and development on the objection site would extend further to the south into the rural area. The site is bounded to the north by the backs of properties fronting Megs Lane and lies within the green barrier which seeks to prevent encroachment into an area of open countryside to the south of Buckley where there is pressure to develop'. Land to the east was also submitted through a number of omission sites for development as part of the UDP and the Inspector also resisted these. A planning application (058237) has since been submitted for a large scale housing development of 435 dwellings, which was refused 18/07/18. This demonstrates that there is clear and continuous development pressure along this southern edge of Buckley and the Council and the Council

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					has consistently sought to prevent the green barrier being breached. The southern edge of Buckley has a well defined urban edge which sits at the top of gently rising land. In relation to this site land South of Buckley / Padeswood, this part of the green barrier comprises prominent and open land which rises from the A5118 at Padeswood up to the prominent edge of built development along the southern edge of Spon Green and Meg's Lane. The land fulfils the purposes for green barrier designation and should be retained. The objectors have included a Green Barrier Assessment as part of the submission. This assessment suggests that the present Green Barrier boundary is weak because it does not comprise a line of trees or a wooded area. However the settlement and Green Barrier boundary follows the line of the houses along Megs Lane and forms a well defined, significant physical feature on the ground, making it very clear the extent of Buckley and the transition from the character of the built limit of the settlement, to the open countryside beyond. It also suggests that built development will not detrimentally affect the green barrier as views into the site will be well screened due to the topography of the surrounding land and by woodlands. However, built development will affect the openness of the green barrier from close to and far views, some views may be shielded by woodland and topography but the extent and scale of the site means it will affect the overall openness of the area. It is not a good planning argument to say that simply because you may not be able to see a development that it doesn't therefore cause harm. This will then set a precedent for further development in an area where there is already significant pressure as has been as detailed above. As the UDP Inquiry Inspector also pointed out '' It would be the first extension beyond the well defined existing line of built development, result in the coalescence of Buckley and Padeswood/the cement works and effectively sever the strategic green barrier.'' The site has therefore been assessed as part of the Green Barrier review and retained as it is considered that it continues to play an

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					important role in protecting the openness of the area by preventing urban encroachment and coalescence. The conclusion of the UDP Inspector in supporting the retention of this barrier along the southern edge of Buckley is still considered to apply to the present situation. Furthermore, the Well Street housing allocation and commitments exist in Buckley for housing development without having to draw back the green barrier.
246	EN11: Green Barriers	Object	The designation of Green Barriers (Policy EN11) to prevent the coalescence of settlements is fully supported, particularly Green Barriers 11 and 12 which separate Ewloe from Connah's Quay/Shotton and Hawarden. The vulnerable open spaces between these settlements have been diminished and reduced over time and are now quite small and inevitably under pressure for development. Whilst the policy is supported along with the currently proposed Green Barrier designations 11 and 12, there is a strategic gap in the Green Barrier designed to conserve the open character between Ewloe and Connah's Quay/Shotton. The area in question is the open land to the north-west of the A494 Aston Hill which separates the A494 from the Old Aston Hill area. To maintain the integrity and purpose of the Green Barrier in this area it is requested that the Green Barrier designation should be extended to include this area. The area was put forward as a Candidate Site and is under pressure for development and if the LDP is to conserve a degree of openness between these settlements, control urban expansion and prevent encroachment into open countryside, this area should be included within the proposed Green Barrier.	Whilst the policy is supported along with the currently proposed Green Barrier designations 11 and 12, there is a strategic gap in the Green Barrier designed to conserve the open character between Ewloe and Connah's Quay/Shotton. The area in question is the open land to the north-west of the A494 Aston Hill which separates the A494 from the Old Aston Hill area. To maintain the integrity and purpose of the Green Barrier in this area it is requested that the Green Barrier designation should be extended to include this area. The area was put forward as a Candidate Site and is under pressure for development and if the LDP is to conserve a degree of openness	The general support for green barriers 11 and 12 is noted. Not accepted. This swathe of open land is set between the ribbon of development along Old Aston Hill and the A494(T) and dissected by Church Lane. It has the character and appearance of open countryside but is separated from the open countryside to the north west by Old Aston Hill and from land to the north east of Ewloe by the A494(T). The role of green barrier EN12 is to prevent the coalescence of Ewloe, Hawarden and the outlier development at Aston. The A494(T) provides a firm and defensible boundary to this green barrier and it is not necessary or appropriate for the green barrier to extend beyond the A494(T). The role of green barrier EN11(11) is to prevent the coalescence of Ewloe and Ewloe Green from Shotton / Aston, Connah's Quay and Northop Hall. The ribbon of residential properties along Old Aston Hill is considered to represent a firm and defensible edge to the extent of the green barrier and it would be inappropriate for the green barrier to extend as far as the A494(T). Ewloe and Ewloe Green form one defined settlement in the LDP with a single settlement boundary and it is not considered appropriate for a green barrier between the two parts of the settlement alongside the A494(T).

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				between these settlements, control urban expansion and prevent encroachment into open countryside, this area should be included within the proposed Green Barrier.	
326	EN11: Green Barriers	Object	Object to EN11(3) regarding the extension of the green barrier between Flint and Bagillt. This objection also cross references to the objection made in respect of Candidate Site FLI008. Please refer to attached document below.	Remove the proposed extension to the green barrier between Flint and Bagillt and include candidate site FLI008 as a contingency site. Add clarification in the explanatory text as to how it determines impact on open character in decision making	Not accepted. The site was previously allocated for employment in the Delyn Local Plan but never came forward in the form of a planning application. In the Deposit UDP the exclusion of the site as an employment allocation was objected to and considered by the UDP Inspector. The Inspector commented 'This land was allocated in the Delyn Local Plan, was assessed for its suitability for rolling forward but was not included due to site constraints. The Council takes the view that there is no prospect of the site coming forward for development during the plan period. No substantive evidence has been produced to convince me otherwise. Adequate land has been allocated in the UDP for employment needs and I do not support this Objection'. As part of preparing the LDP, an Employment Land Review was carried out which has concluded that, on the basis of existing portfolio of employment land there is no need for additional employment land allocations in the Plan period. The objector submitted the site as a candidate site (FLI008) as a mixed use site comprising 500 dwellings and employment land if required. At Preferred Strategy consultation stage the objector submitted a representation clarifying that the proposal was for residential only. The Council's consideration of the representation seeking housing in respect of HN1 (id1218) has concluded that the LDP has provided for a substantial amount of growth in Flint over the Plan period and it is not considered that an additional allocation is either necessary or appropriate. Given the size of the site and the lack of any supporting background or technical

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					evidence it is not considered that the site is viable or deliverable, particularly in the light of previous concerns about viability. In the UDP the green barrier did not extend up to the settlement boundary of Flint in this location. Whilst the UDP Inspector did not recommend allocating the site for development, she did not go so far as to extend the green barrier as there was no objection before her which proposed this. As part of reviewing the green barriers it was evident in this case that the green barrier sought to protect the gap between Bagillt and Flint but did not extend to the edge of the built part of Flint. As clearly set out in the Background Paper 1: Green Barrier Review, the purpose of the green barrier in this location is to prevent continuous built up frontage between Bagillt and Flint alongside the A548. The green barrier has therefore been reviewed and re-configured to focus on retaining the gap between the Manor Drive block of development and Flint and enabling a longer term development opportunity between Coleshill Road and Bagillt. The representor suggests that the UDP green barrier policy is likely to more permanently retain the open character of land than an open countryside policy, stating ''permanence beyond the life span of the Plan.'' This may be true for a Green Belt policy however PPW clearly states in paragraph 3.60 that green wedges should be reviewed as part of the development plan process as reflected in the LDP . PPW states ''The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.'' The site is not required as a contingency housing site as the plan already has enough allocated sites to provide 7950 new homes to meet a housing requirement of 6950 homes with a flexibility allowance over nearly 15%. In addition there is no requirement in

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					PPW or the Development Plans Manual to make provision for 'contingency sites'. The representor also states that ''PPW has changed in what Welsh Government considers to be acceptable in green barriers with the inclusion in paragraph 3.73 of "renewable and low carbon energy generation". The objector then seeks to use this to criticize the Council in respect of alleged inconsistencies between previous decisions on large scale solar proposals elsewhere in the County yet there were key material differences in the cases referred to and none of those decision were call in by the Welsh Ministers as being in conflict with national policy.
555	EN11: Green Barriers	Object	This representation is made on behalf of a Trust which owns an area of land at Kelsterton Farm, Connah's Quay (Appendix 1). This land covers approximately 40Ha (98.8 acres) and is located south of Chester Road, between Connah's Quay and Flint. Given the site's size and its proximity to two 'Main Service Centre' settlements, we consider that this site provides a future opportunity for a range of land uses including residential, employment and roadside uses. Policy EN11 outlines areas that are designated as green barriers on the proposals map and lists the criteria for which development will be permitted. Whilst we support a considered approach to the location of development and are committed to preserving the openness of key areas, we object to the inclusion of land that is unable to meet these requirements. Our client's site is bisected by the proposed "red route" of the new 13km dual carriageway A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement. Whilst this proposed new road represents an exciting new opportunity for the region (which we	Allocate an area of land at Kelsterton Farm, Connah's Quay (Appendix 1). we consider that this site provides a future opportunity for a range of land uses including residential, employment and roadside uses.	Not accepted. The objector seeks the allocation of the site for housing and mixed use development and the Council's response to HN1 (id1269) should be read in conjunction with this objection to the green barrier. The objection site is located on the north western edge of Connah's Quay. It adjoins the existing settlement boundary only at its north east corner adjoining Perenna Court, Kelsterton Hall and the Coach House. For the most part the site is completely divorced from the built form of Connah's Quay, being separate by open land between Kelsterton Lane and the settlement boundary. It is situated within the Flint - Connah's Quay green barrier, GEN4(4) which has been reviewed as part of the LDP process and found to meet the objectives of PPW. The site forms part of a large swathe of open countryside to the north west of the settlement. It is considered that the site is an integral part the open countryside and has little relationship to the form and pattern of development within the settlement of Connah's Quay. The inclusion of this site within the settlement boundary, or its allocation, would virtually split the green barrier between Flint and Connah's Quay in two. At the southernmost part of the site, alongside Cheshire Farm, the remaining green barrier would be a mere 160m compared to the existing 1100m depth of the green barrier. The resultant large detached block of development would place pressure, in particular on the intervening

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			support), it requires the removal of green barrier to the north of Connah's Quay. The new road aims to provide 4 lanes of traffic through the green barrier which will have a considerable impact on its openness and ability to perform as functional green barrier land. The layout of the proposed route however is such that it still maintains a distinct barrier between Connah's Quay and Flint and we propose that this becomes the new border between the two settlements (Appendix 4). Given this, we consider that the land should be removed from the Green Barrier and safeguarded for a mix of uses including residential, employment and roadside uses given its location.		land between the site and the edge of the settlement. Such a significant incursion into open countryside and green barrier is not necessary or appropriate when there are sequentially preferable sites within the settlement boundary to cater for growth at a more proportionate and sustainable scale. The objector appears to argue that the progression of the Red Route necessitates the removal of the green barrier designation. This is not the case as the guidance in para 3.74 of PPW10 explains that certain other forms of development may be appropriate in the Green Belt or green wedge provided they preserve its openness and do not conflict with the purposes of including land within it and these include engineering operations and local transport infrastructure. In its response on policy HN1 the Council has explained how the Red Route is not considered to provide a context for development in this Plan period. The site is located in the middle of the important strategic gap located within an extensive (335ha) green barrier between two of the County's towns (Main Service Centres). The purposes of the green barrier is to prevent coalescence of the two urban areas, to prevent encroachment into open countryside and to manage the urban form. The removal of the objection site from the green barrier would significantly undermine the purposes of the green barrier without any justifiable development context or need. Until further information about the timing and detail of the Red Route becomes known then it is premature for the site to be considered in any context, and certainly not within the timeframe of the LDP. The green barrier can potentially be reviewed at a future review of the LDP in line with the land use context for this location at that time.
603	EN11: Green Barriers	Object	Remove land from the Green Barrier Listed as Site No 6 Flint Mountain Northop.We contend that the draft Plan is not sound because its approach to Green Barriers (and Housing) fails the tests of soundness in Planning Policy Wales (Edition 10,	Remove land from the Green Barrier Listed as Site No 6 Flint Mountain Northop.We contend that the draft Plan is not sound	Not accepted. The green barrier at Northop is a well-established green barrier that seeks, in line with PPW, to prevent encroachment of development into open countryside and protecting the setting of an urban area. The particular land sought for housing development lies between the northern edge of the

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			December 2018) and the Welsh Government's Local Development Plan Manual (Edition 2 - August 2015). Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales. PPW explains the differences between Green Wedges (or Barriers, as in this instance) and Green Belt. Although the restrictions on development are identical, the procedure for designation and degree of permanence differ. Once they are in place, the restrictions they impose are essentially the same. This is why it is so important to ensure that local authorities: - a) Fully appreciate the seriousness of creating a Green Wedge/Barrier and understand the negative effects it will have on development that might have a strong justification and promise significant benefits; and b) Take a robust approach to ensure that land is not included without good reason and that boundaries are chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. It is evident from Paragraph 3.67 that, unless a planning authority can demonstrate why normal planning and development management policies would not provide the necessary protection, it risks having its LDP found unsound. The testing of such designations would need to take account of the need for the LDP to respond to other pressures and considerations. For example, PPW states	because its approach to Green Barriers (and Housing)	settlement and the A55(T) along with the physical infrastructure associated with the grade separated interchange at junction 33. The Plan is not unsound as the Council has reviewed green barriers in line with national planning guidance and evidenced this as part of the Green Barrier Background Paper. The site was submitted as an omission site as part of the UDP and was not recommended for inclusion in the Plan by the Inspector. Indeed, she stated 'Although the site is well contained by existing development, the A55 and the A5119, it is an area of countryside which contributes to the rural setting of Northop. Moreover because of its open nature it is designated as part of the green barrier in order to protect a major road junction from visually intrusive development'. The land has since been the subject of a planning application for housing which was refused, and not taken to appeal. Candidate and Alternative Sites have also been submitted elsewhere at Northop and it is evident that there is clear and consistent development pressure in this part of Northop. The Council is also mindful that the proposed 'red route' linking the A494(T) with the A55(%T) at junction 33 will bring with it significant infrastructure development associated with the new road and how it ties in with the existing grade separated interchange. The Red route may also result in development pressure and it is important to protect the northern part of the settlement during this Plan period until the implications of the new road and its relationship with the settlement and green barrier can be re-assessed as part of the LDP review. The objector's estimates for the construction of the Red Route are unrealistically ambitious and it is far from clear whether the route will actually be built during the life of this LDP and/or before it is reviewed.

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			(Paragraph 3.46) that a broad balance between housing, community facilities, services and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting. PPW makes it clear (Paragraph 1.16) that evidence is needed to support LDP policies, which is tested through the Examination procedure.		The UDP Inspector considered green barrier designation was warranted as part of the adopted UDP and this is considered to still be the case in the LDP. The objector has submitted a Landscape and Visual Impact Review and the Council responds to the conclusions of that review below: 1. The fact that the site is separated from the northern section of the green barrier designation by the A55 does not mean is should not to be included in the designation. Many of the green barriers in the county are dissected by roads or railways. The key feature of the objection site is that it has the character and feel of open countryside. It is an important part of the green barrier as it protects the setting of the historic settlement from intrusive urban encroachment. As set out in in PPW one of the main purposes of the green barrier is to protect the setting of an urban area. 2. Visually, the open landscape in this area comprising agricultural land, the cricket ground and the cemetery together play a very important role in the historic rural setting for the listed church, the conservation area and the village as a whole. That setting is therefore vitally important to retain the character of Northop. Trees line the A55 route which again visually creates a natural backdrop to the area enhancing the impression being in the countryside. The urban influences mentioned by the objector are superficial (street lighting, signs, pavements) in that they do not detract from the site's importance as a tract of open landscape which maintains the sense of place for the village. The development of the site for housing would clearly have a major impact on the character and appearance of locality and the openness of this area of land. 3. Although the A55, A494 A548 Flintshire Corridor Red Route has been chosen it is not certain when it will be built, even though it is somewhat ambitiously at the present time scheduled to be designed and built by 2023. Regulations for LDP state that an Annual Monitoring Report should be carried out once the plan is adopted and a major review of the plan should occur every 4

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					years. It would be at this time that the implications for the interchange could be more accurately considered in relation to this area and the plan as a whole, if indeed it is built within the present unlikely schedule. 4. Development of the site would be detrimental to the setting of the historic village and affect the character of Northop and its sense of place. Planning policy Wales sets out in paragraph 6.1.7 the importance of safeguarding historic assets which includes Listed buildings and Conservation area and states '' It is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.'' 5. As stated previously the Cricket ground and the cemetery add to the historic setting of the village. The sewage works covers a very small area and is situated on the perimeter of the site and set against the tree screening alongside the A55(T) and is not considered to detract from the overall green barrier designation and indeed has the potential to conflict more with an adjacent residential use. LANDMAP may recognise them as urban uses, however in this case the sewage works has very little impact on the landscape and is by definition necessary or essential infrastructure. The cricket ground and pavilion is open in character and adds to the character of Northop as a village. The cemetery is also open in character due to its relationship with the church adds to the historic character on the village. It is also the case that PPW in para 3.71 sets out clearly that some uses are appropriate in the green barrier and this includes 'outdoor sport and recreation' and 'cemeteries'. Contrary to the objectors argument that these features somehow detract from the green barrier they clearly conform with PPW10 in terms of being appropriate to be included within the green barrier. 6. The site is not isolated from the rural landscape, and given its size, has the character and feel of open countryside which creates

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					an important rural setting for the village. Any development would harm the open, rural and historic character of the site. In conclusion, it is vitally important that this site remain open, in order to retain the rural character and sense of place of Northop
625	EN11: Green Barriers	Object	The proposed Flint Mountain - Northop Green Barrier is not appropriate. Without prejudice to that view, our client's site (land at Maes Celyn, Northop) does not fullill any role or purpose as a Green Barrier. Please see enclosed statement.	The proposed Flint Mountain - Northop Green Barrier is not appropriate. Without prejudice to that view, our client's site (land at Maes Celyn, Northop) does not fullill any role or purpose as a Green Barrier. Please see enclosed statement.	Not accepted. The objection is initially to the whole green barrier and then to the objection site put forward for housing. This response on the green barrier should therefore be read in conjunction with the response to objection id 626 re policy HN1. The objector also appears to be 'hedging their bets' given this either/or approach, rather than making specific points that are relevant arguments to consider. The Green Barrier Review does not fall short as it has been undertaken in the light of guidance in PPW10. This particular green barrier also needs to be considered against the UDP Inspectors recommendation to retain the green barrier and where for the LDP the context is unchanged. Each of the objector's points will be addressed in turn: • Green Barriers need to be applied in the context of the settlement pattern within Flintshire, and the particular characteristics of each settlement. • The settlement of Northop has to its west a large college campus and a small residential development. Whilst these are not settlements in their own right they are readily identifiable built development which is separated from and different in character to the settlement form. The green barrier designation quite rightly seeks to prevent the coalescence of the settlement with these outlier developments. The extension of built development by some 200m along Holywell Rd to a small outlier of residential development does not represent a rounding off the settlement form. • The designation of the green barrier is considered to be justified on its own merits. Given previous and recent development pressure it is considered that normal development management

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					policies are not robust enough to provide sufficient protection to the land around Northop. The settlement has seen a large number of sites put forward as omission sites in the UDP and candidate sites and alternative sites in the LDP as well as recent planning applications for residential development. There has been consistent pressure to develop this land in two development plans now. • As explained in the bullet point above, development management policies are not considered adequate given the level of development pressure around the settlement. • The future construction of the Red Route linking the A55(T) with the A494(T) is an additional consideration in terms of development pressure. The Deposit LDP has already received objections seeking major development along the proposed Red Route. Indeed, the objector argues in para 8.3 of their submission 'The development of the entire site would represent a significant increase in the size of the village. However, this [according to the objector] is considered appropriate in the context of the village being a Tier 3 Sustainable Settlement, and also the unique economic opportunities for Northop arising from the Coleg Cambria campus, the proximity to the A55 and the proposed new link road to the A494'. Unfortunately these "unique opportunities" are not defined by the objector and neither is it certain when the Red Route will be constructed or what pressures or opportunities there may be from this. As such there is no need to change the green barrier in this location or any other part of Northop. • The open countryside along either side of Holywell Rd clearly provides an appropriate and proportionate setting to the present built form of the settlement. In terms of the objection site, the green barrier to the west of Northop seeks to protect the open swathe of land on either side of the road. On the north side of the road is a gap between built development and the built development associated with Coleg Cambria. On the south side of the road is a narrower gap between residential development and the outlying housing development at

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					Maes Celyn. This part of the green barrier serves three of the five purposes of a green barrier in PPW in terms of preventing coalescence, safeguarding the countryside from encroachment and protecting the setting of the settlement. The site was submitted as an omission site as part of the UDP but the Inspector did not recommend inclusion of the site in the UDP. The Inspector commented 'The objection site lies in the open countryside between the built up limits of Northop to the east and Maes Celyn to the west. Maes Celyn relates to the horticultural college and not the village. The college is washed over by countryside policies and does not have a defined boundary. Land to the east and west is therefore subject to different policy frameworks. Although partly opposite the school, that is at a lower level with no main road frontage. The site forms a small but effective gap designated as green barrier between the village and college. Its topography rising to the south means it does not relate well to the built up area. Allocation of and development on it would merge the 2 areas, be a significant encroachment into the countryside and to my mind result in an unacceptable extension of the village to the west'. The green barrier concentrates only on the gap between the edge of the village and outlying blocks of built development. It does not seek to include any more land that is strictly necessary to maintain the gap and prevent the coalescence of built development. Although the development at Maes Celyn is not a separate 'settlement' it is a block of 25 residential units based on the former pig farm buildings and has a particular character which is quite different from the residential development within the village. The former Northop Horticultural College, now part of Coleg Cambria, is also of a completely difference character from the village and represents a sizeable development. The green barrier serves to ensure that the character of each development and the village is retained by preventing coalescence.
660	EN11: Green Barriers	Object	The site at Llys Ben is roughly rectangular in shape and is bounded to the east and the south by existing residential development	include the site at Llys ben	Not accepted. The objector has sought the allocation of the site for housing in HN1 (id 689) and the Council's response to that

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			comprising predominately large detached properties. To the west of the site is the Northop Hall Pavilion with carparking, formal play area and football pitches. The site is only open on its northern boundary beyond which is agricultural farmland. It therefore is contained with the existing urban form of Northop Hall. Outside of its Green Barrier designation the site does not have any particular landscape importance attached to it and is identified by Carl Taylor BA (Hons) Dip LA/CMLI as having "a poor-quality landscape".		representation needs to be read in conjunction with this green barrier response. This site has a long history of being promoted through development plan reviews for development, including the deletion of the well-established and appropriately defined green barrier. In addition, recent planning application history shows that this principle has been rejected by the Council and an appeal Inspector. The existing UDP green barriers have been reviewed against the criteria in PPW10. The presence or otherwise of 'landscape quality' considerations is not a factor to be taken into account in the designation of a green barrier as the key consideration is 'openness'. The site was submitted as an omission site in the UDP and was considered by the UDP Inspector who did not recommend the inclusion of the site. The Inspector commented in respect of the green barrier 'In this case because I find the site relates well to the countryside and other open land such as the playing fields to the west, it forms part, albeit a small part, of the green barrier and allocation of/development on it would undermine the objectives of the designation'. The findings of the UDP Inspector are still considered relevant in the context of the LDP. The site was also the subject of a subsequent planning application for 36 dwellings (050613) which was dismissed on appeal on 23/04/15. The Inspector commented that '….it would encroach into the countryside outside the settlement boundary and be detrimental to that green barrier purpose. It would also harm the openness of this part of the green barrier, which is its main attribute'. The site is bounded to the north by open countryside and to the west by the recreational fields associated with Northop Hall Pavilion. Both parcels of land are outside the settlement boundary and open in character and appearance. The retention of the objection site within the green barrier is considered to be justified

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					in terms of protecting the open character of this part of the settlement and preventing urban encroachment.
620	EN11: Green Barriers	Object	Policy EN11: Green Barrier Boundary As set out above, the property known as Newlands, Drury New Road, Drury is also located within the area proposed as Green Barrier. The boundaries of the Green Barrier follow the proposed settlement boundary to the south of Drury. We consider that the Green Barrier boundary should be re-drawn to exclude our client's site, for the reasons set out above in relation to the proposed settlement boundary. Our client's site forms an integral part of the settlement of Drury and should be included within the settlement boundary. It does not fulfil the purposes of a Green Wedge designation as set out in national policy.	We consider that the Green Barrier boundary should be re-drawn to exclude our client's site, for the reasons set out above in relation to the proposed settlement boundary. Our client's site forms an integral part of the settlement of Drury and should be included within the settlement boundary. It does not fulfil the purposes of a Green Wedge designation as set out in national policy. Allocation of additional site in Drury.	Not accepted. The objector proposes the inclusion of the site within the settlement boundary of Drury and the Council's response in respect of PC1 (id619) should be read in conjunction with this green barrier objection. The inclusion of DRU006 within the settlement boundary would result in a ribbon of development extending into the open countryside and the green barrier between Drury and Buckley, which would not be a logical extension of the settlement boundary. The objective of the green barrier designation is to retain the open nature of the countryside around the settlement and to protect the open countryside between Drury and Buckley from further encroachment. Built development in this location would undermine the function and openness of the green barrier. In terms of the green barrier in this location the gap between the two settlements of Buckley and Drury is narrow at this location. The land on either side of Drury New Road is prominent and has a feeling of openness, despite the proximity of the two settlements. The direct coalescence of the two settlements is ultimately prevented by the SSSI / SAC adjoining the western edge of the green barrier, and the GCN ponds comprising the ecological mitigation areas associated with The Heathlands development. However, the removal of the green barrier would potentially erode the openness of this swathe of land to the point where there would be only a very narrow or negligible gap between the two settlements. Drury is also a relatively small settlement when compared with Buckley and the green barrier helps in retaining its present scale, character and form. The green barrier is justified in terms of preventing the near coalescence of the two settlements and preventing urban encroachment into open countryside. Furthermore, para 3.64 of PPW states, relating to green barriers, 'They may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views

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					into and out of the area'. This is applicable to this particular green barrier. The green barrier designation washes over many properties on the edge of settlements. Removal of the property Newlands from the green barrier would not be practicable as it would mean much larger area of land up to the Farm Shop car park would also need to be removed.
650	EN11: Green Barriers	Object	Recommended Change 15.15 TW recommends that the Council review the Green Barrier Review, with specific reference to area 10 (Mold – Mynydd Isa/Sychdyn/New Brighton) and give due consideration to removing part of this area from the Green Barrier; specifically TW's Fford Fer site.	Recommended Change 15.15 TW recommends that the Council review the Green Barrier Review, with specific reference to area 10 (Mold – Mynydd Isa/Sychdyn/New Brighton) and give due consideration to removing part of this area from the Green Barrier; specifically TW's Fford Fer site.	Not accepted. The objector has proposed the allocation of the site under policy HN1 (id636) and the Council response to that objection needs to be considered alongside this response on the green barrier. The site forms part of the green barrier which seeks to maintain a strategic gap between Mold and the outlying villages. The large site incorporates most of the swathe of open countryside and Green Barrier between the western edge of Mynydd Isa and the A494(T),. Each of the objectors points are addressed in turn. i) Prevent the coalescence of large towns and cities with other settlements: In terms of the Green Barrier designation in this location it seeks to protect the open gap between Mold and the outlying settlements. At the eastern edge of Mold there is only a narrow gap between built development at Mold and Mynydd Isa. Development would cause significant harm to the function of the green barrier which is designated to protect the openness of this swathe of open countryside and prevent coalescence of settlements. Development in this location and of this size would fundamentally weaken the gap between Mynydd Isa and Mold/New Brighton, and would be an unacceptable extension of the settlement. ii) Manage urban form through controlled expansion of urban areas: Mynydd Isa presently has a distinct urban form with a well defined edge as a result of built development following the route of overhead power lines. Given the size of the objection site, this is not considered to represent a controlled expansion of a

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					settlement. Rather, it would involve the almost total removal of a large tract of open countryside which presently provides a distinct setting to the settlement and maintains a gap between Mynydd Isa and Mold. Rather than being visually contained as described by the objector, the site is visible from distant viewpoints and is also extremely visible from sections of the adjoining A494(T). Development would be extremely prominent in the landscape. iii) Assist in safeguarding the countryside from encroachment: The size of the site means that it will involve a significant and harmful encroachment into open countryside and result in the near complete loss of this part of the green barrier. The objector's argument that this is the case with all green barrier land is not accepted as it is clearly necessary to look at each proposed green barrier release on its individual merits. The Council does also does not accept that a site of this size represents urban fringe. It is a large swathe of attractive open countryside characterized by hedgerows and mature trees and is open in character. The objector acknowledges that existing residential development is prominent in the landscape and the Council argue that this would be even more the case with development alongside the A494(T). iv) Protect the setting of an urban area. The western edge of Mynydd Isa is presently well defined by a clear line of built development and this forms a firm and defensible settlement boundary. The development of the site would create a detached form of built development within the open countryside, resulting in significant urban sprawl which would harm the character and appearance of the open countryside. From the well-defined edge of development, the objection site slopes downwards generally in a southerly direction towards the A494(T) and Wylfa roundabout. Development on the objection site would be visually prominent and harmful to the setting of Mynydd Isa and to Mold and from more distant vistas when approaching this location. Whereas the entire western edge of Mynydd Isa presently has an open countryside setting, the proposed development would remove the bulk of that setting and leave only a smaller portion of land to the north of the Wylfa roundabout.

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					v) Assist in urban regeneration by encouraging the recycling of derelict and other urban land: The Plan has provided a sufficiently aspiration growth based housing and employment land requirement. The Plan has also identified a balanced housing land supply comprising strategic allocations, housing allocations and allowances for windfalls that have not necessitated the substantial release of green barrier as proposed here. Mynydd Isa - New Brighton. The scale of the site put forward is vastly larger than the area of land removed from the green barrier at New Brighton. It is necessary to look at the relative scales of the objection site compared to that taken out of the green barrier on the edge of New Brighton. The latter measures approx. 5 ha and is considered to represent a logical well defined rounding off of the settlement within the confines of the A494(T), Bryn y Baal Rd and the A5119 and is in addition not proposed as part of this LDP for development, but to provide a proportionate and sustainable future option to consider. By contrast, the objection site represents a loss of 24ha of green barrier. Mold - Mynydd Isa. The Wylfa roundabout clearly has a rural context, as recognised by the UDP Inspector. When looking at the 5 'portions' of land around its perimeter: • Between the north side of Chester Rd and the A494(T) is the valley alongside the R. Alyn • Between the south side of Chester Rd A494 is the Peny bont pub which comprises the conversion and extension of listed farm buildings and set against a block of open countryside. • Between the494(T) and the A549 Mold Road is valley alongside the R. Alyn • Between the A541 and the A549 Mold Rd is open countryside • Between the A549 Mold Rd and the A494(T) is the large block of open countryside comprising the objection site. Although the petrol filling station represents built development it is clearly set against a backdrop of fields and trees. Even the roundabout itself is grassed with a central wooded copse, which serves to soften its appearance in the wider landscape. This reinforces the fact that it is necessary to look at

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					the whole of the green barrier containing the objection site. It is not considered sufficient to rely on only a small portion of this part of the green barrier alongside the Wylfa roundabout in order to protect the narrow gap between Mynydd Isa and Mold. It is also important for the green barrier to protect the present open character of the countryside setting along the entire western edge of Mynydd Isa. The Council does not understand the objector's assertion that 'openness' does not contribute to the one of the 5 purposes of a green barrier in PPW as in the paragraphs 3.60 to 3.74 of PPW10, the word 'openness' is used 7 times in providing guidance on green belts and wedges. Openness is clearly one of the underlying principles of a green barrier and the proposed development of this site would fundamentally harm and undermine a large part of a green barrier. In conclusion there is no justification for a significant loss of this green barrier when land is available outside of the green barrier for development in Mynydd Isa and in Mold.
916	EN11: Green Barriers	Object	Compton Group is promoting its land to be released from the green barrier designation and for it to be allocated and safeguarded as land to meet specific future development needs that will be required during the development plan period.	Part of our client's site forms part of the land required for the proposed improvements to the A55/A494/A548 Deeside Corridor, this is identified by the Welsh Government as the 'Red Option Route'. The finished route is intended to form the new main road between north-west England and North Wales and thus become the main gateway to North Wales.	Not accepted. The objector has submitted objections seeking a mixed use development and the Council's response in respect of HN1 (id915) and STR7 (id917) and should be read in conjunction with this green barrier response. The green barrier follows a well-defined boundary alongside the A548 which marks the outer edge of Deeside Industrial Park. This is a firm and defensible boundary given the land available for development within DIP, particularly at the Northern Gateway site. In this context, the green barrier quite rightly seeks to protect the open land to the north of the A548. The land is flat and open in character and highly visible. Welsh Government guidance in PPW 10 is based on the rationale of green barriers being reviewed as part of the preparation of each development plan. Whereas PPW10 references the need for Green Belts to be defined so as to provide for long term development, this is not the case for green barriers (wedges). The

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				Appropriate recognition of the Red Route within the development plan and its correct alignment within the Proposal Map provides an unique opportunity to build on the existing gateway employment allocation to the south of Deeside. It provides an opportunity to deliver additional employment growth and associated infrastructure and this can be achieved by removing the site from the green barrier and allow the new transport infrastructure investment to unlock economic growth opportunities.	Council have clearly reviewed the green barriers as evidenced in the Background Paper. There is presently a readily identifiable urban form to Deeside Industrial Park whereby existing built development is broadly confined by the A548, A494(T) and the R. Dee. The green barrier serves to protect that urban form, preventing encroachment into open countryside, and preventing near coalescence with the village of Shotwick. It also serves a regeneration purpose by focusing development on existing land within Deeside Industrial park. The green barrier clearly fulfils a number of purposes of green barrier designation as set out in PPW10. The objector references two very minor amendments to the green barrier and that considers that these set a precedent for a further minor change to the green barrier to include the objection site. However, the release of a 54ha site from the green barrier can in no way be described as a 'minor' revision.
948	EN11: Green Barriers	Object	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this. There is no sound justification for the continued Green Barrier designation (in its current entire form) between Sealand and Saltney.	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this. There is no sound justification for the continued Green Barrier designation (in its current entire form)	Not accepted. The objector has proposed the extension to an existing Principal Employment Area in policy PE2 (id945) and the response to that objection should be read in conjunction with this response on the green barrier. The green barrier on the north side of the R.Dee mirrors the Chester green belt along the border between Flintshire and CWAC. It seeks to retain the openness of a strategic swathe of land between Chester and Saltney at its eastern end and Garden City / Deeside Industrial Park at its western end.

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				between Sealand and Saltney.	The site forms part of a much larger site put forward for development in previous development plans as part of omission site objections, and also put forward as an objection to the Deposit Plan. The UDP Inspector did not recommend inclusion of the site for development in the UDP and in respect of the green barrier commented: 'Green barriers have been designated in areas where there is significant development pressure and where standard countryside policies are not considered robust enough to protect the countryside/open land. From Appendix 5 in Topic Paper 3 it is clear that this green barrier takes into account the Cheshire green belt and the level of development pressure in and around Chester. PPW acknowledges that there is often a need to protect open land around towns and cities. Whilst in this case, the city in question is in England, it does not lessen the need to protect land in Flintshire and safeguard it from further encroachment. I find the green barrier is in line with the objectives of PPW'. The conclusions of the UDP Inspector are considered as still being relevant to the LDP. The green barrier background paper clearly but concisely confirms that the green barrier is justified in line with PPW. The objector argues that the draft National Development Framework references the need for a Green Belt around Wrexham and Deeside and that this should only apply to pockets of land rather than 'blanket' coverage. However, that is a matter to be considered as part of the preparation of a Strategic Development Plan. For the time being, the designation of green barriers is wholly in line with PPW10. In looking at the specific objection site now presented, the same principles that apply to the larger Watersmeet site, are also considered to apply to the smaller site. The present boundary of the Principal Employment Area is well defined by the edge of existing industrial plots and its extension on the scale proposed would harm the green barrier.

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963	EN11: Green Barriers	Object	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this. There is no sound justification for the continued Green Barrier designation (in its current form) between Mancot and Pentre.	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this. There is no sound justification for the continued Green Barrier designation (in its current form) between Mancot and Pentre.	Not accepted. The objector has proposed the allocation of the objection site for housing in HN1 (id959) and the Councils response to that objection should be read in conjunction with this green barrier objection. The review has assessed each existing green barrier (and those proposed as part of candidate site submissions) against the criteria in PPW10. Despite raising concerns relating to the continued designation of the green barrier between Mancot and Pentre the objector offers no evidence as to why the green barrier is inappropriate or unnecessary. The objector argues that the draft National Development Framework references the need for a Green Belt around Wrexham and Deeside and that this should only apply to pockets of land rather than 'blanket' coverage. However, that is a matter to be considered as part of the preparation of a Strategic Development Plan. For the time being, the designation of green barriers is wholly in line with PPW10. It is also counter-intuitive as the concept of a green belt implies more of a 'blanket' approach not less. The site was put forward as an omission site as part of the UDP for housing but was not recommended by the Inspector for inclusion in the Plan. The Inspector commented in respect of the green barrier 'The land is an integral part of the open countryside and part of the narrow green barrier between Mancot and Pentre which prevents the coalescence of the settlements'. The objection site MAN001 on Mancot Lane, sits between the separate settlements of Mancot and Pentre, and adjoins the northern western part of the settlement of Mancot. The gap between Mancot and Pentre at this location is very narrow and further development at this point would significantly erode the gap and contribute to the virtual coalesce of the two settlements. The site is flat agricultural land on the northern edge of Mancot. Across Mancot Lane opposite to the site the same flat open fields extends up to the built edge of Pentre. The area is an important clear

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					break between the two settlements which needs to be retained as it is the main function of the green barrier in this location.
1027	EN11: Green Barriers	Object	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this.	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this.	Not accepted. This objection is promoting land at Well Street / Bryn Awelon, Buckley and comments that the green barrier is unsound. However, the land to the east of Well Street and south of Bryn Awelon is not designated as green barrier either in the adopted UDP or the LDP. It would appear that the objector is confused and has included reference to the green barrier and the motivations behind the review, in error.
1147	EN11: Green Barriers	Object	PEN 029 - These proposals have not been designated in LDP 01 Green barrier!? To protect this semi-rural settlement, it is believed these proposals should be added to the final plan. Seeks a green barrier to the west of Penyffordd / Penymynydd. This is important agricultural land that needs protection in the form of a green barrier. Disagrees with Council's assessment.	PEN 029 and PEN 030 These proposals have not been designated in LDP 01 Green barrier!? To protect this semi-rural settlement, it is believed these proposals should be added to the final plan.	Not accepted. The western edge of the settlement of Penyffordd / Penymynydd is well defined by the line of the A550 bypass which serves to logically contain the extent of the settlement along its whole eastern edge. This is a strong physical feature beyond which is open countryside. Proposals for development on the western side of the bypass would be completely inappropriate given the strong urban form of the settlement and the degree of separation given the intervening A550 which acts as a disconnect between the existing settlement and any development to the west. It would also not represent good place making in terms of settlement growth or planning urban form. Therefore the need to prevent encroachment of development into open countryside (one of the green barrier roles) is already performed by the line of the bypass and green barrier designation is not necessary. In terms of preventing the coalescence of settlements to the west, the nearest settlement is Pontblyddyn which is a Tier 5 settlement where new planned development is not proposed in the Plan. Given the distance between the two settlements there is no likelihood of coalescence and green barrier designation is not warranted.
1159	EN11: Green Barriers	Object	PEN 029 and PEN 030. These proposals have not been designated in LDP 01 Green barrier!? To protect this semi-rural settlement, it is believed these proposals should be added to the final plan.	PEN 029 and PEN 030. These proposals have not been designated in LDP 01 Green barrier!? To protect this semi-rural settlement, it is believed these proposals should be	Not accepted. The western edge of the settlement of Penyffordd / Penymynydd is well defined by the line of the A550 bypass which serves to logically contain the extent of the settlement along its whole eastern edge. This is a strong physical feature beyond which is open countryside. Proposals for development on the western side of the bypass would be completely inappropriate given the strong urban form of the settlement and the degree of separation given the intervening A550 which acts as a disconnect

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				added to the final plan.	between the existing settlement and any development to the west. It would also not represent good place making in terms of settlement growth or planning urban form. Therefore the need to prevent encroachment of development into open countryside (one of the green barrier roles) is already performed by the line of the bypass and green barrier designation is not necessary. In terms of preventing the coalescence of settlements to the west, the nearest settlement is Pontblyddyn which is a Tier 5 settlement where new planned development is not proposed in the Plan. Given the distance between the two settlements there is no likelihood of coalescence and green barrier designation is not warranted.
1163	EN11: Green Barriers	Object	Category C - Green Barriers (Policy EN11) - consistency with PPW Policy EN11 should be renamed 'green wedges' and not 'green barrier' to ensure compliance with national policy. The reasoned justification (paras 12.40 - 12.43) are also unclear in this respect as they refer to national policy on both green wedge and green belt designations, conflating the two. As there is no Green Belt designated in Flintshire, the Welsh Government considers the policy and its reasoned justification should be amended to align with the correct terminology in PPW, and ensure clarity for plan users in terms the purpose and status of policy EN11, i.e. green wedges.	As there is no Green Belt designated in Flintshire, the Welsh Government considers the policy and its reasoned justification should be amended to align with the correct terminology in PPW, and ensure clarity for plan users in terms the purpose and status of policy EN11, i.e. green wedges.	Noted. PPW states in para 3.60 'This can be achieved through the identification of Green Belts and/or local designations, such as green wedges'. The words 'such as' would suggest that Welsh Government are not taking a prescriptive approach to using solely the terms 'belt' or 'wedge'. The use of green 'barriers' is well established in Flintshire and the Council asserts is a clearer and definitive term that clearly indicates the purpose of the designation, to act as a barrier to development. The Council will leave this point as a matter for the Inspector to decide.
851	EN11: Green Barriers	Object	Policy EN11 (Green Barriers) As set out in PPW, "the main aim of Green Belts [and by association Green Barriers] is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence" (Paragraph 3.61). Presthaven Sands Holiday Park is located adjacent to the Gronant-Talacre-Gwespyr-Ffynnongroyw Green Barrier. As part of LDP preparation, Flintshire Council has	In reviewing the designations, the Council has concluded that the Gronant-Talacre-Gwespyr-Ffynnongroyw Green Barrier meets only one of the five purposes of a green belt i.e. to assist in safeguarding the countryside from	Not accepted. The retained part of this UDP green barrier fulfils the PPW requirement in terms of 'openness' given the flat nature of the landscape and inter visibility of existing built development. The eastern part of the green barrier (now deleted) was not considered to raise the same concerns about coalescence since Ffynnyngroyw (a Tier 3 settlement) did not physically abut the green barrier and its expansion was constrained by flood risk considerations. The expansion south eastwards of Talacre is constrained by the presence of the Gas Terminal. This contrasts with the western part of the green barrier (now retained) in that the

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			undertaken a process to review the green barrier designations, which PPW requires it to do. In reviewing the designations, the Council has concluded that the Gronant-Talacre-Gwespyr-Ffynnongroyw Green Barrier meets only one of the five purposes of a green belt i.e. to assist in safeguarding the countryside from encroachment. It is recognised that this does not necessarily mean that such a designation shouldn't be retained in principle and further consideration is required. The Council's methodology provides five further matters for consideration: • "not be designated where normal open countryside policies would be sufficient • not be drawn wider than necessary to achieve their purpose • be drawn where there is significant and sustained development pressure • not unnecessarily duplicate other policy designations • not need to possess any intrinsic inherent landscape, nature conservation or other quality." Having reviewed the Council's evidence base in detail, the Council proposes to remove the green barrier designation to the east as there is limited development pressure, the settlement boundary policy is sufficient and the designation would duplicate other policy controls. However, despite a very similar context, and indeed similar conclusions, the western part of the designation will be retained. This approach appears to be inconsistent with the only difference being the topography between the two areas. The Council considers that the more flat and open land to the west is sufficient justification for the difference in approach. Yet the council has provided no visual or	encroachment. It is recognised that this does not necessarily mean that such a designation shouldn't be retained in principle and further consideration is required. The Council's methodology provides five further matters for consideration: • "not be designated where normal open countryside policies would be sufficient • not be drawn wider than necessary to achieve their purpose • be drawn where there is significant and sustained development pressure • not unnecessarily duplicate other policy designations • not need to possess any intrinsic inherent landscape, nature conservation or other quality." Having reviewed the Council's evidence base in detail, the Council proposes to remove the green barrier designation to the east as there is	lower part of Gronant, which is also a Tier 3 Sustainable Settlement, physically abuts the green barrier. Much of this green barrier is bounded by built development with caravan related development along much of its northern boundary, Talacre to the north east and development at Tynmorfa along part of its southern edge. This area has seen pressure for caravan related development and it is considered that given the uniqueness of the coastal landscape, the retention of the green barrier is justified

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			other evidence but still recognises otherwise that the control of development can be met through other policy designations. There is no evidence to suggest there is significant or sustained development pressure which the Council describes as comprising UDP omission sites, LDP candidate sites and alternative sites and planning applications or pre-application enquiries.	limited development pressure, the settlement boundary policy is sufficient and the designation would duplicate other policy controls. However, despite a very similar context, and indeed similar conclusions, the western part of the designation will be retained. This approach appears to be inconsistent with the only difference being the topography between the two areas. The Council considers that the more flat and open land to the west is sufficient justification for the difference in approach. Yet the council has provided no visual or other evidence but still recognises otherwise that the control of development can be met through other policy designations. There is no evidence to suggest there is significant or sustained development pressure which the Council describes as comprising UDP omission sites, LDP	

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				candidate sites and alternative sites and planning applications or pre-application enquiries.	
875	EN11: Green Barriers	Object	Objection: An extent of land between Bannel Lane and Chester Road, Buckley is proposed for removal from the Green Barrier, as a result of the Green Barrier review. Whilst this is supported in principle, we are of the view that the extent of land needs to be increased to include all land up to Bannel Lane, which acts as a natural line of delineation. It is submitted that the land on the north east side of Bannel Lane is read **as a whole**. Whilst in the ownership of two parties, the land on the ground is maintained / managed as one and presented physically accordingly. There is a distinct boundary line to the east, comprising a wooded area and the ribbon development on the southern side, up to and including Bannel Lane itself, acting as a natural boundary line. Accordingly, all of the land up to Bannel Lane should be excluded from the Green Barrier designation. We request the opportunity to present further evidence, including a landscape review, at the Examination, if so required.	An extent of land between Bannel Lane and Chester Road, Buckley is proposed for removal from the Green Barrier, as a result of the Green Barrier review. Whilst this is supported in principle, we are of the view that the extent of land needs to be increased to include all land up to Bannel Lane, which acts as a natural line of delineation. Objection It is submitted that the land on the north east side of Bannel Lane is read as a whole. Whilst in the ownership of two parties, the land on the ground is maintained / managed as one and presented physically accordingly. There is a distinct boundary line to the east, comprising a wooded area and the ribbon development on the southern side, up to and including Bannel Lane itself, acting as a	Not accepted. The objector has proposed the site as a housing allocation in HN1 (id 876) (id945) and the response to that objection should be read in conjunction with this response on the green barrier. The candidate site assessment background paper clearly sets out that the site was considered suitable in principle for housing development and that a drawing back of the green barrier would not undermine its function or role. However, the site was not proposed as an allocation on account of the inability of the respective landowners to sufficiently evidence or agree on the site's availability and deliverability. The objector has proposed that the whole of the land between Chester Road and Bannel Lane, including the disputed portion of green barrier is allocated for housing, and the Council has responded to this separately in its response to id876 regarding policy HN1. In drawing back the green barrier, and considering the sites development potential, the Council was concerned about the desirability of retaining the rural character of Bannel Lane and its hedgerows by retaining a small part of the green barrier on the north side of Bannel Lane. This would serve to prevent a vehicular access onto Bannel Lane and the urbanising effect that this would bring and it would also prevent the appearance of prominent ribbon development extending along Bannel Lane towards the existing dwelling Glan Morfa. The boundary of the revised green barrier seeks to follow the short length of hedgerow field boundaries between Haulfryn and the boundary of the Principal Employment Area. The boundary of the green barrier is considered to be logical and defensible and justified in seeking to retain the openness of land alongside Bannel Lane.

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				natural boundary line. Accordingly, all of the land up to Bannel Lane should be excluded from the Green Barrier designation. We request the opportunity to present further evidence, including a landscape review, at the Examination, if so required.	
978	EN11: Green Barriers	Object	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this.	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this.	Not accepted. This objection is promoting land at Old Warren, Broughton and comments that the green barrier is unsound. However, the land to the north of Old Warren and west of the A5104 is not designated as green barrier either in the adopted UDP or the LDP. It would appear that the objector is confused and has included reference to the green barrier and the motivations behind the review, in error
996	EN11: Green Barriers	Object	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this.There is no sound justification for the continued Green Barrier designation (in its current form) between Mold and Gwerymynydd.	This is based upon a crude review/assessment that is not fit for purpose; Para 20.41 claims it has been robust but it is far from this.There is no sound justification for the continued Green Barrier designation (in its current form) between Mold and Gwerymynydd.	Not accepted. The objector has sought the allocation of the site for housing and the Councils response to policy HN1 (id991) should be read in conjunction with this green barrier response. The site was submitted as an omission site as part of the UDP but the Inspector did not recommend inclusion of the site for housing development. The Inspector commented 'The objection site consists of 2 fields and is an integral part of the open countryside in both character and appearance. As such it is part of the rural setting of Mold and part of a narrow neck of prominent countryside between Mold and Gwernymynydd which is designated as green barrier in order to prevent the coalescence of the 2 settlements. Because of its size, location and topography development on it would be far more intrusive in the rural area than HSG1(18) to the east of Ruthin Road which is more modest in scale and not as prominent. and 'At present the housing area to the north east provides a firm defensible boundary. And given that my conclusions in the background paragraphs above indicate that

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					there is no need for the further release of greenfield sites to satisfy the housing demand in either the County or the town, I do not consider either the settlement or green barrier boundaries should be redrawn to enable a framework for development.' The UDP Inspector clearly considered that the green barrier was justified and necessary. This is considered to remain the case with the LDP as set out in the Green Barrier Background paper. Neither the UDP nor the LDP provides 'blanket coverage' by green barriers. In line with guidance in PPW10 the existing green barriers have been reviewed against the criteria in PPW. It is the case that the draft NDF has raised the issue of designating a green belt for Wrexham and Deeside and representations have been made by FCC on the draft NDF. The vehicle for designating any such green belt is through the development of a Strategic Development Plan. It would be entirely inappropriate to seek to pre-judge what form and extent such a green belt might take. Instead the Plan has sought to retain green barriers in a manner which protects key tracts of open land whilst making sufficient provision for development to meet the Plans housing requirement. The review has assessed each existing green barrier (and those proposed as part of candidate site submission) against the criteria in PPW10. Despite raising concerns with revisions to green barriers relating to BUC030 and EWL017/020 the objector offers no evidence as to why these are inappropriate or harmful. Whilst the objection site is only a small portion of the overall green barrier, it is located at the most important section of the green barrier between the two settlements of Mold and Gwernymynydd adjacent to the A494(T) and A5119. Green barrier designation is not based on the 'attractiveness' of land or whether it has any 'intrinsic landscape quality', or 'historical features' but instead is based on the essential quality of the openness of land. The objection site would erode the green barrier between the two settlements and would reduce the green barrier substantially. The

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					existence of built development (when viewed in plan form) on the southern side of the A5119 Ruthin Road, is not considered to set a precedent for the release of the objection site from the green barrier on the northern side of the A5119. The Llys Ambrose / Maes Glas development does not have its own vehicular access onto the A5119 as it was accessed through the previous phases of development. The built development is set behind a grass verge and mature hedgerow and trees and is not visually prominent. By contrast the objection site is bounded by a footway and low stone wall, with little in the way of landscaping and gives the site a visual prominence and sense of openness when viewed from the A5119. Development of the objection site would represent a harmful encroachment into and significantly erode the green barrier and risk to coalescence, when compared with the St Marys Park site. The objection site would represent an extension to the built form of Mold which is not considered to be logical. It cannot be described as 'infill' development. As previously described the Llys Ambrose development is well screened and does not represent a precedent for development on the objection site. At the northern end of the objection site is 'Parc Plas Aney' which is a large house set in large grounds. It extends into open countryside but is quite distinct from the form and pattern of estate type development which represents a logical boundary with which to delineate the settlement boundary and green barrier. The objection site will significantly reduce the gap and contribute to the coalescence of the two settlements. Each of the detailed points of the objector are commented on below: The objection site may account for only part of the overall green barrier but it is located at the most prominent part of the green barrier and at the most important part of the gap between Mold and Gwernymynydd. The UDP allocated land at Llys Ambrose in the form of an extension to the St Marys Park development. The UDP Inspector

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					considered this allocated site alongside the omission site (now the application site). The UDP Inspector clearly identified that it was of a different character from the omission site, and referred to its development being 'intrusive'. Although the development of the site would not result in the direct coalescence of Mold and Gwernymynydd, it would significantly erode the gap and undermine the objective of the green barrier in preventing coalescence. The presence of development on the eastern side of Ruthin Rd (Llys Ambrose and Maes Glas) does not automatically mean that development on the western side of Ruthin Rd is acceptable. Furthermore, the presence of development at Plas Aney does not justify the applicant's approach of simply drawing a line from development at Llys Ambrose to development at Plas Aney. Plas Aney is a small group of residential units set within extensive grounds and which is completely different from the urban form on the south western edge of Mold. The LDP and the earlier Mold Town Plan has sought to take a more holistic approach to the urban form of Mold and has concluded that the most suitable and logical means by which Mold can be expanded is the north western part of the town. By contrast the agents approach to managing urban form is to simply draw a line between two developments. This is commented on further above. It is not necessary for land to have any intrinsic landscape, historic or other value to warrant designation as green barrier. The application site is of a completely different character from the Llys Ambrose development. The latter is well screened by the grass verge and hedgerow / tree roadside boundary and its 'outer' edge is defined by a distinct change in levels and a line of mature trees. By contrast, the application has a much more open feel created by the low stone roadside wall and views across the site. The UDP Inspector noted that the site had a different character than the allocated site at Llys Ambrose and that development would be more intrusive. The site clearly adds to the open setting of the settlement. When travelling in to Mold it provides a setting to the present well defined edge to built development and when travelling out of Mold it affords views across the wider open countryside thereby clearly defining the setting of the Town in either context.

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					The Green Barrier Background Paper is looking at the whole green barrier and not just the objection site. The 640m is a measurement of the shortest straight line distance between the edge of Gwernymynydd and the closest built development at Mold which is at Llys Ambrose. However, the green barrier extends further than this up to the edge of built development at Lon Cae Del and Lon y Berth. The development of the site would reduce the narrow gap by approximately 160m on the northern side of Ruthin Rd. It must also be noted that there are other candidate sites seeking development in this part of Mold and this includes MOL005 which promotes a further 8ha of land directly to the west of the application site. There is clearly persistent development pressure in this part of Mold which would significantly erode the gap between it and Gwernymynydd. The key point is that the green barrier is prominent alongside the junction of the A494(T) and the A5119. When viewed from the A5119, which is a key route into Mold, the openness of the site and wider agricultural landscape is evident. The objection site, with its low boundary wall to the road has an open character and appearance which is highly visible and this adds to its openness. The fact that Gwernymynydd is in an elevated position and that the green barrier runs alongside Ruthin Road and comprises rising land, emphasises the need to retain this prominent and important green barrier. The objection site lies adjacent to Ruthin Rd and is the most prominent part of the green barrier. Whilst in terms of land area, its loss may be modest, the impact on the narrowest part of the green barrier is far greater in terms of impact. The existence of development at Llys Ambrose on the opposite side of Ruthin Rd does not set a precedent for the development of the objection site as the two are entirely different in character and appearance. The Tros y Wern development involved the redevelopment of existing farm buildings for a zero carbon type sustainable development. Its removal from the green barrier is of a completely different scale than that sought by the objector.
1134	EN11: Green Barriers	Object	Pen-y-ffordd Specific – there is no green barrier on the land east of Vounog Hill, the view over which defines the character of the	Pen-y-ffordd Specific – there is no green barrier on the land east	Not accepted. The only settlement to the east of Penyffordd / Penymynydd is Higher Kinnerton which features in the same tier of the settlement hierarchy i.e. in the third tier of ‘sustainable

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			village for many or west of the A550. This objection relates to candidate site PEN0030 which sought a green barrier on the eastside of the settlement. The objector seeks the inclusion of the following candidate sites and alternative sites as part of this green barrier - PEN003, 006, 011, 013, 128, 045AS, 046AS, 047AS, A48AS, A50AS, 051AS, 052AS, 053AS, 055AS, 056AS, 057AS. This is important agricultural land that needs protection in the form of a green barrier and disagrees with Council's assessment .	of Vounog Hill, the view over which defines the character of the village for many or west of the A550.	villages'. Given the amount of intervening open land as a result of the distance between the two settlements, a green barrier is not considered necessary or appropriate as there is little likelihood of coalescence of the two settlements The Deposit Plan has a strategic mixed use allocation at Warren Hall which has included a modest westwards and southwards extension of the site, from that in the UDP. The extension extends up to Kinnerton Lane which represents a firm and defensible boundary, given the road and the line of mature trees along the edge of the allocation. The distance between the edge of this allocation and the edge of built development at the White Lion site is just under 1km. However, the north western part of the Warren Hall strategic site at the junction of the A5104 and Kinnerton Lane, will remain open from development due to flight path restrictions on the height of development. Penyffordd / Penymynydd has seen significant development pressure as a result of the Councils inability to demonstrate a 5 year housing land supply within the terms of TAN1. However it is not considered that there is any likelihood of the coalescence of Penyffordd / Penymynydd with Warren Hall, which is a stand-alone strategic site within well-defined physical boundaries. The presence of the open space and ecological mitigation area (outside settlement boundary) alongside the eastern edge of the White Lion housing development, demonstrates a clear intention to prevent further eastwards expansion of development eastwards along the A5104. In between the Warren Hall site and Penyffordd is 'Warren Dingle' which is a wildlife site and located just to the south of the A5104. This important landscape and ecological feature would also assist in maintaining a gap between settlements and the Warren Hall development. Given the distance between Penyffordd / Penymynydd and the Warren Hall strategic site and Higher Kinnerton,and the nature of the intervening countryside, it is not considered that there is any likelihood of coalescence between the two.

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1154	EN11: Green Barriers	Object	Penyffordd Specific – there is no green barrier on the land east of Vounog Hill, the view over which defines the character of the village for many or west of the A550.	Penyffordd Specific – there is no green barrier on the land east of Vounog Hill, the view over which defines the character of the village for many or west of the A550.	Not accepted. The only settlement to the east of Penyffordd / Penymynydd is Higher Kinnerton which features in the same tier of the settlement hierarchy i.e. in the third tier of 'sustainable villages'. Given the amount of intervening open land as a result of the distance between the two settlements, a green barrier is not considered necessary or appropriate as there is little likelihood of coalescence of the two settlements The Deposit Plan has a strategic mixed use allocation at Warren Hall which has included a modest westwards and southwards extension of the site, from that in the UDP. The extension extends up to Kinnerton Lane which represents a firm and defensible boundary, given the road and the line of mature trees along the edge of the allocation. The distance between the edge of this allocation and the edge of built development at the White Lion site is just under 1km. However, the north western part of the Warren Hall strategic site at the junction of the A5104 and Kinnerton Lane, will remain open from development due to flight path restrictions on the height of development. Penyffordd / Penymynydd has seen significant development pressure as a result of the Councils inability to demonstrate a 5 year housing land supply within the terms of TAN1. However it is not considered that there is any likelihood of the coalescence of Penyffordd / Penymynydd with Warren Hall, which is a stand-alone strategic site within well-defined physical boundaries. The presence of the open space and ecological mitigation area (outside settlement boundary) alongside the eastern edge of the White Lion housing development, demonstrates a clear intention to prevent further eastwards expansion of development eastwards along the A5104. In between the Warren Hall site and Penyffordd is 'Warren Dingle' which is a wildlife site and located just to the south of the A5104. This important landscape and ecological feature would also assist in maintaining a gap between settlements and the Warren Hall development. Given the distance between Penyffordd / Penymynydd and the Warren Hall strategic site and Higher Kinnerton,and the nature of

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					the intervening countryside, it is not considered that there is any likelihood of coalescence between the two.
1285	EN11: Green Barriers	Object	The representation requests the revision of the Green Barrier Boundary and Settlement Boundary adjacent to the Main Settlement of Mold to exclude land at Pen Y Bont Farm from the Green Barrier and include it within the Settlement Boundary for Mold. It is not considered that there is a 'demonstrable need' (as required by PPW para 3.60) to include the site at Pen Y Bont Farm within the green barrier boundary as its enclosure by existing built form/highway to the north and east fundamentally prevents encroachment towards Mynydd Isa. Likewise, in respect of urban form, the site's enclosure by highways and existing built form (including the pub and PFS adjacent to the Wylfa roundabout) means that it presents a logical rounding off of the existing settlement of Mold. Section 4 of the background paper 1 clarifies that the safeguarding of the countryside "does not mean that every single urban edge requires a green barrier to prevent encroachment, but more a consideration of settlement form and the nature of the urban edge and adjoining countryside" and furthermore, that protection of the urban setting applies to particularly open or sensitive edges. In both respects, enclosure of the site by the raised bypass to the east and associated roadside vegetation means that the purpose of the green barrier designation would not be harmed by de-designation of the Pen y Bont Farm land.	The development of this site will not result in coalescence of settlements and the gap between Mold and Mynydd Isa will be retained – as such, it is considered that a review of the green barrier should be undertaken as part of the LDP review process (as advised within PPW) to allow the logical rounding off of the settlement of Mold (and to facilitate the highly sustainable development of the land).	Not accepted. The objector has proposed the site for housing in respect of policy HN1 (id 653) and the Council's response on that objection should be read in conjunction with this green barrier response. It should be noted that another candidate site (MOL019) related to this site which includes the whole of the Peny Bont site extending to Woodlands Rd. The Objection site does not include a strip of land alongside Woodlands Rd as it is not within the control of the objector. As referenced in the Council's response on HN1 the Objection site does not relate well to existing built form and the settlement boundary and the exclusion of an intervening strip of land merely adds to its importance as open countryside and green barrier. The site sits within the green barrier between Mold and its outlying settlements at the narrowest part of the green barrier between Mold and Mynydd Isa. The settlement boundary for the town follows a strong defensible line of existing built development at Woodlands Road. Successive development plan Inspectors and a planning appeal Inspector have concluded that the site forms an integral part of the green barrier between Mold and Mynydd Isa. Adopting a sequential approach it is entirely inappropriate to seek to develop land within a green barrier ahead of land to the north west of Mold which is not within a green barrier. Given the size of the Candidate site of 11.6 ha, this large proposed housing development would have a significant impact on the green barrier Mold. A sequential approach has been used to consider how Mold should grow in the future and what impact that growth would have on the town and surrounding area. An Allocation has been made to the north west of the Mold in an area where there is no green barrier designation. The Mold Town Plan also identified the north west part of Mold as being the least constrained option for future growth.

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			The development of this site will not result in coalescence of settlements and the gap between Mold and Mynydd Isa will be retained – as such, it is considered that a review of the green barrier should be undertaken as part of the LDP review process (as advised within PPW) to allow the logical rounding off of the settlement of Mold (and to facilitate the highly sustainable development of the land). Pen Y Bont The Background Paper 1:"Green Barrier Review" sets out the methodology of designation at section 4 and assesses the Mold - Mynydd Isa / Sychdyn / New Brighton green barrier from page 16. The green barrier is assessed as meeting all but the urban regeneration purpose of designation. It is not considered that there is a 'demonstrable need' (as required by PPW para 3.60) to include the site at Pen Y Bont Farm within the green barrier boundary as its enclosure by existing built form/highway to the north and east fundamentally prevents encroachment towards Mynydd Isa. Likewise, in respect of urban form, the site's enclosure by highways and existing built form (including the pub and PFS adjacent to the Wylfa roundabout) means that it presents a logical rounding off of the existing settlement of Mold. Section 4 of the background paper 1 clarifies that the safeguarding of the countryside "does not mean that every single urban edge requires a green barrier to prevent		The Pen Y Bont site is well defined by the A494(T), Chester Road and Woodlands Rd. However, its size gives it the character, appearance and feel of open countryside in its own right. The extensive views afforded to the north and east across wider open countryside gives it a sense of openness and a visual link to that wider open countryside. It is a large area of open land which warrants inclusion within the green barrier given it plays an important role in keeping the separation between Mold and Mynydd Isa. At the UDP inquiry the Inspector considered the site and commented in paragraph 11.126.16. ''With regard to the objection site I accept the green barrier is severed by the bypass, but given the scale of the site and its rural appearance I do not agree that it is seen as an integral part of the built up area. It is clearly part of the countryside and contributes towards the gap between settlements. Despite It's street lighting and petrol filling station my site visit confirmed that the roundabout is perceived as a being within the rural not urban area. I indicate above that at some time in the future the land may prove suitable for development, but that does not to my mind justify its deletion from the green barrier given the present circumstances where it forms an integral part of the gap between settlements and prevents encroachment into the rural area. Until such time as the situation is reviewed the development off Woodlands Road provides a firm defensible boundary.'' This conclusion still stands today. Although not recent, in 2002 there were 4 planning applications and subsequent appeals on the site Appeal Ref APP/A6835/A/00/1045870, 1048077,1050355 and 1051448. Dated 16/05/2002, this indicates that pressure for development of this site has been ongoing for many years. Whilst planning applications and appeals are indicators of significant pressure on land, omission and candidate sites are also relevant as they clearly show the intention of landowners and developers to develop sites. As previously stated, a sequential approach to choosing housing sites will look at all designations and site conditions in selecting suitable housing sites. Sites which are not

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			encroachment, but more a consideration of settlement form and the nature of the urban edge and adjoining countryside" and furthermore, that protection of the urban setting applies to particularly open or sensitive edges. In both respects, enclosure of the site by the raised bypass to the east and associated roadside vegetation means that the purpose of the green barrier designation would not be harmed by de-designation of the Pen y Bont Farm land. A further aspect of the methodology set out in the background paper relates to there being significant development pressure. This is presumably to address the PPW requirement that green wedge (and green barrier) designations should only be where "alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust". However, the background paper inappropriately defines "significant pressure" as including LDP candidate sites and omission sites and this is all the Council are able to call in aid of in respect of the Mold - Mynydd Isa barrier. We are not aware of any applications or appeals on the site the subject of these representations and do not consider participation in the development plan process as comprising 'significant development pressure'. The background paper 1 assessment of the green barrier breaks it down into constituent parts. In respect of Mold – Mynydd Isa it is concluded that "In terms of development options for Mold there is land on the north western edge of the town which is not		within the green barrier and do will not result in the erosion of an important gap between settlements will obviously be sequentially preferable to a site which has those constraints. Mold Town Plan, independently drawn up by the Mold Town Council, has also identified the land to the West of Mold for potential housing sites. Although this document does not have statutory weight as supplementary planning guidance, it does give a strong indication of how the local community consider the town should develop. This is a relevant evidence base and material consideration which has helped to guide decisions made on the LDP by the Council. In terms of a physical boundary to the green barrier and the settlement, the Council is of the opinion that the existing development off Woodlands Road provides a firm and defensible edge to the settlement boundary and the start of the green barrier. The objection site comprises a large wedge of farmland which is therefore agricultural in appearance. It relates more to the countryside and is open in character. As such it is appropriately included in the green barrier. Whilst the line of the A494(T) by pass provides a firm outer boundary to development in some parts of Mold, this is largely where industrial development is located. The Council has also taken a consistent approach to the green barrier at the south western edge of Mold where the green barrier included land on the inner side of the A494(T) in order to safeguard the gap between Mold and Gwernymynydd. The above points are backed up by the Inspector's decision letter dated 16th May 2002 in respect of the Pen y Bont Farm appeal Inquiry. The Inspector said: "In my opinion, the development of the open fields would defeat the objective of the green barrier to prevent the coalescence of Mold and Mynydd Isa……"; and "In the absence of a considered need to release the land through the development plan process, I consider that Woodlands Road forms an appropriate edge to the built–up area, and the open countryside between settlements should remain protected by the green barrier designation." (Appeal Ref

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			affected by green barrier designation. There is no justification for a significant incursion into this green barrier when land is available outside of the green barrier." However, this is no justification for allocation and is not even claimed to be part of the methodology in the background paper. The development of this site will not result in coalescence of settlements and the gap between Mold and Mynydd Isa will be retained – as such, it is considered that a review of the green barrier should be undertaken as part of the LDP review process (as advised within PPW) to allow the logical rounding off of the settlement of Mold (and to facilitate the highly sustainable development of the land). In summary, Paragraph 3.66 of PPW confirms that "Green Belt and green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term". As set out above, it is not considered necessary to include Land at Pen y Bont Farm within the green barrier for the purposes of coalescence, urban form, countryside encroachment or setting.		APP/A6835/A/00/1045870, 1048077,1050355 and 1051448. Dated 16/05/2002). In conclusion, the scale of the site gives it the character and appearance of open countryside and the settlement boundary is well defined by Woodlands Road. Given the proximity of the site to Mynydd Isa the development of the site would erode a significant part of the narrow and important gap between settlements. In the light of significant pressure for development over a long period of time in the form of past appeals, omission sites and at the present time the Candidate site submission, the retention of the green barrier is reasonable and justified. This is particularly the case when land to the north west of Mold is sequentially preferable as it lies outside of a green barrier.
125	EN11: Green Barriers	Support	I, and other residents of Northop have had a close interest in the allocation of green barriers since the 2003 Unitary Development Plan era and have fully supported Flintshire County Council's Planning Policies throughout.	On candidate site NOR37 the site has been marked in error showing the red boundary line within my garden. This land was purchased by me in December 2012 and is registered in my name by the Land Registry. However, it is shown correctly on NOR027	Support noted

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				as being green barrier. Flintshire County Council's Planning Policy Team have apologised in their email dated 31st October 2019 for their error.	
155	EN11: Green Barriers	Support	EN11.11 Green Barrier. I support this policy in keeping the Green Barrier between Shotton & Connah's Quay. it is an important area for People and Wildlife it is also designated an area of peace and tranquillity. It has EU.& UK.Protected Specis and adjoins a SSSI & SAC Site		Support noted
417	EN11: Green Barriers	Support	Although the HBF supports the use of Green Barries instead of Green belts, it appears that a number of them are not necessarily based on the assessment carried out in supporting document LD01. A number are covered by other policy designations which would provide just as strong reason to control development. A number also do not fulfil the role of 'Prevent the coalescence of large towns and cities with other settlements' or 'Manage urban form through controlled expansion of urban areas'.	Reconsider such extensive use of green barriers particularly where other policy designations effectively control development.	Noted. In the absence of specific examples from the objector it is not possible to respond further. Equally if the point that appears to be being made is that other policies control development, and as that is one of the key purposes for green barriers, it would appear that the designations are in fact correctly made.
232	EN11: Green Barriers	Support	Policy EN11 – Green Barriers: The Joint Committee supports designation of the Green Barrier separating Mold and Gwernymynydd (EN 11.9), which has an important role to play in conserving the setting of the AONB.		Support noted.
400	EN11: Green Barriers	Support	Support for policy EN11		Support noted

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901	EN11: Green Barriers	Support	Also, SUPPORT the Green Barrier designation for Land adjoining Wepre Brook and Killins Lane that is proposed in the LDP.		Support noted
1263	EN11: Green Barriers	Support	Supports the revised Green Barriers, particularly regarding the Broughton and Bretton settlements. Evidently, locations around these settlements are ideally placed to accommodate further growth, as recognised in the Green Barrier Review. Bloor welcome the removal of their site at Bretton Road from the Green Barrier on the basis is makes no overall contribution to the purposes and extent of the barrier in this location. The site's removal from the Green Barrier demonstrates that in principle it can be brought forward for development.		Support Noted.
803	EN12: New Development and Renewable and Low Carbon Energy Technology	Object	Objects to the current wording of Policy EN12. The policy requires the submission of an Energy Assessment to determine the feasibility of incorporating low carbon or renewable energy technology or connecting to nearby renewable or low carbon energy sources and networks for non-residential development of 1,000 sqm floorspace or more. It is suggested that the floorspace threshold should be increased to 2,500 sqm, which is considered to be a more reasonable reflection of the scale of development which could support its own low carbon or renewable energy source (Soundness Test 2).	Object to the current wording of Policy EN12. sources and networks for non-residential development of 1,000 sqm floorspace or more. It is suggested that the floorspace threshold should be increased to 2,500 sqm, which is considered to be a more reasonable reflection of the scale of development which could support its own low carbon or renewable energy source (Soundness Test 2).	Not accepted. Research identifies that a figure of 1000sq m or more for commercial development is used in several development plans across England and Wales. In the context of the importance attached by Welsh Government in PPW10 to renewable and low carbon energy and climate change it is not considered appropriate to amend the policy threshold for commercial development

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899	EN12: New Development and Renewable and Low Carbon Energy Technology	Object	PGNGL is concerned with Policy EN12. PGNGL support the aims and objectives of EN12. However PGNGL consider that the policy is unnecessarily onerous. The wording 'requires' that development maximises the potential for renewable or low carbon energy technology to meet energy demands. PGNGL consider that the wording should be amended to 'encourage' or 'promote' and this would be more consistent with wording in PPW. The Plan in its present form is not effective or appropriate and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in the PPW. In these circumstances, we do not consider the Flintshire Local Development Plan, in its current form, to be sound. However, we consider that with the suggested amendments to the Policy to 'encourage' rather than 'require' the Plan can be found sound. PGNGL will continue to work with the Council to develop appropriate modifications to the Local Development Plan. However, we consider that with the suggested amendments to the Policy to 'encourage' rather than 'require' the Plan can be found sound.	To overcome the objection and address soundness matters, the Council should: • Amend wording in policy EN12 to 'encourage' rather than 'require'.	Not accepted. In terms of energy, Welsh Government sets the scene in para 5.71 of PPW10 which states quite clearly 'The planning system plays a key role in delivering clean growth and the decarbonisation of energy, as well as being crucial in building resilience to the impacts of climate change. The transition to a low carbon economy not only brings opportunities for clean growth and quality jobs, but also has wider benefits of enhanced places to live and work, with clean air and water and improved health outcomes'. In para 5.7.8 of PPW10. Welsh Government state 'The planning system should: • integrate development with the provision of additional electricity grid network infrastructure; • optimise energy storage; • facilitate the integration of sustainable building design principles in new development; • optimise the location of new developments to allow for efficient use of resources; • maximise renewable and low carbon energy generation; • maximise the use of local energy sources, such as district heating networks; • minimise the carbon impact of other energy generation; and • move away from the extraction of energy minerals, the burning of which is carbon intensive'. The policy seeks to ensure that new development maximizes the potential for renewable or low carbon development and that for development above a certain size will require an energy assessment. In the context of the importance attached by Welsh Government in PPW10 to energy and climate change considerations, it is considered that the policy is wholly appropriate.
68	EN13: Renewable and Low Carbon Energy	Object	The proposed solar farm at Crump's Yard lies on the site of Connah's Quay waggon works and may require assessment prior to development		Whilst the Council notes the point being made by the objector, the representation does not appear to be saying that development of a solar farm at Crump's Yard is inherently constrained. The site is now the subject of an application, such is the Council's positive desire to move forward with the development of this solar farm in

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	Development				order to contribute towards the Welsh Government's ambitions in terms of carbon reduction and the targets identified in PPW10. CPAT will have been consulted as part of the application under consideration to allow more detailed comments to be submitted, than the broad statement made during the LDP consultation. Given that the whole of the site is not proposed to be developed for the proposed solar farm there are opportunities to design the layout of the solar farm that, if necessary, avoid any conflict with heritage assets. It is also the case that as the solar farm will use a surface mounted anchoring system, there is very little if any ground invasive work proposed (beyond cabling) that may impact significantly on any sub-surface heritage remains, and any surface features are capable of being left un-disturbed, such is the mounting system for the solar panels. A heritage impact assessment has been prepared to support the application and in relation to the Wagon Works has assessed the significance and potential impact as follows: "The site of a late 19th century Chemical Works and subsequent early 20th century Wagon Works and Saw Mill are within the Application Site. The Chemical Works was partially demolished in the late 19th/ early 20th century with one building retained and used as a Wagon Works. That in turn was demolished in the late 1950's/ early 1960's when the Wagon Works was redeveloped. The Wagon Repair Workshop was extended in the 1980s but went out of use and all of the buildings associated with it were demolished by the early 2000s. The Application Site has a high potential for remains associated with this activity to be present. Any such remains would be of low to moderate value, and the magnitude of change would be low to moderate given the nature of the development and predicted impact below ground. A minor adverse effect is therefore predicted".
345	EN13: Renewable and Low Carbon Energy Development	Object	On the interactive proposals map, the land on eastern edge of New Brighton is covered by policy EN13-Renewable Energy. We appreciate the intention of this policy but would question why our clients land has been specifically included as the site has never been promoted for such uses in the past. We request further clarification on this.		Noted. The Council's approach to identifying search areas for potential development of renewable energy follows the approach set out in PPW10 and the Welsh Government renewable energy toolkit. Further explanation of the approach taken, and what the Indicative Local Search Areas are and are not, is contained in LDP background paper 13-Renewable Energy. In essence the search areas are broad and indicative, are not finite allocations or designations in the plan, and represent the outcome of the toolkit

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					prescribed sieve mapping exercise to screen out constrained areas of the county, leaving those least constrained and therefore with some potential to be looked at for the development of renewable energy. As the background paper refers, they are the 'first places to look, but not the only places'. Equally given their number and extent, there are far more search areas than is likely to come forward as development from the renewables market, and as the sieve mapping exercise referred to did not for practical reasons include consideration of land ownership, if an area of land within a search area (such as that your client has an interest in) is not available for renewable development, then proposals for a solar farm to come forward on that land seems unlikely.
860	EN13: Renewable and Low Carbon Energy Developme nt	Object	EN13 renewable and low carbon energy development 12.48 the allocation of 18 sites where solar arrays can be sited across the county in the LDP is excessive. They can be an intrusive visual eyesore on the landscape, the sites allocated would mainly take up agricultural land and be seen from a distance due to the rolling nature of the sites. Rather than take up more land put solar PV on every new house roof, and give incentives for solar to be added to existing houses. The NDF indicates an area to the north west of Wrexham for solar	the allocation of 18 sites where solar arrays can be sited across the county in the LDP is excessive.	Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts including unacceptable landscape impact, and that is why policy EN13 contains a clear set of criteria against which any proposals within a search area would need to be assessed. Best and most versatile agricultural

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					land for example, has been one of the considerations used to screen out grades 1, 2 or 3a land as being suitable for inclusion in the areas of search, and criteria ii-v cover various aspects of locational and landscape impact. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment. Policy EN12 already included the requirement to consider the inclusion of renewable energy generating technology such a roof mounted solar in new development, but this alone would not be sufficient to meet the Welsh Government targets and ambitions for renewable energy generation and carbon reduction set out in PPW. The objector should note that the areas of search indicated in the draft NDF is substantially in the Wrexham County Council area, but also extends into Flintshire.
1058	EN13: Renewable and Low Carbon Energy Development	Object	EN13.1 - Crump's Yard, Dock Road The proposed allocation would consist of a solar farm. The site lies in a flood risk zone C1 and as such, we consider further assessment with regards to flood risk should be undertaken for the site prior in order to evidence suitability and deliverability. The site lies partially within Zone C1 as defined by the DAM. The NRW Flood Risk Map confirms that the site lies partially within the 0.5% Annual Exceedance Probability (AEP) event flood outline. Your Authority's Strategic Flood Consequences Assessment (SFCA) also shows the site to be at risk when considering a breach event at Pentre and Queensferry, for the 0.5% AEP event, with an allowance for climate change. Given the site's Zone C1 designation, and the nature of the proposal, a Flood	EN13.1 - Crump's Yard, Dock Road The site lies in a flood risk zone C1 and as such, we consider further assessment with regards to flood risk should be undertaken for the site prior in order to evidence suitability and deliverability. FCA needed.	Whilst the Council notes the position of NRW in relation to this site, as the site is now subject of a planning application an FCA has been prepared to support the site's development as a solar farm and the comments of NRW have been sought and taken into account in the consideration of the application. The Council considers it has clearly evidenced the suitability of the site and in particular the ability to avoid and mitigate the impacts of flood risk to the site and the proposed development. Subject to permission being granted, there will be no need to take this site forward as an allocation in the plan and the proposals map will be amended accordingly following examination and an update of the planning context of the site. The Council is disappointed to note the stance taken by NRW and the tension that seems to exist with the wider positive intent of other Welsh Government policy and ambition in relation to promoting all opportunities for renewable energy development and carbon reduction. This conflict makes it difficult for the Council to set a clear direction for local policies and the Council will continue to work with NRW to try to resolve these tensions with and between national policy areas.

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			Consequences Assessment (FCA) would need to be prepared in support of the allocation (Section 10 TAN15) in order to demonstrate that the proposals are deliverable from a flood risk perspective. In the absence of a FCA we object to this allocation, until sufficient evidence is provided to demonstrate that flood risk can be managed in accordance with TAN15.		
1161	EN13: Renewable and Low Carbon Energy Development	Object	Category C - Renewable Energy A proportion of the authority is within a Priority Area 4 for Solar in the draft NDF. On this basis the Authority should ensure that it is in general conformity with the NDF when adopted. The REA supporting Policy EN13 is broadly in line with national policy and the toolkit methodology which concludes there are no suitable wind Local Search Areas (LSAs) but there is significant potential for solar. The Council has allocated 18 Indicative Solar Local Search Areas. The authority has also allocated specific solar PV farms at Crumps Yard, Connah's Key and Castle Park. We have the following comments: The proposed LSAs for solar PV allocated by this policy should be specifically listed in the plan together with the contributions from each site. The 'actual' solar allocations should be separated from the ILSAs within this policy as they have a different status, i.e. ILSAs are indicative/preferred areas of search, not proposed allocations. ? Policy EN13: Renewable and Low Carbon Energy Development – include the target	The proposed LSAs for solar PV allocated by this policy should be specifically listed in the plan together with the contributions from each site. The 'actual' solar allocations should be separated from the ILSAs within this policy as they have a different status, i.e. ILSAs are indicative/preferred areas of search, not proposed allocations. Policy EN13: Renewable and Low Carbon Energy Development – include the target contribution from renewable and low carbon energy from the REA over the plan period within the reasoned justification and reflect as indicators within the monitoring framework. Land at Castle Park	The Council note's the point about compliance with the draft NDF in relation to the Priority Area 4 for solar that is mostly within the Wrexham County Borough Council area, but with some of its extent in Flintshire. Given that the scale of solar development in the draft NDF is at a higher level than that defined for the ILSAs in the LDP there is not considered to be any inherent conflict in respective approaches between the NDF and LDP. The Council is concerned that there is limited detailed mapping available to precisely identify the extent of the NDF Priority Area 4, or that explains whether these areas have been derived using a toolkit approach similar to that prescribed by Welsh Government for LDPs. It is also the case that the Council has clearly explained that the ILSAs in the LDP are not prescriptive allocations as inferred, but are higher level outcome areas resulting from the toolkit 'sieve mapping' approach prescribed, and represent broad or least constrained area of the county to guide prospective solar developers to. Further work is being undertaken to refine the generating potential of these areas, involving a landscape impact assessment the outcome of which will feed into the submission documents prior to examination. The Council notes the need to include the numbered areas of search within the RJ together with their potential energy contributions and the overall REA contributions (including indicators within the monitoring framework) and the Council would have no objection to this being considered as appropriate Matters Arising Changes following examination of this policy by the

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			contribution from renewable and low carbon energy from the REA over the plan period within the reasoned justification and reflect as indicators within the monitoring framework. Land at Castle Park Flint (Policy EN13.2) is allocated for Solar but overlaps (in part) with a proposed Gypsy and Traveller Allocation HN8.4 - Castle Park, Industrial Estate, Flint. This requires clarification. Can both allocations be developed for thier intended use, or would one preclude the other? See comments regarding the deliverability of Gypsy and Traveller sites (Category B).	Flint (Policy EN13.2) is allocated for Solar but overlaps (in part) with a proposed Gypsy and Traveller Allocation HN8.4 - Castle Park, Industrial Estate, Flint. This requires clarification.	Inspector. The Council will indicate prior to examination how this can be accommodated. In relation to the request to separate out the proposed solar farms into a separate policy, whilst the Council's feels that policy EN13 reads clearly and distinctly enough, and has tried to avoid creating too many policies with similar intent, as both proposed solar farms are likely to have planning permission by the time of examination, reference to them can be removed from the policy as a MAC. There are no conflicts between the proposed solar farm at castle park Flint (EN13.2) with Gypsy and Traveller allocation HN8.4 and this has already been explained in response to representation to that policy.
1189	EN13: Renewable and Low Carbon Energy Development	Object	Members are aware that the deposit plan for sustainable energy identifies the Sites for Special Scientific Interest (SSSI) on the Holway Level as a potential site for solar energy and feel it should not be included in any list, potential or not. No other SSSI has been identified as such.	Removal of SSSI at Holway Level as a potential site for solar enrgy.	Not accepted. All designation such as SSSIs were used as constraints to filter out the land they covered from inclusion in the search areas. Whilst the search area of concern may be in proximity to the SSSI there is no conflict. In addition, given that search areas are only indicative and are not definitive allocations, the developability of any of the land within the search area would be the subject of detailed planning application where any impacts on neighbouring sensitive sites or receptors would need to be properly assessed and justified, and would be the subject of consultation with the statutory bodies including NRW. NRW have not raised an issue of conflict between this search area and the SSSI.
846	EN13: Renewable and Low Carbon Energy Development	Object	- Recognises the importance of ensuring that renewable and low carbon energy generation can play a key role in Flintshire's energy generation. However, the Company considers that the unacceptable loss of amenity and accessibility to the area as stated in part ii of draft Policy EN13 should not be limited to "public" loss. The amenity of any nearby sensitive receptors, including holiday accommodation, should be protected from any adverse impacts	The following amendment to draft Policy EN13: ""…All renewable or low carbon energy proposals will be permitted provided that: i the siting, design, layout, type of installation and materials used do not	Not accepted. Whilst the Council notes the points made by the objector, the plan should be read as a whole and there are already for example other criteria within policy EN13 such as criterion iv that seeks amongst other uses to protect existing "recreation and other uses" to "continue unhindered", as well as policies elsewhere in the plan, that provide adequate consideration for the amenity concerns highlighted without the need to unnecessarily add further criteria or repeat national policy which is already a material consideration in considering any local proposals for renewable development.

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			associated with renewable of low carbon energy activities, such as visual, noise and odour impacts. Failing to protect amenity risks operators not being able to attract new and repeat visitors to the local area with direct and indirect consequences for the local economy, including retaining jobs. The following amendment to draft Policy EN13: ""…All renewable or low carbon energy proposals will be permitted provided that: i the siting, design, layout, type of installation and materials used do not have a significant adverse effect on the character and features of the proposes location; ii there would not be unacceptable loss of public amenity or accessibility to the area or to sensitive receptors…" (proposed amendment underlined). Bourne Leisure considers that the proposed amendment would align Policy EN13 with national policy (PPW) which states "proposed development should be designed wherever possible to prevent adverse effects to amenity, health and the environment but as a minimum, to limit or constrain any effects that do occur. In circumstances where impacts are unacceptable, for example where adequate mitigation is unlikely to be sufficient to safeguard local amenity in terms of air quality and the acoustic environment it will be appropriate to refuse permission." (paragraph 6.7.14). The proposed amendments to draft Policy EN13 would mean that this element of the Plan would satisfy the tests of soundness.	have a significant adverse effect on the character and features of the proposes location; ii there would not be unacceptable loss of public amenity or accessibility to the area or to sensitive receptors…" Bourne Leisure considers that the proposed amendment would align Policy EN13 with national policy (PPW) which states "proposed development should be designed wherever possible to prevent adverse effects to amenity, health and the environment but as a minimum, to limit or constrain any effects that do occur. In circumstances where impacts are unacceptable, for example where adequate mitigation is unlikely to be sufficient to safeguard local amenity in terms of air quality and the acoustic environment it will be appropriate to refuse permission."	

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				(paragraph 6.7.14). The proposed amendments to draft Policy EN13 would mean that this element of the Plan would satisfy the tests of soundness.	
1079	EN13: Renewable and Low Carbon Energy Development	Object	EN13: Renewable and Low Carbon Energy Development –The text indicates that no SSAs or ILSAs for wind have been identified in the county. The policy tests refer to all renewables but the following section on wind energy includes only 2 tests and do not include landscape effects. Large scale wind and solar developments require an LVIA and even small-scale schemes may require a Landscape Appraisal. The Policy is may require revision in the light of the Draft NDF. Reference should also be made to the potential for effects from offshore wind developments and the need for Seascape assessment. We welcome the clear policy intent of EN13 Renewable energy Indicative Local Search Areas (ILSA), which requires the conservation of the setting of the AONB from single and cumulative renewable energy development proposals. We however note from Background Paper 13 Renewable Energy September 2019, that the landscape and visual issues of the 18 ILSAs have yet to be reviewed, to determine which sites singularly, or in combination could be viably brought forward, without significant effects on the setting of the AONB. Should the LPA wish to have more certainty as to the viability of its proposed ILSAs, we recommend the application of landscape and visual planning analysis by a suitably qualified professional using the GLVIA	The Policy is may require revision in the light of the Draft NDF. Reference should also be made to the potential for effects from offshore wind developments and the need for Seascape assessment.	Whilst the Council notes the points made by NRW, the objector has mis-interpreted the purpose and intention of policy EN13 which, in relation to the specific point made about wind energy does not only include 2 tests of appropriateness but in fact set out two additional tests for considering wind energy, as well as the criteria i-viii that relate to ALL renewable or low carbon energy proposals that by definition include those for wind energy. These criterial clearly include landscape impacts. The two addition criteria when read are clearly and specifically related to additional impacts resulting from wind energy development. In terms of the specific reference to the AONB, whilst the ILSAs are undergoing a further landscape impact assessment this is not solely to address any impacts on the AONB as patently not all are in sufficient proximity to have an impact as inferred. In fact the AONB and a significant buffer area beyond its extent, was used as a key constraint in the Welsh Government promoted toolkit sieve mapping exercise undertaken, to screen out land likely to have an impact on the setting. Helpfully, the AONB Committee have commented supportively in recognition of this as follows: “The intention not to identify any Indicative Local Search Areas (ILSA’s) for large scale wind turbine developments is welcome. No large scale solar PV ILSA’s are shown within the AONB, and most of those outside the protected landscape will not have an adverse impact on the setting of the AONB”. In fact the committee raised concerns with just one ILSA at Hope Mountain, recommending that development on the upper slopes be precluded. This is exactly the purpose of the ongoing landscape assessment that will refine the developable potential within the search areas by referencing topography as an issue amongst other factors.

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			edition, supplemented with a preliminary glint and glare assessment in the case of solar development. Considerations we would expect to see assessed: • Glint and glare effects upon views from the AONB – specifically from Offa's Dyke national trail principle peaks and locations along the length of the Clwydian Range. Viewpoints to be determined by the landscape consultant in conjunction with NRW and the AONB planning officer. • The potential effect of the ILSAs appearing as large areas of development infill, settlement coalescence and urbanisation around Buckley - notably from Moel Findeg, but also other areas that might lie within the zone of theoretical visibility. See Appendix 2 for information on: Penyffordd and Penymynydd and Castle Park		Clearly given the indicative nature of the ILSA, any proposals that were to come forward for development would also have to be subject to the normal level of scrutiny required at the development management stage, including reference of any proposal to the relevant statutory bodies including NRW and the AONB committee.
70	EN13: Renewable and Low Carbon Energy Development	Support	However the site west of Greenfield Valley at The Moor is crosses by the line of a roman road (https://www.archwilio.org.uk/arch/query/page.php?prn=CPAT46805&dbname=cpat&tbname=CORE) and may require assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look,

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					but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
74	EN13: Renewable and Low Carbon Energy Developme nt	Support	However the renewable energy allocation east of Sychdyn contains a number of historic assets and these will need to be assessed prior to any devlopment		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – “a series of allocations or designations specifically promoting renewable technologies” or “the likely maximum extent of renewable development”. The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government’s prescribed toolkit for assessing renewable energy potential and represent the “least constrained” parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas

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					will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
76	EN13: Renewable and Low Carbon Energy Developme nt	Support	However the renewable energy allocation north of Buckley contains a number of historic assets and these will require assessment prior to any development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
78	EN13: Renewable and Low Carbon	Support	However the renewable energy allocation south west of Buckley contains a number of historic assets and these will require assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13:

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	Energy Development				Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
80	EN13: Renewable and Low Carbon Energy Development	Support	However the renewable energy allocation east of Penyffordd & Penymynydd contains historic assets and these will require assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to

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					screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
82	EN13: Renewable and Low Carbon Energy Developme nt	Support	However the renewable energy allocation at Mynydd Bychan contains historic assets and these will require assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – “a series of allocations or designations specifically promoting renewable technologies” or “the likely maximum extent of renewable development”. The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government’s prescribed toolkit for assessing renewable energy potential and represent the “least constrained” parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look,

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					but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
71	EN13: Renewable and Low Carbon Energy Development	Support	However the solar farm allocation at Castle Park EN13.2 overlies the sites of the Flint Chemical Works reservoir (https://www.archwilio.org.uk/arch/query/page.php?prn=CPAT83074&dbname=cpat&tbname=CORE) which may require a photographic record prior to development		This site now has planning permission and construction is due to commence during July 2020. A heritage impact assessment was undertaken for the application site which amongst other things concluded: “There are no designated heritage assets within the application site”. It went on to say “there are 82 non-designated heritage assets within the 1km study area, 81 of which are not within the application site or no longer extant and there would be no direct effect on the asset or any effect on the setting of the asset. The former Flint Marsh reservoir is recorded on the CPAT HER but is of negligible value as a late 19th century industrial feature that has subsequently been infilled and used as a landfill site. There is a low potential for any remains with archaeological (evidential) heritage value associated with the reservoir to survive within the application site. The magnitude of impact from the proposed works would be low, in terms of impact any surviving archaeological evidence associated with the former reservoir. The significance of effect would therefore be none”. Given that the proposed solar farm is to be surface mounted on the area of the reclaimed landfill site which itself infilled the reservoir referenced it is not clear what would remain to conduct a photographic survey with or for.
73	EN13: Renewable and Low Carbon Energy	Support	However the large renewable energy allocation north east of Northop overlies several historic assets and will require assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – “a series of allocations or designations specifically

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	Development				promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
75	EN13: Renewable and Low Carbon Energy Development	Support	However the large renewable energy allocation surrounding Mynydd Isa contains a number of historic assets and these will require assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part

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					of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
77	EN13: Renewable and Low Carbon Energy Developme nt	Support	However the renewable energy allocation southeast of Buckley contains a significant number of historic assets including the remains of Wat's Dyke which is here a scheduled monument. These assets will need assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – “a series of allocations or designations specifically promoting renewable technologies” or “the likely maximum extent of renewable development”. The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government’s prescribed toolkit for assessing renewable energy potential and represent the “least constrained” parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed

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					elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
79	EN13: Renewable and Low Carbon Energy Developme nt	Support	However the renewable energy allocation west of Penyffordd & Penymynydd contains a number of historic assets and these will require assessment prior to development.		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – “a series of allocations or designations specifically promoting renewable technologies” or “the likely maximum extent of renewable development”. The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government’s prescribed toolkit for assessing renewable energy potential and represent the “least constrained” parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of

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					solar energy that will be subject to the need for more detailed assessment.
81	EN13: Renewable and Low Carbon Energy Development	Support	However the renewable energy allocation west of Leeswood contains a number of historic assets including the listed Leeswood Green Farm and these will require assessment prior to development		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
83	EN13: Renewable and Low Carbon Energy	Support	However the renewable energy allocation at Coed Talon Banks overlies the line of Offa's Dyke, which is partly scheduled, and this may require assessment prior to development.		Whilst the Council notes the point being made by the objector, they appear to have misinterpreted the nature and purpose of the Solar Indicative Local Search Areas. As is set out clearly in the explanation contained in supporting background paper 13: Renewable Energy (para 2.20) the ILSAs are not (amongst other

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	Development				criteria) – "a series of allocations or designations specifically promoting renewable technologies" or "the likely maximum extent of renewable development". The background paper then goes on to explain that the search areas are simply the outcome of following the Welsh Government's prescribed toolkit for assessing renewable energy potential and represent the "least constrained" parts of the County having followed a sieve mapping exercise to screen out other areas that are broadly constrained. It would have not been possibly to identify every individual heritage asset as part of this process or define for example appropriate avoidance buffers and so on given the broad range of assets and their degree of significant or protection, and the scale at which the mapping work has been undertaken. The search areas are therefore very broad and indicative, acting as a guide to the potential to develop solar energy but are the first places to look, but not the only places. It is self-evident that any detailed proposals that are submitted within a search area, or indeed elsewhere, will be subject to the detailed scrutiny required by the development management process including any potential conflicts with heritage assets, and CPAT would be consulted as statutory consultees. Further refinement of the ILSAs is underway which seeks to narrow down their broad extent, based primarily on a landscape sensitivity assessment, but where the resulting areas will still represent an initial, indicative guide for the development of solar energy that will be subject to the need for more detailed assessment.
233	EN13: Renewable and Low Carbon Energy Development	Support	Policy EN13 – Renewable Energy Development: Recognition of the sensitivity of the AONB and its setting in this policy and associated proposals is fully supported. The intention not to identify any Indicative Local Search Areas (ILSA's) for large scale wind turbine developments is welcome. No large scale solar PV ILSA's are shown within the AONB, and most of those outside the protected landscape will not have an adverse impact on the setting of the AONB. The one exception is the proposed ILSA adjoining Waen Y Llyn Country Park on		The support for the avoidance of locating areas of search within or predominantly adjacent to the AONB is noted. In relation to the one area noted as of concern the committee is asked to note that the ILSAs are not absolute allocations for solar development and neither is it proposed that any development will be to the extent of the broad search areas identified. This is explained clearly in the background paper 13: Renewable energy. In addition, further work is underway to refine the developable extent of the ILSAs to determine their more likely generating potential, which is focused on landscape sensitivity assessment as advocated, which will further filter sensitive landscape receptors such as the intervisibility of the AONB. In addition, and given these areas are only for broad guidance and the 'first places to look', it is self-

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			Hope Mountain. There is good intervisibility between parts of the AONB and Hope Mountain, and the committee would recommend that this ILSA be reduced to exclude the higher slopes facing the AONB. To assist in the determination of other wind turbine proposals which may come forward during the plan period, the committee would also suggest that a Landscape Sensitivity and Capacity Assessment for the county similar to that undertaken by Denbighshire and Conwy Councils would be beneficial.		evident that any proposals for solar development within these areas (or indeed outside) will need to be the subject of more detailed scrutiny at the development management stage, where the AONB Committee are statutory consultees
1049	EN14: Flood Risk		We feel the IIA assessment for the plan understates flood risk for some of the allocations and it is not clear how the IIA has been guided by the Strategic Flood Consequence Assessment (SFCA). For allocations within/partially within flood zones, the inclusion of an element of green infrastructure may not have an appreciable effect on the levels of flood risk experienced onsite. As such, we would not consider this sufficient mitigation to support amending the scoring as presented in the IIA and further evidence would be needed (see flood risk comments below). We note that allocations made in PE2 appear not to have been assessed.		Noted. The Council is presently working to address the concerns of NRW which relate to certain PE1 Employment Allocations and certain PE2 Principal Employment Allocations. The Strategic Flood Consequences Assessment has been revisited to undertake an assessment of the objection sites and the Council is proposing amended and additional policy and explanatory text wording changes to highlight the need for avoidance of flood risk through layout and design measures and requirement for detailed Flood Consequences Assessments as part of the consideration of subsequent planning applications. The IIA is a high level appraisal of the Plan and can be revisited to take account of the amendments proposed in respect of PE1 and PE2.
1050	EN14: Flood Risk	Object	Section 10 of TAN15 identifies that where the local planning authority wishes to allocate a site, and can justify such an allocation, the local planning authority will need to undertake an assessment of the consequences of flooding. This assessment should demonstrate that the consequences of flooding have been understood and are capable of being managed in an acceptable way. Where such local information has been	We welcome the SFCA that supports the Deposit Plan but note that not all allocations presented in the Plan appear to have been assessed. It would appear that the level of assessment undertaken for a	This representation is noted and the Council has commissioned consultants who undertook the SFCA to undertake further work in respect of employment allocations in policy PE1 and Principal Employment Areas in PE2. This will ensure that all the appropriate allocations / designations will be assessed and where appropriate delivery/suitability reports will be made to ensure that sites are still viable.

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			produced then this should be reflected in the plan. If the consequences are considered acceptable in accordance with section 7 and appendix 1 of TAN15, the resulting allocation should include annotation of flooding as a constraint for the individual site on the proposals map and specify the policy requirements which pertain to the development of that site. This should include making it clear that in taking forward the allocation a developer will need to undertake detailed technical assessment in accordance with appendix 1, to ensure that the nature of the proposed development is acceptable, that it is suitably designed to cope with the risk of flooding, and that any funding and maintenance provision is appropriate. We welcome the SCFCA that supports the Deposit Plan but note that not all allocations presented in the Plan appear to have been assessed. It would appear that the level of assessment undertaken for a number of allocations, set out below, and in further detail in Appendix 1 have not been sufficient to provide a robust evidence base to demonstrate suitability/deliverability. Whilst we note that specific allocations were made in your previous Plan, we suggest these need to be revisited as part of the current LDP process to ensure they remain viable.	number of allocations, set out below, and in further detail in Appendix 1 have not been sufficient to provide a robust evidence base to demonstrate suitability/deliverability. Whilst we note that specific allocations were made in your previous Plan, we suggest these need to be revisited as part of the current LDP process to ensure they remain viable.	
1162	EN14: Flood Risk	Object	Category C - Flood Risk The Strategic Flood Consequence Assessment alludes to some allocations having flooding issues. In most cases the Council is content that any issues can be overcome through site layout, i.e. avoiding areas of flood risk. The Council should ensure no highly vulnerable development is allocated in C2 Flood Plain.	The LPA will need to undertake a sufficiently detailed Flood Consequences Assessment (FCA) where appropriate and relevant, and seek advice from the	The representation has been noted and the Council will take into consideration the representation and will take on board the guidance provided.

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			Where development is located in C1, while the principle of development may be appropriate in national policy terms, the key consideration for the LPA will be to demonstrate that allocations are suitable and deliverable in line with any mitigation measures that may be required to meet the requirements of national policy. The LPA will need to undertake a sufficiently detailed Flood Consequences Assessment (FCA) where appropriate and relevant, and seek advice from the statutory body, NRW prior to the examination. The authority should keep abreast of the emerging Welsh Government Technical Advice Note 15 (currently subject to consultation) with regards to allocations and the policy framework within the plan.	statutory body, NRW prior to the examination. The authority should keep abreast of the emerging Welsh Government Technical Advice Note 15 (currently subject to consultation) with regards to allocations and the policy framework within the plan.	
401	EN14: Flood Risk	Support	support policy.		This representation is noted and the Council welcomes the support for Policy EN14 Flood Risk.
402	EN15: Water Resources	Support	support policy		This representation is noted and the Council welcomes the support for Policy EN15 Water Resources.
667	EN15: Water Resources	Support	Policy EN15: Water Resources We support the inclusion of this policy. Safe and reliable water supplies and efficient foul drainage are essential components to any development and are a pre-requisite to development taking place. The capability of our water and sewerage infrastructure to supply and have the capacity to accommodate future growth is an important consideration when assessing proposed development.		This representation is noted and the Council welcomes the support for Policy EN15 Water Resources.
184	EN17: Developme nt of	Support	The Coal Authority is pleased to see the inclusion of this policy which identifies the requirements for development proposals in		Support is noted.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
	Unstable Land		respect of considering and addressing issues of land instability.		
234	EN18: Pollution and Nuisance	Object	Policy EN18- Pollution and Nuisance: This policy has the full support of the Joint Committee, notably the specific references to protecting the AONB's dark sky and the aspiration to secure formal dark sky recognition for the area. It is suggested that the policy wording could be strengthened by amending the final paragraph to include the following '…. should be considered as part of an overall landscaping scheme, kept to a minimum to avoid light pollution and be designed to be dark sky friendly. The possibility of supplementary planning guidance on this topic should also be referenced in the supporting text.	It is suggested that the policy wording could be strengthened by amending the final paragraph to include the following '…. should be considered as part of an overall landscaping scheme, kept to a minimum to avoid light pollution and be designed to be dark sky friendly. The possibility of supplementary planning guidance on this topic should also be referenced in the supporting text.	Not accepted. The policy wording clearly references the need to carefully consider lighting schemes in or near the AONB. Paragraph 12.68 of the explanation to the policy explains that this is in relation to the Dark Skies initiative. Also, the Plan must be read as a whole and policy PC3 Design seeks to ensure sensitive lighting schemes and policy EN5 provides detailed guidelines on the consideration of development proposals in the AONB. It is not considered that the wording suggested is necessary or appropriate when the Plan is read as a whole. The explanation to policy EN5 already references the AONB SPG. The intention behind the AONB SPG is that over time it can be supplemented by additional guidance on particular topics / issues. In this context a supplementary SPG addressing the issues of lighting schemes in the AONB is presently between development between AONB Officers and each LPA. It is not considered that this needs to be specifically referenced in the LDP.
804	EN18: Pollution and Nuisance	Object	The British Land Company PLC object to the current wording of Policy EN18. It is suggested that the policy text should apply the 'Agent of Change' principle (i.e. the condition wording should ensure that new noise sensitive development (e.g. residential development) should not be allowed to locate in areas in which there is the potential to negatively impact upon the future operations of existing businesses / commercial operations) (Soundness Test 1). PPW clearly states; "The agent of change principle says that a business or person responsible for introducing a change is responsible for managing that change. In practice, for example, this means a developer would have to ensure that	The British Land Company PLC object to the current wording of Policy EN18. It is suggested that the policy text should apply the 'Agent of Change' principle (i.e. the condition wording should ensure that new noise sensitive development (e.g. residential development) should not be allowed to locate in areas in which there is	Not accepted. The policy wording is split into two distinct parts. The first part is concerned with new development proposals which are 'sensitive' being located in areas where there is existing sources of pollution or nuisance. The second part is concerned with new development which would result in noise / pollution being located in areas which may have sensitive development. This second part of the policy includes two criteria which consider i) the impact on amenity / living standards and ii) implications on the use or development of land. The policy clearly addresses the scenario put forward by the objector. It is not considered that either the policy or the explanation needs to refer specifically to the 'agent of change' principle for it to be effective in controlling development. The In considering development proposals the development plan must be read in conjunction with PPW and it is not necessary for the development plan to repeat all guidance that is in PPW.

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			solutions to address air quality or noise from nearby pre-existing infrastructure, businesses or venues can be found and implemented as part of ensuring development is acceptable" (paragraph 6.7.5).	the potential to negatively impact upon the future operations of existing businesses / commercial operations) (Soundness Test 1). PPW clearly states;	
119	EN21: Locations for Waste Management Facilities	Object	Connahs Quay Southern Site Uniper support the identification of the site as a potential location for waste management facilities under Policy EN21 on the basis that this does not override the allocation of the site in general employment use. Uniper propose a clarification to Policy EN21 to confirm that the identification of sites within the policy does not override their allocation as general employment sites.	Uniper propose a clarification to Policy EN21 to confirm that the identification of sites within the policy does not override their allocation as general employment sites.	Not accepted. Policy EN21 directs waste management development to existing or allocated employment sites for B2 uses. The policy provides an 'in principle' acceptance that proposals for waste management would be acceptable subject to the criteria detailed in Policy EN22. The policy does not provide allocations for waste management. It is considered that this policy would not override the employment allocations of the LDP and no clarification is required. The site was not allocated for employment use in LDP as it was considered that there was sufficient employment land proposed within the deposit draft. Regardless of the site not being allocated within the LDP as an employment site, it is considered that the site would be 'in principle' acceptable for waste management purposes and the policy provides provision for waste uses to come forward on sites not allocated for employment uses.
1080	EN21: Locations for Waste Management Facilities	Object	EN21: Locations for Waste Management Facilities - We note that these sites are likely to require a permit to operate and that the granting of planning permission does not guarantee that a permit will be granted. Developers should be encouraged to parallel track planning and permit applications.	Developers should be encouraged to parallel track planning and permit applications.	Noted, this is done through the development management process suggested at the pre-application advice stage. Advisory notes are added to decision notices to advise waste developers that environmental permits maybe required.

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848	EN21: Locations for Waste Management Facilities	Object	Whilst Bourne Leisure understands the need for the Council to secure appropriate sites for waste management facilities, minerals development and aggregate management in Flintshire, the Company considers that the amenity of any nearby receptors, including holiday accommodation should be protected from any adverse impacts associated with their respective activities, such as noise, odour and visual impacts. Failing to protect amenity is likely to result in operators not being able to attract new and repeat visitors to the local area with direct and indirect consequences for the local economy, including retaining jobs. As such, Bourne Leisure proposes the following addition to Policy EN21: "Whilst meeting the needs of waste management facilities, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities." (proposed additions underlined) The Company also proposes the following addition to Policy EN26: ""Whilst meeting the needs of mineral extraction, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities." (proposed additions underlined) The Company further proposes the following addition to Policy EN27: ""Whilst meeting the needs of secondary and recycled aggregates management, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities." (proposed additions underlined) The proposed amendments will align Policies EN21, EN26 and EN27 with PPW	Bourne Leisure proposes the following addition to Policy EN21: "Whilst meeting the needs of waste management facilities, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities." (proposed additions underlined) The Company also proposes the following addition to Policy EN26: ""Whilst meeting the needs of mineral extraction, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities." (proposed additions underlined) The Company further proposes the following addition to Policy EN27: ""Whilst meeting the needs of secondary	Not accepted. Policy EN21 directs waste management development to existing or allocated employment sites for B2 uses. The policy provides an 'in principle' acceptance that proposals for waste management would be acceptable subject to the criteria detailed in Policy EN22. Strategic Policy STR14 sets out the general approach that new development will have regard to the protection of the environment in terms or air, noise and light pollution (in point vi). Also, Policies PC2, EN18, EN22 and EN27 provides detailed criteria against which planning applications (including waste management applications) will be assessed. Policy PC2 sets out the general requirements for development which includes a number of criterion including point a. which would ensure development harmonises with the surrounding area, point b. "where all development should, where appropriate not have a significant adverse impact on the safety and living conditions of nearby residents, other users or nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard or the adverse effects of pollution." Policy EN18 will also provide safeguards to ensure that new development would not create an increased risk of noise, vibration, odour, dust, light or other pollution or hazards. Policy EN22 provides specific criteria for waste management proposals which include the provision to safeguard any visual impacts of the waste proposal. Policy EN27, specific to secondary and recycled aggregate proposals will ensure that the development would not have an impact on residential amenity from noise or dust. It is considered that when the Plan is read as a whole, there are detailed criteria based policies within the plan that will safeguard the amenity of residents and other land users from any potential waste management facilities that may be proposed and assessed by the LDP. Therefore there would be no need to change Policy EN21 as suggested as this would repeat policy already contained within the LDP.

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			which states that, “The planning system has an important role to play in facilitating sustainable waste management by providing a framework for decision making which recognises the social, economic and environmental benefits that can be realised from the management of waste as a resource to meet the needs of society and businesses, whilst at the same time: protecting the amenity of residents, of other land users and users affected by existing or proposed waste management facilities.” (paragraph 5.13.1). The amendments will also ensure that the ability to deliver Objective 14 is not compromised and that this element of the Plan would satisfy the tests of soundness.	and recycled aggregates management, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities.” (proposed additions underlined) The proposed amendments will align Policies EN21, EN26 and EN27 with PPW which states that, “The planning system has an important role to play in facilitating sustainable waste management by providing a framework for decision making which recognises the social, economic and environmental benefits that can be realised from the management of waste as a resource to meet the needs of society and businesses, whilst at the same time: protecting the amenity of residents, of other land users and users affected by existing or proposed waste management facilities.”	

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				(paragraph 5.13.1). The amendments will also ensure that the ability to deliver Objective 14 is not compromised and that this element of the Plan would satisfy the tests of soundness.	
235	EN21: Locations for Waste Management Facilities	Support	Policy EN21 – Waste Management Facilities: The Joint Committee welcomes there being no identified sites either within the AONB or its setting. The criteria based part of the policy relating to waste development outside the identified sites but within settlement boundaries only being applied to settlements outside the AONB is also supported. However, given that there are several settlements just outside the AONB the committee would suggest there is also a need to protect the setting of the AONB in the policy and would recommend that criterion iv) be amended to: 'The site is outside the AONB or its immediate setting.' In addition, similar safeguards for the AONB and its setting should be incorporated in the overall statement relating to all waste development outside settlement boundaries and not just biodegradable waste.	given that there are several settlements just outside the AONB the committee would suggest there is also a need to protect the setting of the AONB in the policy and would recommend that criterion iv) be amended to: 'The site is outside the AONB or its immediate setting.' In addition, similar safeguards for the AONB and its setting should be incorporated in the overall statement relating to all waste development outside settlement boundaries and not just biodegradable waste.	Not accepted. Policies within the plan provide criteria to ensure that proposals for waste management would not harm the AONB or its immediate setting. This is specifically addressed in policy EN5. Applications will be considered on their own merits and against the policies of the plan. Therefore no change is required to the policy. STR13 provides the strategic policy which states that all development will iii. Conserve, protect and enhance the quality and diversity of Flintshire's natural environment including landscape…and the AONB". Policy PC2 states development should a. "harmonise with or enhance the character, local distinctiveness and appearance of the site,… and surrounding landscape." Policy EN4 states "New development, either individually or cumulatively, must not have a significant adverse impact on the character and appearance of the landscape. Landscaping and other mitigation measures should seek to reduce landscape impact and where possible bring about enhancement." Policy EN22 provides the criteria which waste management proposals would be assessed. Part d states that waste management facilities will be permitted provided "any visual impacts can be satisfactorily mitigated". When the Plan is read as a whole it is considered that sufficient protection is given to the setting of the AONB and that it is not necessary for this to be repeated in policies throughout the Plan.

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5	EN23: Minerals Safeguarding	Object	The interactive map neglects to show old disused quarrys and areas that are no longer viable for future mineral extraction. The mineral safeguarding zone bares no relation the the British Geological servey for the area and take a very lazy option to identify the zone.	Overlay the British Geological servey with the mineral safeguarding zone and ensure areas that are no longer viable are not included in the safeguarding zone.	Not accepted. In section 5 of the Minerals Background Paper this provides the evidence to justify what minerals have been safeguarded and why, and provides a rationale of how the mineral safeguarding area has been defined. The Mineral Safeguarding areas has been defined by using the British Geological Survey minerals resource map which show, at the strategic level, the distribution of minerals across the County and the BGS Aggregate Safeguarding Map.
188	EN23: Minerals Safeguarding	Object	We note the comments that Flintshire do not consider that there are no specific circumstances to warrant the safeguarding of coal resources.	We note the comments that Flintshire do not consider that there are no specific circumstances to warrant the safeguarding of coal resources.	Noted. Evidence to support this policy position to not safeguard coal is contained within the Minerals Background Paper, in line with the policy in relation to the use of fossil fuels in PPW 10.
330	EN23: Minerals Safeguarding	Object	The plan is unrealstic in terms of its identification of mineral safeguarding zones in that it seeks to include land which would be better used for housing and it is suggests that areas of land in close proximity to exsitsing housing would be suitable for mineral extraction. In reality the suggestion that sites close to exsiting homes would be suitbale for large scale minerale extraction is flawed	The land known as Halfway Field whould be excluded from the proposed Mineral Saefgaurding Zone	Not accepted. Policy EN23 provides the detailed policy criteria to safeguard minerals of economic importance. In section 5 of the Minerals Background Paper this provides the evidence to justify what minerals have been safeguarded and why, and provides a rationale of how the mineral safeguarding area has been defined. The policy states that non mineral development within mineral safeguarding areas (MSAs) will only be permitted where it can be demonstrated that a. the mineral underlying the site does not merit extraction, and b. the need for the non-mineral development outweighs the need to protect the resource. The particular site that the respondent refers to has been assessed within the Minerals Background paper which notes on page 46 that the site is underlain by limestone but the resource has already been sterilised by existing built development and the settlement of Carmel. This site has not been allocated in the LDP for other, non-mineral related reasons. It is noted that this site lies outside of the settlement boundary. The mineral safeguarding area has been refined to exclude settlement boundaries, and international and national designations, and the detail within Policy EN23 provides specific criteria to assess other proposals that may be located within the MSA so that they can be assessed on a site by site, case by case basis.

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4	EN24: Minerals Buffer Zones	Object	Minerals Planning Policy (Wales) Minerals Technical Advice Note (Wales) 1: AGGREGATES Buffer zones States: Hard rock quarries 200 metres. The buffer zone should be defined from the outer edge of the area where extraction and processing operations will take place, including site haul roads, rather than the site boundary, as there may be land within site boundaries where mineral activities are limited or no operations are proposed so that the impact of the proximity of such land is negligible. The council have taken the 200m from the perimeter of the sites and not the working area.	The interactive map should be changes to mirror the Minerals Planning Policy (Wales) Minerals Technical Advice Note (Wales) 1: AGGREGATES and take the buffer zone to 200m from working area.	Not accepted. In line with the requirements of PPW10 and MTAN 1 a buffer has been identified around the quarry sites and shown on the proposals maps. Policy EN24 has been developed to meet the requirements of PPW10 and MTAN 1 and to enable any proposals which come forwards to be considered without compromising quarrying operations. The identification of a buffer is not a moratorium on all development but does require it to be demonstrated that any development which would occur within the buffer zone would not itself inhibit quarrying operations, either through the introduction of sensitive development or through the direct sterilisation of areas which would be required for quarrying development. Development that is proposed within a mineral buffer zone would be assessed on a case by case basis on its own merits. With regards to the proposed minerals allocations proposed in Policy EN25, as limited detail has been provided by the developers other than the general location, it is difficult at present to determine the exact location of the buffer zone. Once an extraction boundary has been delineated by any subsequent planning permission, the buffer zone would be amended at a subsequent review of the LDP.
668	EN25: Sustainable Minerals Development		Policy EN25: Sustainable Minerals Development 1. EN25.3 Extension to Ddol Uchaf Quarry, Afonwen • Site operators need to be aware that this site is crossed by a water main and an easement width would be required which may impact upon mineral extraction	Site operators need to be aware that this site is crossed by a water main and an easement width would be required which may impact upon mineral extraction	Noted and the Council will inform the developer.
1165	EN25: Sustainable Minerals Development	Object	Category C - Minerals (Policy EN25) Policy EN25 seeks to meet the shortfall of sand and gravel and crushed rock to satisfy the apportionments set out in the RTS 1st Review. We note the RTS 2nd Review is currently out for public consultation and there is a significant increase in the requirement for Flintshire, as set out below: ? The apportionment of sand and gravel has	Policy EN25 identifies extensions to four quarries to meet the requirement of the RTS 1st Review. The authority should demonstrate their ability to meet the increased need	Noted. The Flintshire LDP deposit draft, and the figures contained in strategic policy STR16 was published prior to the consultation draft RTS second review. Flintshire will work in collaboration with Wrexham County Borough Council, and Denbighshire County Council to provide for the minerals needs of the region for both the provision of sand and gravel and crushed rock. With respects to Wrexham and crushed rock, Flintshire had already committed to provide for Wrexham's crushed rock

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			increased the allocation required from 1.4mt to 3.543mt. ? The requirement for crushed rock has increased from an allocation of 3.84mt to 35.928mt. Policy EN25 identifies extensions to four quarries to meet the requirement of the RTS 1st Review. The authority should demonstrate their ability to meet the increased need apportioned in the RTS 2nd Review, should it be endorsed prior to the plan being subject to examination.	apportioned in the RTS 2nd Review, should it be endorsed prior to the plan being subject to examination.	requirements through a statement of Common Ground published through Wrexham's LDP process. The RTS second review now recognises that Wrexham is so heavily constrained due to the location of crushed rock in relation to the AONB, it is not reasonable to require Wrexham to provide for crushed rock. Therefore it is inherent that Flintshire will work collaboration with Wrexham with respects to Crushed Rock. As Denbighshire has a large landbank of crushed rock due to a number of mothballed sites in the County, Flintshire will produce a sub-regional Statement of Collaboration with Denbighshire to assist with the required apportionment identified for Flintshire. Furthermore, Flintshire will need to work in collaboration with Wrexham to meet its apportionment figure with respects to Sand and Gravel. The North Wales Minerals and Waste planning team are also in discussions with minerals operators to identify additional sites. It is considered that there is flexibility within policy EN26 which provides criteria for proposals for mineral extraction to come forward which are not on allocated sites. Additional sites can be added to Policy EN25 if required as part of the subsequent review of LDP. It has been suggested that Policy STR16 could be changed to be more generic to state that Flintshire will contribute to the regional supply of minerals in collaboration with Denbighshire and Wrexham County Borough Councils to accord with the apportionment figures contained in the published Regional Technical Statement, rather than prescribing an apportionment figure which will change over time, should the Inspector consider that this change to STR16 would improve the plan.

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					Should the Inspector feel that the Plan could be improved by amending the wording paragraph 12.84, the Council would not object to the following wording to Paragraph 12.84 of the RJ. "The North Wales Regional Technical Statement (RTS) 2nd review (consultation) has identified a requirement for Flintshire to allocated at least 3.543 million tonnes of sand and gravel and at least 35.928 million tonnes of crushed rock. The allocations identified within Policy EN25 are not sufficient to meet the identified need over the plan period. Therefore, the council will work in collaboration with Denbighshire and Wrexham County Borough Councils in order to provide the apportionments identified. Statements of Collaboration will be entered into in order to provide certainty that the identified need will be met over the plan period."
861	EN25: Sustainable Minerals Development	Object	EN25 Sustainable mineral developments Extension to Hendre Quarry 11 million tonnes of limestone, with no indication of which way it will be transported from the site – the Denbigh Road in Mold is potentially going to have a new road junction serving 246 homes on the proposed new Gwernaffield Road and Denbigh Road site. The impact of the quarry extension needs to be considered in line with developing that area of West Mold 12.88 could the LDP be much stronger than this and say that planning permission will not be given by FCC for fracking?	EN25 Sustainable mineral developments Extension to Hendre Quarry 11 million tonnes of limestone, with no indication of which way it will be transported from the site – the Denbigh Road in Mold is potentially going to have a new road junction serving 246 homes on the proposed new Gwernaffield Road and Denbigh Road site. The impact of the quarry extension needs to be considered in line with developing that area of West Mold	Not accepted. A transport assessment would be required to be submitted as part of an environmental statement should a planning application be submitted for the extension of Hendre Quarry. This would address highway concerns such as capacity of the highway and routing raised by this representation. The Plan and the reasoned justification is considered to be in line with the energy policy direction of PPW10 and the government's aspirations to decarbonize the Country and to avoid the continued extraction and consumption of fossil fuels. It is not considered necessary to repeat national policy within the Plan. As 12.88 states, applications will be considered on their own merits and robust and credible evidence will need to be provided to demonstrate that the proposal accords with the energy hierarchy.

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				12.88 could the LDP be much stronger than this and say that planning permission will not be given by FCC for fracking?	
228	EN25: Sustainable Minerals Developme nt	Support	CEMEX UK Operations Ltd. wishes to express its support for Policy EN25.2, Extension to Pant y Pwll Dwr Quarry.		Noted
236	EN25: Sustainable Minerals Developme nt	Support	Policy EN25 and EN26 – Minerals Development: There are no proposed extensions to existing quarries within the AONB, which is welcomed by the committee. However, all four of the allocated sites are considered to be within the setting of the AONB as they are very close to the boundary and/or are clearly visible from the higher ground of the protected landscape. The criteria set out in EN26 are designed to ensure that the impact of mineral extraction at these sites is minimised and mitigated and that the development will be subject to progressive restoration, which is supported. The allocation which gives rise to most concern is the proposed reopening and extension of Ddol Uchaf Quarry near Afonwen, which has lain dormant for many years and has the potential to significantly impact on views from the higher ground of the AONB and the tranquillity of the locality. The current allocated site covers an extensive area of open fields, the upper slopes of which prominently face the AONB. The committee would recommend that the allocation should be reduced to exclude the higher slopes to mitigate the impact on the		Not accepted. Further detail would be provided at the application stage to assess the impact on the AONB. At this stage the Council do not have the evidence to justify the reduction in the allocation area, furthermore, need for sand and gravel may outweigh any visual impact from the AONB which would also be a material consideration when determining a planning application on this site. Policy EN26 provides a criteria based policy for which minerals development will be assessed. Criteria i states that mineral extraction will be permitted on allocated sites subject to no significant adverse visual impact from the development. There is a presumption against minerals development in the AONB. However, applications for minerals development on allocations or unallocated sites would need to include an assessment of the proposal on the landscape and visual impact and would require a Landscape and visual impact Assessment. This would assess the impact of the proposal on the AONB and its setting should the AONB be located in close proximity. Furthermore, Policies within the plan provide criteria to ensure that proposals for minerals development would not harm the AONB or its immediate setting. This is specifically addressed in Policy EN5. Applications will be considered on their own merits and against the policies of the plan. Therefore no change is required to the policy.

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			AONB's special qualities and its setting. The safeguards for the AONB relating to minerals development outside the allocated sites in EN26 are supported, but again the committee would recommend that the policy wording be amended to reflect the need to also protect the setting of the AONB.		STR13 provides the strategic policy which states that all development will iii. Conserve, protect and enhance the quality and diversity of Flintshire's natural environment including landscape…and the AONB". Policy PC2 states development should a. "harmonise with or enhance the character, local distinctiveness and appearance of the site,…and surrounding landscape." Policy EN4 states "New development, either individually or cumulatively, must not have a significant adverse impact on the character and appearance of the landscape. Landscaping and other mitigation measures should seek to reduce landscape impact and where possible bring about enhancement." When the Plan is read as a whole it is considered that sufficient protection is given to the setting of the AONB and that it is not necessary for this to be repeated in policies throughout the Plan.
913	EN25: Sustainable Minerals Developme nt	Support	We support the principles of the policy, however, in light of the above comments and the need to update the mineral requirement, it may be necessary to provide a more flexible approach in case such sites cannot be delivered and the aggregate requirement is greater than that currently identified in STR16. Update the policy and provide more flexibility to ensure the plan can meet the updated mineral requirements.		Noted. Policy STR16 sets out the general approach that has been taken with respect of sustainably managing mineral resources in Flintshire, and the wider region. Policy EN25 provides details of the allocations set out in the plan to demonstrate how a sustainable supply of minerals can be provided for. Policy EN26 provides the criteria to which minerals development will be assessed at the planning application stage. The North Wales Minerals and Waste planning team are also in discussions with minerals operators to identify additional sites to meet the need identified within the draft RTS second review. It is considered that there is flexibility in Policy EN26 which provides criteria for proposals for mineral extraction to come forward which are not on allocated sites. Additional sites can be added to Policy EN25 if required as part of the subsequent reviews of LDP. It has been suggested that Policy STR16 could be changed to be more generic to state that Flintshire will contribute to the regional supply of minerals in collaboration with Denbighshire and Wrexham County Borough Councils to accord with the apportionment figures contained in the published Regional

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					Technical Statement, rather than prescribing an apportionment figure which will change over time, should the Inspector consider that this change to STR16 would improve the plan. The comments are noted. The Policies and RJ was drafted prior to the second review of the RTS being published for consultation. Therefore, at the time of the Plan going on deposit, the first review of the RTS was the evidence base in which the Council used in the drafting of the policy and the RJ and therefore the figures quoted are from the first review of the RTS as the second review was not available at the time of publication. Policy EN26 provides a criteria based policy which allows for non-allocated sites to come forward. The Council feel that this policy provides flexibility for other sites to come forward to meet future demand. Should the Inspector feel that the Plan could be improved by amending the wording of this paragraph, the Council would not object to the following wording to Paragraph 12.84 of the RJ. “The North Wales Regional Technical Statement (RTS) 2nd review (consultation) has identified a requirement for Flintshire to allocated at least 3.543 million tonnes of sand and gravel and at least 35.928 million tonnes of crushed rock. The allocations identified within Policy EN25 are not sufficient to meet the identified need over the plan period. Therefore, the council will work in collaboration with Denbighshire and Wrexham County Borough Councils in order to provide the apportionments identified. Statements of Collaboration will be entered into in order to provide certainty that the identified need will be met over the plan period.” All limestone, including industrial limestone (non-aggregate limestone) is safeguarded through the mineral safeguarding areas shown on the constraints plan, and through Policy EN23.

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					There is also a Mineral Buffer Zone (as defined in Policy EN24) applied to the operational quarry Cefn Mawr that supplies industrial limestone to Padeswood Cement works. The Minerals Background Paper also provides evidence how non mineral Candidates Sites within the Buffer Zone of Cefn Mawr quarry have been assessed. Policy EN26 (and other policies in the plan) provides the criteria in which proposals for non-aggregate minerals would be assessed. The Minerals Background Paper provides details relating to Cefn Mawr Quarry in relation to the life of planning permission to 2042 which is well beyond the plan period. Therefore, it is not necessary to plan for additional need for industrial limestone during this LDP. Furthermore, the LDP is not supposed to repeat national policy contained within PPW10. The area proposed under Policy EN25 is entirely within the existing planning permission boundary and is currently occupied by offices and fixed plant. The existing access would be used. It is considered that the proposal would have no greater impact compared with the existing approved development which were assessed and deemed acceptable in 1997 under planning permission M/97/27/00123. A planning application would need to be submitted to win and work the mineral present under the plant and office area, material planning considerations such as noise, dust, traffic and residential amenity would be required to be assessed through the planning application process and considered at that time, when neighbours would have an opportunity to engage again with the planning process to express their views. The drafting error on Page 9 of the Minerals Background Paper which incorrectly states that the end date of the quarrying permission at Fron Haul as being 21st February 2042 is noted. The correct end date of the current extant planning permission is

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					31st December 2022 as stated in paragraph 6.5.2 of the Minerals Background Paper. However the operator may apply to extend the life.
1252	EN26: Criteria for Minerals Development	Object	Whilst Bourne Leisure understands the need for the Council to secure appropriate sites for waste management facilities, minerals development and aggregate management in Flintshire, the Company considers that the amenity of any nearby receptors, including holiday accommodation should be protected from any adverse impacts associated with their respective activities, such as noise, odour and visual impacts. Failing to protect amenity is likely to result in operators not being able to attract new and repeat visitors to the local area with direct and indirect consequences for the local economy, including retaining jobs. As such, Bourne Leisure proposes the following addition to policy EN26: Whilst meeting the needs of mineral extraction, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities.	proposed amendments to policy wording to align with PPW	Not accepted. Policy EN26 includes specific criteria which minerals development will be assessed. Point i. includes there would be no significant visual impact from the development. Furthermore, Strategic Policy STR14 sets out the general approach in point vi that new development will have regard to the protection of the environment in terms or air, noise and light pollution Also, Policies PC2, EN18, and EN27 provides detailed criteria against which planning applications (including minerals applications) will be assessed. Policy PC2 sets out the general requirements for development which includes a number of criterion including point a. which would ensure development harmonises with the surrounding area, point b. “where all development should, where appropriate not have a significant adverse impact on the safety and living conditions of nearby residents, other users or nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard or the adverse effects of pollution.” Policy EN18 will also provide safeguards to ensure that new development would not create an increased risk of noise, vibration, odour, dust, light or other pollution or hazards. Policy EN27 is specific to secondary and recycled aggregate applications which will ensure that they development would not have an adverse impact on residential amenity through noise or dust. Therefore, there is already an element of what the representor has requested contained within the policy as currently drafted.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					It is considered that, when the Plan is read as a whole, there are detailed criteria based policies within the plan that will safeguard the amenity of residents and other land users from any potential mineral development that may be proposed and assessed by the LDP. Therefore there would be no need to change Policy EN26 as suggested as this would repeat policy already contained within the LDP.
1030	EN26: Criteria for Minerals Development	Object	EN26 (iv) – what would satisfactory provision for progressive restoration require? How will it be assessed whether proposals for progressive restoration are satisfactory? • EN26 (v) – what would be a satisfactory after-use? How will it be assessed whether proposed after-uses are satisfactory?		Noted. Policy EN26 provides a criteria based policy for which minerals development will be assessed. Criteria iv. and v. have been included within the policy to ensure that proposals for mineral development include restoration and aftercare provision which would be assessed at the planning application stage. Each proposal would be considered on a case by case basis, and on its own merits. All minerals development would have characteristics specific to the individual site and restoration for sand and gravel quarries may be different to a hard rock quarry. Therefore, it would be difficult to prescribe in the policy what specifically it should include and it would be unnecessarily restrictive.
1031	EN27: Secondary and Recycled Aggregate	Object	EN27 – what is meant by 'management of secondary and recycled aggregates?' Does this include crushing, processing, sorting, storage, stockpiling or all of these?	EN27 need to be more detailed: what is meant by 'management of secondary and recycled aggregates?' Does this include crushing, processing, sorting, storage, stockpiling or all	Partly accepted. The management of secondary and recycled aggregate does include all those listed; crushing, sorting, screening, stockpiling, storage and transfer. It is suggested that the Council would have no objection to include the above wording in the RJ after para 12.90, if the Inspector considers that this would improve the Plan. Policy EN26 provides a criteria based policy for which minerals development will be assessed. Criteria iv. and v. have been included within the policy to ensure that proposals for mineral development include restoration and aftercare provision which would be assessed at the planning application stage. Each proposal would be considered on a case by case basis, and on its own merits. All minerals development would have characteristics specific to the individual site and restoration for sand and gravel quarries may be different to a hard rock quarry. Therefore, it would be difficult to prescribe in the policy what specifically it should include and it would be unnecessarily restrictive.

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
1253	EN27: Secondary and Recycled Aggregate	Object	whilst Bourne Leisure understands the need for the Council to secure appropriate sites for waste management facilities, minerals development and aggregate management in Flintshire, the Company considers that the amenity of any nearby receptors, including holiday accommodation, should be protected from any adverse impacts associated with their respective activities, such as noise, odour and visual impacts. Failing to protect amenity is likely to result in operators not being able to attract new and repeat visitors to the local area with direct and indirect consequences for the local economy, including retaining jobs. As such, Bourne Leisure proposes the following addition to Policy EN27: Whilst meeting the needs of secondary and recycled aggregates management, the amenity of residents and other land users will be protected from the potential adverse impacts of existing or proposed waste management facilities.	additional wording for policy EN17 to align with PPW	Not accepted. Policy EN27 is specific to secondary and recycled aggregate applications which will ensure that they development would not have an adverse impact on residential amenity through noise or dust. Therefore, there is already an element of what the representor has requested contained within the policy as currently drafted. Furthermore, Strategic Policy STR14 sets out the general approach in point vi that new development will have regard to the protection of the environment in terms or air, noise and light pollution Also, Policies PC2, EN18 and EN26 provides detailed criteria against which planning applications (including minerals applications) will be assessed. Policy PC2 sets out the general requirements for development which includes a number of criterion including point a. which would ensure development harmonises with the surrounding area, point b. “where all development should, where appropriate not have a significant adverse impact on the safety and living conditions of nearby residents, other users or nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard or the adverse effects of pollution.” Policy EN18 will also provide safeguards to ensure that new development would not create an increased risk of noise, vibration, odour, dust, light or other pollution or hazards. Policy EN26 includes specific criteria which minerals development will be assessed. Point i. includes there would be no significant visual impact from the development. It is considered that, when the Plan is read as a whole, there are detailed criteria based policies within the Plan that will safeguard the amenity of residents and other land users from any potential mineral development that may be proposed and assessed by the

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					LDP. Therefore, there would be no need to change Policy EN27 as suggested as this would repeat policy already contained within the LDP.

Ch 13 Monitoring

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
65	Monitoring	Object	CPAT is disappointed to see that there is no provision for the monitoring of the effectiveness of Policy EN8 in Section 13. Monitoring could be achieved by simple comparison of the numbers of planning applications having historic environment implications with the numbers showing how each of those was resolved.	Policy EN8 in Section 13. Monitoring could be achieved by simple comparison of the numbers of planning applications having historic environment implications with the numbers showing how each of those was resolved.	Not accepted. The suggested requirement to evaluate and monitor every single planning application which involves the historic environment is not a simple nor effective form of monitoring nor use of limited resources.
103	Monitoring	Object	This monitoring appears very weak, it just states to monitor and review, with nothing robust to address any failures or missed targets.		Not accepted. The objector offers no specific examples of why monitoring is deficient or how it could be improved. The Council is reviewing the monitoring framework having regard to the requirements contained in Welsh Government Development Plans Manual Ed.3 published in March 2020.
160	Monitoring	Object	Section 13 - Monitoring The monitoring in relation to housing delivery indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will “keep monitoring, further investigate and review as required”. This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of	The monitoring in relation to housing delivery indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will “keep monitoring, further investigate and review as required”. This is extremely vague and provides	Not accepted. The requirement for LPA’s to monitor their housing land supply and maintain a 5 year supply of housing land was removed on 26th March 2020.Technical Advice Note 1 (TAN 1) was revoked in its entirety and the housing delivery section of Planning Policy Wales (Edition 10) was amended to remove the 5 yr housing land policy. Instead LPA’s are now required to monitor the delivery of their development plan housing requirement based on a housing trajectory contained in the development plan (PPW para. 4.2.10).

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			deliverable sites for housing. Where this cannot be met there must be a mechanism in place to allow this to be achieved. Simply monitoring and further investigation will not achieve this and will therefore fail to meet soundness Test 2 in that the Plan will not seek to meet assessed needs. The Council's LDP 10 (Background Paper on Housing Land Supply and Delivery) sets out at paragraph 3.0.1 that "the delivery of the housing supply and the maintenance of a 5 year housing land supply throughout the plan period are essential to the achievement of the Plan's aims". As delivery of the 5 year housing land supply is central to the Plan's aims it is crucial that the Plan has a system in place for bringing forward alternative sites should the housing land supply fall short. The identification of contingency sites which could be brought forward in such circumstances would be an appropriate response. However, the current Plan does not identify contingency sites and will therefore lead to planning by appeal should the housing land supply figure fall below 5 years. It is of note that this is exactly what happened in relation to the previous UDP. We have made representations under policy STR11 and HN1 in relation to potential contingency sites.	no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur.	Not accepted. New guidance contained in the Development Plans Manual (Edition 3, March 2020) requires LPA's to now include in their Deposit LDP a trajectory showing how the Plan's housing requirement will be met over the Plan period. The trajectory is to incorporate an Anticipated Annual build Rate (AABR) calculated based on a formula contained in the Manual. The trajectory is to be updated annually, both up to and following Adoption of the LDP taking into account actual annual completions during the Plan period. The new guidance requires LPA's to monitor actual completions, both annually and cumulatively since the start of the Plan period, against the AABR in the trajectory as part of the LDP Annual Monitoring Report. The Council is reviewing the monitoring framework having regard to these revised requirements and the monitoring arrangements will be further refined through the examination process. There is no requirement in PPW10 or the Development Plans Manual (Edition 3) for LDP's to identify contingency sites. Instead LDP's must include an appropriate flexibility allowance. Furthermore, every LDP must be reviewed at least every 4 years after adoption.
411	Monitoring	Object	In terms of monitoring the level of open space provided by new developments,	In terms of monitoring the level of open	Not accepted. The purpose of this monitoring indicator is to establish whether residential

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			the HBF consider that the contribution made by improvements to existing facilities should also be included. MI15 Viability – trends in house prices, land values, build costs The HBF requests that the trigger point needs to be amended so that not only are house prices considered but also the other factors such as build costs identified in the indicator are considered as well. (By way of example if house prices go up 5% but build cost also go up 5% then there is no impact on viability so a review of the viability should not be triggered). MI41 Open space provided as part of new housing development In terms of monitoring the level of open space provided by new developments, the HBF consider that the contribution made by improvements to existing facilities should also be included.	space provided by new developments, the HBF consider that the contribution made by improvements to existing facilities should also be included.	development is delivering open space in accordance with the policy requirements. This could include new on-site provision or the improvement to existing off-site open space. It is not considered necessary for the indicator to be amended as suggested. The wording of the indicator itself clearly references 'house prices, land values, build costs' but these have not been carried across into the other columns. It is anticipated that the monitoring indicators will be further refined during the examination and would have no objection to amending this indicator as suggested if the Inspector considers this appropriate.
589	Monitoring	Object	Section 13 - Monitoring The monitoring in relation to housing delivery indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to	Section 13 - Monitoring The monitoring in relation to housing delivery indicates that, should the housing land supply	Not accepted. The requirement for LPA's to monitor their housing land supply and maintain a 5 year supply of housing land was removed on 26th March 2020.Technical Advice Note 1 (TAN 1) was revoked in its entirety and the housing delivery section of Planning Policy Wales (Edition 10) was amended to remove the 5 yr

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			meet the shortfall in the 5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of deliverable sites for housing. Where this cannot be met there must be a mechanism in place to allow this to be achieved. Simply monitoring and further investigation will not achieve this and will therefore fail to meet soundness Test 2 in that the Plan will not seek to meet assessed needs. The Council's LDP 10 (Background Paper on Housing Land Supply and Delivery) sets out at paragraph 3.0.1 that "the delivery of the housing supply and the maintenance of a 5 year housing land supply throughout the plan period are essential to the achievement of the Plan's aims". As delivery of the 5 year housing land supply is central to the Plan's aims it is crucial that the Plan has a system in place for bringing forward alternative sites should the housing land supply fall short. The identification of contingency sites which could be brought forward in such circumstances would be an appropriate response. However, the current Plan does not identify contingency sites and will therefore lead to planning by appeal should the housing land supply figure fall below 5 years. It is of note that this is exactly what happened in relation to the previous UDP. We have made representations under policy STR11 and	fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of deliverable sites for housing. Where this cannot be met there must be a mechanism in place to allow this to be achieved. Simply monitoring and further investigation will not achieve this and will therefore fail to meet soundness Test 2 in that the Plan will not seek to meet	housing land policy. Instead LPA's are now required to monitor the delivery of their development plan housing requirement based on a housing trajectory contained in the development plan (PPW para. 4.2.10). New guidance contained in the Development Plans Manual (Edition 3, March 2020) requires LPA's to now include in their Deposit LDP a trajectory showing how the Plan's housing requirement will be met over the Plan period. The trajectory is to incorporate an Anticipated Annual build Rate (AABR) calculated based on a formula contained in the Manual. The trajectory is to be updated annually, both up to and following Adoption of the LDP taking into account actual annual completions during the Plan period. The new guidance requires LPA's to monitor actual completions, both annually and cumulatively since the start of the Plan period, against the AABR in the trajectory as part of the LDP Annual Monitoring Report. The Council is reviewing the monitoring framework having regard to these revised requirements and the monitoring arrangements will be further refined through the examination process. There is no requirement in PPW10 or the Development Plans Manual (Edition 3) for LDP's to identify contingency sites. Instead LDP's must include an appropriate flexibility allowance. Furthermore, every LDP must be reviewed at least every 4 years after adoption.

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			HN1 in relation to potential contingency sites.	assessed needs. The Council's LDP 10 (Background Paper on Housing Land Supply and Delivery) sets out at paragraph 3.0.1 that "the delivery of the housing supply and the maintenance of a 5 year housing land supply throughout the plan period are essential to the achievement of the Plan's aims". As delivery of the 5 year housing land supply is central to the Plan's aims it is crucial that the Plan has a system in place for bringing forward alternative sites should the housing land supply fall short. The identification of contingency sites which could be brought forward in such circumstances would be an appropriate response. However, the current Plan does not identify	

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
				contingency sites and will therefore lead to planning by appeal should the housing land supply figure fall below 5 years. It is of note that this is exactly what happened in relation to the previous UDP.	
862	Monitoring	Object	Actions are weak – keep monitoring, reviewing and investigating – it would give confidence in the plan if measures were taken to address any missed targets. Monitoring section 13 The NDF is not one of the triggers even though it will be produced during the FCC LDP timescale There is no mention at all of Strategic Development Plans and surely they will be in place over the plan period too? Actions are weak – keep monitoring, reviewing and investigating – it would give confidence in the plan if measures were taken to address any missed targets	Actions are weak – keep monitoring, reviewing and investigating – it would give confidence in the plan if measures were taken to address any missed targets	Not accepted. The objector provides no specific example of a monitoring indicator being deficient and how it could be improved. The Council considers the monitoring indicators represent a good starting point for monitoring the Plan. However the Monitoring Framework is being reviewed in the light of the requirements contained in the Development Plans Manual (Edition 3), published in March 2020 by the Welsh Government. It is likely that during the examination of the Plan, further amendments to the monitoring arrangements will be agreed. Once adopted, the Council will be required to review the Plan at least every 4 years. It is anticipated that the NDF will be approved by Welsh Government prior to the close of the examination process and it will be for the Inspector to determine whether the Plan is in general conformity with the NDF. Welsh Governments representations on the Plan has already established that the Plan is broadly in line with the draft NDF. The development of a SDP for North Wales has not yet been

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
					commenced and it is difficult to see how incorporating this into the monitoring will help matters. The monitoring is meant to establish the performance of the Plan. Any emerging SDP is more a matter for the review of the LDP once adopted, and the Council is required to review a LDP every 4 years.
582	Monitoring	Object	The monitoring in relation to housing delivery indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. The monitoring in relation to housing delivery indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur. It is an important national requirement as set out in PPW and TAN1 that Councils are able to continually show a 5 year supply of deliverable sites for housing. Where this cannot be met there must be a mechanism in place to allow this to be achieved. Simply monitoring and further investigation will not achieve this and will	The monitoring in relation to housing delivery indicates that, should the housing land supply fall below 5 years for 2 consecutive years, the Council will "keep monitoring, further investigate and review as required". This is extremely vague and provides no mechanism for bringing sites forward to meet the shortfall in the 5 year supply should this occur.	Not accepted. The requirement for LPA's to monitor their housing land supply and maintain a 5 year supply of housing land was removed on 26th March 2020.Technical Advice Note 1 (TAN 1) was revoked in its entirety and the housing delivery section of Planning Policy Wales (Edition 10) was amended to remove the 5 yr housing land policy. Instead LPA's are now required to monitor the delivery of their development plan housing requirement based on a housing trajectory contained in the development plan (PPW para. 4.2.10). New guidance contained in the Development Plans Manual (Edition 3, March 2020) requires LPA's to now include in their Deposit LDP a trajectory showing how the Plan's housing requirement will be met over the Plan period. The trajectory is to incorporate an Anticipated Annual build Rate (AABR) calculated based on a formula contained in the Manual. The trajectory is to be updated annually, both up to and following Adoption of the LDP taking into account actual annual completions during the Plan period. The new guidance requires LPA's to monitor actual completions, both annually

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			therefore fail to meet soundness Test 2 in that the Plan will not seek to meet assessed needs. The Council's LDP 10 (Background Paper on Housing Land Supply and Delivery) sets out at paragraph 3.0.1 that "the delivery of the housing supply and the maintenance of a 5 year housing land supply throughout the plan period are essential to the achievement of the Plan's aims". As delivery of the 5 year housing land supply is central to the Plan's aims it is crucial that the Plan has a system in place for bringing forward alternative sites should the housing land supply fall short. The identification of contingency sites which could be brought forward in such circumstances would be an appropriate response. However, the current Plan does not identify contingency sites and will, therefore, lead to planning by appeal should the housing land supply figure fall below 5 years. It is of note that this is exactly what happened in relation to the previous UDP. We have made representations under policy STR11 and HN1 in relation to potential contingency sites.		and cumulatively since the start of the Plan period, against the AABR in the trajectory as part of the LDP Annual Monitoring Report. The Council is reviewing the monitoring framework having regard to these revised requirements and the monitoring arrangements will be further refined through the examination process. There is no requirement in PPW10 or the Development Plans Manual (Edition 3) for LDP's to identify contingency sites. Instead LDP's must include an appropriate flexibility allowance. Furthermore, every LDP must be reviewed at least every 4 years after adoption.
1167	Monitoring	Object	Monitoring and Review It is noted that the Council has committed to the annual	it is considered that the LDP should	Not accepted. Welsh Government requires that every LDP is reviewed at least every 4

ID	Title	Support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			monitoring of the LDP once adopted, whilst keeping it under review in order to ensure that it remains up-to-date in relation to changing circumstances, national guidance and policy. This will involve the preparation of an Annual Monitoring Report to measure the effectiveness of the Plan based on its Monitoring Framework. Given the historic issues associated with plan-making in Flintshire (as evidenced in the time it has taken to progress the LDP since the UDP became time-expired in 2015), it is considered that the LDP should contain a specific commitment to undertake a Local Plan Review every five years post-adoption. This should help to ensure that previous delays in the Plan-making process in Flintshire can be avoided moving forward.	contain a specific commitment to undertake a Local Plan Review every five years post-adoption. This should help to ensure that previous delays in the Plan-making process in Flintshire can be avoided moving forward.	years following adoption. In this context it is unclear why the objector seeks a written reference in the Plan to reviewing it very 5 years.
735	Monitoring	Object	LDP MONITORING AND REVIEW 3.1. It is noted that the Council has committed to the annual monitoring of the LDP once adopted, whilst keeping it under review in order to ensure that it remains up-to-date in relation to changing circumstances, national guidance and policy. This will involve the preparation of an Annual Monitoring Report to measure the effectiveness of the Plan based on its Monitoring Framework. 3.2. Given the historic issues associated with plan-making in Flintshire (as evidenced in the time it has taken to progress the LDP since the UDP became time-expired in		Not accepted. Welsh Government requires that every LDP is reviewed at least every 4 years following adoption. In this context it is unclear why the objector seeks a written reference in the Plan to reviewing it very 5 years.

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			2015), it is considered that the LDP should contain a specific commitment to undertake a Local Plan Review every five years postadoption. This should help to ensure that previous delays in the plan-making process in Flintshire can be avoided moving forward.		
1166	Monitoring	Support	Monitoring Framework The Councils monitoring framework provides a good starting point and it is clear the authority has looked at other monitoring frameworks which will need to be refined through the examination sessions. The Council should have regard to the monitoring and review Chapter of DPM (Ed. 3), in particular the key indicators set out in Table 29.		Noted. The Council is reviewing the monitoring framework having regard to the requirements contained in Welsh Government Development Plans Manual Ed.3 published in March 2020. It is noted that the monitoring arrangements will need to be further refined through the examination process.

Appendix 1 - Housing Commitments

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
57	Appendix 1 - Housing Commitments	Support	I am in support of the LDP and am pleased to see that the candidate site GRE002 at Tan y Felin, Greenfield has not been included. I objected to an application in September 2014. Although the site does not adjoin my property, I was concerned about road safety. It is accessed from Tan y Felin and Ffordd Dwyfor. Tan y Felin is a winding hill with drivers having to navigate around parked vehicles, often having to drive in the middle of the road and stop for people reversing out of driveways. The last right hand uphill bend at the cul-de-sac serving 91-99 odds Tan y Felin can be dangerous especially in the evening when the sun is low and in your eyes. Cars using the hill don't always stick to the speed limit. Also, further up the hill in the junction of Cae y Dderwen and Tan y Felin, children play football and ride their bikes in what is at present a very quiet spot. Regarding Ffordd Dwyfor, I would speculate that this road would be used more than Tan y Felin for access onto the site, because it generally goes to the middle of it. As with Tan y Felin, this road has cars parked on the roadside. There is a children's play area at the end of the road, fronting Tan y Felin. It is enclosed by a gate and fence but I was concerned that extra traffic could become a hazard for children who independently walk to and from the park and cross the road. Also, I find that cars do on occasion come		Support is noted

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			out of the Ffordd Dwyfor junction in front of me without the driver looking properly! When it snows heavily Tan y Felin is a hazard. I have witnessed on several occasions cars trying to get down the hill, bumping into parked cars and each other, and one car skidding and mounting a pavement on which was standing a toddler who was luckily unharmed. With a sizeable development on the land, the extra traffic would compound the situations described above and increase the potential for accidents. I can see that an option to mitigate the situation would have been to install speed bumps but this could cause problems for emergency vehicles, buses (Tan y Felin is on a bus route) and farm vehicles and up down Tan y Felin. Further, I'm sure residents like myself who drive up and down the hill on most weekdays would not like to drive over these bumps daily and residents on Tan y Felin itself would likely object to the increased noise levels of cars decelerating etc. Speed bumps were installed on Pen y Maes Road within the last few years but were taken up again maybe for the same reason.		
336	Appendix 1 - Housing Commitments	Object	Appendix 1 of the LDP Deposit Draft includes a list of housing commitments and their associated capacity. These are detailed within the Housing Land Monitoring Statement (April 2018). The ability to deliver		Not accepted. Each of the sites is commented on in turn: • Mount Pool, Buckley – The site only recently gained reserved matter approval (055936 on 04/12/19) and the applicant was Quatrefoil Homes. There is no evidence to doubt that the site will not come forward

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
			a number of these commitments is questionable. Mount Pool (rear of Hillcrest) Buckley - The site was purchased for £1m in 2010. The owners are very unlikely to receive £1m return for 15 units. It is therefore likely that the site will remain undeveloped Land at Brook farm, Buckley - The Site has had planning permission for over 12 years which is renewed every 3 years. Simply rolling forward an extant consent which is clearly not being delivered is unrealistic and nonsensical to include in a housing commitment supply table Bromfield Timber Yard Mold - The site has planning consent no longer an appropriate location for apartments and therefore the site is more realistically able to achieve 35-40 dwellings. The landowners expectations for the value of the site are unrealistic and too high. Station Yard Depot - Whilst Reserved Matters Planning Approval has been granted, there is very limited market demand and interest. The ability to deliver 9 units in 2020 is unrealistic Altbridge House - Whilst the site benefits from planning approval for 41 apartments,		during the Plan period. The LDP Housing trajectory shows the site being delivered over two years 2021/22 and 2022/23 and even if some slippage occurred there is plenty of scope for this small site to be pushed back slightly. • Brook Farm, Buckley – As part of the April 2019 Housing Land Monitoring Study contact was made with the owners daughter who confirmed that following the renewal of the outline she was seeking to dispose of the site and asked advice regarding agents, social housing providers etc. This is a modest sized development of 14 dwellings and is quite capable of coming forward for development. • Bromfield Timber – In the April 2019 Housing Land Monitoring Study the forecast completions were moved outside of the 5 year supply following confirmation from the owners agent that the site is unlikely to be developed within the next five years. However, no information has been made available to suggest that the site will not be developed within the plan period. The site has an extant planning permission. • Station Yard, Coed Talon – the site only recently secured reserved matter approval on 18/09/19. The fact that there is not yet a housebuilder on board does not mean that the site cannot be delivered within the Plan period. • Altbridge House, Whitford – As part of work on the 2019 Housing Land Monitoring Study it has been established that following a change of ownership that

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			the site is former nursing home which was purchased at height of the market in 2007 for £1.3m. There is currently limited Market demand and land value makes the site currently unviable and undeliverable unless the land owner would accept a lower sales fee. XXX questions the deliverability of approximately **203 units** within the next 5 years. Failure to maintain a 5-year supply of readily developable housing land, as contained in paragraph 2.1 of TAN 1, is a key planning policy requirement of the Welsh Government. Through the LDP process, enough land must be provided to allow for new home building that will ensure a 5-year land supply for housing is maintained.		there are no plans for immediate development. Further, the planning permission on the site has expired so the site is not included in the land supply in the 2019 housing land monitoring report.
344	Appendix 1 - Housing Commitments	Object	Appendix 1 of the LDP Deposit Draft includes a list of housing commitments and their associated capacity. These are detailed within the Housing Land Monitoring Statement (April 2018). The ability to deliver a number of these commitments is questionable. Mount Pool (rear of Hillcrest) Buckley - The site was purchased for £1m in 2010. The	Allocate Site at Bryn Y Baal	Not accepted. Each of the sites is commented on in turn: • Mount Pool, Buckley – The site only recently gained reserved matter approval (055936 on 04/12/19) and the applicant was Quatrefoil Homes. There is no evidence to doubt that the site will not come forward during the Plan period. The LDP Housing trajectory shows the site being delivered over two years 2021/22 and 2022/23 and even if some slippage

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			owners are very unlikely to receive £1m return for 15 units. It is therefore likely that the site will remain undeveloped Land at Brook farm, Buckley - The Site has had planning permission for over 12 years which is renewed every 3 years. Simply rolling forward an extant consent which is clearly not being delivered is unrealistic and nonsensical to include in a housing commitment supply table Bromfield Timber Yard Mold - The site has planning consent no longer an appropriate location for apartments and therefore the site is more realistically able to achieve 35-40 dwellings. The landowners expectations for the value of the site are unrealistic and too high. Station Yard Depot - Whilst Reserved Matters Planning Approval has been granted, there is very limited market demand and interest. The ability to deliver 9 units in 2020 is unrealistic Altbridge House - Whilst the site benefits from planning approval for 41 apartments, the site is former nursing home which was purchased at height of the market in 2007 for £1.3m. There is currently limited		occurred there is plenty of scope for this small site to be pushed back slightly. • Brook Farm, Buckley – As part of the April 2019 Housing Land Monitoring Study contact was made with the owners daughter who confirmed that following the renewal of the outline she was seeking to dispose of the site and asked advice regarding agents, social housing providers etc. This is a modest sized development of 14 dwellings and is quite capable of coming forward for development. • Bromfield Timber – In the April 2019 Housing Land Monitoring Study the forecast completions were moved outside of the 5 year supply following confirmation from the owners agent that the site is unlikely to be developed within the next five years. However, no information has been made available to suggest that the site will not be developed within the plan period. The site has an extant planning permission. • Station Yard, Coed Talon – the site only recently secured reserved matter approval on 18/09/19. The fact that there is not yet a housebuilder on board does not mean that the site cannot be delivered within the Plan period. • Altbridge House, Whitford – As part of work on the 2019 Housing Land Monitoring Study it has been established that following a change of ownership that there are no plans for immediate development. Further, the planning permission on the site has

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			Market demand and land value makes the site currently unviable and undeliverable unless the land owner would accept a lower sales fee. XXX questions the deliverability of approximately **203 units** within the next 5 years. Failure to maintain a 5-year supply of readily developable housing land, as contained in paragraph 2.1 of TAN 1, is a key planning policy requirement of the Welsh Government. Through the LDP process, enough land must be provided to allow for new home building that will ensure a 5-year land supply for housing is maintained.		expired so the site is not included in the land supply in the 2019 housing land monitoring report.
370	Appendix 1 - Housing Commitments	Object	Appendix 1 of the LDP Deposit Draft includes a list of housing commitments and their associated capacity. These are detailed within the Housing Land Monitoring Statement (April 2018). The ability to deliver a number of these commitments is questionable. Mount Pool (rear of Hillcrest) Buckley - The site was purchased for £1m in 2010. The owners are very unlikely to receive £1m return for 15 units. It is therefore likely that the site will remain undeveloped Land at Brook farm, Buckley - The Site has had planning permission for over 12 years which is renewed every 3 years. Simply rolling forward an extant consent which is		Not accepted. Each of the sites is commented on in turn: • Mount Pool, Buckley – The site only recently gained reserved matter approval (055936 on 04/12/19) and the applicant was Quatrefoil Homes. There is no evidence to doubt that the site will not come forward during the Plan period. The LDP Housing trajectory shows the site being delivered over two years 2021/22 and 2022/23 and even if some slippage occurred there is plenty of scope for this small site to be pushed back slightly. • Brook Farm, Buckley – As part of the April 2019 Housing Land Monitoring Study contact was made with the owners daughter who confirmed that following the renewal of the outline she was seeking to dispose of the site and asked advice regarding

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			clearly not being delivered is unrealistic and nonsensical to include in a housing commitment supply table Bromfield Timber Yard Mold - The site has planning consent no longer an appropriate location for apartments and therefore the site is more realistically able to achieve 35-40 dwellings. The landowners expectations for the value of the site are unrealistic and too high. Station Yard Depot - Whilst Reserved Matters Planning Approval has been granted, there is very limited market demand and interest. The ability to deliver 9 units in 2020 is unrealistic Altbridge House - Whilst the site benefits from planning approval for 41 apartments, the site is former nursing home which was purchased at height of the market in 2007 for £1.3m. There is currently limited Market demand and land value makes the site currently unviable and undeliverable unless the land owner would accept a lower sales fee. XXX questions the deliverability of approximately **203 units** within the next 5 years. Failure to maintain a 5-year supply of readily developable housing land, as		agents, social housing providers etc. This is a modest sized development of 14 dwellings and is quite capable of coming forward for development. • Bromfield Timber – In the April 2019 Housing Land Monitoring Study the forecast completions were moved outside of the 5 year supply following confirmation from the owners agent that the site is unlikely to be developed within the next five years. However, no information has been made available to suggest that the site will not be developed within the plan period. The site has an extant planning permission. • Station Yard, Coed Talon – the site only recently secured reserved matter approval on 18/09/19. The fact that there is not yet a housebuilder on board does not mean that the site cannot be delivered within the Plan period. • Altbridge House, Whitford – As part of work on the 2019 Housing Land Monitoring Study it has been established that following a change of ownership that there are no plans for immediate development. Further, the planning permission on the site has expired so the site is not included in the land supply in the 2019 housing land monitoring report.

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			contained in paragraph 2.1 of TAN 1, is a key planning policy requirement of the Welsh Government. Through the LDP process, enough land must be provided to allow for new home building that will ensure a 5-year land supply for housing is maintained.		
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			the value of the site are unrealistic and too high. Station Yard Depot - Whilst Reserved Matters Planning Approval has been granted, there is very limited market demand and interest. The ability to deliver 9 units in 2020 is unrealistic Altbridge House - Whilst the site benefits from planning approval for 41 apartments, the site is former nursing home which was purchased at height of the market in 2007 for £1.3m. There is currently limited Market demand and land value makes the site currently unviable and undeliverable unless the land owner would accept a lower sales fee. XXX questions the deliverability of approximately **203 units** within the next 5 years. Failure to maintain a 5-year supply of readily developable housing land, as contained in paragraph 2.1 of TAN 1, is a key planning policy requirement of the Welsh Government. Through the LDP process, enough land must be provided to allow for new home building that will ensure a 5-year land supply for housing is maintained.		However, no information has been made available to suggest that the site will not be developed within the plan period. The site has an extant planning permission. • Station Yard, Coed Talon – the site only recently secured reserved matter approval on 18/09/19. The fact that there is not yet a housebuilder on board does not mean that the site cannot be delivered within the Plan period. • Altbridge House, Whitford – As part of work on the 2019 Housing Land Monitoring Study it has been established that following a change of ownership that there are no plans for immediate development. Further, the planning permission on the site has expired so the site is not included in the land supply in the 2019 housing land monitoring report.

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692	Appendix 1 - Housing Commitments	Object	The site at Llys Ben is roughly rectangular in shape and is bounded to the east and the south by existing residential development comprising predominately large detached properties. To the west of the site is the Northop Hall Pavilion with carparking, formal play area and football pitches. The site is only open on its northern boundary beyond which is agricultural farmland. It therefore is	Include site at Llys Ben	Not accepted. Each of the sites is commented on below and it is evident that the objection is mostly based on inaccurate and out of date information: • The Whitleys Depot site is owned by and will be developed by FG Whitley who are a local developer and listed on the HBF website. Construction is taking place on site and the April 2019 Housing Land Monitoring Study showed 11 units under

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			contained with the existing urban form of Northop Hall. Outside of its Green Barrier designation the site does not have any particular landscape importance attached to it and is identified as having “a poor-quality landscape"		construction. • The Summerhill Farm site is being developed by Quatrefoild Homes and is under construction. The April 2019 Housing Land Monitoring Study showed 5 units under construction. • Station Yard, Coed Talon – the site only recently secured reserved matter approval on 18/09/19. The fact that there is not yet a housebuilder on board does not mean that the site cannot be delivered within the Plan period. • East of Gronant Hill, Gronant – the site is being developed by the Council’s SHARP development partner Wates, who are committed to delivering the site. The site has seen recent planning consents in relation to discharge of conditions and non-material amendments to the scheme. There is no evidence that the scheme cannot be developed within the Plan period. • Kinnerton Lane, Higher Kinnerton – Elan Homes are on site and the development is nearly finished. • Former Bromfield Timber, Mold – In the April 2019 Housing Land Monitoring Study the forecast completions were moved outside of the 5 year supply following confirmation from the owners agent that the site is unlikely to be developed within the next five years. However, no information has been made available to suggest that the site will not be developed within the plan period. The site has an extant planning permission.

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					• Sewage Works, Sychdyn – the site is being developed by Stewart Milne Homes and is nearly complete. The April 2019 Housing Land Monitoring Statement identified that the remaining 10 units on the development were all under construction. • Altbridge House, Whitford – As part of work on the 2019 Housing Land Monitoring Study it has been established that following a change of ownership that there are no plans for immediate development. Further, the planning permission on the site has expired so the site is not included in the land supply in the 2019 housing land monitoring report.

Appendix 2 - Supplementary Planning Guidance

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67	Appendix 2 - Supplementary Planning Guidance	Object	XXX would welcome the preparation of an SPG on the historic environment and would be happy to contribute to the preparation of such a document		Noted. However it is unclear what additional guidance a SPG could provide, over above the policies in the LDP and the guidance in the Historic Environment Wales Act, PPW10 and TAN24: The Historic Environment.

Flintshire Local Development Plan Deposit Draft September 2019 - Miscellaneous

ID	Title	support or object	Summary of representation	Summary of changes being sought/proposed	Council response
20	Flintshire Local Development Plan Deposit Draft September 2019	Support	Re Tan-y-felin fields/ Cae Dderwen Greenfield, Holywell CH8: I wish to support the Planning Officer's decision against building development for the following reasons: 1. The existing insufficient infrastructure in Greenfield- insufficient shops, no doctors, no dentists, the primary school is almost full. 2. The protection of local cemeteries for potential pandemics 3. The importance of not undermining current accepted plans underway to develop the old Holywell hospital sites and sites opposite 4. Existence of more than double the Flintshire housing plans requirement passed 5. Existing poor drainage situation on Greenfield Road 6. Availability of existing brownfield sites in. Flintshire 7. Designation of Tan-y-felin fields as Green Space 8. Need to protect the site as ecologically		Support Noted

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			important for protected wildlife including badgers, bats, red kites, owls, field fare, sparrow hawks, buzzards, ravens, and a natural brook with ancient hedgerows and trees 9. Use of site for community leisure and its right to its unmanaged rural heritage, regularly used by Ramblers and other community groups 10. Existing very narrow and congested access in Woodland Drive and School Lane 11. Existing and increasing traffic congestion on at the bottom of Tan-y-felin and at the junction of Greenfield Road and the Coast Road 12. Existing severe traffic problems on Tan-y-felin: narrowness exacerbated by insufficient parking, cars forced to park on pavements on both sides resulting in single traffic lanes on blind bends and ensuing collisions/ very near misses. Existing very restricted access for emergency vehicles. Existing and increased danger to children at the playground blind bend.		
86	Flintshire Local Development Plan Deposit Draft		Flintshire Local Development Plan Dear Sirs, I object to the introduction of the Flintshire Local Development Plan (FLDP) as shown in the latest circulated		Not accepted. The settlement boundary in the UDP has been reviewed in the light of the construction of the new school. The LDP has drawn back the settlement boundary from the boundary of the school to follow

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	September 2019		form. The extent of the property Ardwyn Strand Lane is incorrectly shown. The boundary of the school is shown as extending to within a few feet of the back of the house. This is incorrect. It is incorrect as to past and current use, which is and since the house was built in the 1920s one settled residential property. since 1963 and at all times the land has been the exclusive property of the owners of Ardwyn who enjoyed sole use of the land. The boundary between my property and the School is clearly shown in the Conveyance of 29th July 1939 whereby the Council bought a piece of land at the bottom of the garden. Copy from plan enclosed (enclosure 1). By showing the boundary in its incorrect position it causes me a nuisance and deprives me of the exclusive residential usage I now enjoy, as mentioned in the said Conveyance. (Copy of section 5 enclosure 2). Which could be further exacerbated by any subsequent trespass by anyone trying to exercise what they think is a Right. The FLDP does not accurately reflect the current usage and is bad in law by not accurately reflect the current usage. I ask that it be amended to show the boundary between our respective properties in the correct position and that that the whole of my property be described by its current settled residential usage.		clearly defined boundaries to the rear of properties on Strand Lane. The purpose of this is to remove from within the settlement boundary an area of mature trees which are an important local amenity feature. This does not change ownership of land but reflects that as a planning tool the settlement boundary is considered to be more appropriately drawn back to more closely follow the line of existing built development and enhance the protection of mature trees.
243	Flintshire Local Development	Object	Objection 1: The Plan is excessively aspirational and results in		Not accepted. Objection 1: Whilst the objector is essentially opposed to a housing

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	Plan Deposit Draft September 2019		disproportionately high levels of projected new housing "need" The Preferred Growth Strategy is based upon an "aspiration scenario" of highly ambitious growth projections for jobs mainly in Deeside and based upon the availability of employment land available in that area of Flintshire. The inflated employment target leads to an inflated housing "need" in Flintshire's Plan, well beyond what would be expected from an analysis of population trends, migration trends, political and economic trading conditions, or even the housing levels associated with a more controlled steady growth rate up to 2030. Also, a significant number of the new jobs would not come to people living in Flintshire, distorting the calculations. These projections together with the high contingency rate inflate the housing "need" in Flintshire at all stages of the process and are unsustainable. Not compliant with PPW paragraph 1.11, 1.15 LDP Section 3 does not consider the external factors needed to create a successful outcome (Test of Soundness Failed: 2,3) Site H1.6/MOL025/MOL044/MOL045 Objection 14: Absence of key documents to support decision making by FCC (and by Mold Town Council in its Plan feeding into the Deposit LDP)		allocation close to where they live, they have made a large number of detailed representations objecting to a number of areas of the plan, but where the statements made are often subjective, confusing, selective, and are not supported by evidence, particularly of harm or that affects the soundness of the plan. That said the Council has attempted to interpret and respond to these objections in the best way it can given the above. See also rep id249 and id250. The Plan has not sought to deliberately overprovide for housing in the context of taking an inappropriate, unjustified or harmful approach. Rather, the Plan has been prepared in the context of a regional growth strategy which is part of Welsh Government Policy and recently re-affirmed in the draft NDF. The objector questions the context for the job growth target but the lower end of the range identified is only slightly above the job projections prepared by the Council's consultants who conclude in their deposit 'Employment and Housing Advice' Background Paper that the job target is not unrealistic. The Welsh Government have submitted representations in support of the economic growth strategy of the plan, stating that they are supportive of the level of homes and jobs proposed within the plan and they consider it

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			Decisions on planning matters, the allocation of candidate sites, the rejection of other sites, decisions to develop in open countryside have, at times, been made in the absence of key documents such as the Green Barrier Review and Background Paper on site assessment. Flintshire CC's Planning Committee has been tasked with producing a LDP before the official paper of the Green Barrier Review (and other key documents) became available in September 2019. Under the circumstances there is the possibility that the Green Barrier Review becomes a rubber stamping exercise for decisions already taken, rather than a document written free of pre-conceptions on new site allocations. The review was not available to either FCC or to MTC until after the LDP and MTC Plans were published. In effect this invalidates both MTC and FCC plans. Therefore those decisions about which sites to allocate were made without reference to consistent approaches to protecting open countryside, which is unsound. Background Paper 1 on Green Barrier Review states that its role is to assist in safeguarding the countryside from encroachment and to protect the setting of an urban area. This applies where a settlement has a particularly open or sensitive edge and an open countryside setting as in the case of MOL045/H1.6. The Review (Sept 2019, p5) also states		to align with national policy and the emerging NDF. The Housing Balance Sheet demonstrates how the Plan can meet its housing requirement figure through various sources of 'supply' and part of this is to incorporate a flexibility allowance. The 'over-allocation' element is in effect the 'flexibility' allowance. Welsh Government explain in paras 5.58 and 5.59 of the Development Plan Manual 3 (now adopted) that it is rare for all of a Plans allocations to come forward and how a Plan will not be effective if it cannot accommodate changing circumstances. Welsh Government specifically state 'This means that a flexibility allowance must be embedded into the Plan '[The Councils emphasis in bold]. The guidance explains that it will be for each LPA to determine the level of flexibility allowance based on local considerations but that 'the starting point for such considerations should be 10% flexibility with any variation robustly evidenced'. Flexibility allowances typically sit within the range of 10-20% and the Plan sits comfortably at the mid point. Given concerns expressed by housebuilders about delivery as part of the UDP, it is considered that a slightly higher flexibility of 14.4% is more realistic and supports the soundness of the plan. The Deposit Plan represents the Council's Plan that it considers 'sound' and which is released for public consultation. It represents

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			that it is not the case that "every single urban edge requires a green barrier to prevent encroachment but more a consideration of settlement form and the nature of the urban edge and adjoining countryside". For instance, the UDP Inspector decided in 2009 that development on the MOL045/H1.6 Gwernaffield Rd/Denbigh Rd site would represent "significant incursion" into the countryside. Yet the LDP now proposes using this Grade 2 agricultural land for housing. Such an important decision requires all available evidence to be available and reasoned justification to be offered. I cannot find any evidence or justification. There is no point in producing a Green Barrier Review if it does not inform planning decisions, and crucially, shape the underlying discussions that precede the decisions to release sites. There is insufficient reasoned justification offered Not compliant with PPW paragraph: 1.19, 3.40 (Test of Soundness Failed: 1,2,3)		the outcome of the requirement to review the UDP given it has time expired and that there is insufficient housing land to support national policy requirements for this. It therefore shows revised settlement boundaries where for instance a new site has been allocated for housing. It will be for the Inspector to decide whether the allocation / settlement boundary should be retained in the adopted Plan. Objection 14: This objection is a duplicate of an objection under 'Strategic Policies – General' and has been fully responded to under rep id281.
384	Flintshire Local Development Plan Deposit Draft September 2019		Refer to attachments		See response to id 383 and 755

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520	Flintshire Local Development Plan Deposit Draft September 2019				
744	Flintshire Local Development Plan Deposit Draft September 2019				
982	Flintshire Local Development Plan Deposit Draft September 2019		Para 9.5 is almost the only place in the LDP where mention is made of protecting high quality agricultural land; yet despite this and the fact PPW10 places significant weight on BMV the LDP is devoid of any policy and makes no mention of any assessment of how this might have influenced housing site selection		Not accepted. It is unclear what para 9.5 the objector is referring to. Para 9.5 of the written statement is part of the explanatory text to policy PC2 'General Requirements for Development' and is not relevant to agricultural land The objector recognises that the protection of Best and Most Versatile Agricultural Land is clearly and fully set out in paras 3.54-3.55 of PPW10. It is not necessary or desirable for LDP's to slavishly repeat national guidance from PPW10. Indeed, para 3.11 of Development Plan Manual 3 states 'An LDP should not repeat national policy. Plans should not be a compendium of policies to cover every eventuality'. The adopted LDP will clearly need to be read in the context of LDP. There is no objection from Welsh Government in their representations on the

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					Plan regarding the lack of a policy on agricultural land. The preparation of the LDP has involved close working with Welsh Government in identifying the predicted loss of BMV as part of the assessment of candidate and alternative sites. On all allocations involving the potential loss of BMV an on-site survey has been arranged and results verified by Welsh Government. In identifying allocations the Council has sought to minimize the loss of BMV. The approach is set out in Background Paper 09 which has been supported in principle by Welsh Government.