

## Flintshire Local Development Plan

### Topic Papers - Summary of Representations and Responses

Name / Organisation	Comments / Changes Sought	Response	Recommendation
<b>Topic Paper 1 - Biodiversity and Nature Conservation</b>			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Supports the principle of conserving and enhancing biodiversity and nature given for instance the exceptional coastal environment which is a key visitor attraction, and therefore something Bourne Leisure wish to protect and where possible enhance.</p> <p>However, the policy objective of seeking to conserve and where possible enhance biodiversity and nature should not mean that appropriate and sustainable development is precluded from coming forward in Flintshire, provided commensurate mitigation measures can be implemented to mitigate both direct and indirect impacts. In this context, pleased to see the Topic Paper includes the reference '...avoid unnecessary constraints on development'.</p> <p>It is important that the Topic Paper sets out a balanced approach to facilitating appropriate development whilst seeking to maintain and enhance biodiversity and nature, which is especially relevant for tourist accommodation and facilities already located in environmentally sensitive locations.</p> <p>Pleased that the Topic Paper recognises that development can also positively impact on</p>	<p>Noted.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>No change</p> <p>No change</p> <p>No change</p> <p>No change</p>

	<p>biodiversity and nature.</p> <p>Points out that CIL can only be used to reduce or mitigate against impacts on biodiversity where a specific infrastructure project has been identified. Otherwise, s106 obligations remain the appropriate method of delivering funding to mitigate against any site specific impacts.</p>	Noted	No change
<b>Topic Paper 2 – Flooding and Environmental Protection</b>			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Welcomes the Topic Paper regarding climate change and flooding. However, the emerging LDP should recognise that specific uses, such as tourism uses, are often already sited on the coast or in river floodplains and that such uses require to be located adjacent to water in order to continue to attract visitors. The LDP should allow for proposals for the improvement / expansion of existing tourism accommodation and facilities to be considered on a more flexible basis to new developments in such locations.</p>	<p>Noted. Policies in the Plan will be drafted in accordance with advice in PPW and technical advice from Natural Resources Wales. Development proposals arising on existing tourism sites where there are flood risk issues will need to be robustly assessed and it would be inappropriate for the Plan to indicate that proposals the expansion of tourism accommodation, which is within the definition of 'highly vulnerable' development, should be treated more 'flexibly'.</p>	No change
	<p>With regard to air, noise and light pollution, tourist facilities are also sensitive to such impacts as it can affect the quality of the holiday experience. The LDP should specifically identify tourist accommodation as sensitive development.</p>	<p>Noted. As the Topic Paper rightly details, housing, hospitals and schools are generally regarded as 'noise sensitive developments'. Whilst there may be other forms of development which might be sensitive to noise, it would be preferable for these to be treated on a case by case basis, on their individual merits, against a criteria based policy in the Plan. Although there are certain forms of tourism accommodation where one would expect a certain standard of protection from undue noise, there are other forms of tourism accommodation, particularly in urban areas which are located close to transport hubs, retail parks and other facilities which are themselves, generators of noise, and where</p>	No change

		satisfactory standards of amenity can only be achieved through engineering measures. On balance it is not considered necessary or appropriate for tourism accommodation to be specifically mentioned in the Topic Paper.	
<b>Topic Paper 4 – Open Space</b>			
Redrow	<p>Supports the implementation of new open space however, any policy in the LDP will need to have regard to the scarcity of developable land and how development proposals should represent best use of land.</p> <p>Considers that a policy to ensure that a minimum quantum of public open space is provided in line with a certain increase in population holds merit, but it should set out the assumption behind new average household sizes and how the number of people per dwelling (and therefore the requirement for open space) will be calculated. Any new policy should state the assumptions made in relation to how the creation of new housing will generate new population and therefore set out a standard for new open space provision (play space, formal and informal). This calculation of new dwellings to population increase should be reflective of the most recent assessment of household sizes and provide a dynamic and robust assessment of how new development will generate a demand for open space.</p>	<p>The Council takes a flexible and pragmatic approach in applying open space standards particularly where a development site is within close reasonable and safe distance of an existing facility and in such circumstances seeks a commuted sum payment to enhance these nearby facilities. This has significant developer benefits for maintaining site viability and ensures that the Council only seeks open space where there is a justified need. Clearly the CIL Regulations pose a challenge to the traditional approach of FCC and may now require that FCC take a more robust approach. Equally all development that is proposed should be sustainable and deliverable, inclusive of the community's need for open space.</p> <p>In developing future LDP policies FCC will consider the issue of development viability and the impact of planning obligations on the viability of a development including residential development. FCC have historically used a open space rate per person which using average occupancy rates has generated a quantitative provision per dwelling.</p> <p>However, FCC in reviewing issues around viability is aware that applying a rate of open space provision by dwelling can cause viability issues particularly when a developer seeks to increase residential density to offset planning</p>	<p>No change</p> <p>No change</p> <p>No change</p>

		obligations. This can result in an escalating need for more open space offsetting more development value. The Council will be considering these issues in detail in the formation of future LDP policy to ensure that a balance between development needs and the valid needs for open space provision are achieved. This could be in the form of revised household occupancy figures or another appropriate approach.	
<b>Topic Paper 6 Minerals</b>			
Minerals Products Association	<p>The Topic Paper is disappointingly brief but the paper covers the necessary ground. The relevance of RTS 1<sup>st</sup> Review will be vital in keeping a steady and adequate supply of mineral available for working. Flintshire's limestone resources are particularly important not only for the North Wales economy, but also the North West England. Allocations of crushed rock to meet needs plus to a lesser extent, sand and gravel should be a major task of the LDP process.</p> <p>The other essential component is mineral safeguarding, which should include all minerals of economic importance. Concerned about statement that the needs for development must be balanced against the need to safeguard mineral. Suggest that if development is proposed on sites containing economic bearing mineral, that developers will always be required to investigate the potential for prior extraction. Moreover, since minerals can only be worked where they are found, whereas other forms of development are more flexible in terms of location, it is hoped that mineral conservation would be prioritised over development.</p>	<p>Noted. The purpose of the Minerals Topic Paper is to highlight the main issues which need to be addressed through the LDP. The evidence base will be expanded upon throughout the course of developing the LDP, as it will for all other aspects covered by the LDP.</p> <p>The need for allocations, in line with the RTS 1st Review, is highlighted within the Topic Paper.</p> <p>The LDP has to balance a range of different land use issues, minerals being just one of them. As highlighted within the Topic Paper, much of Flintshire is underlain by mineral of economic importance. The expansion of settlements is therefore likely to result in the loss of some mineral of economic importance. The assessment of candidate sites submitted will consider the presence of mineral underlying a site. Decisions regarding site selection will be based upon a wide range of factors including, but not limited to, flood risk, ecological sensitivity, accessibility, presence of community facilities, and whilst the conservation of minerals will be an important</p>	No change

	<p>In this context, there is a difference between the principle of prior extraction and proximal sterilisation. It is often assumed that if a development does not directly sterilise a mineral, or only in small quantities, or involves a common mineral, that this exhausts the objective to conserve mineral resources. This fails to take into account that development often will indirectly sterilise mineral by stopping the working of adjacent resources or severely limiting their exploitation. The same approach to delineating buffer zones around active mineral workings, should be extended to cover all economic mineral resources.</p> <p>The LDP should also include development management criteria for the assessment of non-mineral development in mineral safeguarding areas.</p> <p>The proposed LDP policies for dormant workings, buffer zones, recycled materials, development management criteria and restoration are sensible.</p>	<p>consideration, where the distribution of mineral is extensive it may not be possible to avoid allocating some sites underlain by mineral of economic importance. In such cases, the potential for prior extraction will be investigated.</p> <p>The difference between the principle of prior extraction and proximal sterilisation is well understood. In respect of aggregates, the BGS safeguarding maps include buffers, which are in accordance with MTAN 1. This is the starting point in terms of assessing whether mineral would be affected by non-mineral development. The Mineral Resource Maps published by the BGS will also be used, particularly in relation to non-aggregate mineral.</p> <p>It is agreed that it will be important for the LDP to include a policy to address safeguarding. The LDP is at a very early stage and development management policies won't be published until the Deposit Stage.</p> <p>Noted</p>	
Wirral BC	<p>Given that a number of Petroleum Exploration and Development Licences have been issued in and around Flintshire for onshore oil and gas exploration, the approach to energy minerals may also need to be identified as an issue for the LDP to address.</p>	<p>The Topic Paper covers oil and gas, specifically highlighting the presence of PEDL licences within and around Flintshire. The policy approach recommended in the Topic Paper is to identify those areas where mineral development will not be acceptable. This would apply to all types of extraction and is considered appropriate in relation to onshore oil and gas because the PEDL licence blocks are so extensive and need is not quantified. This may include the use of criteria based policy.</p>	No change

Topic Paper No. 7 Spatial Strategy			
Cassidy & Ashton Group Ltd	<p>Considers that Coed Talon is a sustainable location for development and has the capacity to support additional growth. Brownfield land is available for development to the south of Coed Talon.</p> <p>A balanced approach to growth should be adopted where growth is not solely directed towards category A and B settlements and that category C settlements such as Coed Talon should accommodate some additional growth.</p>	<p>Noted – The UDP identified Leeswood as a Category B settlement and Coed Talon as a category C settlement. Despite the different categorisation, both settlements had allocated housing sites, although neither has been taken forward. As part of the preparation of the LDP, a re-assessment of the settlement hierarchy is being undertaken. It is noted that the two settlements physically adjoin each other and both have the presence of brownfield land. Such factors will be addressed when the capacity of Coed Talon to accommodate further development, is undertaken. In this context it is suggested that a new bullet point is added in the LDP section on p5 of the Topic Paper.</p> <p>As part of the process of determining the Councils preferred spatial strategy a number of different spatial strategies will be identified and tested. This will help determine both the spatial distribution of growth across the County and the relative levels of development between different categories of settlement.</p>	<p>Add a new bullet point in the LDP section on p5 of the Topic Paper with the wording ‘the need to review the existing settlement hierarchy and categorisation based on an assessment of the services and facilities of each settlement and whether it is a sustainable location to accommodate further growth’.</p> <p>No change</p>
Cassidy & Ashton Group Ltd (on behalf of Whitley Group)	<p>In respect of ‘Issues to be Addressed by the Plan’:</p> <ul style="list-style-type: none"> <li>• Buckley, Mold, Hope and Pantymwyn are considered sustainable locations for development which has the capacity to support additional growth. These settlements have been the subject of growth over the last 10 years and availability of brownfield land is limited. Appropriate greenfield sites adjacent to settlement boundaries should be considered suitable for accommodating strategic growth alongside brown field land</li> </ul>	<ul style="list-style-type: none"> <li>• As part of the preparation of the LDP, a re-assessment of the settlement hierarchy is being undertaken. It is evident that Buckley and Mold are sustainable locations for development given that they are main towns. It is also considered that Hope / Caergwrle is a sustainable location for development, given its location on a key transport corridor between Wrexham and Mold and the level of facilities and services present, although the</li> </ul>	<p>No change</p>

	<p>within settlement boundaries</p> <ul style="list-style-type: none"> <li>• Growth should not focus solely on category A towns and that category B settlements have sufficient capacity and infrastructure capable of accommodating significant levels of growth. Category C settlements such as Pantymwyn should accommodate additional growth</li> <li>• Having regard to the UDP Inspectors comments regarding settlement boundaries and green barriers, it would not be appropriate for the Council to severely limit growth of any settlement including Buckley, by way of excessive green barriers. It is crucial for the Council to review existing green barriers and in some cases remove constrictions to development (e.g. land to south and east of Buckley)</li> </ul>	<p>actual level of growth may be lower than main towns. However, it is not considered that Pantymwyn can be considered in the same context or categorisation as the above settlements. Pantymwyn has few services and facilities and is not considered to represent a sustainable location for the levels of growth advocated.</p> <p>In terms of brownfield land it is not considered sufficient for brownfield land to be 'available' but the key test is whether it is appropriate and deliverable within the Plan period</p> <ul style="list-style-type: none"> <li>• As part of the process of determining the Councils preferred spatial strategy a number of different spatial strategies will be identified and tested. This will help determine both the spatial distribution of growth across the County and the relative levels of development between different categories of settlement. The role to be played by settlements such as Pantymwyn needs careful consideration in terms of permitting a level of development which meets primarily local housing needs, but not at such a level as to represent unsustainable development.</li> <li>• Although a review of green barriers was undertaken as part of the UDP, the Council will conduct a further review of green barriers in line with the advice in PPW and also having regard to the views of the Inspector.</li> </ul>	<p>No change</p> <p>No change</p>
Cassidy & Ashton Group	In respect of 'Issues to be Addressed by the Plan':		

<p>Ltd (on behalf of Liberty Properties)</p>	<ul style="list-style-type: none"> <li>• Penyffordd / Penymynydd is considered to be a suitable location for development which has the capacity to support additional growth. The settlement has been the subject of growth over the last 10 years and the availability of brownfield sites is limited. As such, greenfield sites adjacent to the settlement boundary and well related to the settlement should be considered suitable for accommodating strategic growth.</li> <li>• Growth should not focus solely on category A settlements and that category B settlements have sufficient capacity and infrastructure capable of accommodating significant levels of growth</li> <li>• It is noted the Council are proposing 2 new green barriers to land immediately outside of Penyffordd / Penymynydd whereas there is no green barrier in the UDP. The Inspector concluded that the amount of green barrier land should be limited and that settlements must have room for growth. As such it would not be appropriate for the Council to encase any settlement, including P/P with green barrier protection. Furthermore, the proposed green barrier surrounding P/P would not be compliant with the defined purposes of green barriers set out in PPW.</li> </ul>	<ul style="list-style-type: none"> <li>• Penyffordd / Penymynydd has and is seeing significant growth as a result as a result of two large allocations in the UDP. The role to be played by settlements such as P/P will be informed by the present review of the settlement hierarchy, having regard to the level of services and facilities in each settlement and whether each settlement represents a sustainable location to accommodate further development.</li> <li>• As part of the process of determining the Councils preferred spatial strategy a number of different spatial strategies will be identified and tested. This will help determine both the spatial distribution of growth across the County and the relative levels of development between different categories of settlement.</li> <li>• The Council is not proposing 2 new green barriers on land immediately adjoining P/P. However, Candidate Sites have been submitted which propose the designation of green barriers around P/P and these will be assessed by the Council having regard to the advice in PPW and the Inspectors comments.</li> </ul>	<p>No change</p> <p>No change</p> <p>No change</p>
<p>J10 Planning (on behalf of various clients)</p>	<p>Few comments to make on the Topic Papers as they provide no real direction.</p>	<p>The Topic Papers are not intended to provide 'real direction'. The Topic Papers represent an early opportunity within the Plans engagement stage for the views of stakeholders and the wider public to be gained on a variety of issues. It would be inappropriate for the Council to present a 'fait accompli' so early in</p>	<p>No change</p>

	<p>Comments on Spatial Strategy:</p> <ul style="list-style-type: none"> <li>• Acceptance that the UDP has ‘failed’ to deliver the required level of growth that was originally anticipated and that this has been caused by the settlement boundaries being drawn too tight and percentile growth band rates have also not been met</li> <li>• The UDP Inspector and others involved in the Inquiry process raised these concerns</li> <li>• The UDP has failed to deliver the level of affordable housing required</li> </ul>	<p>the preparation process.</p> <p>In terms of the representors comments on the Spatial Strategy:</p> <ul style="list-style-type: none"> <li>• Although issues have been identified (both by the Inspector and subsequently by the Council) with the UDP approach to a spatial strategy it is not accepted that i) the UDP failed to deliver the required level of housing (the economic downturn was a principal factor) ii) settlement boundaries were drawn too tightly (settlement boundaries and the provision for growth were considered by the UDP Inspector and the Plan supported (with revision) iii) percentile growth band rates have also not been met (the growth bands are not a target and the UDP was clear in that not every settlement would have growth within or at the top of the growth band).</li> <li>• Whilst objectors may have raised concerns, the UDP Inspector recommended that the Plan was appropriate to be taken forward for adoption, with a number of revision to the strategy, policies and allocations. The key comment of the Inspector was that a more fundamental look at spatial strategy was needed in terms of settlement boundaries and green barriers as part of the LDP.</li> <li>• The Plan has sought to provide affordable housing as part of larger housing developments and the flexible approach taken in bringing about innovative means of affordable housing delivery has been praised. The policy in the UDP was not based on a pre-determined target, but allowed for negotiation on a site by site basis. Revisions to the spatial strategy whereby HSG3 requires local needs housing to be</li> </ul>	<p>No change</p>
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	<ul style="list-style-type: none"> <li>• Would support a spatial strategy based upon sustainable distribution</li> </ul> <p>Also raises a number of other 'key concerns':</p> <ul style="list-style-type: none"> <li>• The Council has a poor track record in providing adopted plan coverage</li> <li>• No 5 year supply exists</li> <li>• That with a plan due to expire, there will be no plan coverage in place</li> <li>• That despite previous concerns raised during the UDP consultation and inquiry process which urged the Council to undertake a green barrier review and consider extending allocations to other sites, no such review was undertaken and despite the impending expiry of its UDP no steps have yet been undertaken to review them</li> <li>• Previously raised concerns over a number proposed allocations (that have unsurprisingly not been built out and are now up for re-assessment) during the UDP</li> </ul>	<p>provided in category B and C settlements has also helped deliver local needs housing.</p> <ul style="list-style-type: none"> <li>• Noted that the representor would support a strategy based on sustainable distribution</li> </ul> <p>In terms of the representors other key concerns:</p> <ul style="list-style-type: none"> <li>• It is accepted that the Council took a long time to adopt its UDP. However, compared to other authorities who abandoned their UDP's, the Council persevered with its UDP in order to ensure that it did have an up to date adopted development plan. This approach was supported by Welsh Government.</li> <li>• It is acknowledged that on the basis of the residual method the Council does not presently have a 5 year supply.</li> <li>• For the purposes of s38 of the 2004 Act the UDP will remain the development plan until such time as the LDP is either adopted or withdrawn. Although the UDP will become time expired at the end of 2015, significant weight can still be attached to it provided that it still accords with PPW.</li> <li>• The UDP Inspector assessed the Councils review of green barriers and delineation of settlement boundaries, and although she had some reservations about them going forward, she still considered that the Plan was appropriate to be taken forward for adoption. The review of green barriers and settlement boundaries will be looked at again as part of the LDP.</li> <li>• Despite the representor raising concerns over a number of allocations, they were still recommended for retention as part of the Plan by the Inspector. All allocations in the</li> </ul>	<p>No change</p>
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	<p>consultation and inquiry process.</p> <p>Now calls on the Council to take a positive approach to its plan making responsibilities that will involve:</p> <ul style="list-style-type: none"> <li>• Undertaking a green barrier review, which ought to consider identifying 'safeguarded land' for future release</li> <li>• Reviewing existing settlement boundaries that are presently deficient and restrictive</li> <li>• Developing the emergent spatial strategy upon sound sustainable development principles where distribution is proportionate and based upon a sound settlement hierarchy</li> <li>• A step change in growth rates to arrest and reverse the lack of new development, a proactive approach to investment in new housing and infrastructure is taken, which will have a positive impact on reducing out-migration and generate inward economic investment and jobs</li> </ul>	<p>Plan were included on the basis that they were genuinely available for development.</p> <p>In terms of the Councils actions going forwards:</p> <ul style="list-style-type: none"> <li>• The Council will undertake a green barrier review and consideration can be given to the concept of 'safeguarded land' for future releases (which was undertaken in a few instances in the UDP)</li> <li>• The Council will undertake a review of settlement boundaries</li> <li>• The Council is presently undertaking a settlement review which will inform the Plan's settlement hierarchy and spatial strategy options</li> <li>• The Council will have regard to the factors raised by the representor in identifying the Plans housing requirement, spatial strategy and housing allocations which are sustainable, deliverable and viable.</li> </ul>	<p>No change</p>
<p>Nathaniel Lichfield &amp; partners (on behalf of Bourne Leisure)</p>	<p>Given the contribution of tourism to the Flintshire economy, it is crucial for the spatial strategy to recognise tourism as a critically important contributor. The spatial strategy should also explain that there is a need for continued redevelopment / reconfiguration of holiday accommodation, in order to maintain a product that meets changing visitor expectations.</p>	<p>Noted. It is accepted that significant tourism development already exists in the County and that these may need to be improved / expanded during the Plan period. Such eventualities can be assessed against a suite of Plan policies. New tourism development proposals which might arise over the Plan period are 'footloose' compared to many forms of development such as industry and housing where a more informed planned approach can be taken. In this context it is not considered that tourism should form a part of the Plans spatial strategy.</p>	<p>No change</p>

<p>Redrow</p>	<p>Welcomes the list of issues but considers that 'the impact Chester's employment facilities have on housing need in the east of Flintshire' should be added:</p> <p>The relationship between Flintshire and CWAC warrants close attention, in particular how parts of the two areas operate within the same housing market area. Specific regard should be given to how the housing needs in the eastern part of the authority which is part of the Chester housing market may be affected, in particular, regard should be had to how land within eastern Flintshire can be used to meet the needs of the Chester housing market.</p> <p>Agrees with the principle of distributing any proposed new land uses in areas which already have infrastructure and are in sustainable locations. The experience of the UDP which had category A, B and C settlements with different percentage growth rates rather than a numeric target, is that it led to ambiguity and interpretation and caused confusion. Considers that the LDP should continue with cat A, B and C settlements, but ascribe a numerical housing target to each of the settlements. This will definitively set the requirement for the number of dwellings each</p>	<p>Noted. It is considered that a further issue with slightly broader wording than that advocated, could be added to p5 of the Topic Paper.</p> <p>It is accepted that there is a close relationship between the housing markets of Flintshire and Chester. For many years housing provision has been constrained within Chester, with a focus on urban regeneration led apartment developments, which resulted in an overspill of demand for family housing into North Wales, particularly Flintshire. However, CWAC is now looking to incorporate higher rates of housing into its Local Plan, accompanied by a substantial release of green belt to the south of the City. In this context, less pressure is likely to be placed on the eastern part of Flintshire to provide for the housing needs of Chester. Although there will always permeability on the housing market across the border, it is not considered appropriate to commence the preparation of the LDP on the premise of using land in the east part of the County to provide for the needs of Chester.</p> <p>It is accepted that the UDP spatial strategy had a number of limitations and that difficulties have been experienced in implementing policy HSG3 with regard to settlement growth bands. The Council is presently undertaking a review of settlements having regard to their services and facilities and whether they represent sustainable locations for further development, and this will inform a settlement hierarchy for the Plan and a number of spatial strategy options. The precise means of quantifying the amount or proportion of development to each category of settlement will be given further</p>	<p>Add a further issue on p5 of Topic Paper no. 7 to read 'the need to have regard to the close relationship between Flintshire and CWAC in terms of housing and employment'.</p>
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	<p>settlement should seek to deliver.</p> <p>If the LDP is to conform to PPW's directive of stimulating economic growth and promoting sustainable development, any policy towards new housing development should be expressed as a minimum level of development in each of the settlement categories, to avoid placing an artificial constraint upon growth in certain areas where there may be a demand beyond the identified thresholds, provided it would not materially impact on the functionality of the existing infrastructure.</p> <p>The Council should take a 'policy off' approach when distributing the levels of development requires within each of the settlements across the County. In effect the Council should remove any planning policy constraint such as green barrier from the assessment of each settlements capacity and examine each settlement from pure land use management point of view. This would ensure that development creates the minimum encroachment into the countryside and is situated as close to existing centres to safeguard a connection between new development and existing centres</p>	<p>consideration, as different approaches could be taken. It is not accepted that each settlement should have a numerical housing target as this would be overly prescriptive, and there are settlements which are unable to accommodate growth.</p> <p>There are a number of policy designations and constraints which will need to be considered in drawing up the Plan's spatial strategy and in identifying potential land allocations. Rather than taking a 'hands off' approach and ignoring green barriers, it would be better to undertake the more fundamental review of green barriers advocated by the UDP Inspector. In addition to setting aside green barriers the representor also seems to be inferring that there is other land within settlements which is suitable for development and where planning designations should be set aside. The Council will assess the capacity of land within settlements to deliver new housing and other development but this should not be at the expense of the loss of green space, open space and other designations.</p>	
Strutt & Parker (on behalf of Mr and Mrs Davies-Cooke)	Agrees with the context and general objectives of the Spatial Strategy which recognises there is a need to strengthen hubs as a focus for investment and outside of these hubs, to ensure that communities sustainability is strengthened.	Noted	No change

	<p>For the Plan to be successful the authority need to ensure:</p> <ul style="list-style-type: none"> <li>• The right balance between focusing development towards urban and rural areas</li> <li>• Flexibility is built into the Plan to allow for change</li> <li>• The Plan is deliverable by identifying allocated sites which are free from constraints and put forward by landowners as available in the short term for development.</li> </ul> <p>Spatial development focus – The UDP Inspector advised that a strategic review of the settlement hierarchy is undertaken which takes into account connectivity to each other. By way of example, Sychdyn should be placed higher up in the hierarchy of settlements which should deliver some new growth. Sychdyn has strong social and spatial connections with the larger settlement of Mold, meaning that when recognised as a satellite community to Mold, Sychdyn’s acceptability to deliver sustainable new development is more apparent. The result of a strategic review in this way will be that there are more settlements within the top tier of the hierarchy where growth should be focused. This should help deliver growth as it will be more in tune with market demand for housing whilst also ensuring that focus remains on delivering development in the most sustainable parts of the County.</p>	<p>Spatial development focus – The Inspectors comments in relation to settlements was in terms of scenarios where there are several adjoining settlement but each having different categories (eg Deeside and Buckley, Drury, Mynydd Isa, Alltami). The Inspector saw this as backward looking and raised the option of these being treated as a single identity i.e. as an urban area. It is also accepted that there are linkages between settlements and that some settlements will act as satellites linking to a larger settlement. In terms of the UDP settlement hierarchy, the only higher category for Sychdyn would be as a category A settlement i.e. on a par with Mold. Whilst recognising the links between Mold and Sychdyn there is a significant difference in the level of facilities, services and infrastructure in Mold compared with Sychdyn. In this context it is not considered that growth should be focused on settlement such as Sychdyn, but rather that the potential of settlements like Sychdyn is assessed in terms of being able to accommodate a level of growth more akin to its size, character and function.</p>	
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	<p>Limited growth should still be allowed in smaller rural settlements, to ensure their future sustainability, in line with PPW, which supports new housing in rural areas to meet local needs. A better strategy to achieve this (in comparison with the UDP) could be to only allow for growth in the settlements where sites have been put forward by landowners or developers, and / or allowing growth in smaller settlements where there is at least one service or amenity to support some additional growth.</p> <p>Flexibility – A reason why the UDP had shortcomings in terms of delivering growth, is due to its rigid nature (settlement boundaries). To ensure the Plan is sound at examination it needs to be flexible to respond to change. The UDP Inspector highlighted that settlement boundaries were too rigid based on historical approaches and failed to take into account the connectivity of settlements and how communities function.</p> <p>To achieve flexibility, settlement boundaries should be widened to allow for additional growth, and a policy is included within the Plan which allows for settlement boundaries to be amended through LDP reviews.</p> <p>Also advocates reviewing green barrier designation coverage which was advocated by the UDP Inspector. There is clear justification for a green barrier designation at the eastern</p>	<p>It is accepted that limited growth should still be allowed in smaller rural settlements. However, it would be unduly restrictive to only allow growth in rural settlements where candidate sites have been submitted and equally this is not considered to be a sound planning approach. More flexible policy approaches are needed to enable more modest housing sites to come forward predominantly to meet local needs. It is also unclear whether a settlement which has only one service or amenity could sustainably accommodate additional growth. The present settlement assessment work will assist in considering these issues.</p> <p>Flexibility – Although the UDP Inspector had reservations about settlement boundaries, these were more focused on areas such as Deeside and Buckley where there were several settlements with different categories, but which adjoined each other. The Inspector advocated a longer term more fundamental review of settlement boundaries and this will be undertaken as part of the LDP. If the Inspector considered that the settlement boundaries in the UDP were too restrictive then she would have recommended significant changes to them. It is a matter of practice and principle that settlement boundaries are reviewed as part of each development plan and it is not necessary for such a policy to be included in the LDP.</p> <p>A review of the green barrier designations will be undertaken having regard to the advice in PPW and the comments of the UDP Inspector. However, in looking at the role of green</p>	
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	<p>extent of the County to provide a buffer between Chester and Flintshire settlements. However, to deliver the authority's housing and employment needs the green barrier designation around Mold should be closely reviewed as there are areas of land which do not meet the purposes of designation (e.g. no coalescence of settlements). If released from green barrier, sustainable development could be brought forward on sites which are well connected to existing infrastructure (e.g. residential development on land adjacent to Sychdyn would be within walking distance to County Hall campus).</p> <p>Delivery – To ensure the Plan is sound at examination, it is crucial that the allocated sites are deliverable. Sites put forward during the candidate site process which are within single ownership and available for development in the short term, should be given greater weight. The Council needs to be realistic about the level of growth which can be achieved at brownfield sites, ensuring that there is not an unbalanced focus on such sites, at the expense of discounting viable greenfield sites. Development of brownfield sites is often questionable from a viability perspective due to site remediation costs, and taking on board the Wrexham failed LDP strategy, the authority should be looking to allocate a degree of development on greenfield sites as these are usually less constrained and available for development in a shorter timescale (contributing to housing land supply).</p>	<p>barriers PPW identifies five purposes of green barrier designation and not just the one (coalescence) referred to by the representor in the context of the Mold green barrier.</p> <p>Delivery – a key part of the LDP will be ensuring that sites are both deliverable and viable. The regeneration of brownfield sites will be a key priority for the Plan, in line with PPW, but this must be balanced with greenfield sites. A range of sites by type, size and location will ensure that housing can be delivered throughout the Plan period, recognising that brownfield or larger sites will take longer to come forward than smaller greenfield sites.</p>	
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<p>Strutt &amp; Parker (on behalf of Mrs Strong &amp; Mrs Jones)</p>	<p>Agrees with the context and general objectives of the Spatial Strategy which recognises there is a need to strengthen hubs as a focus for investment and outside of these hubs, to ensure that communities sustainability is strengthened.</p> <p>For the Plan to be successful the authority need to ensure:</p> <ul style="list-style-type: none"> <li>• The right balance between focusing development towards urban and rural areas</li> <li>• Flexibility is built into the Plan to allow for change</li> <li>• The Plan is deliverable by identifying allocated sites which are free from constraints and put forward by landowners as available in the short term for development.</li> </ul> <p>Spatial development focus – Promoting sustainable development should be at the heart of the Strategy and to achieve this, development should be focused to sites in and around the larger settlements, such as Mold which is already defined as a category A settlement in recognition of its range of services and facilities.</p> <p>Flexibility – A reason why the UDP had shortcomings in terms of delivering growth, is due to its rigid nature (settlement boundaries).To ensure the Plan is sound at examination it needs to be flexible to respond to change. The UDP Inspector highlighted that settlement boundaries were too rigid based on historical approaches and failed to take into account the connectivity of settlements and</p>	<p>Noted.</p> <p>Spatial development focus – The role of towns such as Mold as being sustainable locations for growth is accepted.</p> <p>Flexibility – Although the UDP Inspector had reservations about settlement boundaries, these were more focused on areas such as Deeside and Buckley where there were several settlements with different categories, but which adjoined each other. The Inspector advocated a longer term more fundamental review of settlement boundaries and this will be undertaken as part of the LDP. If the Inspector considered that the settlement</p>	<p>No change</p>
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	<p>how communities function.</p> <p>To achieve flexibility, settlement boundaries should be widened to allow for additional growth, and a policy is included within the Plan which allows for settlement boundaries to be amended through LDP reviews.</p> <p>Also advocates reviewing green barrier designation coverage which was advocated by the UDP Inspector. There is clear justification for a green barrier designation at the eastern extent of the County to provide a buffer between Chester and Flintshire settlements. However, to deliver the authority's housing and employment needs the green barrier designation around Mold should be closely reviewed to as there are areas of land which do not meet the purposes of designation (e.g. no coalescence of settlements). If released from green barrier, sustainable development could be brought forward on sites which are well connected to existing infrastructure (e.g. residential development on land adjacent to Sychdyn would be within walking distance to Vouny Hall campus).</p> <p>Delivery – To ensure the Plan is sound at examination, it is crucial that the allocated sites are deliverable. Sites put forward during the candidate site process which are within single ownership and available for development in the short term, should be given greater weight. The Council needs to be realistic about the level of growth which can be achieved at brownfield sites, ensuring that there is not An unbalanced focus on such sites, at the expense of discounting viable greenfield sites. Development of brownfield sites is often</p>	<p>boundaries in the UDP were too restrictive then she would have recommended significant changes to them. It is a matter of practice and principle that settlement boundaries are reviewed as part of each development plan and it is not necessary for such a policy to be included in the LDP.</p> <p>A review of the green barrier designations will be undertaken having regard to the advice in PPW and the comments of the UDP Inspector. However, in looking at the role of green barriers PPW identifies five purposes of green barrier designation and not just the one (coalescence) referred to by the representor in the context of the Mold green barrier.</p> <p>Delivery – a key part of the LDP will be ensuring that sites are both deliverable and viable. The regeneration of brownfield sites will be a key priority for the Plan, in line with PPW, but this must be balanced with greenfield sites. A range of sites by type, size and location will ensure that housing can be delivered throughout the Plan period, recognising that brownfield or larger sites will take longer to come forward than smaller greenfield sites.</p>	
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	<p>questionable from a viability perspective due to site remediation costs, and taking on board the Wrexham failed LDP strategy, the authority should be looking to allocate a degree of development on greenfield sites as these are usually less constrained and available for development in a shorter timescale (contributing to housing land supply).</p>		
<p>Strutt &amp; Parker (on behalf of Rhual Estate)</p>	<p>Spatial development focus – Promoting sustainable development should be at the heart of the Strategy and to achieve this, development should be focused to sites in and around the larger settlements, such as Mold which is already defined as a category A settlement in recognition of its range of services and facilities.</p> <p>Flexibility – A reason why the UDP had shortcomings in terms of delivering growth, is due to its rigid nature (settlement boundaries). To ensure the Plan is sound at examination it needs to be flexible to respond to change. The UDP Inspector highlighted that settlement boundaries were too rigid based on historical approaches and failed to take into account the connectivity of settlements and how communities function.</p> <p>To achieve flexibility, settlement boundaries should be widened to allow for additional growth, and a policy is included within the Plan which allows for settlement boundaries to be amended through LDP reviews.</p> <p>Delivery – To ensure the Plan is sound at examination, it is crucial that the allocated sites are deliverable. Sites put forward during the</p>	<p>Noted</p> <p>Flexibility – Although the UDP Inspector had reservations about settlement boundaries, these were more focused on areas such as Deeside and Buckley where there were several settlements with different categories, but which adjoined each other. The Inspector advocated a longer term more fundamental review of settlement boundaries and this will be undertaken as part of the LDP. If the Inspector considered that the settlement boundaries in the UDP were too restrictive then she would have recommended significant changes to them. It is a matter of practice and principle that settlement boundaries are reviewed as part of each development plan and it is not necessary for such a policy to be included in the LDP.</p> <p>Delivery – a key part of the LDP will be ensuring that sites are both deliverable and viable. The regeneration of brownfield sites will</p>	<p>No change</p>

	<p>candidate site process which are within single ownership and available for development in the short term, should be given greater weight. The Council needs to be realistic about the level of growth which can be achieved at brownfield sites, ensuring that there is not an unbalanced focus on such sites, at the expense of discounting viable greenfield sites. Development of brownfield sites is often questionable from a viability perspective due to site remediation costs, and taking on board the Wrexham failed LDP strategy, the authority should be looking to allocate a degree of development on greenfield sites as these are usually less constrained and available for development in a shorter timescale (contributing to housing land supply).</p>	<p>be a key priority for the Plan, in line with PPW, but this must be balanced with greenfield sites. A range of sites by type, size and location will ensure that housing can be delivered throughout the Plan period, recognising that brownfield or larger sites will take longer to come forward than smaller greenfield sites.</p>	
Wirral BC	<p>The ongoing status of the West Cheshire / NE Wales Sub Regional Spatial Strategy is unclear, following the abolition of the NW Regional Assembly. The analysis would need to be updated if its conclusions were to remain robust.</p>	<p>Noted. The Sub Regional Spatial Strategy was a key piece of evidence in informing the UDP. Even though it is now somewhat dated, it still forms an important strategic document alongside the Wales Spatial Plan in setting the scene for the LDP. With Wrexham progressing their LDP and CWAC progressing their Local Plan there is little likelihood of this piece of work being revisited. The Wales Planning Bill is moving towards a Strategic Development Plan and a series of Regional Development Plans and these will be the vehicle for looking at regional planning in the sub-region.</p>	No change
Mersey Travel	<p>The strategic direction set by the Plan should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion and help tackle climate change.</p> <p>Development should be focused on areas that</p>	<p>Noted</p> <p>Noted.</p>	No change

	are presently well served by existing, sustainable transport and the need to travel should be minimised, so as to allow walking and cycling to become much more prominent forms of transport in Flintshire. There should also be an expectation that developers should contribute to the cost of public transport in areas that are not well served by existing public transport services.		
<b>Topic Paper 8 – Economy and Employment</b>			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Disappointed that the Topic Paper does not refer to tourism uses as a form of economic development that contributes to the local and regional economy. Whilst agreeing that high value manufacturing is a significant economic contributor to the local area, it is also considered appropriate to refer to tourism due to its significant economic contribution. This approach is in accordance with PPW which states that economic development is more than just B1-B8 uses.</p> <p>Considers that the following addition should be made to the 'issues' section 'seek to preserve and enhance the areas tourist facilities to ensure that their important economic contribution is maintained and increased'.</p>	<p>Noted. The contribution of tourism to the economy is recognised in Topic Paper No. 18 Tourism. It is therefore suggested a cross reference to the Tourism Topic Paper is provided.</p> <p>In the light of the above, this is considered to be adequately addressed by the issues identified within the Tourism Topic Paper.</p>	<p>Add a new third paragraph in the 'Context' section with the wording 'Tourism also makes an important contribution to the local and regional and the issue of tourism is addressed in Topic Paper no 18 Tourism.</p> <p>No change</p>
Redrow	<p>Supports the general identification of issues in relation to the economy and employment provision.</p> <p>However, has concerns over the apparent disconnect between housing and employment land. The link between increasing housebuilding and increasing economic output is well known – 12 net new jobs (7 direct and 5 indirect) are supported when £1m is invested</p>	<p>Noted</p> <p>The economic importance of housing is not disputed both in terms of supporting economic growth aspirations and direct / indirect impacts i.e. jobs, suppliers, services etc. However, it could be argued that the 'economic' contribution is more of a 'temporary'</p>	<p>Add a further bullet point in the Issues section 'Ensure that there is a close correlation between the economic growth aspirations of the Plan and the provision of housing'.</p>

	<p>in house building annually. Therefore strange to see little information on how new housing can meet growing housing needs, but also generate jobs to increase living standards.</p> <p>When producing the LDP, the Council must set out a benchmark rate of economic growth over the Plan period. This must be underpinned by a sound economic forecasting model which takes into consideration socio – economic change and this rate of economic growth should be used as the benchmark for determining overall employment and housing needs. A strong link between housing and employment land needs to be prevalent in the economic policies of the Plan to ensure delivery of appropriate facilities to support that growth.</p> <p>Redrow is supportive of the principle of ‘over-allocating’ land for employment to ensure that there is sufficient flexibility to provide a variety of land uses. Policies should be put in place to easily change use class of employment sites subject to appropriate marketing and demand assessments.</p>	<p>contribution, primarily through the construction phase. In this sense it does not have same lasting impact on the local economy as would more traditional forms of economic development. The approach to economic development in the Topic Paper is broadly in line with ch7 of PPW, and the latter does not specifically highlight the economic importance of housing. However, it is considered that Topic Paper 8 could better set out the link between housing and economic growth.</p> <p>Noted. The Council will be seeking to identify an economic growth strategy over the Plan period which is based on a robust evidence base. There will then be a close correlation between this and the both the level and spatial distribution of housing across the County (see suggested addition to Topic Paper above).</p> <p>Noted. Whilst a case can be made for ‘over-allocating’ employment land in order to provide flexibility over a Plan period, the Plan need to take a more focussed approach to identifying the level of economic growth and the type of economic growth and how this translates into land requirements in terms of location, type, size etc. As part of this approach a detailed review has been undertaken of existing employment sites to assess whether they should be carried over into the LDP. In this context, there should not be a need for over-</p>	<p>See above</p> <p>No change</p>
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		allocating to be undertaken to the same degree as previous plans. A policy addressing the retention of employment sites is already included in the UDP and it is likely that a similar policy will be carried over into the LDP.	
Mersey Travel	Welcomes reference to the importance of the Deeside area in terms of economic growth with its Enterprise Zone and key sites such as DIP and Airbus. However, there must be good transport access to such employment sites. The Plan needs to highlight the importance of cross boundary transport improvements including the Borderlands line. An upgraded station at Hawarden Bridge is of critical importance to help serve DIP and also Hooton rail station (on the Merseyrail Electrics Wirral Line) has an important role as a rail hub for the DIP as well.	Noted. The importance of good transport accessibility to key economic sites is recognised and could be stressed more strongly in the Topic Paper.	Add new bullet Point in the Issues section 'Seek to improve accessibility to key employment sites via a range of means of transport'
Dwr Cymru Welsh Water	Welcomes the opportunity to work with the Council on a Infrastructure Needs Assessment and Delivery Plan as mentioned in the Topic Paper.	Noted	No change
<b>Topic Paper 10 Population, Household Growth and Housing</b>			
Cassidy & Ashton Group Ltd	A range of brownfield sites exist within or immediately adjacent to settlement boundaries and these can contribute towards addressing the identified shortfall in housing land supply. Category C settlements such as Coed Talon are sustainable and sustainable in terms of accommodating growth within the existing settlement boundary and within previously developed land and this approach is consistent with PPW.	Noted. This comment relates more to the spatial strategy Topic Paper than to this Topic Paper (see response to representations on spatial strategy topic paper by Cassidy and Ashton). Nevertheless, it is considered that the issue of brownfield land could be given more emphasis in this Topic Paper, but with a proviso that brownfield land is viable and deliverable over the Plan period.  See response to representation by Cassidy & Ashton Group Ltd to Topic Paper no. 7.	That a further 'Issue' be added to the Topic Paper No.10 'the need to identify brownfield land alongside a range of greenfield sites which are viable and deliverable, and which are capable of contributing to maintaining a 5 year supply of land over the Plan period'.

<p>Cassidy &amp; Ashton Group Ltd (on behalf of Whitley Group)</p>	<p>In respect of 'Issues to be addressed by the Plan', it is submitted that Mold, Buckley, Hope and Pantymwyn are sustainable settlements capable and suitable to accommodate future housing growth.</p> <p>Refers to recent Ewloe appeal decision and concludes that this makes clear that the shortfall in housing provision can only be addressed through the release of greenfield sites adjacent to settlement boundaries. Considers that land adjoining settlement boundaries and some land previously designated as green barrier are suitable to accommodate growth. Also comments that previously developed sites are suitable for immediate development, and this approach is consistent with PPW.</p>	<p>This comment relates more to the spatial strategy Topic Paper than to this Topic Paper (see response to representations on spatial strategy topic paper by Cassidy and Ashton on behalf of Whitley Group).</p> <p>The Ewloe appeal decision must be read in the context of addressing the present housing land supply deficiency. The Inspector considered that greenfield sites were more likely to be able to contribute to the next housing land study. In preparing the LDP, the Council must embrace a sequential site search to identifying housing allocations that incorporates the need to identify brownfield sites in preference to greenfield sites wherever possible, in line with PPW. The key is identifying an appropriate mix of brownfield and greenfield sites and this point is recognised in the suggested additional 'Issue' as set out in the previous response.</p>	<p>No change</p>
<p>Cassidy &amp; Ashton Group Ltd (on behalf of Liberty Properties)</p>	<p>In respect of 'Issues to be addressed by the Plan', it is submitted that Penyffordd / Penymynydd is a sustainable settlement capable and suitable to accommodate future housing growth.</p> <p>Refers to recent Ewloe appeal decision and concludes that this makes clear that the shortfall in housing provision can only be addressed through the release of greenfield sites adjacent to existing settlements and that category B settlements have been determined as being suitable.</p>	<p>This comment relates more to the spatial strategy Topic Paper than to this Topic Paper (see response to representations on spatial strategy topic paper by Cassidy &amp; Ashton Group Ltd (on behalf of Liberty Properties)</p> <p>The Ewloe appeal decision must be read in the context of addressing the present housing land supply deficiency. The Inspector considered that greenfield sites were more likely to be able to contribute to the next housing land study. The Inspector addressed this issue against the argument of having regard to a site search sequence, whereby other sites, either in category A settlements, or poorer quality land on the edge of category B settlements, but considered that these were unlikely to come forward in sufficient time to make a</p>	<p>As above</p>

		<p>contribution to housing land supply. The Inspector did not make the quantum leap that category B settlements per se, are appropriate for development, as advocated by the representor. Indeed, earlier in the appeal decision the Inspector noted the range of actual growth rates over the Plan period within each of the three categories of settlements. This is one of the reasons why a robust review of the settlement hierarchy is being undertaken based on the sustainability of each settlement to accommodate growth, rather than a generalised growth band being applied to every settlement (which brings with it an expectation that every settlement will grow).</p> <p>In preparing the LDP, the Council must embrace a sequential site search to identifying housing allocations that incorporates the need to identify brownfield sites in preference to greenfield sites wherever possible, in line with PPW. The key is identifying an appropriate mix of brownfield and greenfield sites and this point is recognised in the suggested additional 'Issue' as set out in the previous response.</p>	
<p>Graham Bolton Partnership</p>	<p>Does not consider that the statement 'Resisting the false argument that 'undelivered' UDP housing requirement should be 'added on' to the LDP' to be correct for the following reasons:</p> <ul style="list-style-type: none"> <li>• The under or overachievement in meeting previously assessed and planned for housing requirements must be taken into account in assessing and planning for housing requirements in LDP's</li> </ul>	<p>The Topic Paper is making the point that the undelivered housing when compared against the UDP housing requirement, should not simply be added 'wholesale' on to the housing requirement for the LDP. However, it is accepted that any identified under provision should be considered as part of determining the LDP housing requirement figure.</p> <ul style="list-style-type: none"> <li>• The UDP assessed a level of need for the period 2000-2015 having regard to population and household projections at that time, and taking into account a range of other policy considerations. Given the drastic</li> </ul>	<p>Add a further bullet point to the 'sustainability based issues':</p> <p>'Ensuring that the previous under provision of housing is considered as one of the factors in informing the determination of the housing requirement figure'.</p>

	<ul style="list-style-type: none"> <li>• The Topic Paper recognises there has been undelivered housing requirement from the UDP and whether or not this has been as a result of the national economic situation, this has simply delayed the requirement for housing and suppressed household formation. The requirement or need has not gone away and it would be wrong to ignore undelivered housing requirement which is reflected in multiple occupation, higher house prices and a mismatch of requirement to type of housing due to undersupply.</li> <li>• While projections are the starting point for assessing local housing requirements (PPW), such projections are forward looking only and do not pick up on existing or unmet requirements. PPW correctly identifies local housing market assessments (LHMA) as the mechanism for informing the 'quantification' of housing requirement, while the document identifies, amongst other things, existing</li> </ul>	<p>change in economic circumstances during the latter half of the Plan period, it is questionable whether that level of need realistically still exists, given that i) developers were not building and ii) mortgage constraints were preventing potential purchasers from entering the market. The projected need identified did not materialise into a demand that could be met. The LDP must now provide for a level of housing which uses as its starting point the latest WG population and household forecasts as well as a range of other evidence and policy considerations. Whilst there may be an argument for building in a higher level of flexibility allowance to have regard to the UDP under-delivery, this is a different concept from it being 'added on'.</p> <ul style="list-style-type: none"> <li>• As set out above the Council is not ignoring previously unmet housing requirement, but is not prepared to simply add this on to the LDP requirement.</li> <li>• The Council will have regard to these and a wide range of other factors in determining the housing requirement figure in the LDP and is suggesting an amendment to the Topic Paper to make this clear.</li> </ul>	
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	<p>development plans as one of the sources to take into account in assessing housing requirements and in the preparation of new development plans</p> <ul style="list-style-type: none"> <li>• The guidance on LHMA dates from Mar 2006 pre-recession. It defines 'need' narrowly, meaning those who require housing but are unable to provide for themselves without assistance – this is clearly not applied to the use of the word in the Topic Paper or PPW. The March 2006 guide recognises however, the need to take into account of the cumulative under or over-supply to meet housing 'need', initially requiring historical analysis including of potential concealed households. This clearly indicates that not taking into account the UDP underachievement in policies and quantification of the provision of housing in the LDP is not correct</li> </ul> <p>The Topic Paper should be amended to reflect the need to take account of past underachievement in the UDP housing requirements if it is to properly inform and guide the assessment of housing requirement in the LDP.</p>	<ul style="list-style-type: none"> <li>• The Council will have regard to these and a wide range of other factors in determining the housing requirement figure in the LDP and is suggesting an amendment to the Topic Paper to make this clear.</li> </ul> <p>The Council accepts the need to consider this as set out above.</p>	
<p>Hourigan Connolly (on behalf of David Mclean Projects)</p>	<p>The Topic Paper acknowledges that the current UDP has failed to deliver the identified housing requirement of 7,400 homes. It places the blame of failure to deliver upon the recession and resultant wariness of the housebuilding industry. This is overly simplistic and a thorough assessment of those sites which have not come forward or development is required in order to avoid reliance on those same sites to deliver new homes when they have already failed to do so.</p>	<p>The Topic Paper does not acknowledge a failure of the UDP to deliver its housing requirement as the Plan has no direct control over delivery. It made sufficient provision to meet its housing requirement through sites that were considered by the Inspector to be suitable. The representor sets out a number of reasons why sites may not come forward for development either at all or at the rate envisaged and these are noted. The housing allocations in the Plan were assessed by the UDP Inspector who found that they were</p>	<p>No change</p>

	<p>Factors which can affect the rate of delivery of housing on major and smaller sites can include:</p> <ul style="list-style-type: none"> <li>• Time for securing outline, reserved matters, discharge of conditions</li> <li>• Time for appeals</li> <li>• Holding directions such as Highways Agency</li> <li>• Legal challenges</li> <li>• Site conditions – environmental issues and site remediation</li> <li>• Location – can affect availability of labour, materials and build programme</li> <li>• Local market – demand for and supply of housing</li> <li>• Labour market – availability of skilled trades</li> <li>• Residential density</li> <li>• Type and number of house builders – national firms can generally build at faster rates than local firms</li> <li>• Land owner</li> <li>• Quality of design</li> <li>• Changes to schemes</li> <li>• Infrastructure requirements</li> <li>• Section 106 agreements</li> <li>• New policy requirements</li> </ul> <p>Regardless of whether policy or the market is to blame, the identified need remains and any attempt to set that unmet need aside and start again from zero in the LDP, would be to argue that the previous target set out in the UDP was meaningless.</p>	<p>acceptable in planning terms and were based on them being promoted as genuinely available for development over the Plan period by land owners or developers. The fact that sites have not come forward at all or at the rate envisaged (with the exception of Northern Gateway which is a large site with significant infrastructure requirements) is generally down to developers land banking sites in the expectation of improved economic climate or that owners have overinflated values for their land, rather than sites being 'constrained'. Furthermore, it is interesting to note that completions for the period up to April 2014 were 601 compared with an average of 319 over the previous 10 years. This is attributable to improving market conditions rather than to any overcoming of site constraints.</p> <p>It is not accepted that the UDP housing need remains in its entirety and neither is the Council arguing that the UDP housing need is meaningless. Rather, the Council considers that due to changing economic circumstances and the implications for land owners, developers and house buyers, the need as expressed at the beginning of the Plan period, has not translated into demand that could be met in reality. The preparation of the LDP gives the opportunity for the Council to robustly assess the housing requirement figure for the LDP plan period ie 2015-2030. There is no requirement in PPW for unmet housing from a previous Plan period to be added on to the new Plan period. Nevertheless, the Council, will have regard to the fact that housing delivery did not keep pace with the UDP requirement and look at options as to how and to what level this can be addressed within the</p>	
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	<p>The Welsh Government approach is to provide more housing of the right type and offer more choice. We agree that this cannot be achieved by simply having a large bank of sites. The challenge is to identify the right site that will come forward for development.</p> <p>In accordance with PPW, the latest WG household projections should form the starting point to assess Flintshire's housing requirement. Any unmet need from the previous period should be factored in to these numbers. This is not simply 'adding on' undelivered housing but ensuring that the identified need is provided for.</p> <p>In this context regard should be had to TAN1 through integrating the JHLAS and LDP process and consider carefully the deliverability of sites to maintain a 5 year supply of houses but to assist the delivery of homes across the new Plan period.</p> <p>The identification of new sites such as our clients site at Northop (NOR033), with few constraints to delivery is crucial to the process, particularly in Flintshire, where delivery has</p>	<p>Plan requirement.</p> <p>The Council recognises the need to identify a range of housing allocation by location, type and size to ensure that this is both viable and deliverable within the Plan period.</p> <p>The Council accepts the need to consider this as set out above.</p> <p>A range of sites by location, size and type will ensure that delivery over the Plan period can be assessed to ensure the maintenance of a 5 year supply.</p> <p>PPW and TAN1 both highlight the requirement to (and the benefits of) aligning development plan preparation and JHLAS. However, TAN1 then goes on to prevent FCC from formally undertaking future JHLAS once the UDP is time expired. Furthermore, it offers no guidance as to how the Council can accurately measure land supply in the meantime.</p> <p>The identification of an 'un-constrained' site is not of itself sufficient support its inclusion in the Plan as it must also be accompanied by robust viability and deliverability evidence and intent.</p>	
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	<p>lagged behind the requirement, and currently a 5 year supply of housing land cannot be demonstrated.</p>	<p>This site will be assessed alongside other Candidate Sites and against the emerging Plan Strategy to determine if i) Northop is a sustainable location for housing development and ii) this is a suitable site.</p>	
<p>NJL Consulting (on behalf of Rothschild Trust (Schweiz)AG)</p>	<p>There are various reasons why an undersupply of homes have been delivered in Flintshire compared with the UDP requirement, and that it is not simply a case of developers taking a cautious approach and / or landbanking sites'. When assessing the Plan strategy, the different reasons should be given consideration and an innovative approach to the LDP taken which responds to changing market conditions and positively promotes development.</p> <p>Page 2 of the Topic Paper identifies that population growth is slowing down in Flintshire in comparison with historic trends. Considers that this could well be a result of a lack of homes having been delivered in Flintshire over the lifetime of the UDP. It is logical to conclude that in areas with an undersupply of houses, fewer people are able to move into the area, and likewise those wishing to stay in the area may be forced to move away. The previous under delivery of houses should therefore be taken into consideration when setting a new housing requirement, and population trends should not be viewed in isolation.</p> <p>Considers that the Satnam Millennium Ltd v Warrington BC high court decision should be afforded weight when determining the new housing requirement for the LDP. Mr Justice Stewart found that the assessed need for affordable housing had not been taken into full</p>	<p>Noted.</p> <p>It is unlikely that the under-delivery of housing against the UDP housing requirement, in the period of 15 years, would have resulted in the lower population and household projections produced by WG. These are not just the product of migration trends but also the balance of natural change i.e. births minus deaths. The trends in Flintshire show a slowing down of growth via natural change to the extent that there is little net positive change projected. This, coupled with an ageing population structure will impact on household formation rates and will not be affected by housing supply.</p> <p>The Satnam case refers to a challenge to the adoption of the Warrington Local Plan core strategy, where in a late stage in its preparation, a large mixed use development had been included and another site having its strategic site status removed. The High Court</p>	<p>No change</p>

	<p>consideration with the objectively assessed need for housing in Warrington's Core Strategy. In this context it is insufficient merely to 'consider a communities need for affordable housing' as set out on p2 of the Topic Paper.</p> <p>Clarification is sought over the housing categories of 'small sites and conversions' and 'windfall's on p4. It is not clear why there is a differentiation between unplanned schemes of less than and more than 10 units as normally schemes of more than 10 units would be allocated in a LDP.</p>	<p>judge considered that the Council had erred in that:</p> <p>i) the assessment of full, objectively assessed need for housing had left out the substantial need for affordable housing and also failing to carry out an objective assessment of whether the housing land allocations in the plan would meet the area's need for affordable homes and</p> <p>ii) failing to carry out a SEA or sustainability appraisal in line with EU and domestic law</p> <p>The representor has misread the list of factors in the 'Role of the Plan', by not reading them as a whole. Whilst the seventh bullet point does refer to 'Consider a community's need for affordable housing in formulating its policies' the first clearly references 'Use the Welsh Government housing projections as the starting point for assessing housing requirements'. Furthermore, the reference to a 'communities need ...' is taken directly from advice in para 9.2.14 of PPW.</p> <p>The categories in the Topic Paper which comprise the Housing Balance Sheet are reflective of those used in the UDP. Further work will be undertaken to inform the likely contribution made by small and windfall sites based on past trend and an assessment of urban capacity. Until such assessment has been undertaken it is appropriate for the Topic Paper to raise the potential for housing delivery based on both small sites and windfalls.</p>	
Redrow	The period of economic recession since 2007 has had a negative impact on the UDPs ability to deliver net new housing during its period and has resulted in an under-delivery of	Noted. It is the market and development industry that determines the delivery of new housing, not the UDP. The role of the UDP was to make sufficient provision to meet its	No change

	<p>housing. It is therefore assuring that the TP proposes that housing is one of the main components that must be delivered in order to stimulate economic growth. However provides commentary on the sources of evidence that should underpin the LDP's housing needs:</p> <p>Neither the 2011 based household projection data nor the 2011 based population projection data should be the primary bases for the production of housing needs over the Plan period. There is an inherent flaw in the methodology of these datasets as they seek to project forward the trend over the previous 10 years over a 25 year period. This is flawed for planning future housing needs as Britain is only just starting to come out of recession. Therefore the 2011 datasets are artificially deflated due to the impact the recession has had on migration and household formation rates.</p> <p>It would seem logical for the Council to examine trends over a 15 year period in order to forward project over a 15 year period. This would also have the effect of reducing the impact of projecting forward recessionary trends. In addition to this there will need to be a degree of uplifting of the LDP housing needs to fulfil unmet demand that has not been met over the UDP period. This would also have the effect of factoring in the Council's desired increased level of annual economic output throughout the duration of the LDP period. Refute that claim that 'undelivered' UDP housing requirement being 'added on' to the LDP as being a 'false argument'. It is essential that the Plan provides for not only the future housing needs of the County but the existing</p>	<p>housing requirement, which it did. The Topic Paper though is not advocating that new housing by itself will stimulate economic growth. Rather, the Topic Paper is advocating that housing and economic growth are planned for in a complementary manner.</p> <p>The point about the limitations of the 2011 based projections being based on trend data which covers a period of recession has been clarified by a Ministerial letter.</p> <p>It is accepted that the Council will need to test a number of scenarios for projections, based on different trends periods and data assumptions. For instance, one option is to utilise the earlier set of WG projections which showed a higher housing requirement for Flintshire. Also, different levels of economic development aspirations will be tested. However, as set out in earlier responses, it is not considered reasonable for the UDP unmet need to be simply added on, but for this factor to be assessed as part of the identification of the Plans housing requirement figure.</p>	
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	<p>and any unmet needs immediately in order to help achieve economic growth aspirations.</p> <p>When assessing housing land supply over the 5 year and Plan periods, the authority should have due regard to the recently revised TAN1. The authority should seek to conduct a review of all available and suitable land for housing over both periods to ensure that housing need during the short and long terms can be met effectively. Such a review should not rely on the assumptions found within the 2013 JHLAS as this was published in June 2014 and is almost 12 months out of date. The Council should conduct a new assessment of land supply over the Plan period, separate to the JHLAS process (and not utilising any of the assumptions within the JHLAS) to ensure that there is a deliverable supply over the duration of the Plan period.</p>	<p>The Council will undertake a robust assessment of existing housing land and will also assess Candidate Site submissions.</p>	
<p>Emery Planning</p>	<p>The Topic Paper points to decreasing levels of population / household growth. However, consideration needs to be given to the underlying reasons which are not captured in a trend based assessment. For example, the chronic undersupply of housing has prevented households from forming, and is likely to have also influenced migration patterns. The Topic Paper refers to 'resisting the false argument that undelivered UDP housing requirement should be added on to the LDP'. Whilst it is not the case that unmet requirement should simply be added on to a new requirement, careful consideration must be given to what scale of housing is needed including unmet needs from previous years. Simply planning to meet future household projections can severely underestimate the true scale of housing need and</p>	<p>It is not accepted that in absolute terms there is a chronic undersupply of housing. The JHLAS 2013 identifies a land supply of 4.1 years which is hardly 'chronic'. Data collected as part of the 2014 Study identifies completions of 601 for the preceding 12 months compared with average completions of 319 over the previous 10 years. This step change in completions is influenced by an improving local housing market rather than a chronic undersupply of housing. Indeed, if as advocated by the representor, the land supply shortage was so chronic, how could such significantly higher completions have been achieved?</p> <p>The Council accepts the need to consider the issue of under provision over the Plan period as set out in earlier responses.</p>	<p>No change</p>

	<p>demand.</p> <p>Turing to the reasons that have influenced past under-delivery, we accept that the economic downturn and lack of mortgage availability has been a factor. However, it is wrong to suggest this is the main reason. The availability of deliverable land was not sufficient to meet the requirement pre-2008, which was a period of significant boom. Also the UDP allocated a number of sites which are not actually deliverable, compounding the problem. The Council has failed to take action to remedy supply to meet the UDP requirement, instead using the past build rates method to assess housing land supply (no longer acceptable under new TAN1). Whilst re-using previously developed land is a valid policy objective, doing so at the expense of meeting housing needs can result in sever, long term socio-economic problems.</p> <p>Agree that careful consideration needs to be given to economic growth trends and policy. The level of housing growth needs to be carefully considered in the context of</p>	<p>The representor has provided no evidence as to which UDP sites were not deliverable nor set out the reasons why. The UDP sites were all assessed by the Inspector in the light of objections and were supported to be included in the Plan, with the Inspector concluding that the Plans supply was sufficient to ensure a 5 year supply. In practice this did not happen, largely due to the economic downturn. The only site where the Council would freely admit that the level of delivery was optimistic was with the Northern Gateway allocation, but even this has been compounded by the site subsequently having two developers and the development parameters changing considerably from that envisages in the UDP. In terms of JHLAS, past completions have been used only as a comparison against the residual method of calculation. Given that many other authorities in Wales were allowed to measure land supply based on the past completions, on expiry of their UDP Plan periods or following abandoning their UDP's, the Council considered it reasonable, following expiry of the UDP for it to also be able to measure land supply using past completions which would have given it a 5 year supply. However, with the revised TAN1 this is clearly not now possible. In terms of previously developed land, the Topic Paper is not saying that it is focusing on brownfield land, at the expense of meeting housing needs.</p> <p>Noted.</p>	
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	<p>supporting planned economic growth and wider policy objectives.</p> <p>References are made to the 'significant landbank of housing land' and the 'relatively low level of housing completions despite the significant availability of housing land'. The simple fact is that much of the supply is not actually deliverable, either because it is not viable or due to other constraints. The LDP needs to provide a sufficient supply of housing, with sufficient flexibility to deal with sites not delivering. Recent delivery trends have shown that the amount of flexibility needs to be significant and much higher than 10%.</p>	<p>The representor has provided no evidence to substantiate the claim that much of the housing land supply is not deliverable, because it is not viable or because it has constraints. Further commentary on this point has been provided in the response to Graham Bolton Partnership, with the recommendation that an additional point be added to the Topic Paper regarding flexibility.</p>	
N.B. This Topic Paper needs to be updated generally to take into account changes since it was first drafted.			
<b>Topic Paper 11 – Retailing and Town Centres</b>			
Redrow	<p>The Council should seek to maintain and enhance the quality of its town centres and retail offer. Whilst recognising the inherent benefits of promoting the re-use of derelict land and the diversification of existing buildings in town and village centres, it is important to recognise the benefit that development on the edge of towns can have on existing centres in stimulating regeneration.</p>	Noted	No change
<b>Topic Paper 13 – Landscape</b>			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	<p>Endorses the Topic Paper as it considers the Flintshire landscape to comprise one of the key attractions for tourists and acknowledges that the natural landscape can bring economic benefits.</p> <p>Stresses that not all development has the potential to negatively impact on key landscape features, public views and open</p>	<p>Noted</p> <p>Noted</p>	<p>The title of the Topic Paper is incorrectly given as 'Landscaping' and should be amended to 'Landscape'.</p>

	<p>spaces. For example, a number of recent developments and current proposals have rationalised caravan plots and / or reconfigured site layouts, resulting in improved public views, positive impacts on the landscape and the provision of enhanced landscaping and open space.</p> <p>Considers that the LDP landscape policies should acknowledge that due to the need for tourist facilities to be located near the coast there is a high probability that they will also be located in sensitive landscape areas. Even for sites in areas of landscape value, appropriate development can come forward, providing that commensurate mitigation measures can be implemented. An additional bullet point should therefore be added in the 'Role of the Plan' section with the wording 'Allow development in sensitive landscape areas where the development either neutrally or positively impacts on the designated landscape'.</p>	<p>The Topic Paper is concerned with 'Landscape' and the manner in which the LDP has regard to it in terms of designations and a suite of land use policies. It seems to be a sweeping generalisation that new tourist facilities need to be located near to the coast, particularly given the trends for short breaks in attractive inland locations, or as part of activity based experiences. It is also unclear what the representation means by 'sensitive landscape areas' as for statutorily protected sites there is clear guidance in PPW about planning within for instance AONB's. The likely policy framework against which proposals for tourism development will be judged is set out in the Tourism Topic Paper.</p>	
<b>Topic Paper 14 – Rural Affairs</b>			
<p>Nathaniel Lichfield &amp; partners (on behalf of Bourne Leisure)</p>	<p>Endorses the Topic Paper which seeks to permit appropriate tourism facilities, attractions and accommodation in rural areas. Tourist facilities form a crucial element of rural communities due to employment opportunities and spin off trade.</p> <p>However the following potential policy should be included 'Permit appropriate new tourism facilities, attractions and accommodation as well as the enhancement of existing facilities, attractions and accommodation'.</p>	<p>Noted</p> <p>The Topic Paper already includes within the list of potential policies 'Permitting appropriate tourism facilities, attractions and accommodation' and it is considered that this is sufficiently flexible to cover the enhancement of existing tourism.</p>	<p>n/a</p> <p>No change</p>

<b>Topic Paper 15 - Energy</b>			
Wirral BC	Supports the recognition that consideration of the cross boundary issue in relation to large scale renewable energy schemes will be an issue to be addressed by the LDP.	Noted	No change
<b>Topic Paper 16 Transport</b>			
Nathaniel Lichfield & partners (on behalf of Bourne Leisure)	Emerging transport policies should recognise that due to the location of many tourist facilities and attractions, there is often no other feasible option other than the private car. Emerging policies should therefore be consistent with TAN18 ‘..in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific areas...’.	Noted. In terms of tourism, this is more appropriately included with the Tourism Topic Paper.	Include in the Issues section in Topic Paper 18 Tourism the following ‘in rural areas a lack of public transport access needs to be balanced against the contribution tourism makes to the rural economy in the specific areas’.
Wirral BC	Supports the identification of improvements to the rail network (Wrexham – Bidston and NW Coast line) for local journeys and the potential for new stations in strategic locations, will be an issue to be addressed by the LDP.	Noted	No change
Mersey Rail	<p>Cross boundary transport links are important for NE Wales and in particular its linkages with areas such as the Liverpool City Region.</p> <p>Network Rail’s recent Wales Route Study consultation document raised the potential for a rebuilt Shotton Interchange rail station serving both the Borderlands line and the NW Coast line. This should be referenced in the document.</p> <p>As highlighted in the TAITH RTP (2009) a rail freight terminal to serve occupiers of Deeside Industrial Park may be something to consider as this could improve its attractiveness to any new businesses wishing to locate in the areas</p>	<p>Noted</p> <p>Noted. This documents and its key findings should be added to the Topic Paper.</p> <p>Noted. Under the ‘Issues’ section, reference is made to ‘Improved rail freight facilities’ but this could be widened to include ‘particularly serving Deeside Industrial Park’. Reference should also be made to ‘and reviewing the</p>	<p>No change</p> <p>Add reference to the Network Rail Route Study Report and its main findings.</p> <p>Add to 5<sup>th</sup> bullet point under ‘bus and rail’ the words ‘, particularly serving Deeside Industrial Park and reviewing the Shotton Rail Chord which is allocated in the UDP.</p>

	<p>especially if it has access off the NW Coast line.</p> <p>Merseyrail and partners commissioned a demand study on the Borderlands line, completed on Feb 2015. The study outlines options for service enhancements on the line including extending the service to Birkenhead to facilitate better linkages to Liverpool and a major enhancement of Hawarden Bridge station to become an interchange for DIP. Hooton Rail Station has an important role as a rail hub for the DIP as well.</p> <p>Merseyrail and partners has also commissioned a demand study on the Halton curve, completed in Feb 2015. The study shows there is a strong business case for a rail service via the Halton Curve from Liverpool to Chester and beyond to Wales. This project is a capital scheme Merseyrail and its partners are hoping to take forward through the Growth Deal and would encourage Flintshire and other N Wales authorities to support the Liverpool City Region in lobbying the Welsh Government to ensure adequate provision is made in the new Wales and Borders franchise from 2017/8 for the Halton Curve service into North Wales.</p>	<p>Shotton Rail Chord which is allocated in the UDP'.</p> <p>Noted. In the first bullet point under 'bus and rail' reference should be made to improvements to Hawarden Bridge Station to act as an interchange for DIP.</p> <p>Noted</p>	<p>Add to the 1<sup>st</sup> bullet point under bus and rail' the words 'e.g. improvements to Hawarden Bridge Station to act as an interchange for Deeside Industrial Park'.</p>
<b>Topic Paper 18 Tourism</b>			
<p>Nathaniel Lichfield &amp; partners (on behalf of Bourne Leisure)</p>	<p>Endorses the fact that the Topic Paper encourages sustainable development that brings considerable benefits for the local economy in the form of inward investment, employment and urban regenerations benefits. The economic contribution of tourism in Flintshire should not be underestimated and full details should be set out in the LDP.</p>	<p>Noted. However, it is not considered necessary for the LDP to set out full details about the economic contribution as this is clearly documented as part of background evidence.</p>	<p>No change</p>

	<p>Endorses the Topic paper for setting out a clear policy direction for the provision and enhancement of well-designed tourist facilities. It is important that existing tourist facilities are given policy support to enable them to redevelop and improve.</p> <p>With regard to the proposed policy for Talacre, Gronant and Gwespyr area there should not be a blanket restriction on development within these areas. The policy should recognise that tourist facilities already exist in these areas and there will be a need to develop and enhance these facilities. If a policy is considered necessary for this area, it should facilitate each proposal to be considered on its merits.</p>	<p>Noted</p> <p>Disagree. This policy approach is not a new one, as it is already encompassed within policy T4 of the adopted UDP which restricts further development of new static holiday caravan and chalet sites in the Talacre, Gronant and Gwespyr area. Policy T5 allows for the improvement / extension of existing sites. In her report the UDP Inspector commented 'The open character of the coast and sand dune system around Gronant, Talacre and Gwespyr has already been extensively affected by caravan site development and T4 seeks to restrict new caravan sites in this area. Because of the need to balance the tourism offer and the impact it can have on the landscape and wildlife value of the coast I consider this to be reasonable'. The policy allows for the improvement / extension of existing sites within this area. The Topic Paper is merely referencing the need to review this policy approach.</p>	<p>No change</p> <p>No change</p>
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