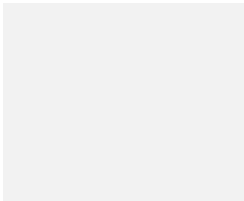


Integrated Impact Assessment of the Flintshire Local Development Plan

IIA Matters Arising Changes Addendum

DECEMBER 2021

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This report dated 06 December 2021 has been prepared for Flintshire County Council (the “Client”) in accordance with the terms and conditions of appointment dated 09 November 2021 (the “Appointment”) between the Client and Arcadis Consulting (UK) Limited (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

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Schedule of Matters Arising Changes

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Schedule of Inspector matters Arising Changes

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Abbreviations

ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
BMV	Best and Most Versatile (soil quality)
CC	County Council
DCPRS	Dee Catchment Phosphorus Reduction Strategy
EqIA	Equalities Impact Assessment
GHGs	Greenhouse Gases
HCAC	Hope / Caergwrle / Abermorddu / Cefn y Bedd
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
HMO	Houses in Multiple Occupation
IIA	Integrated Impact Assessment
IMAC	Inspector Matters Arising Changes
LDP	Local Development Plan
LSOA	Lower Super Output Area
MAC	Matters Arising Changes
mec	Minor Editing Changes
NRW	Natural Resources Wales
NVQ	National Vocational Qualification
ONS	Office for National Statistics
ODPM	The Office of the Deputy Prime Minister
PPW	Planning Policy Wales
PRoW	Public Right of Way
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SM	Scheduled Monument
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Urban Drainage Systems
UDP	Unitary Development Plan
WG	Welsh Government

1 Introduction

1.1 Background

Flintshire County Council ('the Council') is currently preparing the new Flintshire Local Development Plan 2015 – 2030 ('LDP'). This Integrated Impact Assessment (IIA) report has been prepared by Arcadis Consulting (UK) Ltd. on behalf of the Council. This IIA incorporates the requirements of a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), as well as Welsh Language Impact Assessment, Health Impact Assessment (HIA) and Equalities Impact Assessment (EqIA). Findings in this report are up to date with the latest findings from the Habitats Regulations Assessment (HRA) of the LDP which has been updated to consider phosphate issues and its impact on protected rivers in the County.

This IIA Addendum has been prepared to consider the Matters Arising Changes which have been proposed during the Examination Hearings (see Chapter 2 for more information).

1.2 The Local Development Plan

Once adopted, the LDP will replace the existing Flintshire Unitary Development Plan (UDP)¹ and will become the framework against which land use planning decisions will be made across the County up to the year 2030. It will shape Flintshire's future physically and environmentally as well as influence it economically and socially. It will respond to the varied needs of a growing population and economy by providing for new jobs, homes, infrastructure and community facilities in a way that ensures that the well-being of people is enhanced, and the effects of development are sustainably managed.

The context is set by national legislation and planning guidance which requires local authorities in Wales to prepare and maintain a development plan that deals with the above challenges in accordance with the sustainable development duty embodied by the Well-Being of Future Generations Act (2015)². The LDP embodies a positive and responsible approach to development in Flintshire and aims to create more high-quality sustainable places in both urban and rural settings. A sustainable place is one with sufficient social, economic and environmental infrastructure to meet the needs of its people whilst being resilient and adaptable in the face of future challenges.

1.3 Sustainability Appraisal and Strategic Environmental Assessment

Flintshire County Council is committed to improving the social, economic, environmental and cultural well-being of Wales now and over the long term. One of the key methods of achieving this is to take an integrated approach to strategy and policy development. Integrated Impact Assessment (IIA) is a process for predicting and evaluating the likely social, economic and environmental impacts of a plan, and aims to ensure that sustainable development is at the heart of the plan-making process. It can also be used to capture cultural impacts, making it consistent with the four components of sustainable development in Welsh law.

Strategic Environmental Assessment (SEA) is a requirement of several pieces of legislation including the European Directive 2001/42/EC on 'the assessment of the effects of certain plans and programmes on the environment' (The Strategic Environmental Assessment Directive)³ which was transposed directly into Welsh

¹ Available at: <http://www.cartogold.co.uk/flintshire/>

² Available at: <https://futuregenerations.wales/about-us/future-generations-act/>

³ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment. Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A32001L0042> [Accessed: 22.02.21]

law through the SEA Regulations⁴. SEA is a systematic process for evaluating the environmental consequences of plans and programmes to ensure that environmental issues are integrated and assessed at the earliest opportunity in the decision-making process.

Sustainability Appraisal (SA) is an assessment of the economic, environmental, and social effects of a Plan carried out from the outset of the Plan-making process to ensure that decisions are made that accord with sustainable development principles. SA is a systematic and iterative process that identifies and reports on the extent to which implementation of the plan will achieve the environmental, social, and economic objectives by which sustainable development can be defined and identifies opportunities for improving plan performance in relation to these.

In addition to these specific topics, the Council has decided to integrate several other impact assessments with the SA/SEA to form an IIA. In addition to SA/SEA, the IIA therefore also accounts for the legislative requirements of:

- SA, as required by the Compulsory Purchase Act 2004⁵ as amended by Planning (Wales) Act 2015⁶, and as required by Planning Policy Wales 2018 (10th edition)⁷;
- Strategic Environmental Assessment (SEA), as required by Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive)⁸, the requirements of which are transposed into Welsh law through the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regs)⁹;
- Welsh Language (Wales) Measure 2011 and Standards;
- Equalities Impact Assessment (EqIA), as required by the Equalities Act (2010)¹⁰; and
- Health Impact Assessment (HIA).

1.4 IIA work to date

The Wales Development Plans Manual - Edition 3 (2020), as well as the ODPM's A Practical Guide to the SEA Directive (2005), provide guidance on conducting an SA/SEA. This has been followed for the purposes of the IIA. The five main stages in conducting an IIA are defined as:

- Stage A - setting the context and objectives, establishing the baseline and deciding on the scope;
- Stage B - developing and refining options and assessing effects;
- Stage C - preparing the Sustainability Appraisal Report;
- Stage D - consulting on the preferred option of the development plan and SA Report; and
- Stage E - monitoring significant effects of implementing the development plan.

Key stages in the SA process are presented in Table 1-1. The table also demonstrates how each of the SA (including SEA), HIA, EqIA and HRA assessment processes and stages are linked to each other, as well as to the preparation and development of the LDP.

⁴ Environmental Assessment of Plans and Programmes (Wales) Regulations (SI 2004/1656 (W/170)) and in England, the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633). Available at: <https://www.legislation.gov.uk/wsi/2004/1656/contents/made> [Accessed: 22.02.21]

⁵ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Accessed 22.02.21]

⁶ Planning (Wales) Act 2015. Available at: <http://www.legislation.gov.uk/anaw/2015/4/contents/enacted> [Accessed 22.02.21]

⁷ Welsh Government (2018) Planning Policy Wales. Available at: <https://gov.wales/sites/default/files/publications/2019-02/planning-policy-wales-edition-10.pdf> [Accessed 22.02.21]

⁸ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Accessed 22.02.21]

⁹ The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004. Available at: <http://www.legislation.gov.uk/wsi/2004/1656/contents/made> [Accessed 22.02.21]

¹⁰ Equality Act 2010. Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Accessed 22.02.21]

Table 1-1: Stages of the IIA process to date

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulations Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in the IIA Reporting	
Evidence Gathering and Objectives	A. Setting the context and objectives, establishing the baseline and deciding on the scope	Identify related plans/programmes	N/A	Identify health related plans/programmes (as part of IIA) linked into local Joint Strategic Needs Assessments	Review of relevant policies and strategies	Completed in 2015 ¹¹ and revisited in Appendix B of the Submission IIA Report ¹² .
		Identify environmental protection objectives	N/A	Derivation of health - related themes	Derivation of equality-related themes	
		Baseline data and likely future trends	Identify all European sites within and up to 20km from the Flintshire area	Gather baseline data relating to health (as part of IIA)	Baseline data and likely future trends	Completed in 2015 and revisited in Appendix A of the Submission IIA Report.
		Identify sustainability issues and opportunities	Contact NRW for details on European sites and consultation	Identify health issues and relevant determinants (as part of IIA)	Identify equalities specific issues	
		Develop objectives, indicators and targets (Assessment Framework)	Ensure IIA Framework covers European sites appropriately	Inclusion of health specific objectives, indicators and targets in IIA Framework	Ensure inclusion of equalities specific objectives, indicators and targets in IIA Framework	
		Prepare IIA Scoping Report, incorporating HRA and HIA	HRA information incorporated into IIA Scoping Report	HIA information incorporated in IIA Scoping Report.	EqIA information incorporated in IIA Scoping Report.	Completed in 2015 Scoping and August 2017 Re-Scoping.
		Consult on the IIA Scoping Report, including HIA, EqIA and HRA (5 weeks)				
		Review of scoping consultation responses and preparation of Final Scoping Report to inform next stage				
Strategic Options and Preferred Strategy	B1/B2. Developing, refining and appraising strategic options, policy	Assess objectives against the Assessment Framework	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework	Completed in October 2016 ¹³
		Develop, refine and appraise strategic options	Consider HRA implications of the options.	N/A	N/A	

¹¹ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA-SA-scoping-Report-Mar-2015.pdf> [Accessed: 23.11.21]

¹² Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA4-Deposit-IIA-Sept-2019.pdf> [Accessed: 23.11.21]

¹³ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA2-SA-Strategic-Options-Oct-2016.pdf> [Accessed: 23.11.21]

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment		Habitats Regulations Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in the IIA Reporting	
	options and preferred policy options.	Evaluate/select preferred policy options	N/A	N/A	N/A		
	Prepare Initial IIA Report on Strategic Options						
	Consultation on Initial IIA Report (non-statutory)						
	B3/B4. Assessing the effects of the Local Plan Preferred Strategy	Predict and assess effects of preferred options taken forward	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework		
		Proposed mitigation measures	N/A	N/A	N/A		
		Propose monitoring programme	Monitoring as part of IIA				
	Prepare Further Interim IIA Report on Preferred Options						Completed in October 2017 ¹⁴
	B3/B4. Assessing the effects of the Deposit Local Plan including detailed policies and allocations	Predict and assess effects of preferred options taken forward	N/A	HIA effects evaluated through IIA Framework – including mitigation	EqIA effects evaluated through IIA Framework		
		Proposed mitigation measures	N/A	N/A	N/A		
		Propose monitoring programme	Monitoring as part of IIA				
LDP Preparation and Deposit	C. Prepare IIA Report		HRA Screening Report produced separately.	HIA documented in appropriate IIA Objectives in IIA Report	EqIA documented in appropriate IIA Objectives in IIA Report	Completed in September 2019 ¹⁵	
	D. Consultation on the IIA Report		<i>Screening consulted on with NRW.</i>	<i>Included in IIA Consultation.</i>		Completed between September and November 2019	
	D. Prepare a supplementary or revised IIA Report if necessary	Assess significant changes	Prepare updated HRA Report following consultation.	HIA documented in appropriate IIA Objectives in IIA Report	EqIA documented in appropriate IIA Objectives in IIA Report	Completed in September 2020	
Prepare supplementary or revised IIA Report							

¹⁴ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA3-IIA-Preferred-Strategy-Oct-2017.pdf> [Accessed: 23.11.21]

¹⁵ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Key-Process-Documents-Policy/LDP-KPD-IIA4-Deposit-IIA-Sept-2019.pdf> [Accessed: 23.11.21]

LDP Stage	Sustainability Appraisal including Strategic Environmental Assessment	Habitats Regulations Assessment	Health Impact Assessment	Equalities Impact Assessment	Where covered in the IIA Reporting
Submission Examination and Adoption	D. Adoption Statement				Matters Arising Changes from the Examination are Assessed in this Report, dated December 2021. Post Adoption Statement still to be completed.

2 Matters Arising Changes

2.1 Introduction

The Flintshire Local Development Plan 2015-2030 (LDP) is presently the subject of Examination in Public. The Council has compiled a draft schedule of Matters Arising Changes primarily resulting from Action Points taken from the Examination Hearing Sessions that have already taken place, and which were agreed with the Inspector at the end of each session. The Matters Arising Changes should therefore be read in conjunction with the updated Action Points available on the Examination website.

The Matters Arising Changes also include other changes arising from i) the Council's responses to representations where the Council suggested a revision to the Plan, ii) the agreed Statement of Common Ground with Natural Resources Wales (NRW) and iii) further revisions referenced in the various Council Hearing Statements. The suite of changes is those which were not specifically discussed at Hearing Sessions, but those which are considered by the Council to add clarity to the Plan and assist with demonstrating its soundness. The Council sought and secured, through the Programme Officer, the agreement of the Inspectors to include these changes within the draft schedule, for discussion at the hearing session.

2.1.1 Types of Matters Arising Changes

The Matters Arising Changes fall into three main categories:

1 – Matters Arising Changes

The Matters Arising Changes (MACs) are the main changes to the Plan. They comprise changes of varying substance which relate to policy wordings, explanatory text and proposals maps which the Council considers necessary to demonstrate the soundness of the LDP. These changes use the prefix 'MAC' and are individually numbered in Plan order.

2 – Inspectors Matters Arising Changes

These are changes to the Plan proposed by the Inspectors to make the plan sound. These need to be shown separately as Inspectors Matters Arising Changes (IMACs). They set out the key changes to the Plan in respect of policy STR3B and the Warren Hall site in terms of i) the Inspectors deletion of the housing element i.e., 300 units and ii) other changes arising from other Action Points relating to Warren Hall (including splitting STR3 into separate policies). These have been presented in one place rather than being split between the IMAC and MAC tables, for ease of reference. These changes use the prefix 'IMAC' and are individually numbered in Plan order.

3 – Minor Editing Changes

The Minor Editing Changes (mec) are editing changes to the Plan which do not affect the meaning or implementation of a policy. They include editing changes relating to the introduction of PPW11 and the revocation of TAN1. They also include general editing changes to the written statement, particularly the introductory chapters, to explain its redrafting from a Deposit LDP for consultation, to the adopted version of the LDP.

For clarification going forward, Matters Arising Changes will be referred to as 'MACs', Inspectors Matters Arising Changes will be referred to as 'IMACs', and 'Matters Arising Changes' will be used when discussing the entirety of the Matters Arising Changes Process, which includes both MACs, IMACs and mecs.

As the mecs primarily focus on minor editing changes, these changes would not be expected to alter the essence of the LDP, they would also not be expected to alter the IIA findings, and as such, this IIA Report only considered the MACs and IMACs.

2.2 Contents of the LDP

The LDP includes the following sections:

- Policy index;
- Forward;
- Introduction;
- Strategic Policies;
 - Creating Sustainable Places and Communities;
 - Supporting a Prosperous Economy;
 - Meeting Housing Needs;
 - Valuing the Environment;
- Development Management Policies;
 - Creating Sustainable Places and Communities;
 - Supporting a Prosperous Economy;
 - Meeting Housing Needs;
 - Valuing the Environment;
- Monitoring;
- Appendices; and
- Technical Terms and Glossary.

The Vision and Objectives of the LDP have been amended through the Matters Arising Changes. The updated Vision and Objectives are set out in Box 1.

Box 1: The Vision set out in the LDP

“The LDP is about people and places. It seeks to achieve a sustainable and lasting ~~balance which provides for~~ **balance between** the economic, social, and environmental needs of Flintshire and its residents, through realising its unique position as a regional gateway and area for economic investment, whilst protecting its strong historic and cultural heritage **and natural environment**”.

The Council also proposed 19 Strategic Objectives, designed to help ensure the Vision is achieved. The Strategic Objectives, which are split between three themes, are set out in Box 2.

Box 2: The 19 Strategic Objectives set out in the LDP

Enhancing Community Life:

1. Ensure communities have access to a mix of services and facilities, such as education and health, to allow community life to flourish, and meet the needs of particular groups such as the elderly;
2. Encourage the development of town and district centres as the focus for regeneration;
3. Promote a sustainable and safe transport system that reduces reliance on the car;
4. Facilitate the provision of necessary transport, utility and social / community infrastructure;
5. Facilitate the sustainable management of waste;
6. Protecting and supporting the Welsh Language; and
7. Create places that are safe, accessible and encourage and support good health, well-being and equality.

Delivering Growth and Prosperity:

8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors;
9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region;

10. ~~Redefine~~ **Repurpose** the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport;
11. Ensuring that Flintshire has the right amount, size, and type of new housing to support economic development and to meet a **full** range of housing needs;
12. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure;
13. Promote ~~and enhance~~ a diverse and sustainable rural economy; and
14. Support the provision of sustainable tourism development.

Safeguarding the Environment:

15. Minimise the causes and impacts of climate change and pollution;
16. Conserve and enhance Flintshire's high-quality environmental assets including landscape, cultural heritage and natural and built environments;
17. Maintain and enhance green infrastructure networks;
18. Promote good design that is locally distinct, innovative and sensitive to location; and
19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land.

In order to achieve the 19 Objectives, the LDP sets out Strategic and Development Management Policies (see Table 2-1). These are divided across the following themes:

- Creating sustainable places and communities;
- Supporting a prosperous economy;
- Meeting housing needs; and
- Valuing the environment.

Table 2-1: Policies set out in the September 2019 Deposit LDP and the updated policies following the Matter Arising Changes (those in bold are new policies)

Policies in September 2019 LDP	Policies following Matters Arising Changes 2021
Strategic Policies	
Creating Sustainable Places and Communities	
Policy STR1: Strategic Growth	Policy STR1: Strategic Growth
Policy STR2: The Location of Development	Policy STR2: The Location of Development
Policy STR3: Strategic Sites	Policy STR3A: Strategic Site - Northern Gateway
	Policy STR3B: Strategic Site - Warren Hall
Policy STR4: Principles of Sustainable Development, Design and Placemaking	Policy STR4: Principles of Sustainable Development, Design and Placemaking
Policy STR5: Transport and Accessibility	Policy STR5: Transport and Accessibility
Policy STR6: Services, Facilities and Infrastructure	Policy STR6: Services, Facilities and Infrastructure
Supporting a Prosperous Economy	
Policy STR7: Economic Development, Enterprise and Employment	Policy STR7: Economic Development, Enterprise and Employment
Policy STR8: Employment Land Provision	Policy STR8: Employment Land Provision
Policy STR9: Retail Centres and Development	Policy STR9: Retail Centres and Development
Policy STR10: Tourism, Culture, and Leisure	Policy STR10: Tourism, Culture, and Leisure
Meeting Housing Needs	
Policy STR11: Provision of Sustainable Housing Sites	Policy STR11: Provision of Sustainable Housing Sites
Policy STR12: Provision for Gypsies and Travellers	Policy STR12: Provision for Gypsies and Travellers
Valuing the Environment	
Policy STR13: Natural and Built Environment, Green Networks and Infrastructure	Policy STR13: Natural and Built Environment, Green Networks and Infrastructure
Policy STR14: Climate Change and Environmental Protection	Policy STR14: Climate Change and Environmental Protection
Policy STR15: Waste Management	Policy STR15: Waste Management
Policy STR16: Strategic Planning for Minerals	Policy STR16: Strategic Planning for Minerals

Policies in September 2019 LDP	Policies following Matters Arising Changes 2021
Development Management Policies	
Creating Sustainable Places and Communities	
Policy PC1: The Relationship of Development to Settlement Boundaries	Policy PC1: The Relationship of Development to Settlement Boundaries
Policy PC2: General Requirements for Development	Policy PC2: General Requirements for Development
Policy PC3: Design	Policy PC3: Design
Policy PC4: Sustainability and Resilience of New Development	Policy PC4: Sustainability and Resilience of New Development
Policy PC5: Transport and Accessibility	Policy PC5: Transport and Accessibility
Policy PC6: Active Travel	Policy PC6: Active Travel
Policy PC7: Passenger Transport	Policy PC7: Passenger Transport
Policy PC8: Airport Safeguarding Zone	Policy PC8: Airport Safeguarding Zone
Policy PC9: Protection of Disused Railway Lines	Policy PC9: Protection of Disused Railway Lines
Policy PC10: New Transport Schemes	Policy PC10: New Transport Schemes
Policy PC11: Mostyn Docks	Policy PC11: Mostyn Docks
Policy PC12: Community Facilities	Policy PC12: Community Facilities
Supporting a Prosperous Economy	
Policy PE1: General Employment Land Allocations	Policy PE1: General Employment Land Allocations
Policy PE2: Principal Employment Areas	Policy PE2: Principal Employment Areas
Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas	Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas
Policy PE4: Farm Diversification	Policy PE4: Farm Diversification
Policy PE5: Expansion of Existing Employment Uses	Policy PE5: Expansion of Existing Employment Uses
Policy PE6: Protection of Employment Land	Policy PE6: Protection of Employment Land
Policy PE7: Retail Hierarchy	Policy PE7: Retail Hierarchy
Policy PE8: Development within Primary Shopping Areas	Policy PE8: Development within Primary Shopping Areas
Policy PE9: Development outside Primary Shopping Areas	Policy PE9: Development outside Primary Shopping Areas
Policy PE10: District and Local Centres	Policy PE10: District and Local Centres and Local Convenience Shops
Policy PE11: Edge and Out of Town Retail Development	Policy PE11: Edge and Out of Town Retail Development
Policy PE12: Tourist Accommodation, Facilities and Attractions	Policy PE12: Tourist Accommodation, Facilities and Attractions
Policy PE13: Caravan Development in the Open Countryside	Policy PE13: Caravan Development in the Open Countryside
Policy PE14: Greenfield Valley	Policy PE14: Greenfield Valley
	Policy PE15: Telecommunications and Digital Technology Infrastructure
Meeting Housing Needs	
Policy HN1: New Housing Development Proposals	Policy HN1: New Housing Development Proposals
Policy HN2: Density and Mix of Development	Policy HN2: Density and Mix of Development
Policy HN3: Affordable Housing	Policy HN3: Affordable Housing
Policy HN4: Housing in the Countryside	Policy HN4: Housing in the Countryside
Policy HN4-A: Replacement Dwellings	Policy HN4-A: Replacement Dwellings
Policy HN4-B: Residential Conversion of Rural Buildings	Policy HN4-B: Residential Conversion of Rural Buildings
Policy HN4-C: Infill Development in Groups of Houses	Policy HN4-C: Infill Development in Groups of Houses
Policy HN4-D: Affordable Housing Exceptions Schemes	Policy HN4-D: Affordable Housing Exceptions Schemes
Policy HN5: House Extensions and Alterations	Policy HN5: House Extensions and Alterations
Policy HN6: Annex Accommodation	Policy HN6: Annex Accommodation
Policy HN7: Houses in Multiple Occupation	Policy HN7: Houses in Multiple Occupation
Policy HN8: Gypsy and Traveller Sites	Policy HN8: Gypsy and Traveller Sites
Policy HN9: Gypsy and Traveller Accommodation	Policy HN9: Gypsy and Traveller Accommodation

Policies in September 2019 LDP	Policies following Matters Arising Changes 2021
Valuing the Environment	
Policy EN1: Sports, Recreation and Cultural Facilities	Policy EN1: Sports, Recreation and Cultural Facilities
Policy EN2: Green Infrastructure	Policy EN2: Green Infrastructure
Policy EN3: Undeveloped Coast and Dee Estuary Corridor	Policy EN3: Undeveloped Coast and Dee Estuary Corridor
Policy EN4: Landscape Character	Policy EN4: Landscape Character
Policy EN5: Area of Outstanding Natural Beauty	Policy EN5: Area of Outstanding Natural Beauty
Policy EN6: Sites of Biodiversity Importance	Policy EN6: Sites of Biodiversity and Geodiversity Importance
Policy EN7: Development Affecting Trees, Woodland and Hedgerows	Policy EN7: Development Affecting Trees, Woodland and Hedgerows
Policy EN8: Built Historic Environment and Listed Buildings	Policy EN8: Built Historic Environment and Listed Buildings
Policy EN9: Development in or Adjacent to Conservation Areas	Policy EN9: Development in or Adjacent to Conservation Areas
Policy EN10: Buildings of Local Interest	Policy EN10: Buildings of Local Interest
Policy EN11: Green Barriers	Policy EN11: Green Wedges
Policy EN12: New Development and Renewable and Low Carbon Energy Technology	Policy EN12: New Development and Renewable and Low Carbon Energy Technology
Policy EN13: Renewable and Low Carbon Energy Development	Policy EN13: Renewable and Low Carbon Energy Development
Policy EN14: Flood Risk	Policy EN14: Flood Risk
Policy EN15: Water Resources	Policy EN15: Water Resources
Policy EN16: Development on or near Landfill Sites or Derelict and Contaminated Land	Policy EN16: Development on or near Landfill Sites or Derelict and Contaminated Land
Policy EN17: Development of Unstable Land	Policy EN17: Development of Unstable Land
Policy EN18: Pollution and Nuisance	Policy EN18: Pollution and Nuisance
Policy EN19: Managing Waste Sustainably	Policy EN19: Managing Waste Sustainably
Policy EN20: Landfill Buffer Zone	Policy EN20: Landfill Buffer Zone
Policy EN21: Locations for Waste Management Facilities	Policy EN21: Locations for Waste Management Facilities
Policy EN22: Criteria for Waste Management Facilities and Operations	Policy EN22: Criteria for Waste Management Facilities and Operations
Policy EN23: Minerals Safeguarding	Policy EN23: Minerals Safeguarding
Policy EN24: Minerals Buffer Zones	Policy EN24: Minerals Buffer Zones
Policy EN25: Sustainable Minerals Development	Policy EN25: Sustainable Minerals Development
Policy EN26: Criteria for Minerals Development	Policy EN26: Criteria for Minerals Development
Policy EN27: Secondary and Recycled Aggregate	Policy EN27: Secondary and Recycled Aggregate

Within the policies are various site allocations, including sites allocated for future residential or employment development.

There were 38 sites allocated in the September 2019 Deposit LDP, these are listed in Table 2-2.

Table 2-2: Site Allocations in the September 2019 LDP

Proposed land-use	LDP Policy	Location in Flintshire	Settlement
Community Facilities	PC12.1	Community Centre, Woodlane	Ewloe
Community Facilities	PC12.2	Greenfield Cemetery	Greenfield
Community Facilities	PC12.3	Treuddyn Cemetery	Treuddyn
Housing	H1.1	Well Street	Buckley
Housing	H1.2	Broad Oak holding, Mold Road	Connah's Quay
Housing	H1.3	Highmere Drive, Connah's Quay	Connah's Quay
Housing	H1.4	Northop Road	Flint
Housing	H1.5	Maes Gwern	Mold
Housing	H1.6	Land between Denbigh Road and Gwernaffield Road	Mold
Housing	H1.7	Holywell Road / Green Lane	Ewloe

Proposed land-use	LDP Policy	Location in Flintshire	Settlement
Housing	H1.8	Ash Lane	Hawarden
Housing	H1.9	Wrexham Road	Hope, Caergwrle, Abermorddu & Cefn-y-Bedd
Housing	H1.10	Cae Isa, A5119	New Brighton
Housing	H1.11	Chester Road	Penymynydd
Gypsy and Traveller Site	HN8.1	Magazine Lane	Ewloe
Gypsy and Traveller Site	HN8.2	Gwern Lane	Caer Estyn
Gypsy and Traveller Site	HN8.3	Riverside Park	Queensferry
Gypsy and Traveller Site	HN8.4	Castle Park	Flint
Sustainable Minerals Development	EN25.1	Hendre Quarry	Hendre
Sustainable Minerals Development	EN25.2	Pant y Pwll Dwr Quarry	Pentre Halkyn
Sustainable Minerals Development	EN25.3	Ddol Uchaf Quarry	Afonwen
Sustainable Minerals Development	EN25.4	Fron Haul Quarry	Afonwen
Employment	PE1.1	Manor Lane, Chester Aerospace Park	Broughton
Employment	PE1.2	Manor Lane, Hawarden Park Extension	Broughton
Employment	PE1.3	Drury New Road	Buckley
Employment	PE1.4	Greenfield Business Park Phase II	Greenfield
Employment	PE1.5	Greenfield Business Park Phase III	Greenfield
Employment	PE1.6	Broncoed Industrial Estate	Mold
Employment	PE1.7	Mold Business Park	Mold
Employment	PE1.8	Adjacent Mostyn Docks	Mostyn
Employment	PE1.9	Chester Road East	Queensferry
Employment	PE1.10	Antelope Industrial Estate	Rhydymwyn
Employment	PE1.11	River Lane	Saltney
Employment	PE1.12	Rowley's Drive	Shotton
Mixed use strategic site	STR3A	Northern Gateway Mixed Use Development Site	Garden City
Mixed use strategic site	STR3B	Warren Hall Mixed Use Development Site	Broughton
Solar Farm	EN13.1	Crump's Yard, Dock Road	Connah's Quay
Solar Farm	EN13.2	Castle Park	Flint

Six employment sites have been removed from Policy PE1. The deleted sites include:

- PE1.4 Greenfield Business Park Phase II
- PE1.5 Greenfield Business Park Phase III
- PE1.6 Broncoed Industrial Estate
- PE1.8 Adjacent Mostyn Docks
- PE1.10 Antelope Industrial Estate
- PE1.12 Rowley's Drive

The proposed use at Site STR3B has also changed, with the previously proposed 300 homes removed from the allocation. The two solar farm allocations have been removed from the Plan, as they have been constructed.

No new sites have been proposed through the Matters Arising Changes process and all sites allocated in the LDP have been assessed in previous IIA reports.

2.2.1 Summary of the Matters Arising Changes

The majority of the Matters Arising Changes are minor editing changes which do not affect the meaning or implementation of a policy and sets out amendments to the LDP to take into account Planning Policy Wales – Edition 11¹⁶.

The amendments include change to policy wordings, explanatory text and proposals maps which are considered necessary to demonstrate soundness of the LDP.

The Matters Arising Changes include the deletion of six employment sites and amendments to the proposed development at Site STR3B, to remove the previously proposed 300 homes.

¹⁶ Welsh Government, Planning Policy Wales – Edition 11, February 2021. Available at: <https://gov.wales/planning-policy-wales> [Accessed: 23/11/2021]

3 Appraisal of Matters Arising Changes

3.1 Background

The MACs and IMACs made to the LDP are presented in full in the Appendices. Appendix A of this report comprises the Schedule of MACs. Appendix B comprises the Schedule of IMACs. The two tables set out the proposed changes, the reason for each Matter Arising Change (set out by the Council) and whether each change would require further assessment as part of the IIA process, as determined by Arcadis. If further IIA work has been identified as being required, the tables reference where these assessments can be found. If no further IIA work was deemed necessary, an explanation for this has been stated.

The Matter Arising Changes to the LDP include changes/removal of policies, plus changes/removal to a number of existing site allocations, to be considered within the Local Plan period.

It is noted that throughout this section, Matters Arising Changes to the policies are shown using strikethrough and bold. In the assessment tables, '2019' refers to the previous IIA assessment of that policy or site, included in the Submission IIA Report of the Deposit LDP, and '2021' refers to the updated assessment which has been conducted within this IIA Report.

The following sections of this IIA Addendum sets out the assessment of the Matters Arising Changes as identified in the appendices. The assessments have been carried out using the same methodology as the previous IIA work, which is set out in the Flintshire Local Development Plan Integrated Impact Assessment Environmental Report.

3.2 LDP Objectives

Good practice guidance recommends that the key aims and principles of the LDP should be tested for their compatibility with IIA Objectives and to determine whether they accord with broad sustainability principles. Table 3-1 sets out the compatibility assessment.

Table 3-1: Compatibility of the LDP Objectives with the IIA Objectives

✓ Objectives are compatible								✗ Objectives likely incompatible if not mitigated											
0 There is no link between Objectives								? The link between the Objectives is uncertain											
IIA Objective	Enhancing Community Life							Delivering Growth and Prosperity							Safeguarding the Environment				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
1: Crime	0	0	0	✓	0	0	✓	0	0	0	0	0	0	0	0	0	0	✓	0
2: Education	0	0	0	0	0	0	✓	✓	0	✓	0	0	0	0	0	0	0	0	0
3: Health	✓	0	0	✓	0	0	✓	0	0	0	0	0	0	0	✓	0	✓	0	
4: Housing	?	0	✓	0	0	0	✓	0	0	0	✓	✓	0	0	0	0	0	✓	0
5: Access	✓	?	✓	✓	0	0	✓	0	0	?	✓	?	0	0	0	0	0	✓	0
6: Communities	✓	✓	0	✓	0	0	✓	✓	0	✓	✓	✓	0	✓	0	0	0	✓	0
7: Economy	0	✓	0	✓	0	0	0	✓	✓	✓	✓	0	✓	✓	0	0	0	0	0
8: Employment	0	✓	✓	0	0	0	✓	✓	✓	✓	0	0	✓	✓	0	0	0	0	0
9: Rural life	✓	0	0	✓	0	0	✓	0	0	0	?	?	0	0	✓	✓	0	?	0
10: Biodiversity & geodiversity	0	✓	?	0	0	0	0	0	?	✓	?	✓	0	0	✓	✓	✓	0	0

IIA Objective	Enhancing Community Life							Delivering Growth and Prosperity							Safeguarding the Environment				
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
11: Landscape & townscape	0	✓	?	0	✓	0	0	0	0	✓	0	0	0	0	0	✓	✓	✓	0
12: Cultural heritage	0	?	0	?	0	0	0	0	0	0	0	0	0	0	0	✓	0	0	0
13: Water	0	?	0	0	0	0	0	0	?	?	0	✓	0	0	✓	✓	0	0	0
14: Flooding	0	?	0	0	0	0	0	0	0	0	0	0	0	0	✓	✓	0	0	✓
15: Air quality & GHGs	0	✘	✓	?	0	0	0	0	?	?	0	?	✘	0	✓	0	0	0	✓
16: Energy	0	✓	✓	?	0	0	0	0	0	0	?	✓	✓	0	✓	0	0	0	✓
17: Natural resources	0	✓	✓	?	0	0	0	0	0	?	0	✓	✓	0	✓	0	0	0	✓
18: Welsh Language	0	0	0	0	0	✓	0	0	0	0	0	0	0	0	0	0	0	0	0

The compatibility scores have not altered when taking into consideration the Matters Arising Changes. The changes have enhanced the compatibility, but not altered individual scores. Overall, the LDP Strategic Objectives are highly compatible with the IIA Objectives.

3.3 Strategic Policies

3.3.1 Policy STR1: Strategic Growth

Policy STR1 has been amended with an updated employment land figure to reflect the deletion of six employment allocations; and reduced amount of employment land at the Warren Hall site (STR3B). The number of houses allocated under this policy has also been amended, to reflect changes to the Housing Balance Sheet (01/04/20) base date and deletion of housing within the Warren Hall allocation (STR3B).

Policy STR1: Strategic Growth	
In order to meet Flintshire’s economic ambition between 2015 and 2030, the Plan will make provision for:	
i.	8,000 – 10,000 new jobs;
ii.	439.67 124.97 hectares of employment land;
iii.	7,950 7,870 new homes to meet a housing requirement of 6,950, of which 2,265 will be affordable.
The focus of this development will be at sustainable employment locations and in accordance with the sustainable settlement hierarchy and spatial distribution strategy.	

Site STR1	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	+/-	+/-	+/-	++	+	+/-	++	++	+/-	--	-	-	-	-	+/-	-	-	+/-
2021	+/-	+/-	+/-	++	+	+/-	++	++	+/-	--	-	-	-	-	+/-	-	-	+/-

The amendments to this policy through the Matters Arising Changes process has led to a decrease in the quantity of employment land (by 14.7ha) and the number of new dwellings (by 80 homes) allocated in the 2021 LDP, compared to the 2019 iteration. The reduction in homes and employment land is not seen as a significant change in terms of the findings of the IIA. Although these changes do reduce the number of new homes and quantity of employment land allocated at this site, the changes would not be expected to alter the overall IIA scores identified in Appendix C of the Submission IIA Report (see Table 1-1 for link). Despite the

deletion of the housing at Warren Hall, the Inspector has not identified the need for alternative sites to replace the allocation. This is due to the Plan still having a flexibility allowance of 13% housing growth. Overall, the Plan is still providing a total of 7,870 dwellings to meet the requirement figure of 6,950 so is meeting the identified housing needs.

The policy has also been amended to include reference to the requirement for 2,265 homes across the County to be affordable homes. This would help to ensure a range of housing types is available for buyers within the County, meeting a range of local housing needs, and the affordable housing target of 2,008 dwellings. This change would have benefits in relation to IIA Objective 4: Housing, but as a major positive effect has already been identified for this IIA Objective, no change in IIA score is required.

3.3.2 Policy STR2: The Location of Development

Amendments to Policy STR2 seek to enable exceptions housing schemes on the edge of Tier 1 settlements and to ensure consistency with Policy HN4-D. In addition, the reference to 'small-scale' exceptions schemes has been removed, and the policy now refers to all exception schemes.

Policy STR2: The Location of Development

New development will be directed to the following locations:

- i. Allocated Sites;
 - ii. Principal Employment Areas as detailed in policy PE2;
 - iii. Sustainable settlements based on the first three tiers of the settlement hierarchy, as detailed in the attached table:
- a. Tier 1 - Main Service Centres will be the main locations for new housing development which reinforces and contributes to sustainable settlements. Provision will include:
 - i. Allocations
 - ii. Windfall market housing
 - iii. Affordable housing on sites above an area / units threshold
 - iv. **Exception Schemes for affordable housing adjoining settlement boundaries**
 - b. Tier 2 - Local Service Centres will be the locations for more modest levels of new housing development. Provision will include:
 - i. Allocations
 - ii. Windfall market housing
 - iii. Affordable housing on sites above an area / units threshold
 - iv. **Small Scale** Exceptions Schemes for Affordable Housing adjoining settlement boundaries
 - c. Tier 3 - Sustainable Settlements will be the locations for housing development related to the scale, character and role of the settlement. Provision will include:
 - i. Allocations
 - ii. Windfall market housing
 - iii. Affordable housing on sites above an area / units threshold
 - iv. **Small Scale** Exceptions Schemes for Affordable Housing adjoining settlement boundaries
 - d. In Tier 4 Defined Villages housing development will only be permitted within settlement boundaries related to the scale, character and role of the settlement and which delivers local needs affordable housing. Provision will include:
 - i. Windfall market housing (only permitted when essential to delivering affordable housing)
 - ii. **Small Scale** Exceptions Schemes for Affordable Housing adjoining settlement boundaries
 - e. In Tier 5 Undefined villages housing development will be limited to sensitive small scale housing development in the form of infill or rounding off where local needs affordable housing only is provided.

Site STR2	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	+/-	+/-	+/-	++	+	+/-	++	++	+/-	--	-	-	-	-	+/-	-	-	+/-
2021	+/-	+/-	+/-	++	+	+/-	++	++	+/-	--	-	-	-	-	+/-	-	-	+/-

The removal of the term ‘small scale’ in this policy would not be expected to alter the previously identified IIA effects. Adding criteria ‘a’ ‘iv’ to this policy would have benefits in relation IIA Objective 4: Housing, by helping to ensure a range of housing types are available for buyers within the County, meeting a range of local housing needs, but as a major positive impact has already been identified for this IIA Objective, no change in IIA score is necessary.

3.3.3 Policy STR3A: Strategic Site: Northern Gateway

Policy STR3 from the Deposit LDP has been separated into two policies: STR3A and STR3B, to provide clarity for the two allocated sites. The policy criteria for the site allocation at STR3A has not been altered through the Matters Arising Changes. It is noted that the format for the assessments of the site allocations differs slightly to those for the assessment of strategic and development management policies, as they consider a residual score following the implementation of specific mitigation measures.

Policy STR3A: Strategic Site: Northern Gateway	
<p>The majority of new development in Flintshire during the Plan period will be provided by a combination of commitments and new sites located in accordance with the sustainable settlement hierarchy. The following key strategic site will make an important contribution to the overall provision for growth in Flintshire over the Plan period:</p> <ol style="list-style-type: none"> i. 1,325 new homes, including affordable ii. 72.4 hectares of B2/B8 employment land iii. Commercial development hub adjacent to A550 iv. District Centre(s) to serve local convenience needs v. Strengthened and raised River Dee flood defences vi. Provision of internal road infrastructure vii. Provision of land and a contribution to extending Sealand CP School viii. Sustainable drainage/flood management solution ix. Provision of green infrastructure network x. Sensitive re-use of John Summers Listed buildings and grounds 	

IIA Objective Topics (See IIA Framework)		Score	Supporting Information		Residual Score	Timing	Uncertainty
1	Crime	+/-	Key reason	Site is a large site in an area of 10% most deprived for community safety. The proposed Development could potentially increase rates of crime and expose new residents to crime. At the same time, the proposed development could potentially help to reduce local rates of deprivation, homelessness and poverty and subsequently combat crime.	+/-	S-LT	M
			Mitigation	The proposed development should be designed in a manner that helps to reduce the risk of crime and minimises opportunities for anti-social behaviour, such as through			

IIA Objective Topics (See IIA Framework)		Score	Supporting Information		Residual Score	Timing	Uncertainty
				encouraging high rates of natural surveillance and a well-lit public realm where appropriate.			
2	Education	++	Key reason	The majority of new residents here would be more than 1km from a primary school and more than 2km from a secondary school. The nearest school is Sealand, a primary school up to 1.3km from the Site. The policy seeks to ensure the provision of land and contribution to the expansion of Sealand Primary School is provided alongside the development.	++	M-LT	M
			Mitigation	Ideally, there would be requirements for contributions from developers towards secondary education facilities.			
3	Health	+	Key reason	Site is within 1 - 4 km of a GP surgery. Site is located within 1 km of a sports facility. Site includes the development of housing in proximity to an existing community. The proposed Development would have a positive impact on the health objective in an area of 20% most deprived for health and may therefore, help to reduce health inequalities. The site is in proximity to services and facilities, which may encourage higher rates of walking and cycling and thus more active lifestyles as well a more community interaction. The provision of green infrastructure network within the site would also be expected to provide outside space for exercise and have benefits for mental well-being.	+	ST	M
4	Housing	++	Key reason	Site seeks to provide 1,325 new homes that vary in type, size and tenure ranging from 2, 3 and 4 bed units, detached, semi-detached, mews and terraced house types. Low density bungalow types have not formed part of discussions with prospective developers to date. A condition is in place which requires an appropriate level of affordable housing provision in line with this policy. This will ensure that the provision of housing here is in line with the local need.	++	ST	L
5	Access	++	Key reason	A national cycle route runs adjacent to the Site's perimeter. In line with the planning permission requirements, it is expected that the existing PRoWs will be connected with the wider strategic site increasing the opportunity for greater ease of movement. The site has adopted a Public Open Space Strategy which join together where the site boundaries meet, allowing access through connected cycle links, corridors and parklands to continue at a wider level. Reducing the capacity and function of existing PRoWs is to be avoided as their very existence provides an opportunity to open the wider site to sustainable modes of transport, increasing well-being and contribute to active travel legislation. The policy seeks to ensure the local District Centre serves local convenience needs, which would help reduce the distance needed to travel by residents to reach essential services. Furthermore, the policy seeks to provide the provision of internal road infrastructure to help improve access. The Site is located within 500m of the countryside. Bus stops are accessible east of the Site, with a railway station also accessible south-west of the Site. Overall, residents will be within 1km of a bus-stop or Hawarden Bridge railway station.	++	M-LT	H

IIA Objective Topics (See IIA Framework)		Score	Supporting Information		Residual Score	Timing	Uncertainty
				<p>As the Site is in proximity to most services and amenities the proposed Development could potentially encourage walking and cycling.</p> <p>Site is within 1km of a place of worship and within 1km of sport / recreation facilities.</p> <p>The viability of the Site has improved through the provision of road infrastructure to the south of the Site.</p>			
			Mitigation	The PRoW should be preserved within the Development with its capacity and function unaffected.			
6	Strong & cohesive communities	-	Key reason	<p>The proposed Development would situate new residents in homes adjacent to a railway line as well as the A494, both of which would be expected to be sources of noise, air and light pollution.</p> <p>The policy seeks to ensure the local District Centre serves local convenience needs, which could benefit community cohesion, although there is no detail on how this would be achieved.</p> <p>The proposed Development would introduce new homes to a location near an existing community, with good access to employment opportunities as well as health and education facilities.</p>	-	M-LT	H
7	Economy	++	Key reason	Site is a large mixed-use site adjacent to an existing industrial area that would be likely to help provide a boost to local economic activity. The policy also seeks to deliver new employment land and commercial development adjacent to the A550.	++	N/A	L
8	Employment	++	Key reason	The proposed Development is mixed use and would deliver 72.4ha of B2/B8 employment land and commercial development adjacent to the A550. The development would be expected to increase the number of jobs in the local area that are accessible for new and existing residents.	++	S-LT	L
9	Quality of life in rural areas	O	Key reason	Site is unlikely to have a discernible effect on rural diversification or broadband connectivity.	O	N/A	L
10	Biodiversity	-	Key reason	<p>The proposed Development would be expected to reduce habitat connectivity by increasing distances between habitats and agricultural areas in multiple directions.</p> <p>The proposed Development could potentially affect priority species, such as breeding birds or bats, as it contains existing structures.</p> <p>Approximately 75m east of the Site is a stand of ancient woodland. The south-western perimeter of the Site is adjacent to River Dee and Bala Lake SAC. The Dee Estuary SPA is 100m from the Site's edge. An LSE on the SAC and SPA was objectively ruled out for each during the HRA of the Site. However, both the SAC and SPA are coincident with SSSIs that could potentially be adversely affected.</p> <p>Ecological surveys of the site were carried out in support of the Sch 2 Environmental Impact Assessment supporting the planning application. Both portions of the site have a Framework Ecological Strategy for the whole site identifying specific specie. Planning conditions here also require submission of a Construction Environmental Management Plan. Furthermore, long-term habitat management and appropriate landscaping which retains as much existing as possible and or includes native planting more likely to encourage biodiversity are integral to any phase of</p>	-	S-LT	H

IIA Objective Topics (See IIA Framework)		Score	Supporting Information		Residual Score	Timing	Uncertainty
				<p>development within the site. Further suitable off-site mitigation schemes for winter birds have also been secured through financial contributions directed to a local RSPB project.</p> <p>The proposed Development would result in the loss of a large quantity of greenfield land. The amount of green infrastructure proposed is not currently known – a limited amount is assumed.</p> <p>The policy seeks to ensure that a green infrastructure network is provided on site. This would help reduce the loss of habitat and mitigate the loss of habitat connectivity on Site.</p>			
			Mitigation	<p>Green infrastructure that already exists within the Site, including the hedgerow and trees delineating the Site's perimeter and within the Site, should be conserved. Any habitats lost as a result of development should be replaced in terms of quantity and quality nearby. This would also help to preserve the Site's wildlife corridor and stepping-stone function in the wider ecological network.</p> <p>Pollution or contamination of nearby waters and the biodiversity designations, such as via run-off during construction, should be avoided with a Pollution management plan in place. Land functionally linked with the sensitive designations should be protected from harm during construction and operation of the Site.</p>			
11	Landscape / Townscape	-	Key reason	<p>The proposed Development would result in the loss of a significant quantity of greenfield and open space that plays a major role in the local landscape character. However, the site benefits from Green Infrastructure Plans which have informed the delivery of the open space and landscaping strategies. This will help to mitigate adverse effects on character.</p> <p>The broad proposed design or appearance is unknown at this stage. However, the provision of green infrastructure on site could help reduce visual detractors and have benefits to the local landscape character.</p> <p>The Site is within an area of >1 NanoWatts/cm2/sr night light pollution and so the proposed. Development would be unlikely to have an adverse impact on local tranquillity due to light pollution.</p>	-	S-LT	H
			Mitigation	<p>Hedgerow and trees delineating the Site perimeter should be preserved and incorporated into the Development to help screen the site and reduce the impacts of development on character. A careful layout should be employed, in addition to vernacular architecture, to help ensure that the Site is in-keeping with the local townscape.</p>			
12	Heritage	-	Key reason	<p>Eight Listed Buildings are within 300m of the Site, including:</p> <ul style="list-style-type: none"> • North Pair of Aircraft Hangers (Grade II); • South Pair of Aircraft Hangers (Grade II); • West Pair of Aircraft Hangers (Grade II); • Old Marsh Farm (Grade II); • Bascule Bridge (Grade II); • Office Building, Corus Steelworks (Grade II); • Former Office Buildings, Shotton Steelworks (Grade II); and • Hawarden Bridge (Grade II). 	-	S-LT	H

IIA Objective Topics (See IIA Framework)		Score	Supporting Information		Residual Score	Timing	Uncertainty
				<p>The proposed Development would be expected to alter the Site's contribution to local character and would be likely to diminish views from several Grade II Listed Buildings. However, the provision of high-quality green infrastructure on site would help to mitigate this by screening the development and helping to preserve the settings of nearby heritage assets.</p> <p>The policy seeks to ensure the development delivers a sensitive re-use of the John Summers Listed Building and associated grounds. However, at this stage, details of the re-development of this heritage assets is uncertain.</p> <p>The existing outline planning permission includes requirements related to preserving and enhancing heritage assets and these would help to avoid or minimise some potentially negative impacts of the development on setting.</p>			
			Mitigation	Vernacular architecture should be incorporated throughout to help ensure the Site makes a positive contribution towards the local character and thereby help to preserve the setting of sensitive heritage assets nearby.			
13	Water resources	-	Key reason	<p>Small watercourses are within the north and western portions of the Site. It is expected that the CEMP submitter per phase of development would help to ensure adverse effects on water resources are avoided and mitigated to some extent. The policy seeks to strengthen the River Dee's flood defences, which would be expected to help reduce water pollution from flood events. In addition, suitable drainage management would be required, helping to prevent surface water runoff.</p> <p>Site is not within a groundwater Source Protection Zone.</p>	-	S-LT	L
			Mitigation	Careful consideration should be given to the potential impacts of the proposed Development on the quality of the nearby waterbody, particularly during the construction phase. Dust or other contaminants entering the waterbody through surface runoff should be prevented and the local water table should remain unaltered by development.			
14	Flood risk	+	Key reason	<p>The Site is entirely within Flood Zone 3. Small areas of the site are at a medium risk of surface water flooding. The policy requires the proposed Development ins strengthen the River Dee's flood defences and provide sustainable drainage and flood management measures to reduce the risk of flooding on site. These measures would also be expected to reduce flood risk in surrounding areas. Green infrastructure will be incorporated into the Development as per the policy which would be expected to help alleviate flood risk.</p>	+	S-LT	L
15	Air quality & GHGs	-	Key reason	<p>The construction and operation phases of the proposed Development could potentially result in a moderate increase in emissions into air, including GHG emissions and particulate matter pollutants primarily caused by an increase in local road traffic.</p> <p>Site located within 1 km of sustainable transport opportunities. Site located within 1 km of jobs/services.</p> <p>The provision of green infrastructure on site would help to filter air pollutants and increase carbon capture on site.</p>	-	N/A	M
			Mitigation	Promote the use of low-emission vehicles and methods during the construction phase. Providing good access to			

IIA Objective Topics (See IIA Framework)		Score	Supporting Information		Residual Score	Timing	Uncertainty
				electric charging points for workers and residents would help to limit increases in emissions associated with transport.			
16	Efficient & renewable energy	-	Key reason	The construction and operation phases of the proposed Development could potentially result in a moderate increase in energy demand. The potential for energy efficiency or renewable energy sources is unknown at this stage. It is assumed that new homes would, as a minimum, satisfy the requirements of the Building Regulations (2014 update) in terms of carbon dioxide emissions and energy consumption.	-	S-LT	L
			Mitigation	It may be appropriate to use a Development Brief for the Site, given its size. A Design and Access Statement is a Welsh Government requirement for most planning applications in Wales. This would include an explanation of sustainable design, proportionate to the scale and type of development proposed. This should include the likely energy consumption of the proposed Development during construction and operation and to identify and seek out opportunities for improving energy efficiency and employing low and zero carbon technologies.			
17	Natural resources	-	Key reason	The Site is brownfield and coincides with a disused airbase. The construction and operation phases of the proposed Development would be likely to cause a moderate increase in the demand and use of raw materials. The provision of green infrastructure as well as flood prevention measures on site as per the policy would help to reduce soil erosion on site to some extent.	-	S-LT	L
			Mitigation	Promote the use of recycled/ reused materials in order to decrease the demand on raw materials during construction and provide on-site waste separation facilities wherever possible. Promote sustainable management soils during construction and re-use excavated soils where feasible.			
18	Welsh Language	0	Key reason	Ysgol Croes Atti is a Welsh-medium primary school in Shotton. Given the size of this Site, only a minor portion of residents here would be within 1km of the school. Overall, it is considered to be unlikely that the proposed Development would have a discernible effect on access to Welsh language learning opportunities.	0	S-LT	L

Site STR3A	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	+/-	++	+	++	++	-	++	++	0	-	-	-	-	-	-	-	-	-	0
2021	+/-	++	+	++	++	-	++	++	0	-	-	-	-	+	-	-	-	-	0

The Matters Arising Changes would be expected to improve the sustainability effects of this proposed Development slightly. The IIA effects identified in the 2019 report have remained primarily the same. Although improvements have been made to a number of IIA Objectives, the majority of these effects would not be expected to change the identified IIA score. However, the IIA score for IIA Objective 14: Flooding has improved from minor negative to minor positive, as the policy requirements to improve flood defences and

incorporate drainage and flood management solutions on site would be expected to effectively remove the risk of flooding in site. These requirements were set out in the original Policy STR3 (Deposit LDP) but were not considered in the previous site assessments.

The IIA score for IIA Objective 17 has been amended to minor negative as the original assessment incorrectly recorded the site as greenfield, whereas the site is brownfield and coincides with a disused airbase.

3.3.4 Policy STR3B: Warren Hall Mixed Use Development Site

Policy STR3 from the Deposit LDP has been separated into two policies: STRA3A and STR3B to provide clarity for the two allocated sites. The policy criteria for the site allocation at STR3B has been altered through the Matters Arising Changes, including removing the housing allocation of 300 dwellings, so the site is now solely proposed for employment and commercial uses. The Inspector did not consider the site to be in a sustainable location for housing growth and would be likely to result in car-based travel (despite being in walking and cycling distance of Higher Kinnerton and Broughton and having a shop on site as part of the business park). Other changes include a slight reduction in employment land, as well as adding requirements for the provision of green infrastructure, mitigation measures for ecological and heritage assets, and the provision of SuDS. It is noted that the format for the assessments of the site allocations differs slightly to those for the assessment of strategic and development management policies, as they consider a residual score following the implementation of specific mitigation measures.

Policy STR3B: Warren Hall	
<p>The majority of new development in Flintshire during the Plan period will be provided by a combination of commitments and new sites located in accordance with the sustainable settlement hierarchy. The following key strategic site will make an important contribution to the overall provision for growth in Flintshire over the Plan period:</p> <ul style="list-style-type: none"> i. 300 new homes, including affordable i. 22.719.1ha of B1 and high quality B2 employment land ii. 1.3ha commercial hub involving comprising hotel, leisure, local centre and retail and local convenience shop, with high quality public realm as a focal point for the development iii. Strategic landscaping and multi-functional green infrastructure network iv. Sustainable transport links within the site in terms of walking and cycling and provision for bus service and links with nearby settlements and a link with the section of the Mold – Deeside Active Travel route between Penynydd and Broughton v. safeguarding built heritage assets within and adjoining the site vi. ecological avoidance and mitigation measures vii. Employment development not to exceed 12m in height viii. Appropriately designed SuDs, landscaping, waste management and lighting as part of a scheme of aerodrome safeguarding measures. 	

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
1	Crime	+	Key reason	The provision of new employment opportunities could potentially help to reduce the uptake of criminal activity.	+	S-LT	H
2	Education	+	Key reason	The proposed development would create new employment opportunities in the area and these would be expected to provide new employees with new skills and training.	+	M-LT	M
3	Health	0	Key reason	The proposed development is for employment purposes. Impacts on the Health Objective are therefore not expected.	0	N/A	L

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
4	Housing	O	Key reason	The proposed development is an employment site and would therefore not be expected to impact on the Housing Objective.	O	N/A	L
5	Access	+	Key reason	The Site is located within 500m of the countryside. Bus stops are accessible on the A5140, adjacent to the Site's northern perimeter. Site is within 2km of a place of worship and within 2km of sports / recreation facilities. The policy requires sustainable transport links, including walking and cycle routes, and increased provision of bus services to be provided on site. The policy seeks to deliver a local convenience shop, which would help reduce the distance needed to travel by residents to reach essential services.	+	ST	L
			Mitigation	The PRoW should be preserved within the Development with its capacity and function unaffected.			
6	Strong & cohesive communities	O	Key reason	The proposed development is for employment purposes. Impacts on the Communities Objective are therefore not expected.	O	N/A	L
7	Economy	++	Key reason	The proposed development would provide floorspace for new businesses. This would be expected to encourage economic growth in the area.	++	S-LT	L
8	Employment	++	Key reason	The proposed Development is mixed use and would be expected to increase the number of jobs in the local area that are accessible for existing residents.	++	S-LT	L
9	Quality of life in rural areas	O	Key reason	Site is unlikely to have a discernible effect on rural diversification or broadband connectivity.	O	N/A	L
10	Biodiversity	-	Key reason	Adjacent to the Site's western perimeter is Warren Dingle RIG, an Upper Carboniferous area of Holywell Shales. The Site contains several stands of Ancient Woodland, including Gravelhole Wood and the woodland associated with the Warren Dingle stream. The proposed Development would be expected to affect priority species as the Site contains land in agricultural use as well as existing structures, including a pond and several areas of woodland. The proposed Development would reduce habitat connectivity by increasing distances between habitats and agricultural areas in multiple directions. Part of the site (that which was allocated in the UDP) has planning permission, within which environmental effects have been tested. The policy requires green infrastructure to be incorporated into the development which be expected to help protect local habitat connectivity. This would also help to preserve the Site's wildlife corridor and stepping-stone function in the wider ecological network. The policy also seeks to ensure ecological avoidance and mitigation measures are taken into consideration, but the details of these measures are uncertain. The proposed Development would result in the loss of a large quantity of greenfield land. The amount of green infrastructure proposed is not currently known – a limited amount is assumed. An LSE on a European site has been objectively ruled out for this Site during HRA.	-	S-LT	L
			Mitigation	Appropriate ecological surveys should be conducted prior to Development to establish the presence of priority species and habitats, including of the pond near the north of the Site and the Warren Dingle stream.			

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
				Green infrastructure that already exists within the Site, including the hedgerow and trees delineating the Site's perimeter and within the Site, should be conserved. The stands of Ancient Woodland should be protected from harm and supported by additional woodland planting throughout the Development. Any habitats lost as a result of development should be replaced in terms of quantity and quality nearby. Pollution or contamination of nearby waters and the biodiversity designations, such as via run-off during construction, should be avoided with a Pollution management plan in place.			
11	Landscape / Townscape	-	Key reason	<p>The proposed Development would result in the loss of a large greenfield site that plays a major role in the local landscape character. It could potentially have an adverse effect on the local character.</p> <p>Part of the site (that which was allocated in the UDP) has planning permission, within which environmental effects have been tested. The masterplan shows that GI will be incorporated into the development along the perimeter and throughout the site. This would be expected to help mitigate adverse effects on the local character.</p> <p>The broad proposed design or appearance is unknown at this stage. The Site is within an area of >1 NanoWatts/cm2/sr night light pollution and so the proposed Development would be unlikely to have an adverse impact on local tranquillity due to light pollution.</p> <p>The policy requires green infrastructure to be incorporated into the site which would help to screen the site and reduce the impacts of the development on character and to help the site be in-keeping with the local townscape.</p> <p>The development will be a maximum of 12m in height, in line with the policy, as well as appropriately designed landscaping measures.</p>	-	S-LT	M
			Mitigation	Hedgerow and trees delineating the Site perimeter should be preserved.			
12	Heritage	-	Key reason	<p>Four Listed Buildings are within 300m of the Site, including:</p> <ul style="list-style-type: none"> Warren Hall (Grade II); Hillside Cottage (Grade II); Kinnerton Lodge (Grade II); Stables at Kinnerton Lodge (Grade II). <p>Part of the site (that which was allocated in the UDP) has planning permission, within which environmental effects have been tested. The masterplan shows that GI will be incorporated into the development around the Warren Hall Grade II Listed Building which would help to mitigate adverse effects on its setting.</p> <p>Given the woodland belt separating the site from the Grade II Listed Kinnerton Lodge and the Stables here, adverse effects on the setting of these heritage assets are considered to be unlikely. The policy seeks to safeguard built heritage assets within and adjoining the site, alongside the provision of green infrastructure on site, would make a positive contribution towards the local character and thereby help to preserve the setting of sensitive heritage assets nearby.</p>	-	S-LT	H
13	Water resources	--	Key reason	A pond sits near the north of the Site and a small stream flows through the south.	-	S-LT	L

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
				The policy seeks to ensure the development incorporates suitable drainage management would be required, helping to prevent surface water runoff. Site is not within a groundwater Source Protection Zone.			
			Mitigation	Careful consideration should be given to the potential impacts of the proposed Development on the quality of the nearby waterbody, particularly during the construction phase. Dust or other contaminants entering the waterbody through surface runoff should be prevented and the local water table should remain unaltered by development.			
14	Flood risk	-	Key reason	The Site is in Flood Zone 3. Small areas of the site are at a high risk of surface water flooding. The policy requires the proposed Development to provide sustainable drainage measures to reduce the risk of flooding on site. Green infrastructure will be incorporated into the Development as per the policy which would be expected to help alleviate flood risk.	-	S-LT	L
			Mitigation	It is considered to be likely that the proposed Development could avoid land at risk of flooding through a careful layout. An FCA would be required given the Site's size.			
15	Air quality & GHGs	-	Key reason	The construction and operation phases of the proposed Development could potentially result in a moderate increase in emissions into air, including GHG emissions and particulate matter pollutants primarily caused by an increase in local road traffic. Site located within 1 km of sustainable transport opportunities. Site located within 1 km of jobs/services.	-	N/A	M
			Mitigation	Promote the use of low-emission vehicles and methods during the construction phase. Providing good access to electric charging points for workers and residents would help to limit increases in emissions associated with transport.			
16	Efficient & renewable energy	-	Key reason	The construction and operation phases of the proposed Development could potentially result in a moderate increase in energy demand. The potential for energy efficiency or renewable energy sources is unknown at this stage. It is assumed that new homes would, as a minimum, satisfy the requirements of the Building Regulations (2014 update) in terms of carbon dioxide emissions and energy consumption.	-	S-LT	L
			Mitigation	It may be appropriate to use a Development Brief for the Site, given its size. This would include an explanation of sustainable design, proportionate to the scale and type of development proposed. This should include the likely energy consumption of the proposed Development during construction and operation and to identify and seek out opportunities for improving energy efficiency and employing low and zero carbon technologies.			
17	Natural resources	--	Key reason	The proposed Development would result in the loss of a significant quantity of greenfield land that contains ecologically valuable soils as well as some Grade 3a ALC land (i.e. BMV). The Grade 3a ALC soils are within the portion of the site that has planning permission yet, as this site has been allocated in the LDP, this effect is still noted. Given the size of this site, a major loss of soils would be expected.	-	S-LT	L

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
				The construction and operation phases of the proposed Development would be likely to cause a moderate increase in the demand and use of raw materials. The provision of green infrastructure as well as flood prevention measures on site as per the policy would help to reduce soil erosion on site to some extent.			
			Mitigation	Promote the use of recycled/ reused materials in order to decrease the demand on raw materials during construction and provide on-site waste separation facilities wherever possible. Promote sustainable management soils during construction and re-use excavated soils where feasible.			
18	Welsh Language	0	Key reason	The proposed Development is unlikely to have a discernible effect on access to Welsh language learning opportunities.	0	N/A	L

Policy STR3B	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	0	-	+	++	+	-	++	++	0	-	-	-	-	-	-	-	-	-	0
2021	+	+	0	0	+	0	++	++	0	-	-	-	-	-	-	-	-	-	0

The Matters Arising Changes would be expected to improve the sustainability effects of this proposed Development slightly. Through the Matters Arising Changes, the proposal for 300 homes at this site has been removed and the site is now proposed for employment and commercial use only. This alters the previously identified IIA scores for IIA Objectives 1, 2, 3, 4 and 6 to reflect that no housing is allocated. The IIA score for IIA Objective 14: Flooding has improved from major negative to minor negative, as the policy requirements to incorporate sustainable drainage solution and green infrastructure on site would be expected to reduce the risk of flooding on site. The site was allocated in the Deposit LDP (September 2019), but the policy criteria have been altered through the Matters Arising Changes.

3.4 Development Management Policies

3.4.1 Policy PC3: Design

Policy PC3 has been amended from the Deposit LDP to include criteria 'h', which requires new development to protect the living conditions of nearby occupiers from potential harmful effects of new development.

Policy PC3: Design
<p>All new development should, where appropriate:</p> <ol style="list-style-type: none"> be of a high quality, distinctive and inclusive design which respects and enhances the site and its surroundings in terms of its siting, layout, scale, height, design, density, use of materials and landscaping, and creates a sense of place; retain existing landscape and nature conservation features and incorporate opportunities to enhance biodiversity and ecological connectivity; ensure that new materials are appropriate, durable and sympathetic to the character and context of the site; protect and enhance the townscape, architectural, historic and cultural built environment; incorporate suitable provision of space about dwellings, amenity space, landscaping and planting;

Policy PC3: Design

- f. create attractive, accessible and safe and healthy places with natural surveillance, visibility and sensitive lighting;
- g. incorporate Sustainable Urban Drainage Schemes to bring about multiple benefits as an integral part of the development.
- h. **protect the living conditions of nearby occupiers from any harmful effects of new development including overlooking, harm to outlook, increased activity / disturbance / noise.**

I/A Objective	Effects	Score	Effects and Recommendations
3. To improve physical and mental health and well-being for all and reduce health inequalities	Score	++	PC3 would be likely to have positive impacts on I/A Objective 3 as it would require all new developments to provide suitable amenity space and protect current occupiers from noise and disturbance, as well as overlooking, from the new development. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy PC3	I/A Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	++	0	++	+	+	0	0	0	0	++	++	++	0	+	0	0	0	0	0
2021	++	0	++	+	+	0	0	0	0	++	++	++	0	+	0	0	0	0	0

There has been no change to the I/A scores following the Matters Arising Changes. Even though the amendments would be expected to be beneficial in relation to health and well-being, the policy was already identified as having major positive effects for I/A Objective 3, so no further changes were necessary.

3.4.2 Policy PC4: Sustainability and Resilience of New Development

Policy PC4 has been updated to include minor amendments, which are required to reflect the removal of the phrase 'ensure that'. In addition, reference to 'Sustainable Management of Natural Resources approach' has been added to the policy.

PC4: Sustainability and Resilience of New Development

Development should ~~ensure that~~:

- a. ~~it is be~~ sustainably located and accessible to non – private car means of travel, so as to reduce carbon emissions;
- b. ~~it is be~~ designed so as to be resilient and adaptable to the effects of climate change;
- c. ~~it incorporates~~ planting, landscaping and design features **within a Sustainable Management of Natural Resources (SMNR) approach** which mitigate the effects of climate change such as increased rainfall events and high temperatures;
- d. ~~it makes~~ efficient use of resources through sustainable construction techniques and materials, including layout, siting and orientation to maximise solar gain, water conservation and waste reduction; and
- e. ~~it incorporates~~ renewable energy technologies and carbon sinks where appropriate.

I/A Objective	Effects	Score	Effects and Recommendations
14. To reduce the risk of flooding	Score	++	PC4 would be likely to have a positive impact on I/A Objective 14 as it requires new developments to incorporate features which can mitigate the effects of climate change such as increased rainfall, including following a Sustainable Management of Natural Resources approach. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy PC4	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	+	O	+	+	O	O	O	O	O	O	++	++	+	+	++	+	++	+	O
2021	+	O	+	+	O	O	O	O	O	O	++	++	+	+	++	+	++	+	O

There has been no change to the IIA scores following the Matters Arising Changes. Even though the amendments would be expected to be beneficial in relation to flooding, the policy was already identified as having major positive effects for IIA Objective 14, so no further changes are necessary.

3.4.3 Policy PC5: Transport and Accessibility

Policy PC5 has been amended to improve the clarity of the policy wording and avoid repetition. The amendments emphasise the preferred hierarchy for sustainable modes of transport, and now include the requirements for mitigation to be implemented, if significant adverse effects on the transport network from the proposed development are unavoidable.

Policy PC5: Transport and Accessibility
<p>New development proposals must be supported by appropriate transport infrastructure, and depending on the nature, scale, location and siting of the proposal, will be required to:</p> <ol style="list-style-type: none"> Reduce reliance on the car by incorporating Incorporate good access to the more sustainable modes of travel, firstly by walking and cycling, secondly by public transport, then by low emission private vehicle and finally by other private motor vehicle. mitigate any significant adverse effects upon the transport network that arise from the proposed development including improvements to transport infrastructure and traffic management where required; not compromise the safe, effective and efficient use of the highway network and not have an adverse impact on highway safety or create unacceptable levels of traffic generation; do not compromise the safe, effective and efficient use of the highway network and do not have an adverse impact on highway safety or create unacceptable levels of traffic generation; where significant adverse effects upon the transport network arising from the proposed development are unavoidable, they must be mitigated by, for example, improvements to transport infrastructure and traffic management; provide appropriate levels of parking, servicing and manoeuvring space and in non-residential development, a minimum of 10% of parking spaces to have electric vehicle charging points; create well designed people orientated streets and make provision for people with restricted mobility including those with characteristics as defined by the Equality Act 2010; safeguard, enhance and expand the active travel network, particularly by means of improving connectivity to and from the proposed development.

IIA Objective	Effects	Score	Effects and Recommendations
3. To improve physical and mental health and well-being for all and reduce health inequalities	Score	+	Policy PC5 would be likely to have positive impacts on IIA Objective 3 through ensuring new developments provide safe and convenient access to active transport paths for pedestrians and cyclists. By prioritising walking and cycling over other sustainable transport modes, this policy would encourage active travel, which will have benefits in relation to physical health and mental well-being.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
	Score	++	

IIA Objective	Effects	Score	Effects and Recommendations
5. To improve sustainable access to basic goods, services and amenities for all groups	Uncertainty	M	Policy PC5 would be likely to have a positive impact on IIA Objective 5 as they require new developments to be supported by appropriate transport infrastructure. The amendments to this policy seek to ensure mitigation is put into place if significant adverse effects from new development on the transport network is unavoidable, through improvements to infrastructure or traffic management.
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy PC5	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	+	o	+	o	++	+	+	+	o	o	o	o	o	o	o	o	o	o	o
2021	+	o	+	o	++	+	+	+	o	o	o	o	o	o	o	o	o	o	o

The amendments to this policy further support sustainable transport options throughout the County and emphasise the prioritization of walking and cycling over personal vehicle use. The amendments also emphasise the requirement to provide mitigation if adverse effects on the transport network are unavoidable. Although these changes are beneficial to the policy, they would not alter the previously identified IIA scores. The score against IIA Objective 5 is already significant positive based on the 2019 assessment.

3.4.4 Policy PE2: Principal Employment Areas

Policy PE2 has been amended to include the requirement for development in the principal employment areas to avoid adverse effects on European designated biodiversity sites, as well as requiring further investigation if the site is within a flood zone.

Policy PE2: Principal Employment Areas
<p>Within principal employment areas, as defined on the proposals map and listed below, the following types of employment development be permitted:</p> <ul style="list-style-type: none"> B1 business use; B2 general industry; B8 storage and distribution <p>Provided that the proposal is of an appropriate type and scale for both the site and its surroundings and satisfies other Plan policies. Within these areas, development must also avoid adverse effects on European Sites. Any development proposals on sites that may be located within a flood risk zone causing constraint will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage.</p>

IIA Objective	Effects	Score	Effects and Recommendations
10. To protect and enhance biodiversity and geodiversity	Score	+	Policy PE2 would be likely to have a positive impact on IIA Objective 10 as it requires the local environment to be considered in the allocation of employment land in order to ensure there are no harmful impacts. The amended policy text requires development to avoid adverse impacts on European sites, which would further benefit the biodiversity objective.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
14. To reduce the risk of flooding	Reversible/Irreversible	R	Policy PE2 has been amended to require further investigation for development proposals in flood zones, including avoiding flood risk through design and layout.
	Score	+	
	Uncertainty	M	
	Duration	LT	

IIA Objective	Effects	Score	Effects and Recommendations
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy PE2	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	++	+	+	+	+	++	++	+	O	+	+	+	O	O	+	O	+	+
2021	++	+	+	+	+	++	++	+	O	+	+	+	O	+	+	O	+	+

Policy PE2 has been amended and would lead to further benefits in relation to the protection of biodiversity assets. However, the policy is already identified as having a minor positive impact in relation to IIA Objective 10 and therefore, the IIA score would not change as a result of these amendments. . Policy PE2 was previously identified as neutral in regard to IIA Objective 14: Flooding, but the policy amendments would be expected to help protect development from the risk of flooding, and therefore, this IIA score has changed to minor positive.

3.4.5 Policy PE10: District and Local Centres and Local Convenience Shops

Policy PE10 has been amended to clarify that local convenience shops may also be acceptable elsewhere within settlements in order to meet local food shopping needs.

Policy PE10: District and Local Centres and Local Convenience Shops
<p>Within the designated District Centres of Connah's Quay, Queensferry and Saltney proposals which maintain or improve the range and quality of shopping provision or complimentary commercial and leisure facilities will be supported provided it is appropriate in scale and enhances the centre.</p> <p>Small scale retail and other commercial uses intended to meet the day to day needs of the local neighbourhood will be directed towards suitable sites or premises within the Local Centres identified in Policy PE7. In settlements without a defined district or local centre, or where there is no opportunity within a defined local or district centre, local convenience shops will be supported elsewhere within settlement boundaries provided that proposals are appropriate in scale to the locality.</p>

IIA Objective	Effects	Score	Effects and Recommendations
6. To build strong and cohesive communities	Score	+	Policy PE10 seeks to ensure that new employment, retail, leisure and commercial developments are situated within existing settlements and generally in areas within which the site use would be appropriate and accordant with the existing local character, such as by situating new employment land within existing key employment areas. This approach would be expected to help preserve and avoid adverse impacts on the sense of place and community in many areas of Flintshire. The amendments to this policy would provide greater flexibility in the location of local convenience stores and would be likely to ensure essential stores are in a variety of locations to meet the needs of local communities.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
7. To promote a sustainable economy, business development and investment	Score	++	Policy PE10 would be expected to make a positive contribution towards sustainable economic growth in Flintshire, setting out protection for existing employment, retail, tourism and commercial areas and facilitating the creation of new such areas. This employment, retail, commercial and tourism focussed land will predominantly be in highly accessible locations in well-connected settlements, existing employment areas or centres and so will be able to attract employees, customers and visitors. The amendments to this policy would be expected to give more flexibility on the location of local convenience shops, with benefits to the local economy.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy PE10	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+
2021	+	+	0	0	+	+	++	++	0	+	+	0	0	0	+	0	+	+

Through the Matters Arising Changes process, Policy PE10 has been amended to include details on the flexibility on location of local convenience stores, if appropriate. This change would be expected to lead to benefits in relation to the local economy and local communities. This, however, would not alter the previously identified IIA scores.

3.4.6 Policy PE13: Caravan Development in the Open Countryside

Policy PE13 has been amended to emphasise that the development of static caravan development or the extension of existing caravan related sites will not lead to adverse effects on European sites and to clarify where in the County new static caravan development may or may not take place.

Policy PE13: Caravan Development in the Open Countryside	
a.	The development of static caravan accommodation will not be permitted outside in the Talacre, Gronant and Gwespyr area (as defined on the proposals map). Elsewhere in the County proposals will be permitted where: <ul style="list-style-type: none"> i. there would be no material harm to the landscape character and environmental quality of the surrounding area and no adverse effects on European Sites, either individually or cumulatively with other sites in the vicinity; and ii. the scale of the proposal together with the number, siting and layout of units, circulation roads and service buildings is appropriate to the characteristics of the site and locality; and
b.	New touring caravan sites will be permitted, in addition to the criteria in a. only where: <ul style="list-style-type: none"> i. it is used for touring caravan purposes and any touring caravans are removed from the site for periods when not in use; and ii. any essential service buildings that are needed can be provided within existing buildings or appropriately sited and designed small new buildings.
c.	The extension of existing caravan related sites will be permitted only where: <ul style="list-style-type: none"> i. any increase in the number of pitches or units is modest; ii. any physical extension of the site is modest; iii. the scheme incorporates substantial internal and external structural landscaping, demonstrates significant improvement to the environment of the site and a reduction of its impact on the surrounding landscape; iv. the proposal involves improved on-site facilities; v. any touring caravans are removed when not in use. vi. the proposal has no adverse effects on European sites. <p>The occupancy of caravan related developments will be restricted to holiday use only.</p>

IIA Objective	Effects	Score	Effects and Recommendations
10. To protect and enhance biodiversity and geodiversity	Score	+	Policy PE13 would be likely to have a positive impact on IIA Objective 10 as it ensures that any new tourist developments in the countryside avoid causing harm to areas or features of high biodiversity value. The amendments to this policy would be expected to ensure Caravan development does not lead to adverse effects on European sites.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy PE13	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	+	+	O	O	+	O	++	++	+	+	+	+	O	O	O	O	-	+
2021	+	+	O	O	+	O	++	++	+	+	+	+	O	O	O	O	-	+

The amendments to this policy seek to further protect European sites from the potential adverse effects of Caravan development, and therefore, would have benefits in relation to IIA Objective 10: Biodiversity. This IIA Objective has already been identified as minor positive, and therefore, these amendments would not lead to a change in IIA score. Significant positive effects would only be expected, should a biodiversity net gain be achieved.

3.4.7 Policy PE14: Greenfield Valley

Policy PE14 has been amended to emphasise that development proposals within or adjacent to the Greenfield Valley do not result in adverse effects on European sites.

Policy PE14: Greenfield Valley	
Development proposals within or adjoining the Greenfield Valley, as designated on the proposals map, will be permitted where they do should not detract from the tourism potential of the Valley or harm areas or features of landscape, nature conservation or historic value. Within or adjoining the Greenfield Valley, development must also avoid adverse effects on European Sites.	

Policy PE14	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	+	+	O	O	+	O	++	++	+	+	+	+	O	O	O	O	-	+
2021	+	+	O	O	+	O	++	++	+	+	+	+	O	O	O	O	-	+

IIA Objective	Effects	Score	Effects and Recommendations
10. To protect and enhance biodiversity and geodiversity	Score	+	PE14 would be likely to have a positive impact on IIA Objective 10 as it ensures that any new Caravan developments would not cause any material harm to the environmental quality of the surrounding area. The policy has been amended to include the requirement to avoid causing harm to European areas.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

The amendments to Policy PE14 would lead to further benefits in relation to biodiversity by protecting European sites, however, this would not be expected to further improve the IIA score from that previously identified.

3.4.8 New Policy PE15: Telecommunications and Digital Technology Infrastructure

Policy PE15 is a new policy to ensure conformity with the requirements of Planning Policy Wales - Edition 11.

Policy PE15: Telecommunications and Digital Technology Infrastructure	
Proposals for telecommunications and digital technology infrastructure will be assessed in the context of technical and operational requirements and permitted where:	
<ul style="list-style-type: none"> i. The development contributes towards the objectives of future proofing development and regeneration proposals or forms part of the planned development of a wider network; 	

- ii. **The development incorporates all reasonable measures to minimise any significant adverse impact due to the siting and external appearance of the apparatus, and the design minimises impact caused by its visual appearance;**
- iii. **There would be no significant adverse effect on natural heritage, the historic environment, or amenity of neighbouring residents;**
- iv. **The application is accompanied by evidence of compliance with Government guidelines on health impacts of telecommunications infrastructure.**

I/A Objective	Effects	Score	Effects and Recommendations
1. To reduce crime, disorder and fear of crime	Score	+	The provision of telecommunication and digital infrastructure across the Plan area would be expected to make a major contribution towards helping to combat unemployment and in so doing, would help to combat a major cause of poverty. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
2. To improve levels of educational attainment for all age groups and all sectors of society	Score	+	This policy would help to facilitate the creation of new employment throughout the County, in particular by increasing the number of those able to work from home. It is considered to be likely that opportunities for learning new skills and potentially gaining new qualifications would increase as a result of this policy. No recommendations.
	Uncertainty	L	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
3. To improve physical and mental health and well-being for all and reduce health inequalities	Score	+	Policy PE15 would ensure that potential health implications from telecommunications infrastructure are assessed in line with government guidelines. This would ensure that any potential inequalities are addressed. No recommendations.
	Uncertainty	L	
	Duration	L	
	Direct / Indirect	I	
	Reversible/Irreversible	R	
4. To provide access to good quality, affordable housing that meets the needs and requirements of the community	Score	O	Policy PE15 would be unlikely to have a discernible effect on housing. No recommendations.
	Uncertainty	L	
	Duration	N/A	
	Direct / Indirect	N/A	
	Reversible/Irreversible	N/A	
5. To improve sustainable access to basic goods, services and amenities for all groups	Score	+	Policy PE15 would be likely to have benefits in relation to sustainable access, as by improving digital access, those who are unable to travel far or for those services which are out of reach, online services can be used. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
6. To build strong and cohesive communities	Score	+	Policy PE15 could enable an improvement in building strong and resilient communities, through increasing their viability and attractiveness through digital infrastructure. This could help to ensure that rural communities are supported. No recommendations.
	Uncertainty	L	
	Duration	LT	
	Direct / Indirect	I	
	Reversible/Irreversible	R	
7. To promote a sustainable economy, business development and investment	Score	+	This policy would be expected to make a positive contribution towards sustainable economic growth in Flintshire, enhancing access to employment opportunities and providing opportunities for businesses in Flintshire to grow beyond the county borders. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
8. To provide employment opportunities across the County and promote economic inclusion	Score	+	This policy would be expected to make a positive contribution towards sustainable economic growth in Flintshire, enhancing access to employment opportunities and providing opportunities for businesses in Flintshire to grow beyond the county borders. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
	Score	+	

IIA Objective	Effects	Score	Effects and Recommendations
9. To maintain and improve the quality of life in rural areas	Uncertainty	M	Policy PE15 would be expected to support the provision of telecommunication and digital infrastructure in rural areas and therefore, help reduce isolation of such communities. This policy also could help provide employment opportunities through home working for rural communities. No recommendations.
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
10. To protect and enhance biodiversity and geodiversity	Score	+	Policy PE15 seeks to ensure that telecommunications and digital infrastructure does not lead to significant adverse effect on natural heritage and would therefore protect local biodiversity assets. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
11. To conserve and enhance the County's landscape and townscape character and quality	Score	+	This policy seeks to ensure telecommunications and digital infrastructure has a design that minimises potential impacts caused by its visual appearance and does not lead significant adverse effects on the amenity of neighbouring residents. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
12. To protect and enhance the cultural heritage asset	Score	+	The policy requires telecommunications and digital infrastructure to ensure that there 'would be no significant adverse effect on natural heritage [or] the historic environment' and would therefore be expected to help protect and enhance local cultural heritage assets. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
13. To protect and enhance the quality of water features and resources	Score	O	Policy PE15 would be unlikely to have a discernible effect on water resources. No recommendations.
	Uncertainty	L	
	Duration	N/A	
	Direct / Indirect	N/A	
14. To reduce the risk of flooding	Score	O	Policy PE15 would be unlikely to have a discernible effect on flooding. No recommendations.
	Uncertainty	L	
	Duration	N/A	
	Direct / Indirect	N/A	
15. To protect and improve air quality and limit greenhouse gas emission	Score	O	Policy PE15 would be unlikely to have a discernible effect on air quality. No recommendations.
	Uncertainty	L	
	Duration	N/A	
	Direct / Indirect	N/A	
16. To increase energy efficiency, require the use of renewable energy and sustainable building design	Score	+	The provision of telecommunication and digital infrastructure could help to improve energy efficiency in the County by enabling residents to access services online rather than relying on travelling to reach services and facilities. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
17. To ensure sustainable use of natural resource	Score	O	Policy PE15 would be unlikely to have a discernible effect on natural resources. No recommendations.
	Uncertainty	L	
	Duration	N/A	
	Direct / Indirect	N/A	
18. To encourage the protection and promotion of the Welsh Language	Score	+	This policy could have positive effects on the promotion of the Welsh Language, as the installation of telecommunications and digital infrastructure could facilitate access to Welsh resources, either to enhance Welsh language learning or provide services in Welsh. It could also improve the viability of Welsh speaking communities. No recommendations.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy PE15	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2021	+	+	+	0	+	+	+	+	+	+	+	+	0	0	0	+	0	+

This is a new policy and as such, the assessment of all 18 IIA Objectives has been set out in full.

3.4.9 Policy HN7: Houses in Multiple Occupation

Criterion 'e' of Policy HN7 has been amended. The requirement to prevent the 'over concentration of HMOs' has been removed and replaced with requirement for the cumulative impact of development to 'not adversely affect the character of the locality or residential amenity'.

Policy HN7: Houses in Multiple Occupation
<p>Within defined settlement boundaries, proposals to convert an existing building into self-contained accommodation, bedsits or houses in multiple occupation (HMO) will only be permitted if:</p> <ol style="list-style-type: none"> Conversion is possible without major alterations or extensions which would significantly alter the character and appearance of the building and locality; The scale and intensity of use would be compatible with the existing building and adjoining and nearby uses; the proposal includes on-site parking or it can be demonstrated that it does not have an adverse effect on local parking provision; the proposal includes a drying area, bin storage and cycle parking, and provides for the amenity of future occupants; The cumulative impact of development would not lead to the over concentration of HMOs in the locality to the detriment of community cohesion or residential living standards the cumulative impact of development would not adversely affect the character of the locality or residential amenity; The proposed HMO does not result in either more than two HMOs side by side or an existing residential property sandwiched between HMOs.

IIA Objective	Effects	Score	Effects and Recommendations
4. To provide access to good quality, affordable housing that meets the needs and requirements of the community	Score	++	Policy HN7 would be likely to have positive impacts on IIA Objective 4 as it ensures that HMO are of suitable standards seeks to support the development of a range of housing types, including self-build homes, bedsits and HMOs.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
11. To conserve and enhance the County's landscape and townscape character and quality	Score	+	Policy HN7 aims to ensure that conversion of buildings as part of development does not 'significantly alter the character and appearance of the building and locality' and that the cumulative impact of development would not adversely impact the local landscape character or residential amenity.
	Uncertainty	M	
	Duration	S-MT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy HN7	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	++	0	+	++	++	+	0	0	0	0	0	0	0	0	+	0	0	0	+
2021	++	0	+	++	++	+	0	0	0	0	+	0	0	0	+	0	0	0	+

Criterion 'e' of Policy HN7 has been replaced to ensure the cumulative effect of development does not alter residential amenity, which would be expected to have positive effects in relation to landscape and townscape. This was previously identified as a neutral impact. In addition, the changes to criterion 'e' has led to an alteration of the effects description as set out above. This has not led to a change in overall IIA score.

3.4.10 Policy HN8: Gypsy and Traveller Sites

This policy has been amended to reflect the updated proposals on each site allocation. For allocation HN8-1, the proposed number of pitches has increased, and for allocation HN8-2, the number of proposals has decreased.

At Site HN8-1 Magazine Lane, Ewloe, the owners of the approved Gypsy site were concerned about the costs associated with an extension to the existing site. The Council was aware that the approved site was large, and that there was scope to make better use of the existing site. The owner's architect prepared a planning application showing an additional nine pitches could be secured within the existing site boundaries. This application is still under consideration by the Council. The benefits of the revised allocation may include:

- Make use of existing developed land and utilises existing infrastructure and services;
- Avoid the need to use further greenfield land; and
- Avoid the need to extend built development into green barrier.

In regard to Site HN8-2 Gwern Lane, Hope, it was identified that the extended family need, in terms of number of pitches, was not as great as originally determined. A planning application was submitted showing an additional four pitches, and this application is under consideration. This reduction in pitch numbers on the site will generate benefits in terms of the scale of the traveller site/ community, compared with the settled community as well as a lessened effect on landscape considerations.

Policy HN8: Gypsy and Traveller Sites			
Land is allocated in the following locations as shown on the proposals map to meet the identified needs of Gypsy and Travellers as detailed in the Flintshire Gypsy and Traveller Accommodation Assessment Update over the plan period:			
Ref.	Site Location	Type of Site	No. of Pitches
HN8-1	Magazine Lane, Ewloe (extension remodeling)	Permanent	6-8 9
HN8-2	Gwern Lane, Cae Estyn, Hope (extension)	Permanent	6-8 4
HN8-3	Riverside, Queensferry (extension)	Permanent	10
HN8-4	Castle Park Industrial Estate	Transit	6

Policy HN8 has not been assessed in its entirety, and the assessment of Site HN8-1 and HN8-2, which have been amended through the Matters Arising Changes process, are set out below.

HN8-1

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
4	Housing	+	Key reason	The proposed allocations would help to ensure that there is an adequate supply of Gypsy and Traveller accommodation in Flintshire. The amendment to the Ewloe allocation, increased 6-8 pitches to 9 pitches would have benefits in relation to meeting local accommodation needs, but would not alter the IIA score.	+	S-LT	L
6	Strong & cohesive communities	++	Key reason	Site would situate new residents adjacent to an existing gypsy and traveller community. The remodelling of the site, rather than extension, could help foster relationships between residents, furthering community cohesion.	++	S-LT	L
10	Biodiversity	-	Key reason	Given the site is currently greenfield, there could potentially be an adverse effect on biodiversity value on site. As the site is now proposed for remodelling rather than extension, the development would not result in a loss of greenfield. Remodelling would lead to an increase in capacity on site and would be expected to result in the loss of on-site green infrastructure. Existing structures could potentially be supporting priority species.	-	S-LT	L
11	Landscape / Townscape	-	Key reason	Given the site is currently greenfield, there could potentially be a minor adverse effect on the local landscape character. The site is now proposed for remodelling rather than an extension of an existing site, which would no longer lead to a loss of greenfield land. However, the remodelling of the site to increase capacity would lead to pitches being closer together and could still alter the existing landscape.	-	S-LT	L

Policy HN8-1	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	○	-	+	+	-	++	○	+	○	-	-	○	-	○	-	-	-	○
2021	○	-	+	+	-	++	○	+	○	-	-	○	-	○	-	-	-	○

HN8-2

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
4	Housing	+	Key reason	The proposed allocation would help to ensure that there is an adequate supply of Gypsy and Traveller accommodation in Flintshire. The amendments to this site allocation has decreased the proposed number of pitches to 4, which would weaken the effect of the allocation on this IIA Objective, however, would not alter the IIA score.	+	S-LT	L
6	Strong & cohesive communities	++	Key reason	Site would situate new residents adjacent to an existing gypsy and traveller community. By reducing the proposed new pitches from 6-8 to 4, there would be more space and the	++	S-LT	L

IIA Objective Topics		Score	Supporting Information		Residual Score	Timing	Uncertainty
				traveller site would be of a more suitable scale to facilitate community cohesion.			
11	Landscape / Townscape	-	Key reason	Given the site is currently greenfield, there could potentially be a minor adverse effect on the local landscape character. The amendment to reduce the proposed pitches from 6-8 to 4 would be likely to have benefits in terms of landscape, but as development would still be on greenfield land, adverse effects could still be likely.	-	S-LT	L
			Mitigation	The proposal should seek to incorporate existing and new GI elements into the site use as much as is realistic.			

Policy HN8-2	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	O	-	++	+	+	++	O	+	O	-	-	O	-	O	-	-	-	-	O
2021	O	-	++	+	+	++	O	+	O	-	-	O	-	O	-	-	-	-	O

Although the proposed number of pitches has altered for both sites HN8-1 and HN8-2, the majority of the scores for all IIA Objectives have not altered.

3.4.11 Policy HN9: Gypsy and Traveller Accommodation

Policy HN9 has been amended through the Matters Arising Changes process to reflect guidance in the Welsh Government Circular 005/2018 and emphasis the fact that development is preferred within or adjoining settlements. Open countryside locations will only be considered if settlement locations are exhausted or not suitable.

Policy HN9: Gypsy and Traveller Accommodation
<p>Proposals for new Gypsy and Traveller sites, or the extension of existing sites, including land outside of defined settlement limits will be permitted provided: will be preferred within settlements, or adjoining settlement boundaries where the resulting development would represent a logical extension to the settlement.</p> <p>Where there are no suitable locations within or adjacent to existing settlements, open countryside locations will then be considered. In all instances the proposal should satisfy the following criteria:</p> <ul style="list-style-type: none"> a. There is a clearly identified unmet need in accordance with the most recently undertaken Gypsy and Traveller Accommodation Assessment; b. There are no suitable alternative sites either with planning permission or allocated for such uses which could accommodate the need; a. The site is well related to suitable community facilities and services for the prospective occupants; b. The site is capable of being served by utilities including sustainable waste disposal and recovery and emergency services; c. The site affords satisfactory amenity standards both for its occupants and for neighbouring land uses; d. The site is not in an area at high risk of flooding given the particular vulnerability of caravans.

IIA Objective	Effects	Score	Effects and Recommendations
5. To improve sustainable access to basic goods, services and amenities for all groups	Score	++	Policy HN9 would be likely to have significant positive impacts on IIA Objective 5 as it requires new Gypsy and Traveller sites to be located with good access to main gypsy travelling routes as well as key services and facilities. It also seeks for development to be prioritised within or adjacent to existing settlements, where there are existing transport services.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
6. To build strong and cohesive communities	Score	+	Policy HN9 would help to ensure that new residential development provides satisfactory amenity standards for occupants and neighbours. As the policy seeks to direct new development within or adjacent to existing settlements in the first instance, new residents would be likely to be situated within existing communities, which could help to increase the potential for fostering community relationships.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy HN9	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	+	○	○	++	++	+	○	++	○	-	-	○	○	+	○	○	+	+
2021	+	○	○	++	++	+	○	++	○	-	-	○	○	+	○	○	+	+

The changes emphasise the hierarchy of new Gypsy and Traveller sites to be allocated within the County but would not be expected to lead to any material change to the policy. This is because the policy already required new Gypsy and Traveller sites to be located with good access to key services and facilities, which is likely to be found in existing settlements, and therefore positive effects were previously identified in relation to access and communities.

3.4.12 Policy EN6: Sites of Biodiversity and Geodiversity Importance

The first paragraph of Policy EN6 has been amended to provide greater clarity of the wording of the policy regarding international nature conservation designations. Reference to the requirement of a Habitats Regulations Assessment for a development proposal if likely significant effects on an internationally designated site is potential, has been removed. This has been replaced with the requirement for development not to lead to the potential for adverse effects on the integrity of sites of international nature conservation importance.

Policy EN6: Sites of Biodiversity and Geodiversity Importance
<p>Development likely to significantly affect any site of international importance, either alone or in combination with other plans or projects, will be subject to a Habitat Regulations Assessment (HRA). Development will only be permitted where it is possible to ascertain no adverse effect on the integrity of the Site or where there are Imperative Reasons of Overriding Public Interest and compensatory measures are secured.</p> <p>Development will not be permitted that would result in an adverse effect on the integrity of sites of international nature conservation importance. Proposals where adverse effects on site integrity cannot be ruled out would not be supported.</p> <p>Development likely to impact the special features of a Nationally Designated Site will only be granted in exceptional circumstances where appropriate compensation can be provided.</p> <p>Development proposals that would have a significant adverse effect on locally designated sites or site with other biodiversity and / or geological interest, including priority species, will only be permitted where:</p> <ol style="list-style-type: none"> it can be demonstrated that the need for the development outweighs the biodiversity or geological importance of the site; and it can be demonstrated that the development cannot reasonably be located elsewhere; and

Policy EN6: Sites of Biodiversity and Geodiversity Importance

- c. any unavoidable harm is minimised by effective mitigation to ensure that there is no reduction in the overall biodiversity value of the area. Where this is not feasible compensation measures designed to create, restore and enhance biodiversity must be provided.

Development that results in the restoration, enhancement and creation of habitats will be supported especially where this promotes the resilience of ecosystems.

IIA Objective	Effects	Score	Effects and Recommendations
10. To protect and enhance biodiversity and geodiversity	Score	++	EN6 would protect sites of biodiversity importance and prohibits developments that would result in a significant adverse effect to sites and species of national and international biodiversity importance. The amendments to the policy seek to emphasise that development proposals will not be supported if adverse effects on European sites are likely.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy EN6	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	○	○	+	○	+	○	○	○	○	++	+	++	○	○	○	○	○	○	○
2021	○	○	+	○	+	○	○	○	○	++	+	++	○	○	○	○	○	○	○

The amendments to this policy seek to ensure development will not be supported if there is the potential for adverse effects on sites of international nature conservation importance to occur. This protects European sites more than the previous policy wording, however, as the biodiversity objective was already identified as major positive, the score for this objective following the Matters Arising Changes has not altered.

3.4.13 Policy EN13: Renewable and Low Carbon Energy Development

Policy EN13 has been amended to no longer support renewable or low carbon energy generation proposals for over 10 MW. The changes to this policy reflect the approach set out in Future Wales: National Plan 2040, where any renewable to low carbon energy generation schemes above 10MW are no longer within the remit of the LPA but classed as a Development of National Significance. Reference to land allocated for solar PV at Crumps Yard, Connah's Quay and at Castle Park has also been removed from this policy as they have been built out. The number of Solar Indicative Search Areas has been reduced to reflect a landscape assessment of the larger number of areas identified in the Deposit LDP.

Policy EN13: Renewable and Low Carbon Energy Development

Renewable or low carbon energy generation development may be permitted for:

- ~~For large scale s~~Solar PV farms (**5 Less than 10 MW and above**) within the Solar Indicative Local Search Areas identified on the proposals map;
- ~~For~~ small scale and/or community based proposals (less than 5MW) for wind, solar, biomass, energy from waste, anaerobic digestion and hydropower in appropriate locations;

subject to satisfying the relevant policy tests below.

~~Land is specifically allocated for solar PV farms at Crumps Yard, Connah's Quay and at Castle Park, Flint, as shown on the proposals map.~~

All renewable or low carbon energy proposals will be permitted provided that:

- the development does not prejudice the purpose of the ILSAs to maximise opportunities for large scale solar PV development;

Policy EN13: Renewable and Low Carbon Energy Development

- ii. the siting, design, layout, type of installation and materials used do not have a significant adverse effect on the character and features of the proposed location;
- iii. there would not be unacceptable loss of public amenity or accessibility to the area;
- iv. the impact of the development upon agriculture, forestry, recreation and other land uses is minimised to permit existing uses to continue unhindered;
- v. there would be no individual or cumulative significant adverse effect on the landscape, particularly the AONB and its setting;
- vi. any associated ancillary buildings or structures are sensitively sited and designed to minimize their impact on the character and quality of the locality;
- vii. in sensitive areas where above ground connections will have an unacceptable adverse effect on the landscape, connection lines and pipes should be located underground;
- viii. adequate provision has been made in the scheme for the restoration and aftercare of the site on the cessation of use.

In the case of wind energy proposals:

- i. the turbines are appropriately designed so as to avoid, or mitigate against, unacceptable environmental impacts, including noise, light reflection and shadow flicker;
- ii. sufficient steps are taken to avoid or, where possible, to mitigate electro-magnetic interference to any existing transmitting or receiving systems.

Proposals on land not identified within the Indicative Local Search Areas may still be considered, dependent on the technology proposed, its scale, location, and degree of compliance with the above criteria, particularly where proposals would have a demonstrably positive community or economic benefit.

IIA Objective	Effects	Score	Effects and Recommendations
11. To conserve and enhance the County's landscape and townscape character and quality	Score	+	The policy has been amended to reflect the landscape assessment and therefore, the amended policy seeks to further protect the landscape character by reducing the size of renewable and low carbon energy generation developments that will be supported.
	Uncertainty	H	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
15. To protect and improve air quality and limit greenhouse gas emission	Score	++	Policy EN13 would be expected to make a major contribution towards an increase in locally generated and consumed renewable energy. This would help to lower the County's carbon footprint whilst also helping to improve air quality.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
16. To increase energy efficiency, require the use of renewable energy and sustainable building design	Score	++	Policy EN13 would be expected to make a major contribution towards an increase in locally generated and consumed renewable energy. This would help to lower the County's carbon footprint whilst also helping to improve air quality.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy EN13	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	++	++	0	0
2021	0	0	0	0	+	0	0	0	0	0	+	0	0	0	0	++	++	0	0

The changes to the policy through the Matters Arising Changes would remain similar in terms of energy efficiency and greenhouse gas emissions, as although the policy has been amended to remove renewable or low carbon energy generation schemes over 10 MW, these will still be delivered, but at a national level, in line with Welsh Government policy. These changes would therefore not alter the previously identified IIA scores for IIA Objectives 15 and 16. The policy has also been amended to take into consideration the findings of a

landscape assessment, and therefore, the updated policy seeks to further protect the landscape character from inappropriate development, and therefore, a minor positive effect has now been identified in relation to IIA Objective 11: Landscape.

3.4.14 Policy EN15: Water Resources

Policy EN15 has been updated to reflect ongoing work on a joint basis with Wrexham County Borough Council in relation to NRW advice relating to the impact from new development on Phosphorus Sensitive River Special Areas of Conservation¹⁷ and tighter phosphate targets¹⁸. The amended policy as set out below should be considered alongside the following documents:

- the Dee Catchment Phosphorous Reduction Strategy (DCPRS)¹⁹;
- a draft Statement of Common Ground with NRW²⁰;
- Habitats Regulations Assessment (HRA) Addendum²¹.

Policy EN15: Water Resources

Development affecting water resources will only be permitted if:

- a. it would not have a significant adverse impact on the capacity and flow of groundwater, surface water, or coastal water systems;
- b. it would not pose an unacceptable risk to the quality of groundwater, surface water, or coastal water;
- c. it would have access to adequate water supply, sewerage and sewage treatment facilities which either already exist, or will be provided in time to serve the development, without detriment to existing abstractions, water quality, fisheries, amenity or nature conservation; **and**
- d. **there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through the treatment of waste water.**

This can be achieved through implementation of mitigation measures and associated supplementary planning guidance. Mitigation will involve, either:

- 1. Delivery of measures specified in the Dee Catchment Phosphorus Reduction Strategy (DCPRS), which will require:**
 - i. Developer contributions/community infrastructure levy funds to deliver measures identified within the DCPRS to reduce phosphorus levels within the catchment.**
 - ii. Phasing of development to meet the delivery milestones within the DCPRS, and delaying development if milestones have not been met;**

OR

- 2. Using alternative mitigation approaches to those mentioned in 1. above. Where further evidence demonstrates that adverse effects on the integrity of the River Dee and Bala Lake SAC can be avoided using alternative mitigation, these must be agreed with the Council, in consultation with Natural Resources Wales.**

¹⁷ Available at: [Natural Resources Wales / Advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation](#) [Accessed: 23.11.21]

¹⁸ Available at: [Natural Resources Wales / Tighter phosphate targets change our view of the state of Welsh rivers](#) [Accessed: 23.11.21]

¹⁹ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/FCC/FCC031-Phosphate-Strategy.pdf> [Accessed: 24.11.21]

²⁰ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/SoCG/SOCG012-Statement-of-common-ground-NRW.pdf> [Accessed: 24.11.21]

²¹ Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/Examination-Library-Documents/FCC/FCC032-Habitat-Regulations-Assessment-HRA-Addendum.pdf> [Accessed: 24.11.21]

IIA Objective	Effects	Score	Effects and Recommendations
10. To protect and enhance biodiversity and geodiversity	Score	++	Policy EN15 would ensure that when considering the future hydrological impacts of new developments, special attention is given to the flows of existing water channels and their nature conservation value. The amendments to this policy seek to ensure no adverse effects on the integrity of the River Dee and Bala Lake SAC through the implementation of mitigation measures via compliance with the Dee Catchment Phosphorus Reduction Strategy. This would be likely to lead to significant positive effects as the measures set out in this strategy would help to reduce existing phosphate levels in the catchment.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	
13. To protect and enhance the quality of water features and resources	Score	++	EN15 would prohibit developments which would have a significantly adverse impact groundwater, surface water, or coastal water systems and directs developers to NRW. The amendments to the policy reference the mitigation measures set out in the Dee Catchment Phosphorus Reduction Strategy which would further protect and improve the quality of water features and resources.
	Uncertainty	M	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy EN15	IIA Objectives																	
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh
2019	○	○	○	○	○	○	○	○	○	+	○	○	++	○	○	○	+	○
2021	○	○	○	○	○	○	○	○	○	++	○	○	++	○	○	○	+	○

Policy EN15 has been amended to refer to the Dee Catchment Phosphorous Reduction Strategy (DCPRS). This will be the vehicle to deliver the strategic mitigation in the catchment that will be supported by subsequent local action plans for delivery. By including this in the policy text, the policy would be expected to lead to greater benefits in terms of protecting and enhancing water quality, in particular in relation to phosphate levels. However, as the policy is already identified as major positive regarding water resources, the IIA score has remained the same. In addition, the amendments to Policy EN15 would be expected to improve the effect of the policy regarding biodiversity, as the DCPRS would be expected to help reduce existing phosphate levels in the catchment which has the potential to harm sites of international importance. Therefore, the amended policy would be likely to have a significant positive effect in relation to IIA Objective 10: Biodiversity.

3.4.15 Policy EN23: Minerals Safeguarding

Policy EN23 has been amended to include reference to land safeguarded at the Mostyn Docks and Padeswood Cement Works.

Policy EN23: Minerals Safeguarding
<p>Non-mineral development within Mineral Safeguarding Areas as defined on the proposals map will only be permitted where it can be demonstrated that:</p> <ol style="list-style-type: none"> the mineral underlying the site does not merit extraction, or the need for the non-mineral development outweighs the need to protect the resource, or the mineral can be satisfactorily extracted prior to the non-mineral development, or the development is of a temporary nature or can be removed within the timescales within which the mineral is likely to be needed, and essential infrastructure that supports the supply of minerals including Mostyn Docks and Padeswood Cement Works, (as shown on the proposals maps), would not be compromised or would be provided elsewhere. <p>All applications for development, with the exception of householder applications, in these areas shall be supported by a Mineral Safeguarding Assessment.</p>

Policy EN23: Minerals Safeguarding

Proposals for non-mineral development on sites of 4ha or more, which are underlain by Category 1 sand and gravel shall be supported by a Prior Extraction Assessment.

IIA Objective	Effects	Score	Effects and Recommendations
17. To ensure sustainable use of natural resource	Score	+	Policy EN23 would help to protect important mineral resources in Flintshire being adversely impacted by other types of development. The amendments to this policy and supporting text now sets out land safeguarded at including Mostyn Docks and Padeswood Cement Works which could help to enhance sustainable mineral resource extraction in the County.
	Uncertainty	H	
	Duration	LT	
	Direct / Indirect	D	
	Reversible/Irreversible	R	

Policy EN23	IIA Objectives																		
	1 Crime	2 Education	3 Health	4 Housing	5 Access	6 Communities	7 Economy	8 Employment	9 Rural life	10 Biodiversity	11 Landscape	12 Heritage	13 Water	14 Flooding	15 Emissions	16 Energy	17 Resources	18 Welsh	
2019	O	O	O	+	O	+	+	+	O	O	O	O	O	O	O	O	O	+	O
2021	O	O	O	+	O	+	+	+	O	O	O	O	O	O	O	O	O	+	O

The supporting policy text has been amended through the Matters Arising Changes process and now states “Land is also safeguarded through this policy at two sites which have an important existing or potential role as minerals infrastructure. Padeswood Cement Works has an active rail link and has the potential to distribute minerals. Mostyn Docks has the potential to distribute minerals by either train and / or boat. Both sites have the potential to reduce the number of road based minerals journeys and are therefore safeguarded through the policy as transport hubs for minerals”.

The amendments to this policy further support sustainable mineral extraction within Flintshire but would not be expected to alter the previously identified IIA scores.

3.5 Reasonable Alternatives

Through the preparation of the LDP, the Council have considered a suite of Reasonable Alternatives in terms of:

- six housing growth options;
- five spatial options; and
- a number of site options.

The assessment of these options is set out in the Submission IIA Report and have been found to be sound by the Inspector during the Examination Hearings.

Amendments have been proposed during the Examination Hearings. Most of these changes have arisen from the agreement of Action Points at the end of each Hearing session. This discussion involved a recap of the points covered at that session and the changes/ further work required were recorded by Officers. Participants to the Examination hearing also had the opportunity to contribute. The Action Points were then agreed by the Inspector before they were published by the Council. At a session, the Inspector would have had the benefit of alternatives to:

- retain a site un-amended;
- retain a site amended; or
- delete a site.

Similarly, with policy wording changes, there would have been different options presented by the Council, the objectors, and sometimes, the Inspector. The Action Point would have reflected what the Inspector thought was the best fit. In a small number of cases, the Inspector went away and gave further thought to this and provided the Council with amended wording.

Many changes to policy wording have been triggered by the publication of the Planning Policy Wales Edition 11, and therefore, there are no reasonable alternatives to these changes, as any other options would not be in line with the latest Welsh Planning Policy.

The six employment sites have been removed from the LDP to reflect the lack of sufficient evidence to demonstrate that the effects of flooding can be acceptably managed on these allocations. Amendments have been made to the allocation at site STR3B to reflect the reduced employment area at Warren Hall. In relation to site STR3B, the Inspector had options before her:

- i) retain the allocation with the housing element;
- ii) retain the allocation with the housing element deleted; and
- iii) a variation of ii) where she replaced the housing element with an alternative housing site elsewhere. The Inspector chose option ii).

There are no further Reasonable Alternatives for the Council to consider to the IMACs as they were proposed by the Inspector. Alternatives to these proposed changes are not considered reasonable, as alternatives have the potential to result in the LDP being found to be unsound.

3.6 Cumulative effects

An important element of SA is the consideration of cumulative effects.

Cumulative effects arise, for instance, where several proposals each have insignificant effects but together have a significant effect, or where several individual effects of the proposal have a combined effect: and

Synergistic effects interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual effects.

Table 3-2 seeks to predict and evaluate the likely cumulative and synergistic effects of all policies and site allocations in the LDP in-combination.

Table 3-2: Cumulative and synergistic effects of the LDP (taking into account the Matters Arising Changes) in-combination

I/A Objective	Overall score	Description of effects
1 Crime	+	Development proposed in the LDP would be expected to make a major contribution towards reducing rates of homelessness, unemployment, poverty, deprivation and inequality. In so doing, it is likely that it would make a meaningful contribution towards combatting crime in Flintshire. Policies in the LDP seek to ensure that new development is also designed in a way that reduces the risk of crime, such as through high rates of natural surveillance. Much of the proposed development is situated on greenfield land in areas of relatively high crime rates. New development in these locations could potentially have the greatest impact in combatting crime rates, but at the same time could also introduce new targets of crime to the area.
2 Education	++	The LDP would be expected to situate the majority of new residents in locations where they have excellent access to education opportunities. The provision of new employment land would also help to improve opportunities for employment-based skills learning. In some locations it is likely that the capacity of education facilities would be expanded. This is tempered to some extent by a risk of the capacity of some schools being placed under additional pressure due to new development, although in line with LDP policies it is expected

IIA Objective	Overall score	Description of effects
		that new residential development will only take place when adequate local school capacity has been demonstrated.
3 Health	++	Policies in the LDP would be expected to provide a major contribution towards improving the physical and mental health and well-being of local people. The significant provision of homes and jobs would reduce local rates of homelessness, unemployment, poverty, deprivation and inequality with subsequent benefits to people's physical and mental health. Due to the location of site allocations, new and existing residents would be expected to have good access to health facilities, including hospitals and GP surgeries recreational, as well as exercise opportunities, social spaces and a diverse range of semi-natural habitats.
4 Housing	++	The LDP would be expected to help ensure that the growing and varied needs of Flintshire's diverse community are catered for over the Plan period.
5 Access	++	Strategic and development management policies would require proposals to demonstrate that site users of new developments have good accessibility via walking, cycling and public transport modes. The proposed site allocations are situated in locations which, for the most part, are within a short distance of key services and amenities including community buildings, recreational opportunities, employment areas and retail areas.
6 Communities	++	Strategic and development management policies would be likely to help ensure that the cohesiveness of communities across Flintshire is protected and enhanced. New development is predominantly directed towards areas of existing similar built form, with new residents likely to be living within an existing community and employment uses directed towards business or industrial areas. The capacity and quality of existing community facilities are protected whilst new community facilities have been allocated.
7 Economy	++	The LDP sets out strategic and development management policies that would be expected to help enhance the sustainability and diversity of Flintshire's economy by providing support and encouragement for particular types of businesses that are key to local economic growth. New employment sites allocated for certain uses, such as B2 office-use, would provide a boost to the local economy. Their location versus the location of new residential allocations helps to ensure that businesses and retail spaces have good access to customers and employees. It is likely that improvements to local educational attainment as well as Flintshire's digital infrastructure would also benefit the local economy.
8 Employment	++	The LDP allocates a range of employment sites, whilst also supporting and encouraging new employment development in existing business and industrial locations and would therefore be expected to ensure that local rates of unemployment decreases whilst people are afforded greater access to a broader range of high-quality jobs. Improved educational attainment would also improve the employability of Flintshire's residents.
9 Rural life	++	The distribution of new residential and employment development would be expected to help enhance the vitality of rural communities throughout Flintshire whilst not exceeding the capacity of these places to accommodate new development.
10 Biodiversity	-	Development management and strategic policies seek to ensure that biodiversity in Flintshire is protected and enhanced, including the wildlife found across the county and its overall ecological connectivity. It is expected that in many cases new development would avoid negative effects on biodiversity as a result of these policies, including the protection of European sites such as the River Dee and Bala Lake SAC. Where development has been proposed on brownfield sites there is the potential for development to realise a local net gain in biodiversity. However, the majority of new site allocations would result in the loss of significant quantities of greenfield land and would be likely to result in a loss of sensitive habitats or supporting habitats in some locations. In some areas of Flintshire it is likely that ecological connectivity would be diminished and there is a risk of habitats becoming cut off and isolated from the network.
11 Landscape	-	Strategic and development management policies seek to ensure that new development in Flintshire is of a high-quality and visually attractive design that respects the local character and is in-keeping with the local form. In some cases new development is potentially an opportunity to enhance the local character. However, the majority of new development would

IIA Objective	Overall score	Description of effects
		be on greenfield sites that results in the loss of open spaces and GI elements that play an important role in defining the local character. Whilst the development would be of a high-quality design, alternations and potentially negative impacts on the landscape character in rural settlements or edge of settlements throughout Flintshire cannot be ruled out. Site allocations are often adjacent to, or within, areas of similar built form and this may help to avoid or mitigate negative impacts in many cases.
12 Heritage	-	Development management and strategic policies in the LDP are designed to ensure that the rich cultural heritage of Flintshire is preserved and enhanced and that new development avoids or mitigates negative impacts as much as possible. This would largely be achieved through requiring development to be designed, laid out and positioned in a manner that respects the local setting. However, as with IIA Objective 11, negative impacts cannot be ruled out primarily due to the loss of open space and greenfield land that alters the views of and from heritage assets such as Listed Buildings.
13 Water	-	Development management and strategic policies in the LDP seek to ensure that new development in Flintshire is relatively water efficient whilst also avoiding negative impacts on natural waterbodies. It is likely that the overall efficiency of water management in Flintshire will improve over time. However, given the scale of development being pursued, a net increase in total water consumption in Flintshire is likely. Sites allocated for new development are often in rural locations within 100m of natural waterbodies or near the coastline. Development in these locations would make achieving water quality improvement targets more difficult due to the increased risk of contamination or pollution from surface waters as a result of greenfields (which provide natural water filtering services) being replaced with hard standing.
14 Flooding	-	Policies in the LPD seek to ensure that no new development in Flintshire increases the risk of flooding faced by local people and buildings. However, there are extensive flood risk areas in the county and it has not been possible to allocate all sites away from land at risk of flooding. The majority of allocated sites are currently greenfield and replacing permeable soils with hard standing could to some extent alter the characteristics of overland flow of surface waters. This would to some extent be avoided or mitigated by policies requiring proposals to incorporate sustainable drainage systems into development as well as the protection of green spaces in some areas, but an overall minor negative impact on this IIA Objective cannot be ruled out.
15 Air quality and GHGs	-	The LDP sets out various policies that would be likely to encourage higher rates of walking, cycling and public transport uptake. It also encourages more energy efficient buildings, improved access to electric vehicle charging infrastructure and increase generation of renewable energy. The LDP also allocates two new sites for solar farm developments. In addition, most new sites allocated for residential or employment development facilitate relatively efficient movements for local people with only short journeys required to access key services, amenities and employment areas. However, the scale of the development proposed in the LDP, including the significant growth in housing and employment development, would be expected to lead to a net increase in energy consumption and congestion in Flintshire that results in an overall minor negative impact on air quality and carbon emissions.
16 Energy	-	The LDP sets out various policies that would be likely to encourage higher rates of walking, cycling and public transport uptake. It also encourages more energy efficient buildings, improved access to electric vehicle charging infrastructure and increase generation of renewable energy. The LDP also allocates two new sites for solar farm developments. In addition, most new sites allocated for residential or employment development facilitate relatively efficient movements for local people with only short journeys required to access key services, amenities and employment areas. However, the scale of the development proposed in the LDP, including the significant growth in housing and employment development, would be expected to lead to a net increase in energy consumption and congestion in Flintshire that results in an overall minor negative impact on air quality and carbon emissions.
17 Natural resources	-	<p>The scale and distribution of development sought through the LDP would be expected to lead to a significant, permanent and irreversible net loss of soils throughout Flintshire. This would be mitigated to some extent by policies seeking to ensure that development makes a relatively efficient use of land, that valuable mineral areas are safeguarded, and that fields and open spare are protected as well as due to national policy that requires the best and most versatile agricultural soils to be protected from development.</p> <p>It is likely that the increase in local construction and the number of households and businesses would increase local rates of the consumption of materials and the amount of waste sent to landfill. Several development management policies would be expected to help enhance the efficiency of Flintshire's waste management system and could encourage higher rates of reduce, reuse and recycle, but are unlikely to entirely prevent an overall net increase in materials consumption and waste generation.</p>

IIA Objective	Overall score	Description of effects
18 Welsh language	+	A key Objective of the LDP is to protect and support the Welsh Language. This has been carried through to Policy STR4 on the Principles of Sustainable Development, Design and Placemaking i.e. new development must ensure that it supports and sustains the long-term well-being of the Welsh language. New sites allocated for development in the LDP, for the most part, would provide new residents with access to Welsh-language learning opportunities at schools. Some sites are within proximity to Welsh-only schools. New development is situated within a range of different rates of Welsh-speaking. Where the rate of Welsh-speaking is relatively high there could be a risk of new residents diluting these rates or, alternatively, it could be an effective means of situating large numbers of new residents within communities of high Welsh-speaking rates and thus encourage an even greater uptake. It is generally considered that no single community or settlement would be subject to development of a scale that could discernibly dilute rates of Welsh-speaking.

3.7 Recommendations

A wide range of recommendations were made in the Submission IIA alongside the assessments, as summarised in Table 3-3. The Council have supplied information on how these recommendations have been taken into account in the plan-making process.

No further recommendations have been suggested following the assessment of the Matters Arising Changes, as the amendments lead to improvements in terms to IIA effects.

Table 3-3: Summary of measures recommended for each IIA Objective in the Submission IIA Report and how these recommendations have been taken into account

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
1 Crime	Where development would be situated within areas of relatively high-crime rates, proposals should demonstrate that the design of the development incorporates measures for reducing the risk of crime and minimises opportunities for anti-social behaviour, such as by facilitating high rates of natural surveillance, providing safe and secure storage spaces for bicycles or providing a well-lit public realm.	Policy PC2 contains several criteria which will work towards achieving this through design measures. Policy PC3 requires in criteria f) 'create attractive, accessible and safe and healthy places with natural surveillance, visibility and sensitive lighting'. Para 12.67 of the explanation to policy EN18 recognises that there is balance between lighting in terms of safety and reducing crime and causing light pollution. PPW11 identifies in Figure 8 that 'community safety' is a key part of Good Design and specifies 'Ensuring attractive, safe public spaces / security through natural surveillance'. It is considered that the combined national and local policy context provides the basis for this to be achieved.
2 Education	Where new residential development would place pressure on the capacity of local schools, appropriate class-room capacity should be demonstrated prior to development being approved. Where necessary, contributions from developers towards the expansion of schools could be considered. All new residential development should enable and encourage walking and cycling and would ideally provide safe and convenient walking and cycling access to primary and secondary schools.	Policy STR6 sets out a clear requirement in criteria ii) for new development to mitigate the impacts on school capacity. This will be achieved through the existing SPG which is to be reviewed and updated following adoption of the Plan. Policy PC2 requires in criteria d. that new developments 'maximise sustainable travel choice by having safe and convenient access by foot, cycle, public transport and vehicles'. Policy PC5 reflects the transport hierarchy in PPW11, and has been further modified by the Inspector, by seeking to reduce reliance on the car by ensure sustainable means of travel. On larger scale housing developments

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
		consideration will be given to Safe Routes to Schools. It is not considered that the policies in the Plan need to specifically mention schools
3 Health	<p>New residential development proposals should demonstrate a provision of adequate space, outdoor amenity space and access to communal open-spaces as well as a diverse-range of natural habitats.</p> <p>All new residential development should enable and encourage walking and cycling and would ideally provide safe and convenient walking and cycling access to a nearby GP surgery.</p>	<p>Policy EN1 has been amended as part of the MACs to specify the provision of open space at the standard of 2.4ha per 1000 population. The policy will be supported by SPG. The policy should be read in conjunction with EN2 Green Infrastructure. Policies EN6 and EN7 also seek to bring about biodiversity enhancement or net benefit.</p> <p>Policies PC2, PC4PC5 and PC6 would all work towards the objective of accessibility on foot or by cycle. However, the geographical location of health facilities across the County is such that not all residential development can be within walking or cycling distance of a GP surgery.</p>
5 Access	<p>Some sites allocated for development run in close proximity to, or adjacent to, the PRoW network. At some sites the PRoW runs through the site perimeter. In such cases, development proposals should demonstrate that the capacity, function and quality of the PRoW is not diminished during the construction or operation phases of the proposed development.</p>	<p>Policies PC2, PC5, PC6 and EN2 work together in seeking to ensure green infrastructure incorporates where appropriate, pedestrian linkages and this could include existing PROW. Where this is considered to be an issue in the subsequent layout and design of a housing allocation, it has been referenced in the brief design guiding e.g. HN1.7.</p>
6 Strong & cohesive communities	<p>New residential development proposals should demonstrate that new residents would have appropriate access to community facilities. The development should provide appropriate levels of outdoor amenity space and communal areas that facilitate interactions and socialisation between members of the community.</p>	<p>The Plans allocations have been located in sustainable settlements which have appropriate provision of community facilities and services. Subsequent windfall proposals will be assessed in the context of policy STR2 which specifies the type and scale of housing development relative to different tiers in the settlement hierarchy.</p> <p>Policy PC3 will ensure the provision of appropriate space about dwellings and private amenity space whilst policy EN1 will ensure appropriate communal open space to enable community cohesion.</p>
8 Employment	<p>All new residential development should enable and encourage walking and cycling that would ideally provide safe and convenient walking and cycling access to key employment areas.</p>	<p>The Plans allocations have been made in sustainable locations which are well located in terms of proximity to employment and Active Travel proposals being pursued by the Council will seek to facilitate journeys to work by foot and cycle. However, it would be unreasonable to require that every single new dwelling in the County could access employment areas on foot or by cycle.</p>
9 Quality of life in rural areas	<p>Where new development takes place in rural locations it should be demonstrated that site-users would have good access to the internet.</p>	<p>Whilst this is a laudable and desired outcome for rural communities it is unclear how this can be positively influenced by the LDP alone. The MAC's have introduced a new policy in respect of telecommunications, and this would be supportive of appropriately sited and design telecommunications development. However, the funding for and timing of improved broadband in rural areas is not a matter within the remit of the Plan.</p>

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
10 Biodiversity	<p>Many of the new sites allocated for development are greenfield sites that could potentially be of a high biodiversity value or could be supporting priority and protected species and habitats. Appropriate ecological surveys should be conducted prior to development starting and, where appropriate, appropriate measures taken to ensure protected species are not adversely impacted.</p> <p>At sites containing existing green infrastructure and wildlife elements, such as hedgerows, mature trees or small ponds, including those delineating site perimeters, these should be preserved and protected from negative impacts caused by new development. Where the removal of trees, hedgerow or other habitat is necessary for development to proceed these should be replaced by similar wildlife features of a similar quantity, quality and composition nearby. This is not only to attempt to secure the protection and, preferably, enhancement of the site's biodiversity value but to preserve the connectivity of the wider ecological network and to prevent habitats being cut-off or isolated from the network.</p>	<p>The preparation of the Plan involved Cofnod (North Wales Environmental Information Service) undertaking a mapping exercise of all known biodiversity habitats / species against candidate sites. There is also no objection from NRW to the Plan's allocations. The majority of those allocations have been the subject of ecological surveys. Policies EN6 and EN7 provide the basis with which to assess subsequent development proposals and planning applications will be required to be accompanied by ecological surveys and strategies.</p>
11 Landscape / Townscape	<p>Where sites contain existing green infrastructure elements, such as trees or hedgerow, that make a meaningful contribution to the local character it has been recommended that these are preserved as much as possible and supported by the provision of additional GI elements.</p> <p>Development proposals should demonstrate that, when they are situated within or adjacent to existing communities, they respect the local character and if appropriate adopt vernacular architecture in order to preserve and preferably enhance the local townscape or landscape character.</p>	<p>Policy EN2 seeks to protect, maintain and enhance existing green infrastructure as well as create new green infrastructure, as part of new development proposals. Policy EN7 provides specific guidance in respect of trees, woodlands and hedgerows.</p> <p>Policy PC2 criteria a) seeks to ensure new development has regard to character and local distinctiveness.</p>
12 Heritage	<p>In some cases, site locations are relatively close, such as within 300m, of Scheduled Monuments (e.g. Bryn y Cwm, a large earthwork motte and partially surviving counterscarp bank) and it may therefore be appropriate to ensure that archaeological surveys of the site are completed prior to development taking place.</p> <p>Archaeological surveys could potentially be required to help ensure that below ground archaeology is not harmed as a result of the proposed Development.</p> <p>Design that accords with the existing local townscape and local sense of place, in addition to the incorporation of green infrastructure into Development, would be likely to help ensure that the impacts of new development on greenfield or brownfield sites on the setting as well as the views of and from and on the setting of heritage assets, such as Listed Buildings, are avoided or minimised.</p>	<p>Policy EN8 seeks to protect Scheduled Ancient Monuments and their settings. The HN1.4 Northop Rd Flint allocation can avoid harm to the setting of the SAM through the careful siting of built development in this part of the site.</p> <p>Clwyd Powys Archaeological Trust have been involved throughout the preparation of the plan and archaeological features can be addressed as part of the formulation of detailed development proposals and at the development management stage.</p>
13 Water resources	<p>Careful consideration should be given to the potential impacts of the proposed Development on the quality of the nearby waterbody. Dust or other contaminants entering the waterbody through surface runoff should be prevented and the local water table should remain unaltered by development.</p>	<p>Policy EN15 seeks to protect the water environment from harm and has been added to, to cover the phosphates issue. Policy EN18 also seeks to prevent harm as a result of pollution from new development.</p>
14 Flood risk	<p>Undertake a Flood Consequences Assessment for the Site and consider the need for SuDS in the drainage strategy.</p>	<p>A Strategic Flood Consequences Assessment has been undertaken to support the Plan and there are no objections from NRW. Policy EN15</p>

IIA Objective	Summary of Recommendations	How has the recommendation been taken into account?
	<p>The area of land at a High risk of surface water flooding is relatively small and in the south east corner of the Site. It is considered to be likely that with a careful layout of the proposed Development this area of the Site could be avoided.</p> <p>Where GI is within or delineates sites, it should be preserved. New GI provided within developments should seek to be positioned in a way that maximises its flood risk alleviation potential (where flood risk is present).</p>	<p>sets out guidance in respect of flood risk. At development management stage a further detailed FCA will be required to support development proposals. Policy EN2 provides guidance in respect of green infrastructure.</p>
15 Air quality & GHGs	<p>All new residential development should enable and encourage walking and cycling and would ideally provide safe and convenient walking and cycling access to key services, amenities and facilities.</p> <p>Low-emission vehicles should be encouraged during construction and site-use.</p> <p>New residential development could be encouraged to provide electric car charging infrastructure.</p>	<p>Policies PC2, PC4, PC5 and PC6 will all work together in encouraging walking and cycling as part of the accessibility of housing sites to local facilities and services.</p> <p>It is unclear how the Plan can stipulate what vehicles and machinery should be used during construction.</p> <p>PPW11 explains that Future Wales sets out the Welsh Government's requirements for the provision of electric vehicle charging points for non-residential development (10% of spaces to have charging points – as built into Policy PC5). However, there is no national policy either in PPW11 or in Future Wales requiring new housing to have charging points as standard. To include this in the policy would be going beyond national policy and introduce concerns from housebuilders about viability.</p>
16 Efficient & renewable energy	<p>It may be appropriate to use a Development Brief some of the larger site allocations.</p> <p>A Design and Access Statement is a Welsh Government requirement for most planning applications in Wales. This would include an explanation of sustainable design, proportionate to the scale and type of development proposed. This should include the likely energy consumption of the proposed Development during construction and operation and to identify and seek out opportunities for improving energy efficiency and employing low and zero carbon technologies.</p>	<p>The MACs have introduced a commitment in policy STR3B to prepare a SPG / development brief in respect of the Warren Hall Strategic Site. STR3A Northern Gateway is proceeding on the basis of the existing framework of planning permissions. Of the 11 allocated housing sites 3 are under construction, 3 have current planning applications and the majority have a preferred developer. Given that each site in policy HN1 has brief guidance, it is not considered necessary that every site has a development brief.</p>
17 Natural resources	<p>Promote the use of recycled/ reused materials in order to decrease the demand on raw materials during construction and provide on-site waste separation facilities wherever possible. Promote sustainable management soils during construction and re-use excavated soils where feasible.</p>	<p>Policy STR15 provides strategic guidance in respect of waste management and reflects the waste hierarchy in PPW11. Policy STR16 also references maximising the use of secondary and recycled aggregates. Policy EN19 requires new development to demonstrate how waste is managed sustainably.</p>

3.8 Summary of the HRA

Separate to the IIA, an HRA of the LDP has also been carried out to determine if any policies or site allocations in the LDP, whether alone or when considered cumulatively, could potentially result in a likely significant effect (LSE) on a European site. The HRA Addendum also took into consideration the Matters Arising Changes. All other MACs not relating to water quality with regards to Phosphate levels in the River Dee were screened out.

In respect of the potential effects from discharge of wastewater on the River Dee and Bala Lake SAC, following Appropriate Assessment, and taking account of the proposed additional mitigation provided by policy EN15, and demonstrated within the DCPRS, it can be concluded that all policies will have no adverse effect

on the integrity of the SAC. Policy EN15, as amended, and the delivery of mitigation through the DCPRS, can be relied upon to avoid adverse effects to site integrity as a result of the discharge of wastewater.

3.9 Integrated Assessments

Equalities

During the assessments of strategic options, policies and site allocations the consideration of impacts on equality has been factored into a range of IIA Objectives, particularly those related to health, communities and safety. The assessments have identified, where appropriate, potential impacts on people with characteristics protected under the Equalities Act in Flintshire's community.

Policies and site allocations in the LDP would be expected to make a meaningful contribution towards advancing the equality of opportunity for people in Flintshire, with those most in need likely to have greater access to a broader range of high-quality jobs as well as key services and amenities. The LDP directs new residential development towards existing communities in a manner that could help to foster more diverse and integrated communities without exceeding the capacity of these communities for accommodating new development and, in so doing, this would help to foster good relations between people who share protected characteristics as well as those who do not. Enhancements to walking and cycling routes as well as public transport would be expected to benefit those with protected characteristics and those without.

Health

Health has been considered throughout the IIA process, with the effect on health for the proposed development and policies have been assessed primarily through IIA Objective 3 but linking to a range of Objectives when considering the effect on air quality, communities, and crime. The assessments have identified, where appropriate, potential impacts on human health, with particular focus on physical health and mental well-being, but also taking into consideration health inequalities.

The proposals set out in the LDP would be result in improvements in health of the population of Flintshire, encouraging active travel and promoting mental well-being. The LDP direct new development towards existing communities to help encourage walking and cycling to services, including GP services. Being in close proximity to services helps to improve local air quality as well, which can be detrimental to health. The LDP seeks to enhance the sense of community in settlements, which can facilitate positive relationships. I

The Rapid Participatory Health Impact Assessment Workshop on the Flintshire LDP Final Report was prepared in December 2019²². This document reports on the outcome and recommendations of the rapid participatory HIA workshop on the LDP held in December 2019 by Public Health Wales. The rapid participatory workshop was part of the overall consultation process to consider and include professionals' views on the potential impacts of the plan on Health and Well-being of the population in Flintshire. The HIA workshop enabled attendees to gain further insight and a greater understanding of the LDP and the HIA process that has supported the LDP development.

²² Available at: <https://www.flintshire.gov.uk/en/PDFFiles/Planning/2019-12-20-Flintshire-HIA.pdf> [Accessed: 24.11.21]

4 Monitoring

The proposed Monitoring Framework will be developed to measure the performance of the plan against changes in defined indicators that are linked to its implementation. These indicators have been developed based on the following:

- The objectives, targets and indicators that were developed for the IIA Framework;
- Features of the baseline that will indicate the effects of the plan;
- The likely significant effects that were identified during the assessment; and
- The mitigation measures that were proposed to offset or reduce significant adverse effects.

The Monitoring Framework will be designed to focus mainly on significant sustainability effects including those:

- That indicate a likely breach of international, national or local legislation, recognised guidelines or standards.
- That may give rise to irreversible damage, with a view to identifying trends before such damage is caused.
- Where there was uncertainty in the IIA, and where monitoring would enable preventative or mitigation measures to be taken.

As well as measuring specific indicators linked to the implementation of the plan, contextual monitoring of social, environmental and economic change has been included i.e. a regular review of baseline conditions in the County. This enables the measurement of the overall effects of the LDP.

There are numerous IIA indicators available and it is not always possible to identify how a specific plan has impacted a receptor, for example housing provision is likely to be influenced by a number of actions and different plans. A thorough analysis of the data collated, and the emerging trends will, therefore, be important.

A fundamental aspect of developing the monitoring strategy is to link with existing monitoring programmes and to prevent duplication of other monitoring work that is already being undertaken. Flintshire will need to consider how their Annual Performance Report can be used for this purpose.

The Monitoring Framework has been re-considered following the incorporation of the Matters Arising Changes, however, no significant changes have been made.

Table 4-1: Proposed Monitoring Framework

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency
1. To reduce crime, disorder and fear of crime	Positive effects on crime reduction. Uncertain effects on fear of crime.	<ol style="list-style-type: none"> 1. Number and distribution of wards with LSOAs in the bottom 10% most deprived for crime deprivation, targeting a reduction in those living in the bottom 10%; 2. Crime rates per 1,000 of the population for key offences, targeting a reduction; and 3. % rating of residents who perceived their quality of life has worsened due to crime, targeting a reduction. 	Development management, FCC	Every three years
2. To improve levels of educational attainment for all age groups and all sectors of society	Good access to education for new residents. Some schools could be rendered over-capacity as a result of the LDP.	<ol style="list-style-type: none"> 1. Percentage of population with no qualifications; 2. Percentage of population with NVQ2 and above qualifications. 	Office for National Statistics data on labour market	Annual
3. To improve physical and mental health and well-being for all and reduce health inequalities	Good access to health services Some health services potentially rendered over-capacity	<ol style="list-style-type: none"> 1. Number of wards in the bottom 10% for health deprivation, seeking a reduction; 2. Percentage of people classified as being in good or very good health, targeting an increase; 3. Percentage of people participating in regular sport or exercise, targeting an increase; and 4. Number of GP surgeries in the County with surplus capacity, seeking to ensure there is enough capacity to satisfy local needs. 	Index of Multiple Deprivation Well-Being Assessment Area Profiles Development management, FCC	Every three years
4. To provide access to good quality, affordable housing that meets the needs and requirements of the community	LDP will satisfy the housing needs of the entire community	<ol style="list-style-type: none"> 1. Percentage of households prevented from becoming homeless 2. Housing supply in relation to housing need 3. Number of affordable homes 	Development management, FCC	Annual
5. To improve sustainable access to basic goods, services and amenities for all groups	Some new residents will be likely to have relatively high reliance on personal car use	<ol style="list-style-type: none"> 1. Journey to work by mode i.e. % of those opting to walk, cycle, bus or train to work, targeting a consistent increase in sustainable transport modes; 2. Average distances travelled to work; and 3. Distance travelled to work, seeking to ensure residents are typically within a few kilometres of their place of work. 	Office for National Statistics data on labour market	Every three years
6. To build strong and cohesive communities	The LDP will ensure new residents are situated within existing communities	<ol style="list-style-type: none"> 1. Percentage of people who feel that their local area is a place where people from different backgrounds can get on well together; 2. Support provide for those who feel lonely and isolated; 3. % residents living in dangerously low air quality. 	Development management, FCC	Every three years

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency
	The LDP may situate new residents in proximity to air, noise and light pollutants, which should be avoided and monitored		North Wales Combined Authority Annual Air Quality Progress Report	
7. To promote a sustainable economy, business development and investment	The LDP will enable sustainable economic growth	<ol style="list-style-type: none"> 1. Gross Value Added per head, seeking an increase; 2. Value Added Tax, seeking an increase; and 3. Economic activity rate, seeking an increase. 	Development management, FCC	Every three years
8. To provide employment opportunities across the County and promote economic inclusion	The LDP would help to facilitate growth in local employment opportunities	<ol style="list-style-type: none"> 1. Number of LSOAs in bottom 10% employment deprived; 2. Percentage of 16-64-year olds unemployed; 3. Proportion of businesses in Flintshire hiring locally; 4. Employment in different sectors, seeking to ensure a varied mix; 5. Number of LSOAs in bottom 10% for income deprivation. 	Index of Multiple Deprivation Office for National Statistics data on labour market	Every three years
10. To protect and enhance biodiversity and geodiversity	The LDP could have adverse effects on biodiversity in some locations.	<ol style="list-style-type: none"> 1. Number of development schemes which adopt biodiversity enhancement measures; 2. Total tree canopy in the County, targeting a net increase; 3. Condition of SSSIs in the County. 	Development management, FCC NRW SSSI survey results	Every three years
11. To conserve and enhance the County's landscape and townscape character and quality	The LDP could have adverse effects on landscape in some locations.	<ol style="list-style-type: none"> 1. Amount of development in the countryside; and 2. Development within, adjacent to or viewable from the AONB. 	Development management, FCC	Every three years
12. To protect and enhance the cultural heritage assets	The LDP could have adverse effects on the historic environment in some locations.	<ol style="list-style-type: none"> 1. Proportion of new development that adopts avoidance or mitigation measures in relation to heritage assets 2. Number of Listed Buildings, on the at-risk register, seeking a reduction. 	Development management, FCC	Every three years
13. To protect and enhance the quality of water features and resources	The LDP could pose a risk to the quality of water in natural waterbodies in some locations. The LDP would result in a net increase in water consumption.	<ol style="list-style-type: none"> 1. Amount of new development each year that requires a consent to be built in proximity to the Dee 2. Water resource availability as per Water Resource Management Plans (every 5 years). 	Development management, FCC	Annual

IIA Objective	Effect to be monitored	Indicators	Source of data	Frequency
14. To reduce the risk of flooding	The LDP would expose a limited number of residents and businesses to surface water and fluvial flood risk.	<ol style="list-style-type: none"> 1. Percentage of development with SuDS 2. Number of applications permitted contrary to NRW advice on flooding. 	Development management, FCC	Annual
15. To protect and improve air quality and limit greenhouse gas emissions	The LDP would be expected to result in a net increase in GHG emissions and air pollution	<ol style="list-style-type: none"> 1. Total and proportion of CO₂ emissions from the transport sector 	UK local authority and regional carbon dioxide emissions national statistics: 2005 - 2016	Annual
16. To increase energy efficiency, require the use of renewable energy and sustainable building design	The LDP would be expected to result in a net increase in energy consumption	<ol style="list-style-type: none"> 1. Average annual fuel bill for residents; 2. Number of renewable energy projects permitted in the County; and 	Development management, FCC	Annual
17. To ensure sustainable use of natural resources	The LDP would be expected to result in a net loss of agriculturally and ecologically valuable soils	<ol style="list-style-type: none"> 1. % of development that takes place on best and most versatile (ALC) land; 2. Percentage of land remediated, as a proportion of total contaminated land in the County; and 3. % of new developments that incorporate waste management facilities. 	Development management, FCC	Annual
18. To encourage the protection and promotion of the Welsh Language	The LDP could risk diluting rates of Welsh speaking in sensitive areas	<ol style="list-style-type: none"> 1. % increase in the number of Welsh speakers in the County; 2. CIL or S106 Agreement contributions from large developments in areas where there is a high percentage of Welsh speakers in the Ward – for lessons or community activities in Welsh or Education. 	Development management, FCC	Every three years

5 Conclusions

5.1 Summary of Matters Arising Changes

This IIA Addendum has provided further clarity on how the IIA process which has been carried out alongside the preparation of the LDP has satisfied the requirements of SEA, SA, EqIA and HIA, and has made a meaningful contribution towards informing the plan-making process.

The matters Arising Changes have primarily been procedural changes to take into consideration Planning Policy Wales Edition 11. Amendments to the LDP also seek to provide further clarity to policies and reduce repetition. Other amendments include change to policy wordings, explanatory text and proposals maps which are considered necessary to demonstrate soundness of the LDP. The Matters Arising Changes include the deletion of six employment sites and amendments to the proposed development at Site STR3B, which includes the removal of the previously proposed 300 homes

The amendments to the policies have primarily lead to positive improvements in relation to the IIA Objectives, even if the IIA Objective score did result in an improvement to the previously identified IIA score. Overall, the Matters Arising Changes have resulted in greater benefits, even though the overall cumulative effects have not altered.

5.2 Next Steps

Once the LDP has been adopted, an IIA Post Adoption Statement will be published. This statement will provide information on how the sustainability considerations have been incorporated into the LDP, how the SA consultation representations have been taken into account and an outline of the reasons for choosing the LDP as it has been adopted.

Appendix A

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
Contents				
MAC 001	Contents Section 4	Remove Section 4 and re-number subsequent Section numbers. Amend subsequent paragraph references throughout the Plan accordingly.	Part of relocation of Section 4 of written statement	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 002	Appendices	Add a new appendix as section 16 ' Appendix 3 - Housing Tables '.	To reflect the incorporation of housing tables in written statement as per DPM3.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 003	Appendices	Add a new appendix as section 17 ' Appendix 4 – Housing Sub Market Area Maps '.	To reflect the incorporation of Housing Sub Market Area maps in the written statement.	No further IIA considerations required - change is minor and would not alter IIA findings.
1. Policy Index				
MAC 004	Policy Index	Amend EN11 Green Barriers to 'EN11 Green Wedges '	Conformity with PPW11	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 005	Policy Index	Amend 'STR3 Strategic Sites' into two separate policies as follows: <ul style="list-style-type: none"> STR3A Strategic Site: Northern Gateway STR3B Strategic Site: Warren Hall 	To have a distinct policy for each site	Further IIA consideration required - see

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
				sections 3.3.3 and 3.3.4.
How to Use / Navigate and Interpret the Deposit Plan				
MAC 006	3.21	Amend 7 th bullet point from 'Green Barriers' to 'Green Wedges '	Conformity with PPW11	No further IIA considerations required - change is minor and would not alter IIA findings.
Strategic Context				
MAC 007	3.25 c. Local Context	Following para 3.25, at the end of the 3 rd bullet point under c) 'Local Context' which relates to ' <i>The Deeside Plan (2017)</i> ' add the following text ' <i>The Deeside Plan provides an overarching framework to guide actions over the next thirty years and pulls together a wide variety of objectives, plans and strategies grouped according to the key themes of economic growth, transport, housing, skills and employment and the environment.</i> '	To provide further detail on the Deeside Plan.	No further IIA considerations required - change is minor and would not alter IIA findings.
Key Issues and Drivers for Change				
MAC 008	3.30 Table	In 11 th point replace 'green barriers' with 'green wedges '	Conformity with PPW11	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 009	3.35	In the table following para 3.35 replace 'In Flintshire, we need to plan for' with ' Planning Challenges '.	To add clarity to the purpose of the table	No further IIA considerations required - change is minor and would not alter IIA findings.
Forming the Plan's Strategy from This Context				
MAC	3.38	Amend the LDP Vision in para 3.38 by replacing 'balance which provides for' with ' balance between '. Include 'and natural environment' after 'heritage'.	To improve the clarity of the Plan Vision.	No further IIA considerations

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
010		The vision reads as follows: “The LDP is about people and places. It seeks to achieve a sustainable and lasting balance which provides for balance between the economic, social, and environmental needs of Flintshire and its residents, through realising its unique position as a regional gateway and area for economic investment, whilst protecting its strong historic and cultural heritage and natural environment ”.		required - change is minor and would not alter IIA findings.
MAC 011	3.41	In Objective 10 following para 3.41 replace ‘Redefine’ with ‘ Repurpose ’. The revised Objective reads ‘ Repurpose the role and function of Flintshire’s town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport.’	To reflect the wording used in the Welsh Government publication ‘Building Better Places’.	Further IIA consideration required - see section 3.2.
MAC 012	3.41	In Objective 11 following para 3.41 add ‘ full ’ before ‘range of housing needs’. The revised Objective reads ‘Ensuring that Flintshire has the right amount, size, and type of new housing to support economic development and to meet a full range of housing needs’	To ensure that the Plan has the objective of meeting a full range of housing needs.	
MAC 013	3.41	In Objective 13 following para 3.41 delete the words ‘and enhance’. The revised Objective reads ‘Promote and enhance a diverse and sustainable rural economy’	To add clarity to the wording and scope of the Objective.	
The Preferred Strategy				
MAC 014	3.64	Amend the section heading prior to para 3.64 by deleting ‘Preferred’ and in the opening wording of para 3.64 delete ‘Preferred’. The revised title is ‘The Preferred Strategy’ The revised opening wording of 3.64 is ‘The Plan’s Preferred Strategy...’	To more clearly explain that this section of the Plan relates to the actual Plan Strategy.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 015	3.65	Add the title ‘ Key elements of LDP Strategy ’ after paragraph 3.65, before the table.	In order to provide a heading for the table.	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 016	3.65 Table	<p>Update the Housing Growth section as follows:</p> <ul style="list-style-type: none"> Ensuring a housing land supply to provide for 7,950 7870 dwellings to meet an LDP housing requirement of 6,950 dwellings This equates to an average build rate of 463 dwellings per annum over the Plan period. In comparison, the average annual build rate over the last 10 years has been 420 427, and 573 over the last 5 years. Completions in the first three five years of the Plan period have averaged 563 521 (4,694 2609 in total), showing that the Plan is on track in terms of enabling delivery. There is capacity for a further 4774 1221 dwellings on sites with planning permission (commitments) which are either under construction or expected to be delivered within 5 years the Plan period.. Whilst the residual requirement for new sites is 879 855 the Plan has allocated 4874 1775 dwellings on sustainable new sites, providing as a consequence for an overall flexibility of 44.4% 13.2%. This is a generous over-provision and will help ensure the overall deliverability of the Plan's housing requirement 	To reflect updates to Housing Balance Sheet and other Housing Tables.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 017	3.65 Table	<p>In the 2nd bullet point of the spatial strategy section, amend the last sentence as follows: 'The Plan's aim of a 15% 13% flexibility allowance will also help balance this strategic commitment.'</p>	To reflect the updated Housing Balance Sheet.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 018	3.65 Table	In the 'Managing Growth' section replace 'Green barriers (wedges)' with ' Green Wedges '.	Conformity with PPW11	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 019	3.72	<p>Add the following new paragraphs after paragraph 3.72 and re-number subsequent paragraph:</p> <p>'PPW11 highlights that 'the built and natural environment is a key determinant of health and well-being' (para 3.19). The LDP is important to the health and well-being of Flintshire's residents as it directly shapes the natural and built environment which subsequently influences the social, economic, environmental and cultural factors which impact on health and well-being. The LDP seeks to promote sustainable development which enhances the health and well-being of Flintshire's residents through the creation of new employment opportunities, affordable housing options and the provision of high quality open spaces and green infrastructure. All of these elements combined can positively influence the health and well-being of communities. The LDP will achieve this by ensuring that the right type of developments take place in the most sustainable locations with the necessary infrastructure in place to support the new and existing</p>	To explain how the LDP is important to health and well-being.	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>community. In addition to this, the LDP can protect communities from inappropriate developments that would have a detrimental impact upon the health and well-being of residents.</p> <p>As part of the process of preparing the LDP a Health Impact Assessment (HIA) has been carried out in partnership with Betsi Cadwaladr Public Health Team. A HIA is not a statutory part of plan preparation but can have a positive effect in shaping the strategy and policies within an LDP which reduce health inequalities. The purpose of the HIA is to consult with health and planning professionals on the potential wider impact of the LDP on the health and well-being of Flintshire's population. The HIA process highlighted the importance of the LDP in protecting and promoting the health and well-being of Flintshire's residents and identified areas where the plan can ensure that this is maximized. Overall the HIA highlighted that the promotion of active travel and the accessibility of new development have a significant impact upon health and well-being, in addition the integration of existing communities and the provision of key infrastructure such as education and health centres should also be given very careful consideration. The requirements of Gypsies and Travellers was also identified as a key area for attention that could impact upon health and well-being'.</p>		
MAC 020	3.73	<p>In para 3.73 delete 'Preferred'.</p> <p>The revised wording is 'The Key Diagram below helps to demonstrate the Council's Preferred Strategy'.</p>	To more clearly explain that this section of the Plan relates to the actual Plan Strategy.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 021	3.73	Add the title ' The Plan Strategy ' to the diagram following para 3.73 on page 36.	To provide a heading for the diagram.	No further IIA considerations required - change is minor and would not alter IIA findings.
4. Strategic Policies				
MAC 022	Para 4.1 / 4.2	Move paras 4.1 and 4.2 to the beginning of section 5 with a heading 'Introduction – Strategic Policies' to provide a general introduction before each of the 4 groups of strategic policies.	Part of relocation of Section 4 of written statement	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 023	Para 4.3 to 4.7	Move paras 4.3 to 4.7 to the end of section 3 with a new heading 'Well-being and Ways of Working'	Part of relocation of Section 4 of written statement	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 024	Para 4.4	<p>Include the following new paragraph after para 4.4:</p> <p>'In preparing the Plan the Council has had regard to the Ways of Working and each is considered in turn:</p> <ul style="list-style-type: none"> • Collaboration – throughout the Plan’s preparation the Council has collaborated with a wide variety of stakeholders particularly through the Key Stakeholder Forum who have a shared responsibility and intention to help meet well-being objectives. The Council has worked in a collaborative manner in terms of establishing joint evidence bases (Employment Land Review and Local Housing Market Assessment) and more recently establishing a common approach to viability assessment. Flintshire also provides a Minerals and Waste planning service to North Wales authorities. • Prevention – The Plan has had regard to existing problems and sought to prevent new problems from occurring whether in respect of the economy, the environment, infrastructure and people’s health and well-being. The Plans framework of policies and proposals provide the basis with which to achieve the Well-being goals. • Involvement – In addition to the Key Stakeholder Forum, the Council have also sought to involve a large number of local and specific interest groups, as identified in the appendices to the Delivery Agreement. As the Plan has progressed the emphasis changed from engagement to participation, as explained in detail in the Consultation Report. The additional engagement exercise which comprised the Key Messages document was intended to ensure a firm basis with which to shape the plan’s vision, issues and objectives which acted as a platform for formation of strategic options. The Council has also worked with groups such as Flintshire 50+ Action Group, Flintshire Youth Forum, Public Health Wales and the Gypsy and Traveller Community, amongst others. Town and Community Councils have been closely involved throughout all stages of Plan preparing. This ongoing process of engagement has helped inform and refine the Plan as it has progressed, as explained in the Consultation Report. • Long term – Although the Plan is directly concerned with planning for the present Plan period, its preparation has regard to the long term in ensuring that patterns of development are both sustainable and resilient in the long term. • Integration – The preparation of the Plan has sought to draw upon a large number and variety of guidance, plans and strategies at the international, national and local levels, including the Council’s Well-being Plan. The Plan’s strategy, policy and proposals are considered to sit comfortably within this wider context. For instance, each of the strategic policies is referenced to the well-being goals. The preparation of the Plan has been the subject of a continuous 	To explain how the Council had regard to the 5 Ways of Working as part of the preparation of the Plan.	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		process of independent assessment through the Integrated Impact Assessment which itself was re-scoped in order to ensure it incorporated and worked towards achieving the Well-being goals and Ways of Working’.		
5. Strategic Policies – Creating Sustainable Places and Communities				
MAC 025	5.1	Amend the ‘Introduction’ heading prior to para 5.1 to ‘Introduction – Creating Sustainable Places and Communities’	Part of relocation of Section 4 of written statement	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 026	STR1	In criteria ii amend 139.67 hectares to 124.97 hectares	To reflect deletions of employment allocations and reduced amount at Warren Hall	Further IIA consideration required - see section 3.3.1.
MAC 027	STR1	In criteria iii amend ‘7,950’ to 7,870	To update the Plans total provision of housing to reflect changes to the Housing Balance Sheet (01/04/20) base date and deletion of housing at Warren Hall.	
MAC 028	STR1	In criteria iii add at end of present wording ‘ of which 2265 will be affordable ’.	To include the Plan’s affordable housing target, having regard to deletion of housing at Warren Hall.	
MAC 029	STR2	In policy STR2 make the following changes: <ul style="list-style-type: none"> In criteria a) regarding Tier 1 settlements add a new criteria ‘iv. Exceptions Schemes for affordable housing adjoining settlement boundaries’ 	To enable exceptions housing schemes on the edge of Tier 1	Further IIA consideration

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<ul style="list-style-type: none"> • In criteria b iv, c iv and d ii delete the word ‘small scale’ <p>The revised policy wording is as follows:</p> <p>STR2: The Location of Development</p> <p>New development will be directed to the following locations:</p> <ul style="list-style-type: none"> i. Allocated Sites; ii. Principal Employment Areas as detailed in policy PE2; iii. Sustainable settlements based on the first three tiers of the settlement hierarchy, as detailed in the attached table: <p>a. Tier 1 - Main Service Centres will be the main locations for new housing development which reinforces and contributes to sustainable settlements. Provision will include:</p> <ul style="list-style-type: none"> i. Allocations ii. Windfall market housing iii. Affordable housing on sites above an area / units threshold iv. Exception schemes for affordable housing adjoining settlement boundaries <p>b. Tier 2 - Local Service Centres will be the locations for more modest levels of new housing development. Provision will include:</p> <ul style="list-style-type: none"> i. Allocations ii. Windfall market housing iii. Affordable housing on sites above an area / units threshold iv. Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries <p>c. Tier 3 - Sustainable Settlements will be the locations for housing development related to the scale, character and role of the settlement.</p> <p>Provision will include:</p> <ul style="list-style-type: none"> i. Allocations ii. Windfall market housing iii. Affordable housing on sites above an area / units threshold iv. Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries <p>d. In Tier 4 Defined Villages housing development will only be permitted within settlement boundaries related to the scale, character and role of the settlement and which delivers local needs affordable housing.</p> <p>Provision will include:</p> <ul style="list-style-type: none"> i. Windfall market housing (only permitted when essential to delivering affordable housing) ii. Small Scale Exceptions Schemes for Affordable Housing adjoining settlement boundaries 	<p>settlements and to ensure consistency with policy HN4-D.</p>	<p>required - see section 3.3.2.</p>

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments																																																														
		e. In Tier 5 Undefined villages housing development will be limited to sensitive small scale housing development in the form of infill or rounding off where local needs affordable housing only is provided.																																																																
MAC 030	STR2 5.13	<p>Insert DPM Table 16 (Background Paper 10A – Table 4A) as part of explanation to policy STR2.</p> <ul style="list-style-type: none"> Reword the last two sentences of para 5.13 as follows: ‘The Preferred Strategy detailed a broad brush distribution of housing, based on the settlement and spatial strategy, and is set out below. This compares well with the actual apportionment of growth in the Deposit Plan and in the adopted Plan as set out in the first table below, taking into account completions during the first three years of the LDP period, commitments as at April 2018, the housing allocations and anticipated windfalls. A more detailed breakdown is set out in the Housing Land Supply Background Paper. The second table below , in line with the Development Plans Manual 3, shows a more detailed spatial breakdown of supply.’ Amend the table by adding a third column ‘Adopted Plan’ with figures of Tier 1 – 47%, Tier 2 35%, Tier 3 – 15%, Tier 4 – 2%, Tier 5 – 1%’ Add a further table below the above table to give a detailed breakdown: <p>Summary of Spatial Distribution of Housing as at 1.4.20</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">Components of Housing Supply</th> <th colspan="6">Settlement Hierarchy</th> </tr> <tr> <th>Tier 1</th> <th>Tier 2</th> <th>Tier 3</th> <th>Tier 4</th> <th>Tier 5</th> <th>Totals</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Total completions (small & large)</td> <td>1489</td> <td>579</td> <td>433</td> <td>67</td> <td>41</td> <td>2609</td> </tr> <tr> <td>B</td> <td>*Units under construction</td> <td>162</td> <td>71</td> <td>19</td> <td>2</td> <td>0</td> <td>**254</td> </tr> <tr> <td>C</td> <td>*Units with Planning permission</td> <td>535</td> <td>108</td> <td>255</td> <td>43</td> <td>26</td> <td>967</td> </tr> <tr> <td>D</td> <td>New Housing Allocations</td> <td>863</td> <td>1851</td> <td>246</td> <td>0</td> <td>0</td> <td>2960</td> </tr> <tr> <td>E</td> <td>Windfall sites (large & small)</td> <td>702</td> <td>173</td> <td>173</td> <td>21</td> <td>11</td> <td>1080</td> </tr> <tr> <td>F</td> <td>Total Housing Provision</td> <td>3751</td> <td>2782</td> <td>1126</td> <td>133</td> <td>78</td> <td>7870</td> </tr> </tbody> </table> <p>* Relates to large sites of 10 or more units only ** Excludes units under construction on Allocated sites (which are included in the row D figures)</p>		Components of Housing Supply	Settlement Hierarchy						Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Totals	A	Total completions (small & large)	1489	579	433	67	41	2609	B	*Units under construction	162	71	19	2	0	**254	C	*Units with Planning permission	535	108	255	43	26	967	D	New Housing Allocations	863	1851	246	0	0	2960	E	Windfall sites (large & small)	702	173	173	21	11	1080	F	Total Housing Provision	3751	2782	1126	133	78	7870	To accord with DPM3 and to update the explanatory text and to take account of the deletion of housing at Warren Hall.	
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MAC 031	STR3	<p>Split policy STR3 into two separate policies and amend Policy Index:</p> <p>For STR3A Northern Gateway:</p> <ul style="list-style-type: none"> In second sentence of opening part of policy wording replace ‘Two’ with ‘The following’ and replace ‘sites’ with ‘site’. Delete the policy wording relating to STR3B Warren Hall Amend para 5.19 as follows: 	To add clarity by having a dedicated policy and explanation for each site.	Further IIA consideration required - see section 3.3.3.																																																														

Schedule of Matters Arising Changes

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		<ul style="list-style-type: none"> • Replace 'The two strategic allocations are both sites' with 'This strategic allocation is a site' • Replace 'but where it is vital to revisit both sites in different ways' with 'but where it is vital to revisit the site' • Replace 'ensure that they come forward' with 'ensure that it comes forward' • Delete para 5.20 • Delete para 5.23 • Delete para 5.24 • Delete 'Warren Hall Masterplan and Delivery Statement' in the Policy Context Table • Re-number paragraphs • Include an Indicative Masterplan as part of the explanation for the site (illustrative masterplan diagrams in LDP-EBD-STR3A.1 and LDP-EBD-STR3A.2). • Add a reference at the end of para 5.19 'The Council produced early planning guidance in respect of the Northern Gateway site and this assisted in working proactively with the two developers in bringing forward subsequent development proposals. The comprehensive framework of planning outline permissions supported by applications for discharges of conditions and reserved matters provides the basis for guiding and determining subsequent planning applications on remaining phases of the strategic site. <p>For STR3B Warren Hall the changes are set out in IMAC01.</p> <p>The complete revised policy wording and explanatory text STR3A is as follows:</p> <p>STR3A Strategic Site: Northern Gateway Mixed Use Development Site: Employment, housing, commercial, community facilities:</p> <p>The majority of new development in Flintshire during the Plan period will be provided by a combination of commitments and new sites located in accordance with the sustainable settlement hierarchy. The following key strategic site will make an important contribution to the overall provision for growth in Flintshire over the Plan period:</p> <ul style="list-style-type: none"> i. 1,325 new homes, including affordable ii. 72.4 hectares of B2/B8 employment land iii Commercial development hub adjacent to A550 iv. District Centre(s) to serve local convenience needs v. Strengthened and raised River Dee flood defences 		

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>vi. Provision of internal road infrastructure</p> <p>vii Provision of land and a contribution to extending Sealand CP School</p> <p>viii Sustainable drainage/flood management solution</p> <p>ix Provision of green infrastructure network</p> <p>x. Sensitive re-use of John Summers Listed buildings and grounds</p> <p>The settlement audit work which underpins the settlement hierarchy reflects the geographic diversity of the County, ranging from larger towns to small rural hamlets. The County is unlike many others in Wales as there is no single settlement which is dominant in terms of size and function. Instead there are several main towns and the urban area of Deeside where a number of settlements are in close proximity to one another. Given the polycentric settlement and development pattern, and as a general rule the lack of suitable new strategic sites, the Council's focus in the Plan is on ensuring that the existing strategic site commitments are fully enabled to deliver development, before considering further strategic scale allocations.</p> <p>The relative lack of strategic sites, compared to other LDP's in Wales, should not necessarily be seen as a weakness. The experience of other large sites in Wales suggests they can be difficult to get off the ground and are not delivering development as anticipated. This can have a negative effect on securing and maintaining a 5 year housing land supply from adoption onwards despite the purpose and intention of such sites being soundly based. The adjoining LPA's of Wrexham and Cheshire West and Chester (CWAC) both have planned strategic urban extensions delivering the bulk of new housing in Wrexham and as part of the green belt release on the south western edge of Chester. Further afield, Denbighshire also has a large urban extension at Bodelwyddan. The bulk of the 'new allocations' or residual requirement element of the Plan's overall housing provision will therefore be delivered by a range of deliverable housing allocations that are below the scale of strategic sites. This should enable sites to be delivered and ensure a 5 year housing land supply at adoption and through the Plan period.</p> <p>The strategic allocation is a site where the principle of development has been secured through outline planning consents but where it is vital to revisit the site to ensure that it comes forward and contributes to the economic growth of the County and also contribute to meeting its housing needs. The Northern Gateway site is a mixed use strategic site at the heart of the Enterprise Zone. The mix and quantum of development has changed since the allocation in the UDP because the two halves of the site are in separate ownership and are being promoted separately and market demand has changed since the site was first allocated. It is considered that a renewed allocation as part of the LDP is required to re-promote</p>		

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments				
		<p>the sites which will result in increased market confidence in the scheme, on the back of considerable public sector infrastructure investment. As part of the framework of planning permissions relating to the site, an approved Masterplan Framework Document, prepared in 2012 sets out agreed parameters and principles for the development of the site.</p> <p>The Northern Gateway site represents a large area of brownfield and under-utilised land adjacent to Deeside Industrial Park and Garden City. The site is located adjacent to the A494 Trunk Road and in close proximity to the Wrexham Bidston and North Wales Coast railways lines. It therefore sits at the heart of a sub-regional economic hub and at the Gateway to Flintshire and Wales. The site forms a key part of the Deeside area, being designated as an Enterprise Zone. The promotion of the site as a mixed use development enhances the sustainability credentials arising from its location.</p> <p>The mixed use site provides for 1,325 new homes and will include affordable housing. The site benefits from two outline permissions and is a 'commitment' but the 1,325 dwellings will be included as a strategic allocation within the housing balance sheet, rather than as a commitment, in order to avoid double counting. In terms of employment land the site will deliver some 72.4ha of B2 and B8 employment land, which reflects the general nature of employment development in the locality and the fact that B1 high quality employment land is available elsewhere in the County. In order to support the employment and housing development the scheme will provide a commercial hub and district centre adjacent to the A550. Land will also be provided along with a financial contribution to enable the provision of an extension to the existing primary school. Infrastructure investment has taken place by strengthening and raising the River Dee flood defences and internal access roads are also being delivered by Welsh Government. A sustainable drainage and flood management scheme will also be secured as part of the detailed design of the scheme.</p> <p>Policy Context</p> <table border="1" data-bbox="405 1050 1536 1334"> <tr> <td data-bbox="405 1050 607 1334">LDP Objectives</td> <td data-bbox="607 1050 1536 1334"> <p>8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors.</p> <p>9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region.</p> <p>10. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure.</p> </td> </tr> <tr> <td data-bbox="405 1334 607 1382">PPW11</td> <td data-bbox="607 1334 1536 1382">Para 4.1.37</td> </tr> </table>	LDP Objectives	<p>8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors.</p> <p>9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region.</p> <p>10. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure.</p>	PPW11	Para 4.1.37		
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PPW11	Para 4.1.37							

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>Para 4.8.4</p> <p>Paras 5.4.14 – 5.4.15</p> <p>Well Being Goals</p> <p>A prosperous Wales</p> <p>A resilient Wales</p> <p>Key Evidence</p> <p>Flintshire and Wrexham Employment Land Review Study</p> <p>Flintshire Further Employment Growth Scenario Assessment</p> <p>PPW11</p> <p>TAN23</p> <p>Deeside Plan</p> <p>Topic Paper 7 – Spatial Strategy</p> <p>Topic Paper 8 – Economy and Employment</p> <p>Topic Paper 10 – Population, Household Growth and Housing</p> <p>Northern Gateway Masterplan and Development Statement</p> <p>Monitoring</p> <p>The monitoring framework is set out in Chapter 21 Monitoring.</p> <p>Detailed Policies</p> <p>This strategic policy will need to be read alongside a broad range of detailed policies on relevant and specific issues.</p>		
MAC 032	STR5	<p>Add the following wording at the end of para 5.36 'Future Wales The National Plan 2040 sets out in Policy 23 –' North Wales Metro: The Welsh Government supports the development of the North Wales Metro and will work with Transport for Wales, local authorities and other partners to enable its delivery and maximise associated opportunities". This will involve:</p> <ul style="list-style-type: none"> • Enhanced and integrated rail and bus services across North Wales/Cheshire • Enhanced Borderlands line with direct and faster services between Wrexham and Liverpool and integration with Merseyrail services • Additional stations and potential extensions • Upgrades of Wrexham General and Shotton stations • Further rail extension and/or re-openings to be considered (Source: A Railway for Wales – Meeting the Needs of Future Generations, 2019)" 	To ensure that the Plan references the North Wales Metro.	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
6. Strategic Policies – Supporting a Prosperous Economy				
MAC 033	6.1	Amend the 'Introduction' heading prior to para 6.1 to 'Introduction – Supporting a Prosperous Economy'.	Part of relocation of Section 4 of written statement	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 034	STR9 6.24	Amend para 6.24 accompanying policy STR9 to read as follows: 'Core Retail Areas (CRA) have previously been used in the UDP to delineate the primary shopping areas where retail development is encouraged and non- A1 development is controlled to ensure the availability of premises for retailing. In recognising the dynamic changing trends in retailing such as increases in home delivery services and internet retailing can impact upon the role of town and other centres, the CRA policy and their associated boundaries have been reviewed to assess whether it is still an effective means of ensuring that a focus of retail uses is retained in key parts of Flintshire's town centres. In order to ensure greater consistency with PPW10 it is proposed that the policy tool be retitled 'Primary Shopping Areas'. The Retail Study identifies that there is only a small need for further comparison retail floorspace (508 sq m net) over the Plan period and a negative need for convenience retail floorspace. Following the expiry of one of the retail commitments in the Retail Study at Saltney retail park, the comparison need has increased to 4028 sq m net. However changes to the retail industry in recent years have made it difficult to predict the most appropriate areas to allocate for retail uses, particularly given the large number of centres within the County. Since there are options for comparison retail sites within the plan area, the council is also working to encouraging appropriate retail uses and the plan has a flexible approach to retail windfall sites it is considered that no retail allocation is needed necessary or appropriate. The implementation of the Plan's retail policies will be informed by its evidence base for example health checks, and existing town centre masterplans and the up to date Retail Study'.	To provide an updated commentary on the need for retail floorspace and the Plan's approach regarding of not allocating sites.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 035	STR10	Amend criteria i by adding after 'tourism' the words ', cultural and leisure '. The revised wording of criteria a is 'Supporting new and extended tourism, cultural and leisure development which is appropriate to its location and enhances the existing offer within Flintshire;'	To ensure that the policy wording reflects the policy title.	No further IIA considerations required - change is minor and would not alter IIA findings.
7. Strategic Policies – Meeting Housing Needs				

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 036	7.1	Amend the 'Introduction' heading prior to para 7.1 with 'Introduction – Meeting Housing Needs'.	Part of relocation of Section 4 of written statement	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 037	STR11 and 7.8	<p>Amend policy STR11 as follows:</p> <ul style="list-style-type: none"> • In introductory policy wording beginning 'The delivery of...' replace 'will be expected to' with 'should'. • In criteria ii) replace 'Making' with 'Make' • Delete the final paragraph of the policy wording and relocate to the end of para 7.8. <p>The revised policy wording is:</p> <p>As part of implementing the Sustainable Settlement Hierarchy, and to ensure that communities have access to sufficient, good quality, affordable housing to meet a range of needs and support economic growth, new housing will be directed to sustainably located, economically viable and deliverable housing sites.</p> <p>The delivery of new housing on these sites will be expected to should:</p> <ol style="list-style-type: none"> Facilitate the provision of affordable housing relative to local needs and viability; Make the most efficient use of land through appropriate density of development; Provide balanced developments through a mix of housing units; Make provision for specific housing needs, where appropriate, including for example small family and elderly housing, extra care and supported accommodation, live-work units; Provide or contribute to physical, environmental and social infrastructure necessary to integrate new development into communities; Ensure in rural areas, that genuine and proportionate needs for housing are met in a sustainable manner. <p>The availability of housing land will be monitored and maintained over the plan period as part of the Annual Monitoring Report (AMR) process, to ensure a continuous and adequate supply to enable the delivery of the overall housing requirement. This will involve maximizing the delivery of sustainable and viable commitments already within the landbank, balanced against the allocation of sustainable, viable and deliverable new sites.</p> <p>The revised wording of para 7.8 is as follows:</p> <p>7.8 A home is a vital part of people's lives as it affects their health and well-being, quality of life and the opportunities open to them. The Welsh Government's approach, set out in the National Housing Strategy</p>	To improve the clarity of the policy wording and reasoned justification and to update following revocation of TAN1.	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments																														
		is to: provide more housing of the right type and offer more choice; improve homes and communities, including the energy efficiency of new and existing homes; and improve housing-related services and support, particularly for vulnerable people and people from minority groups. The availability of housing land will be monitored and maintained over the plan period as part of the Annual Monitoring Report (AMR) process, to ensure a continuous and adequate supply to enable the delivery of the overall housing requirement. This will involve maximizing the delivery of sustainable and viable commitments already within the landbank, balanced against the allocation of sustainable, viable and deliverable new sites.																																
MAC 038	STR11 Housing Balance Sheet	<p>Update Housing Balance Sheet as below:</p> <p>Appendix 2 – Updated Housing Balance Sheet as at 1/4/20</p> <table border="1"> <thead> <tr> <th>Element</th> <th>Amount</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>REQUIREMENT</td> <td>6,950</td> <td></td> </tr> <tr> <td>Less completions 15-16</td> <td>662</td> <td>Includes large and small site completions.</td> </tr> <tr> <td>Less completions 16-17</td> <td>421</td> <td>Includes large and small site completions.</td> </tr> <tr> <td>Less completions 17-18</td> <td>608</td> <td>Includes large and small site completions.</td> </tr> <tr> <td>Less completions 18-19</td> <td>454</td> <td>Includes large and small site completions.</td> </tr> <tr> <td>Less completions 19-20</td> <td>464</td> <td>Includes large and small site completions.</td> </tr> <tr> <td>Revised Requirement:</td> <td>5,259</td> <td></td> </tr> <tr> <td></td> <td>4,341</td> <td></td> </tr> <tr> <td>Less commitments</td> <td>4774 1221</td> <td>This reflects a review of large sites whereby only sites with planning permission as at 01/04/20 which are considered to be realistically capable of development, are included. The figures do not include the 1,325 consented units at Northern Gateway, nor the consented units on the allocated sites at Broad Oak Holding, Connah's Quay, Chester Road Penymynydd as these are included in the strategic sites and allocations figures. Housing</td> </tr> </tbody> </table>	Element	Amount	Notes	REQUIREMENT	6,950		Less completions 15-16	662	Includes large and small site completions.	Less completions 16-17	421	Includes large and small site completions.	Less completions 17-18	608	Includes large and small site completions.	Less completions 18-19	454	Includes large and small site completions.	Less completions 19-20	464	Includes large and small site completions.	Revised Requirement:	5,259			4,341		Less commitments	4774 1221	This reflects a review of large sites whereby only sites with planning permission as at 01/04/20 which are considered to be realistically capable of development, are included. The figures do not include the 1,325 consented units at Northern Gateway, nor the consented units on the allocated sites at Broad Oak Holding, Connah's Quay, Chester Road Penymynydd as these are included in the strategic sites and allocations figures. Housing	To reflect Action Points arising from Sessions and site updates including the deletion of housing at Warren Hall.	
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Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change		Reason	IIA Comments
				commitments are detailed in Appendix 1.and shown on the proposals map.	
		Revised Requirement	3,488 3,120		
		Less future Small sites allowance 600 (<10 units) 60 pa	720 600	Small sites allowance represents a conservative but realistic allowance of 60 units per annum (as per UDP) over the remaining Plan period.	
		Less future Windfall allowance (>10 units)	600 480*	Windfalls allowance (large sites) represents a conservative but realistic allowance of 50 units per annum (as per UDP) over the remaining Plan period. Windfalls allowance (large sites) represents a conservative but realistic allowance. The Housing balance sheet at Deposit included an allowance of 600 units over the remaining 12 yr Plan period, equating to an average of 50 pa or 60 per annum assuming no completions in the first year & reduced completions in the second & third years. The figure of 480 is based on this same figure of 60 per annum over the remaining 8 years (assuming no completions in the first two years as now advised in Ed. 3 of the Manual).	
		Residual Requirement	2,168 2,040		
		Less LDP Strategic Allocations	4294 1185	Includes Northern Gateway 1,325 units and Warren Hall 300 However Northern Gateway discounted by 331 units which may be delivered beyond the Plan end date - 131 units on Praxis and 200 units on Pochin Comprises Northern Gateway Strategic site of 1325 units, discounted by 140 units which may be delivered beyond the Plan end date.	

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change			Reason	IIA Comments
		New allocations Requirement	874 855			
		LDP Allocations	4874 1775	See Policy HN1 (3014 less 54 completions, less 1185 on Strategic allocation) See Site Allocations Policy Table		
		Overallocation / flexibility	4000 920	This equates to a flexibility allowance of 13.2% based on the overall housing requirement of 6,950		
8. Strategic Policies – Valuing the Environment						
MAC 039	8.1	Amend the 'Introduction' heading prior to para 8.1 with 'Introduction – Valuing the Environment'.			Part of relocation of Section 4 of written statement	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 040	8.7	Replace 'EN11 Green Barriers' with 'EN11 Green Wedges '			Conformity with PPW11	
MAC 041	STR13	<p>In the second paragraph of the introductory STR13 policy wording replace 'will' with 'should'.</p> <p>In the third paragraph of the introductory wording replace 'To achieve this all development will' with 'Development should'.</p> <p>The revised introductory policy wording is:</p> <p>'... Development willshould identify, respect, protect, enhance and connect Flintshire's environmental assets, to create a multifunctional network of natural and historic resources.</p> <p>'To achieve this all development willshould:'</p>			To add clarity to the policy wording.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 042	STR13	In criteria ii. replace 'green barriers' with ' green wedges '			Conformity with PPW11	
MAC 043	STR13 Policy context table	In the 'detailed policies' section replace 'green barriers' with ' green wedges '.			Conformity with PPW11	

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 044	STR14	<p>Change criteria ii in policy STR14 by replacing 'Supporting' with 'Encouraging'.</p> <p>The criteria will read "Supporting Encouraging the use and development of appropriate or suitable brownfield land;"</p>	To improve the clarity of the Plan.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 045	STR16	<p>Amend Policy STR16 as follows:</p> <ul style="list-style-type: none"> • Add the wording 'in accordance with the criteria set out in Policy EN23' at the end of criteria i. • Add the wording 'as identified on the constraints map and applied through Policy EN24' at the end of criteria ii. • Replace wording in criteria iii with 'Contributing towards the regional supply of mineral through the allocation of at least 3.543 million tonnes of sand & gravel, and at least 35.928 million tonnes of crushed rock through the extensions to existing quarries as set out in Policy EN25, new sites and in collaboration with Denbighshire County Council and Wrexham County Borough Council'. • In criteria iv. Insert 'to' between 'as' and 'minimise'. • Add at the end of criteria vi. 'in accordance with the criteria set out in Policy EN27'. <p>The revised policy is as follows:</p> <p>Flintshire's important mineral resources will be sustainably managed by:</p> <ol style="list-style-type: none"> i. Protecting minerals from unnecessary sterilization by directing new development away from areas underlain by mineral of economic importance or where this is not possible through the requirement for prior extraction in accordance with the criteria set out in Policy EN23; ii. Reducing the conflict between mineral development and sensitive development through the use of buffer zones as identified on the constraints map and applied through Policy EN24 ; iii. Contributing towards the regional supply of mineral through the allocation of at least 4.4 3.543 million tonnes of sand and gravel and at least 3.84 35.928 million tonnes of crushed rock through the extension to existing quarries as set out in policy EN25, and in collaboration with Denbighshire County Council and Wrexham County Borough Council; iv. Ensuring new mineral extraction is located so as to minimise impacts on communities and the environment; v. Securing appropriate restoration which can deliver specific environmental and community benefits; vi. Maximising the use of secondary and recycled aggregate in accordance with the criteria set out in Policy EN27' 	To add greater clarity to the policy wording and to improve signposting to other detailed policies	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 046	STR16 Policy context table	Add the following documents to the Key Evidence section: <ul style="list-style-type: none"> • North Wales Regional Aggregates Working Party Report • Regional Technical Statement second review and accompanying appendix for North Wales • Minerals Technical Advice Note 1 (MTAN1) 	To update the policy context for policy STR16	
MAC 047	STR16 Para 8.27	Amend para 8.27 as follows: The North Wales Regional Technical Statement and accompanying appendix for North Wales identifies the level of need for mineral at the regional level and then apportions this to individual local authorities. A need for additional sand and gravel as well as crushed rock has been identified in Flintshire as well as a need for crushed rock shared between Flintshire and Wrexham (see Statement of Common Ground – Crushed Rock) within the Regional Technical Statement Second Review . It is proposed to meet the shared need for crushed rock within Flintshire through the extension of existing quarries, rather than through the allocation of a new site, since the tonnage required would not support the creation of a new quarry site and this has been formally agreed with Wrexham, forming part of their LDP Strategy. Detailed allocations are identified within the Plan in policy EN25 and shown on the proposals map. In addition to this, new site development will also be required to meet future demand in addition to the extensions proposed as allocations. Further allocations may be proposed on subsequent reviews of the LDP to meet the identified need of the RTS, and to work in collaboration with neighbouring authorities Denbighshire County Council and Wrexham County Borough Council within the sub-region.	To update the Plan in respect of the requirement for minerals and approach taken in meeting this need.	
9. Development Management Policies – Creating Sustainable Places and Communities				
MAC 048	PC1	In opening part of the policy wording of PC1 delete 'generally'. The amended introductory policy wording is 'New development will be generally permitted within settlement boundaries as defined on the Proposals Maps, on allocations and within Principal Employment Areas subject to complying within other Plan policies'.	To improve the clarity of the policy wording which already references the need to comply with other Plan policies.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 049	PC1	In criteria a. of PC1 replace 'policy HN4-A/B/C/D' with ' policies HN4 / HN4A / HN4B / HN4C / HN4D '. The amended wording of criteria a. is 'the specific forms of housing development as set out in policy policies HN4-A/B/C/D HN4 / HN4-A / HN4-B / HN4-C / HN4-D '	To improve the cross references to the housing policies	

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 050	PC2	In opening wording of Policy PC2 delete ‘, where appropriate’. The revised introductory policy wording is ‘All development should, where appropriate .’	The policy criteria are applicable to all new development.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 051	PC3	In opening wording of policy PC3 delete ‘, where appropriate’. The revised introductory policy wording is ‘All new development should, where appropriate .’	The policy criteria are applicable to all new development.	Further IIA consideration required - see section 3.4.1.
MAC 052	PC3	In PC3 include a new criteria ‘h. protect the living conditions of nearby occupiers from any harmful effects of new development including overlooking, harm to outlook, increased activity/disturbance/noise’ .	To provide additional policy wording in respect of maintaining living standards	
MAC 053	PC4	In introductory wording of PC4 delete ‘ensure that’. Amend each criteria as follows: <ul style="list-style-type: none"> a. Replace ‘it is’ with ‘be’ b. Replace ‘it is’ with ‘be’ c. Replace ‘it incorporates’ with ‘incorporate’ d. Replace ‘it makes’ with ‘make’ e. Replace ‘it incorporates’ with ‘incorporate’ The revised policy wording is ‘Development should ensure that ; <ul style="list-style-type: none"> a. it is be sustainably located and accessible to non – private car means of travel, so as to reduce carbon emissions; b. it is be designed so as to be resilient and adaptable to the effects of climate change; c. it incorporates incorporates planting, landscaping and design features which mitigate the effects of climate change such as increased rainfall events and high temperatures; d. it makes makes efficient use of resources through sustainable construction techniques and materials, including layout, siting and orientation to maximise solar gain, water conservation and waste reduction; and e. it incorporates incorporates renewable energy technologies and carbon sinks where appropriate. 	To improve the clarity of the policy wording and avoid repetition.	Further IIA consideration required - see section 3.4.2.
MAC 054	PC4 9.11	Amend criteria c by adding reference to a Sustainable Management of Natural Resources (SMNR) approach. The revised wording of criteria c is as follows:	To ensure that the Plan references	

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
	9.13	<p>'it incorporates planting, landscaping and design features within a Sustainable Management of Natural Resources (SMNR) approach which mitigate the effects of climate change such as increased rainfall events and high temperatures;'</p> <p>Amend the 4th sentence of paragraph 9.11 to read "It would be expected that developments use the Design and Access Statements (DAS) and within those a Sustainable Management of Natural Resources (SMNR) approach, accompanying relevant applications to demonstrate how proposals deliver the intentions of this policy by explaining how the design of the proposal responds to environmental sustainability. "</p> <p>Add to the end of paragraph 9.13 'A Sustainable Management of Natural Resources (SMNR) approach should also include setting out a comprehensive integrated landscape scheme for the development'.</p>	SMNR in line with PPW11	
MAC 055	PC5	<p>In policy PC5 amend the following criteria:</p> <p>In criterion a) delete 'reduce reliance on the car by incorporating' and replace with 'incorporate good access to the more sustainable modes of travel, firstly by walking and cycling, secondly by public transport, then by low emission private vehicle and finally by other private motor vehicle;'</p> <p>In criterion b) replace the existing policy wording with 'not compromise the safe, effective and efficient use of the highway network and not have an adverse impact on highway safety or create unacceptable levels of traffic generation;'</p> <p>In criterion c) replace existing wording with 'where significant adverse effects upon the transport network arising from the proposed development are unavoidable, they must be mitigated by, for example, improvements to transport infrastructure and traffic management'.</p> <p>The revised policy to read as follows:</p> <p>PC5: Transport and Accessibility</p> <p>New development proposals must be supported by appropriate transport infrastructure, and depending on the nature, scale, location and siting of the proposal, will be required to:</p> <p>a. Reduce reliance on the car by incorporating Incorporate good access to the more sustainable modes of travel, firstly by walking and cycling, secondly by public transport, then by low emission private vehicle and finally by other private motor vehicle.</p> <p>b. mitigate any significant adverse effects upon the transport network that arise from the proposed development including improvements to transport infrastructure and traffic management where required;</p>	To improve the clarity of the policy wording and avoid repetition.	Further IIA consideration required - see section 3.4.3.

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>not compromise the safe, effective and efficient use of the highway network and not have an adverse impact on highway safety or create unacceptable levels of traffic generation;</p> <p>c. do not compromise the safe, effective and efficient use of the highway network and do not have an adverse impact on highway safety or create unacceptable levels of traffic generation; where significant adverse effects upon the transport network arising from the proposed development are unavoidable, they much be mitigated by, for example, improvements to transport infrastructure and traffic management;</p> <p>d. provide appropriate levels of parking, servicing and manoeuvring space and in non-residential development, a minimum of 10% of parking spaces to have electric vehicle charging points;</p> <p>e. create well designed people orientated streets and make provision for people with restricted mobility including those with characteristics as defined by the Equality Act 2010;</p> <p>f. safeguard, enhance and expand the active travel network, particularly by means of improving connectivity to and from the proposed development.</p>		
<p>MAC 056</p>	<p>PC6</p>	<p>In opening part of policy wording of PC6 delete 'proposals'.</p> <p>At end of introductory wording add '.' after 'facilities' and then replace 'as a result of' with 'Proposals should wherever possible:'.</p> <p>Amend each criteria as follows:</p> <ul style="list-style-type: none"> a. replace 'the provision of' with 'provide' b. replace 'the provision of' with 'provide' c. replace 'the provision of' with 'provide' d. replace 'the incorporation of' with 'incorporate'. e. replace 'the development and enhancement of' with 'develop and enhance' f. replace 'the incorporation of' with 'incorporate'. <p>The revised policy wording is as follows:</p> <ul style="list-style-type: none"> a. the provision of provide appropriate walking and cycling routes being an integral part of the scheme and connecting the development with key destinations; b. the provision of provide infrastructure and facilities that promote walking and cycling such as signing, lighting, secure and convenient cycle storage and parking and where appropriate, shower and changing facilities; c. the provision of provide appropriate travel choice information relating to cycling and walking for all or part of journeys as part of Travel Plans; 	<p>To improve the clarity of the policy wording and avoid repetition.</p>	<p>No further IIA considerations required - change is minor and would not alter IIA findings.</p>

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>d. the incorporation of incorporate measures to reduce the dominance and speed of vehicles affording increased priority to pedestrians and cyclists;</p> <p>e. the development and enhancement of the Active Travel routes identified on the Integrated Network Map connecting communities to essential services including public transport, employment and education opportunities;</p> <p>f. the incorporation of incorporate existing public rights of way as an integral part of the design and layout of the development.</p>		
<p>MAC 057</p>	<p>PC8 para 9.24</p>	<p>In para 9.24 remove capital letters from ‘police’, ‘air ambulance’, ‘military’, ‘military training jets’, ‘private business jets’ or ‘aircraft’.</p> <p>Further revise the explanation to policy PC8 to read:</p> <p>9.24 Airbus currently owns the airport and is the main user. However, other uses include police, air ambulance and military helicopters, military training jets and private business jets, as well as flight training. Alongside Airbus other companies based at Hawarden include Aerocare, Raytheon UK and NWMAS all of whom provide aircraft maintenance facilities on site. Aviation Park Group offer a range of services including Aircraft handling, overnight parking, hangerage and passenger services. There is a need to control the location and scale of development in the vicinity of the flightpaths of aircraft in order to prevent physical obstacles or distraction. A Safeguarding Zone has been identified for Hawarden Airport within which development proposals will be closely scrutinised to ensure that they would not affect the safe and efficient operation of the airport and airfield. Consultation will be carried out with the Civil Aviation Authority.</p> <p>9.25 The safeguarding zone for Hawarden Airport is defined on a safeguarding map issued by the Civil Aviation Authority. This defines certain types of development that, by reason of their height, attraction to birds or inclusion of or effect upon aviation activity, require prior consultation with the Airport owner or operator. Government advice in OPDM Circular 1/2003 ‘Advice to Local Planning Authorities on Safeguarding Aerodromes and Military Explosives Storage Areas’ sets out the detailed guidance on how safe and efficient operations can be secured.</p> <p>9.26 In accordance with this Circular, the owner or operator of Hawarden Airport is a statutory consultee for certain planning applications for developments that require safeguarding to protect the safety of the airport’s operation.</p> <p>9.27 The owner or operator of Hawarden Airport will assess planning applications and consider their potential impact on whether the development causes: an obstacle; an attraction to birds; any light or reflection that might be confused with or interfere with aerodrome lighting or present a</p>	<p>To improve the reading of the explanatory text.</p> <p>To reflect the agreed wording in Appendix 6 of the Council Response (FCC019) to the Inspector’s Post Inquiry Hearings letter (INSP010)</p>	<p>No further IIA considerations required - change is minor and would not alter IIA findings.</p>

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments						
		<i>visual hazard; interference with communication systems including radar systems and ground to air communication and whether its construction will present any hazard to flight safety.</i>								
10. Development Management Policies – Supporting a Prosperous Economy										
MAC 058	PE1	<p>Add at the end of the introductory wording of PE1 ‘with the exception of the Northern Gateway site which is allocated for B2 and B8 uses and the Warren Hall site which is suitable for B1 and B2 uses’.</p> <p>The revised wording is ‘The following sites, as defined on the proposals map, are allocated for B1, B2 and B8 employment uses, with the exception of the Northern Gateway site which is allocated for B2 and B8 uses and the Warren Hall site which is suitable for B1 and B2 uses:’</p>	To clarify that the Northern Gateway site is not suitable for B1 uses and that Warren Hall site is not suitable for B8 uses.							
MAC 059	PE1	<p>In the table accompanying policy PE1 delete the following sites:</p> <ul style="list-style-type: none"> • PE1.4 Greenfield Business Park Phase II • PE1.5 Greenfield Business Park Phase III • PE1.6 Broncoed Industrial Estate • PE1.8 Adjacent Mostyn Docks • PE1.10 Antelope Industrial Estate • PE1.12 Rowley’s Drive <p>As a result of the deletion of these six employment allocations update the table under PE1 and re-number the remaining allocations:</p> <ul style="list-style-type: none"> • STR3A Northern Gateway Mixed Use Development Site 72.40ha • STR3B Warren Hall 19.1ha • 1 Broughton Aerospace Park 5.72ha • 2 Broughton Manor Lane / Hawarden Park Extension 18.20 • 3 Buckley Drury New Road 1.40ha • 4 & Mold Mold Business Park 3.90ha • 5 & Queensferry Chester Road East 3.15 • 6 12 Saltney River Lane 1.10ha <p>The table of allocations will be revised as follows:</p> <table border="1" data-bbox="403 1276 1451 1361"> <thead> <tr> <th>Ref No.</th> <th>Site</th> <th>Area (ha.)</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Ref No.	Site	Area (ha.)				To reflect the lack of sufficient evidence to demonstrate that the effects of flooding can be acceptably managed on these allocations as explained in section 1.5 of the NRW SoCG and to reflect the reduced employment area at Warren Hall.	No further IIA considerations required - changes are captured in Policy STR1, where the reduced overall employment land is considered, and the assessment of site STR3B.
Ref No.	Site	Area (ha.)								

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Ref	Policy/Para	Matters Arising Change			Reason	IIA Comments
		STR3A	Northern Gateway Mixed Use Development Site		72.40	
		STR3B	Warren Hall Mixed Use Development Site		19.1ha	
		Ref No.	Settlement / Location	Site	Area (ha.)	
		1	Broughton	Chester Aerospace Park	5.72	
		2	Broughton	Manor Lane/Hawarden Park Extension	18.20	
		3	Buckley	Drury New Road	1.40	
		4	Greenfield	Greenfield Business Park, Phase II	1.20	
		5	Greenfield	Greenfield Business Park, Phase III	4.40	
		6	Mold	Broncoed Industrial Estate	0.70	
		7 4	Mold	Mold Business Park	3.90	
		8	Mostyn	Adjacent Mostyn Docks	3.00	
		9 5	Queensferry	Chester Road East	3.15	
		10	Rhydymwyn	Antelope Industrial Estate	1.10	
		11 6	Saltney	River Lane	1.10	
		12	Shotton	Rowley's Drive	0.70	
				Total	139.67	
					124.97	
MAC 060	PE1 / para 10.1	Add at the end of paragraph 10.1 in the plan: 'The Deeside Enterprise Zone is vitally important to the employment aspirations of the plan. The DEZ has been designated by Welsh Government to continue to develop as a major centre for advanced manufacturing on an international scale by ensuring that the Zone builds on its strengths in key sectors, encourages investment and re-investment in order to compete with locations on a global scale. Further information on the Deeside Enterprise Zone can be found here.'				To explain the importance of the Deeside Enterprise Zone to the Plan Strategy and to clarify which employment allocations are within the DEZ.

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>Within the table under PE1 add a column at the right hand edge of the table with the title 'Location with Deeside Enterprise Zone?' Add a '✓' for the following sites to explain that they are within the Deeside Enterprise Zone:</p> <p>STR3A Northern Gateway</p> <p>PE1.1 Chester Aerospace Park</p> <p>PE1.2 Manor Lane / Hawarden Park, Broughton</p> <p>PE1.9 Chester Road East, Queensferry</p>		
MAC 061	PE1 10.1	Delete para 10.1 and the accompanying table and replace with ' The Plan allocates 124.97ha of land for employment development. This comprises the two strategic mixed use sites at Northern Gateway and Warren Hall and several other more local allocations. The Plan provides a range of employment sites in terms of location, size and type to suit a variety of investments needs. All sites are intended to accommodate B1, B2 and B8 employment development with the exception of Warren Hall which is B1 and B2 only. '	To reflect changes to employment allocations in PE1 including reduced employment area at Warren Hall.	
MAC 062	PE1	Include an additional paragraph at the end of the reasoned justification to PE1 with the wording ' Any development proposals on sites that may be located within a flood risk zone causing constraint will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage. The SFCA undertaken in respect of employment allocations and areas does not assess each allocation in detail as this can only be done as part of the project design and development management stages. This seeks to ensure that flood risk areas can be avoided and mitigation measures can be put in place to address flood risk and comply with the relevant national flood risk policy and policy EN14. '	To clarify how proposals within employment allocations will deal with flood risk.	
MAC 063	PE2	<p>Add at the end of the policy wording 'Development must also avoid adverse effects on European Sites'.</p> <p>The revised policy wording is as follows:</p> <p>'Within principal employment areas, as defined on the proposals map and listed below, the following types of employment development will be permitted:</p> <ul style="list-style-type: none"> a. B1 business use; b. B2 general industry; c. B8 storage and distribution 	To provide further policy protection where Principal Employment Areas are adjacent to European Sites.	Further IIA consideration required - see section 3.4.4.

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>provided that the proposal is of an appropriate type and scale for both the site and its surroundings. Development must also avoid adverse effects on European Sites.'</p>		
<p>MAC 064</p>	<p>PE2</p>	<p>Further to the additional policy wording referenced in section 1.1 of the NRW SOCG006 above, make the following additional changes:</p> <ul style="list-style-type: none"> • Add to policy wording after 'surroundings', 'and satisfies other Plan policies' • Add 'Within these areas,' before the wording in 1.1 above • Add the following subsequent policy wording 'Any development proposals on sites that may be located within a flood risk zone causing constraint will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage'. <p>The final policy wording combining the changes in 1.1 and 1.6 (as shown in Appendix 1 of the Council Hearing Statement M11.01 is as follows:</p> <p>Policy PE2: Principal Employment Areas</p> <p>Within principal employment areas, as defined on the proposals map and listed below, the following types of employment development will be permitted:</p> <ul style="list-style-type: none"> • B1 business use; • B2 general industry; • B8 storage and distribution <p>provided that the proposal is of an appropriate type and scale for both the site and its surroundings and satisfies other Plan policies. Within these areas, development must also avoid adverse effects on European Sites. Any development proposals on sites that may be located within a flood risk zone causing constraint will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage.</p>	<p>To clarify how proposals within employment allocations will deal with flood risk.</p>	
<p>MAC 065</p>	<p>PE2 10.3</p>	<p>Replace the present wording of para 10.3 with 'Through policy PE2 it is considered that by identifying key areas where primarily existing employment development can be safeguarded and where new employment development in relation to this will generally be acceptable, the Plan aims to provide a greater degree of certainty and consistency and avoid the need to identify numerous small</p>	<p>To clarify how proposals within employment</p>	

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>allocations or commitments. The policy is applicable to the use of land, new build, conversion, redevelopment and extension or expansion. Within these areas, employment development will generally be acceptable, unless it is allocated for a specific use by virtue of another policy. However, it will still be necessary for proposals to be of a type and scale which respects the local environment and amenity of other land uses and residents and satisfies other policies throughout the Plan. In particular, development proposals must demonstrate at planning application stage how flood risk considerations can be fully assessed through further detailed assessment. The SFCA undertaken in respect of Principal Employment Areas is a high level assessment and does not assess each area in detail as this can only be done as part of considering individual development proposals as part of the specific project design and development management stages. This seeks to ensure that flood risk areas can preferably be avoided and mitigation measures can be put in place to address flood risk and the consequences of flooding, comply with the relevant national flood risk policy and policy EN14’.</p>	<p>allocations will deal with flood risk.</p>	
<p>MAC 066</p>	<p>PE6 Para 10.13</p>	<p>Add at the end of para 10.13 accompanying policy PE6, the following text: ‘It is recognised that there may be ancillary uses such as a convenience store, café, gym or other uses which are complementary to employment development and these will considered on their individual merits’.</p>	<p>To provide further clarification on how other uses within employment sites will be considered</p>	<p>No further IIA considerations required - change is minor and would not alter IIA findings.</p>
<p>MAC 067</p>	<p>PE10</p>	<p>Add at the end of the Policy Title ‘and Local Convenience Shops’ and add at the end of the second policy paragraph ‘In settlements without a defined district or local centre, or where there is no opportunity within a defined local or district centre, local convenience shops will be supported elsewhere within settlement boundaries provided that proposals are appropriate in scale to the locality’.</p> <p>The revised policy wording is: PE10: District and Local Centres and Local Convenience Shops</p> <p>Within the designated District Centres of Connah’s Quay, Queensferry and Saltney proposals which maintain or improve the range and quality of shopping provision or complimentary commercial and leisure facilities will be supported provided it is appropriate in scale and enhances the centre.</p> <p>Small scale retail and other commercial uses intended to meet the day to day needs of the local neighbourhood will be directed towards suitable sites or premises within the Local Centres identified in Policy PE7. In settlements without a defined district or local centre, or where there is no</p>	<p>To clarify that local convenience shops may also be acceptable elsewhere within settlements in order to meet local food shopping needs.</p>	<p>Further IIA consideration required - see section 3.4.5</p>

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		opportunity within a defined local or district centre, local convenience shops will be supported elsewhere within settlement boundaries provided that proposals are appropriate in scale to the locality.		
MAC 068	PE10 10.25	Amend the second sentence of para 10.25 as follows: As a consequence proposals other than A4 for retail and non-retail commercial uses may be more difficult to satisfactorily accommodate in such Local Centres, and the importance of safeguarding residential amenity will be a key consideration.	To add clarity to the text within para 10.25 by assessing all uses within Local Centres on their individual merits.	
MAC 069	PE13	The opening part of criterion a to be reworded to read ‘The development of static caravan accommodation will not be permitted outside in the Talacre, Gronant and Gwespyr area (as defined on the proposals map). Elsewhere in the County proposals will be permitted where.’ The revised wording is ‘ The development of static caravan accommodation will not be permitted in the Talacre, Gronant and Gwespyr area (as defined on the proposals maps). Elsewhere in the County proposals will be permitted where: ’	To clarify where in the County new static caravan development may or may not take place.	Further IIA consideration required - see section 3.4.6.
MAC 070	PE13	Amend the wording of criteria a.i. and add a new criteria c.vi. making reference to proposals having no adverse effects on European Sites. The revised policy wording of the two criteria is as follows: a.i. ‘there would be no material harm to the landscape character and environmental quality of the surrounding area and no adverse effects on European Sites , either individually or cumulatively with other sites in the vicinity; and’ c vi. ‘ the proposal has no adverse effects on European sites ’.	To strengthen the policy protection in respect of European Sites.	
MAC 071	PE14	Amend the policy wording as follows ‘Development proposals within or adjoining the Greenfield Valley, as designated on the proposals map, will be permitted where they do should not detract from the tourism potential of the Valley or harm areas or features of landscape, nature conservation or historic value’.	To clarify that the policy is not promoting development at Greenfield Valley	Further IIA consideration required - see section 3.4.7.
MAC	PE14	Add at end of policy wording ‘ Within or adjoining the Greenfield Valley, development must also avoid adverse effects on European Sites. ’	To strengthen the policy protection in	

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
072		<p>The revised policy wording is as follows:</p> <p>Development proposals within or adjoining the Greenfield Valley, as designated on the proposals map, will be permitted where they do not detract from the tourism potential of the Valley or harm areas or features of landscape, nature conservation or historic value. Within or adjoining the Greenfield Valley, development must also avoid adverse effects on European Sites.'</p>	respect of European Sites at Greenfield Valley.	
MAC 073	New policy	<p>Add a new Telecommunications Policy located in the Supporting a Prosperous Economy section under reference PE15:</p> <p>PE15: Telecommunications and Digital Technology Infrastructure</p> <p>Proposals for telecommunications and digital technology infrastructure will be assessed in the context of technical and operational requirements and permitted where:</p> <ul style="list-style-type: none"> i. The development contributes towards the objectives of future proofing development and regeneration proposals or forms part of the planned development of a wider network; ii. The development incorporates all reasonable measures to minimise any significant adverse impact due to the siting and external appearance of the apparatus, and the design minimises impact caused by its visual appearance; iii. There would be no significant adverse effect on natural heritage, the historic environment, or amenity of neighbouring residents; iv. The application is accompanied by evidence of compliance with Government guidelines on health impacts of telecommunications infrastructure. <p>Explanation:</p> <p>Facilitating digital communications is key to Flintshire’s plans to accelerate growth in the County in the context of the Growth Deal which recognizes the need to ‘Upgrade digital networks and infrastructure access the region to support the functionality, competitiveness and growth of the indigenous business sector..’. Modern, fast, affordable and secure telecommunications and future proofed digital connectivity infrastructure can stimulate business innovation, enable high-value economic activity and drive-up productivity. For residents, it can transform their communications, home computing, on-line shopping, entertainment facilities, as well as enable effective home working. The potential benefits that telecommunications and digital communications can offer</p>	To ensure conformity with requirements of PPW11	Further IIA consideration required - see section 3.4.8.

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Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments																																		
		<p>individuals and organisations are recognised, for example in terms of working from home, which can assist in creating a sustainable future by reducing the need to travel.</p> <p>Telecommunication facilities may have special needs and technical considerations, which require them to be installed in particular locations to work effectively. However in sensitive locations the erection of telecommunication towers and antennae can have a significant adverse effect on the quality of the urban and rural environment. Clear guidance with respect to the development of telecoms infrastructure is contained within section 5.2 of PPW11 and TAN19 Telecommunications, which is not repeated in this policy. Applications for telecoms and digital infrastructure developments will therefore be assessed against National Planning Policy and Guidance. In accordance with national planning policy, the Council encourages operators to share telecoms masts. Operators will be required to submit evidence that opportunities for mast sharing and alternative sites have been fully explored. Careful siting, design and disguise, including landscaping and screening, can make developments less obtrusive and enable them to blend in with their surroundings.</p>																																				
11. Development Management Policies – Meeting Housing Needs																																						
MAC 074	HN1 11.2	<p>Add at the end of para 11.2 'The following table shows a summary of the Plan's housing allocations in line with the advice in Development Plans Manual 3'.</p> <table border="1"> <thead> <tr> <th colspan="7">Site Allocations Policy Table (as at 01.04.20):</th> </tr> <tr> <th rowspan="2">Site Name</th> <th rowspan="2">Settlement Tier</th> <th rowspan="2">Total Units in plan period</th> <th rowspan="2">Total Affordable Units in plan period</th> <th colspan="3">Delivery timescale (Years)</th> <th rowspan="2">Units Beyond the plan period</th> </tr> <tr> <th>1-5</th> <th>6-10</th> <th>11-15</th> </tr> </thead> <tbody> <tr> <td>Northern Gateway</td> <td>Garden City Tier 2</td> <td>1185</td> <td>237</td> <td></td> <td>620</td> <td>565</td> <td>140</td> </tr> <tr> <td>Well Street</td> <td>Buckley Tier 1</td> <td>140</td> <td>56</td> <td></td> <td>93</td> <td>47</td> <td></td> </tr> </tbody> </table>	Site Allocations Policy Table (as at 01.04.20):							Site Name	Settlement Tier	Total Units in plan period	Total Affordable Units in plan period	Delivery timescale (Years)			Units Beyond the plan period	1-5	6-10	11-15	Northern Gateway	Garden City Tier 2	1185	237		620	565	140	Well Street	Buckley Tier 1	140	56		93	47		To present the up to date position in relation to housing allocations and to take account of deletion of housing at Warren Hall.	No further IIA considerations required - change is minor and would not alter IIA findings.
Site Allocations Policy Table (as at 01.04.20):																																						
Site Name	Settlement Tier	Total Units in plan period	Total Affordable Units in plan period	Delivery timescale (Years)			Units Beyond the plan period																															
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Northern Gateway	Garden City Tier 2	1185	237		620	565	140																															
Well Street	Buckley Tier 1	140	56		93	47																																

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Ref	Policy/Para	Matters Arising Change								Reason	IIA Comments
		Broad Oak Holding, Mold Road	Connah's Quay Tier 1	32	9		32				
		Highmere Drive	Connah's Quay Tier 1	150	53		60	90			
		Northop Road	Flint Tier 1	170	26		60	110			
		Maes Gwern	Mold Tier 1	160	48	27	133				
		Land between Denbigh Rd & Gwernaffield Rd.	Mold Tier 1	238	95		118	120			
		Holywell Road /Green Lane	Ewloe Tier 2	298	119		73	225			
		Ash Lane	Hawarden Tier 2	288	101		63	225			
		Wrexham Road	HCAC Tier 2	80	24		50	30			
		Cae Isa, A5119	New Brighton Tier 3	92	37		75	17			
		Chester Road	Penymynydd Tier 3	181	27	27	154				
		TOTALS		3014	832	54	1531	1429	140		

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments																																			
MAC 075	HN3	In introductory policy wording replace 'starting point' with ' target '. The revised introductory wording is 'Affordable housing contributions will be sought on developments of 10 or more units in accordance with the following quotas which should be taken as a starting point target for negotiation on a site by site basis subject to detailed viability considerations.'	To clarify that the % affordable housing requirements are expressed as a 'maximum'																																				
MAC 076	HN3	Add following new paragraph after para 11.9 and renumber subsequent paragraphs: 11.10 As outlined in policy HN3 affordable housing will be expected to be delivered on site in the first instance. Where it can clearly be evidenced by the developer that on site provision is not appropriate then off-site contributions towards affordable housing will be accepted and secured with a S106 legal agreement. An updated affordable housing SPG will set out the formula for calculating off site commuted sums for affordable housing, this formula will ensure that the commuted sum received is equivalent to the percentage of affordable housing that should have been delivered on site. It will also set out how commuted sum payments will be used where the development results in the requirement to provide a part unit.	To explain the Plan's approach in respect of commuted sums for affordable housing.																																				
MAC 077	HN3	Insert table showing the components of affordable housing supply (Table 3 in BP7 October 2020 version) into the written statement after policy HN3 as follows: <table border="1"> <thead> <tr> <th></th> <th>Tier 1 - Main Service Centres</th> <th>Tier 2 - Local Service Centres</th> <th>Tier 3 - Sustainable Settlements</th> <th>Tier 4 - Defined Villages</th> <th>Tier 5 - Undefined Villages</th> <th>Total Affordable Housing Provision</th> </tr> </thead> <tbody> <tr> <td>Affordable Housing on Allocated Sites</td> <td>287</td> <td>481</td> <td>64</td> <td>0</td> <td>0</td> <td>832</td> </tr> <tr> <td>Affordable Housing on Large & Small Windfall Sites</td> <td>197</td> <td>48</td> <td>48</td> <td>21</td> <td>11</td> <td>325</td> </tr> <tr> <td>Affordable Housing on Committed Sites</td> <td>212</td> <td>118</td> <td>119</td> <td>9</td> <td>15</td> <td>473</td> </tr> <tr> <td>Completions 01/04/2015 to 01/04/2020</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>635</td> </tr> </tbody> </table>		Tier 1 - Main Service Centres	Tier 2 - Local Service Centres	Tier 3 - Sustainable Settlements	Tier 4 - Defined Villages	Tier 5 - Undefined Villages	Total Affordable Housing Provision	Affordable Housing on Allocated Sites	287	481	64	0	0	832	Affordable Housing on Large & Small Windfall Sites	197	48	48	21	11	325	Affordable Housing on Committed Sites	212	118	119	9	15	473	Completions 01/04/2015 to 01/04/2020	-	-	-	-	-	635	To explain the spatial components of affordable housing supply and to take account of deletion of housing at Warren Hall.	No further IIA considerations required - change is minor and would not alter IIA findings.
	Tier 1 - Main Service Centres	Tier 2 - Local Service Centres	Tier 3 - Sustainable Settlements	Tier 4 - Defined Villages	Tier 5 - Undefined Villages	Total Affordable Housing Provision																																	
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		<table border="1"> <tr> <td>Total Affordable Housing Provision</td> <td>696</td> <td>647</td> <td>231</td> <td>30</td> <td>26</td> <td>2265</td> </tr> <tr> <td colspan="6">Average annual delivery rate per annum over LDP period (2015-2030)</td> <td>151</td> </tr> </table>	Total Affordable Housing Provision	696	647	231	30	26	2265	Average annual delivery rate per annum over LDP period (2015-2030)						151		
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MAC 078	HN3	Add at end of second sentence of para 11.9 'The sub market areas are illustrated in the maps in Appendix 4'.	To reference the inclusion of the housing sub market area maps in the written statement															
MAC 079	HN4	In criteria 'f' delete 'rural'. The revised criterion f is 'it is for affordable housing rural exception sites on land adjoining the settlement limits (see policy HN4-D)'.	To reflect the terminology in para 4.2.34 of PPW11	No further IIA considerations required - change is minor and would not alter IIA findings.														
MAC 080	HN4-D	In opening policy wording delete 'for tier 2, 3 and 4 settlements,'. The revised introductory policy wording is 'Outside settlement boundaries for tier 2, 3 and 4 settlements, proposals to develop affordable housing in rural areas will only be permitted, where:'	To simplify the introductory policy wording which applies to all settlements with a settlement boundary.															
MAC 081	HN7	Delete present wording of criteria e) of HN7 and replace with ' the cumulative impact of development would not adversely affect the character of the locality or residential amenity '.	To add clarity to the policy wording in respect of the cumulative impacts of HMO's	Further IIA consideration required - see section 3.4.9.														
MAC 082	HN8	Amend table accompanying policy HN8 as follows: <ul style="list-style-type: none"> HN8.1 Magazine Lane, Ewloe – replace 'extension' with 'remodelling' and replace '6-8' with '9' HN8.2 Gwern Lane, Cae Estyn, Hope – replace '6-8' with '4' 	To reflect the updated proposals on each site allocation	Further IIA consideration														

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
<p>MAC 083</p>	<p>HN8 11.33</p>	<p>In para 11.33 delete all the text after ‘... for a small transit site’.</p> <p>The revised wording of para 11.33 is:</p> <p>11.33 The GTAA (2016) for Flintshire covers the 5 year period 2015-2020 as well as the 15 year Plan period 2015 to 2030 and was approved by the Welsh Government in accordance with Section 102 of the Housing (Wales) Act 2014) on 28/03/17. The approved GTAA identified a need for -5 pitches over the over the 5 year period and 19 pitches over the Plan period, plus a need for a small transit site. However, at the time the original GTAA was prepared, the position was complicated by a number of temporary permissions and undetermined planning applications. In order to provide greater clarity an update of the GTAA was commissioned in June 2018. This update has identified:</p> <ul style="list-style-type: none"> • A need over the 5 year period for 8 pitches • A need over the 15 year Plan period for 26 pitches • A need over the 15 year Plan period for a small transit site 	<p>To provide clarification that the Plan is informed by the approved GTAA and not the subsequent informal update.</p>	<p>required - see section 3.4.10.</p>
<p>MAC 084</p>	<p>HN8 Para 11.34</p>	<p>In para 11.34 delete ‘updated’ in the first and second sentence.</p> <p>In para 11.34 in the 3rd sentence add after ‘extend’ the words ‘or remodel’.</p> <p>At the end of para 11.34 add ‘The allocation at Magazine Lane, Ewloe is for the reconfiguration of the existing consented site and will provide for an additional 9 pitches and the allocation at Gwern Lane, Ewloe is for the extension of the site for an additional 4 pitches. In conjunction with the 10 pitches at the Riverside site this will provide for a total of 23 pitches which slightly exceeds the GTAA need of 19 pitches. A transit site for 6 pitches has also been allocated at Castle Park, Flint to meet the identified need for a small transit site’.</p> <p>The revised wording of para 11.34 is:</p> <p>‘11.34 On the basis of the need identified in the updated GTAA for permanent pitches, the Council have allocated 3 sites as identified above and as shown on the proposals maps. The Riverside extension proposals will involve a reconfiguration of the existing site (20 pitches) to provide a new layout for 30 pitches i.e. a net increase in 10 pitches. The other two allocations for permanent pitches both seek to extend or remodel existing sites and pitches. Both of which have planning permission and have either been implemented or is being implemented. The updated GTAA was also accompanied by an assessment of Council owned sites for both permanent and transit site(s). An earlier focussed Call for Candidate Sites for gypsy sites and minerals / waste sites was undertaken in August 2017 and whilst sites came forward for the latter none were submitted for the former. It has therefore been necessary and practical to evaluate Council owned land and privately owned land in order to identify sites suitable to meet the identified need. The approach is set out in a Gypsy and Traveller Site Selection Background</p>	<p>To update the Plan in respect of the revised position on residential allocations in terms of meeting the identified need.</p>	

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>paper. The allocation at Magazine Lane, Ewloe is for the reconfiguration of the existing consented site and will provide for an additional 9 pitches and the allocation at Gwern Lane, Ewloe is for the extension of the site for an additional 4 pitches. In conjunction with the 10 pitches at the Riverside site this will provide for a total of 23 pitches which slightly exceeds the GTAA need of 19 pitches. A transit site for 6 pitches has also been allocated at Castle Park, Flint to meet the identified need for a small transit site.'</p>		
<p>MAC 085</p>	<p>HN9</p>	<p>In policy HN9 delete criteria 'a' and 'b' and renumber the remaining criteria.</p>	<p>To reflect the guidance in Welsh Government Circular 005/2018.</p>	
<p>MAC 086</p>	<p>HN9</p>	<p>In the opening part of wording of HN9 delete the wording 'or the extension of existing sites, including land outside of defined settlement limits, will be permitted provided' and replace with 'will be preferred within settlements, or adjoining settlement boundaries where the resulting development would represent a logical extension to the settlement.</p> <p>Where there are no suitable locations within or adjacent to existing settlements, open countryside locations will then be considered.</p> <p>In all instances the proposal should satisfy the following criteria:'</p> <p>The revised policy wording and explanatory wording (as a result of the combined changes) is as follows: 'Proposals for new Gypsy and Traveller sites, or the extension of existing sites, including land outside of defined settlement limits will be permitted provided: will be preferred within settlements, or adjoining settlement boundaries where the resulting development would represent a logical extension to the settlement.</p> <p>Where there are no suitable locations within or adjacent to existing settlements, open countryside locations will then be considered.</p> <p>In all instances the proposal should satisfy the following criteria:</p> <p>a. There is a clearly identified unmet need in accordance with the most recently undertaken Gypsy and Traveller Accommodation Assessment; b. There are no suitable alternative sites either with planning permission or allocated for such uses which could accommodate the need; c. a. The site is well related to suitable community facilities and services for the prospective occupants;</p>	<p>To reflect the guidance in Welsh Government Circular 005/2018.</p>	<p>Further IIA consideration required - see section 3.4.1.</p>

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>d. b. The site is capable of being served by utilities including sustainable waste disposal and recovery and emergency services;</p> <p>e. c. The site affords satisfactory amenity standards both for its occupants and for neighbouring land uses;</p> <p>d. The site is not in an area at high risk of flooding given the particular vulnerability of caravans’.</p>		
MAC 087	HN9 11.37 11.38	<p>In para 11.37 delete the last sentence to ensure consistency with the deletion of criteria ‘a’ and ‘b’...</p> <p>The revised explanatory text is as follows:</p> <p>11.37 Despite provision being made in the Plan through allocations, there may be development proposals for Gypsy and Traveller sites submitted during the Plan period, particularly in order to meet a specific need. This policy takes the form of a criteria based policy for assessing such proposals and should be read alongside the Plan’s framework of policies. It will be necessary for each applicant to demonstrate that there is a specific need which cannot be met on existing sites or sites with planning permission.</p>	To improve the clarity of the explanatory wording and to reflect the guidance in Welsh Government Circular 005/2018.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 088	HN9 11.38	<p>Delete in first sentence of para 11.38 ‘be located on or close to main travelling routes for ease of access, and’ as this is more applicable to transit sites, and replace with ‘The preference will be for sites within settlements but consideration will be given to edge of settlement sites, where the proposed development would represent a logical extension to the form and pattern of built development within the settlement boundary. Only when there are no suitable sites within or on the edge of settlements will sites in open countryside be considered subject to meeting the policy criteria. Sites...’</p> <p>The revised explanatory wording is as follows:</p> <p>11.38 The preference will be for sites within settlements but consideration will be given to edge of settlement sites, where the proposed development would represent a logical extension to the form and pattern of built development within the settlement boundary. Only when there are no suitable sites within or on the edge of settlements will sites in open countryside be considered subject to meeting the policy criteria. Sites should be located on or close to main travelling routes for ease of access, and should be capable of being serviced with appropriate infrastructure and be well located in respect of accessing services and facilities to meet residents needs. Sites should not be in areas of high flood risk given that caravan development is a highly vulnerable form of development. Proposals should be designed in accordance with advice in Welsh Government Circular 005/2018: Planning for Gypsy, Traveller and Showpeople Sites.</p>	To improve the clarity of the explanatory wording and to reflect the guidance in Welsh Government Circular 005/2018.	No further IIA considerations required - change is minor and would not alter IIA findings.
12. Development Management Policies – Valuing the Environment				

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 089	EN1	<p>In the penultimate paragraph of the policy wording add after ‘... Council’s adopted standards’ the words ‘of 2.4 Hectares per 1,000 population’ and amend ‘standards’ to read ‘standard’.</p> <p>The revised policy wording is:</p> <p>‘All new residential developments will be required to include provision for public open space or sports and recreational facilities in accordance with the Council’s adopted standards of 2.4 Hectares per 1,000 population and be well related to the development it is intended to serve’.</p>	To state what level of open space provision the Council seeks.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 090	EN2	<p>In opening part of policy wording after ‘including designated’ add ‘and non-designated’ and then after ‘... proposals maps’ add ‘and listed in the table below’.</p> <p>The revised policy wording is:</p> <p>‘Development proposals will be required to protect, maintain and enhance the extent, quality and connectivity of the green infrastructure network, including designated and non-designated green spaces (as shown on the proposals maps and listed in the table below), and where appropriate.’</p>	To explain that the policy does not only protect the designated green spaces.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 091	EN2	<p>Add a title ‘Designated Green Spaces’ before the table accompanying Policy EN2.</p> <p>Add the following explanatory text</p> <p>The following table details the designated green spaces throughout Flintshire. This is list is not exhaustive and the non-designation of a green space does not mean that it is not protected from development under policy EN2 or EN1. Green spaces are areas of open land identified as being of value to a local community in terms of add to the character of towns and villages and to the enjoyment of local residents. Such areas can be important for wildlife or general recreational value, or simply as the only green area in an otherwise urbanised environment. The designated green spaces may have a number of benefits:</p> <ul style="list-style-type: none"> • for their landscape quality; • for their value as a character feature in a locality; • as a visual break in a developed area; • as a buffer between incompatible uses; • for their importance as part of an existing or proposed network of open areas, or as a link to open countryside. <p>The Open Space Assessment (OSA) records all green spaces in the County including children’s play space, playing fields, outdoor sports facilities, cemeteries and amenity space. It also records School facilities that are unavailable for public use. The OSA will be continually monitored and</p>	To provide further explanation regarding designated and non-designated green spaces.	

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		added to as new green spaces are developed, this will ensure that all green spaces are afforded protection under policies within the LDP.		
MAC 092	EN2	In criteria a add ' local ' before 'network'. The revised wording of criteria a is 'create new green infrastructure linkages from the proposed development to the existing local network;'	To clarify that the policy is only seeking linkages between a development and the local green infrastructure network	
MAC 093	EN5	In the first sentence of EN5 policy wording add after 'AONB' the words 'and its setting'. The sentence will read 'Within the Clwydian Range and Dee Valley AONB and its setting, ... '	To clarify the policy wording regarding the setting of the AONB	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 094	EN6	Replace the first paragraph of the policy wording with the following wording, but not to make reference to other legislation [see strike through]. 'Development will not be permitted that would result in an adverse effect on the integrity of sites of international nature conservation importance, except in the circumstances specified in relevant legislation . Proposals where adverse effects on site integrity cannot be ruled out would not be supported'.	To clarify wording of EN6 regarding international nature conservation designations	Further IIA consideration required - see section 3.4.12.
MAC 095	EN6	Amend Policy Title as follows: EN6: Sites of Biodiversity and Geodiversity Importance	To add clarity that the policy encompasses geodiversity.	
MAC 096	EN7	In criteria c) replace 'gain' with ' benefit '. The revised wording is 'it results in a net gain benefit in biodiversity'.	To ensure consistency with terminology in PPW11.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 097	EN11	Reword policy EN11 and explanatory text to refer to green wedges as follows: EN11: Green Barriers Wedges The following areas have been designated as green barriers wedges on the proposals map:	To ensure the Plan's terminology is consistent with	No further IIA considerations required - change is

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>[insert table]</p> <p>Within the designated green barriers wedges development will only be permitted for:</p> <ol style="list-style-type: none"> a. justified rural enterprise needs; b. essential facilities for outdoor sport and outdoor recreation, cemeteries, and other uses of land which maintain the openness of the green barrier wedge and which do not conflict with the purpose of including land within it; c. limited extension, alteration or replacement of existing dwellings; d. small scale diversification within farm complexes where this is run as part of the farm business; or e. the re-use of buildings provided that: <ol style="list-style-type: none"> i. the original building is substantial, permanent and capable of conversion without major reconstruction; ii. the new use will not have a greater impact on the openness of the green barrier wedge and the purposes of including land within it; and iii. the building is in keeping with its surroundings. <p>Certain other forms of development may be appropriate in the green barrier wedge provided they preserve its openness and do not conflict with the purposes of including land within it. These are: mineral extraction; renewable and low carbon energy generation; engineering operations; and local transport infrastructure.</p> <p>Other forms of development would be inappropriate development unless they maintain the openness of the green barrier wedge and do not conflict with the purposes of including land within it.</p> <p>12.40 Green barrier wedge designations are drawn to ensure protection of the openness of key areas of land in strategic or key locations over the Plan period. Whilst there are other policies in the Plan to control development in the countryside, it is considered important to give added protection to some areas via designation as green barriers wedges as they protect key areas of open countryside between and around settlements.</p> <p>12.41 The green barriers designated in the UDP have been the subject of a robust review as to their fitness for purpose, details of which can be found in a Background Paper: Green Barrier Review. The review involved each green barrier being assessed against the criteria within Planning Policy Wales i.e. that the purpose of a green barrier wedge is to:</p> <ul style="list-style-type: none"> • prevent the coalescence of large towns and cities with other settlements; • manage urban form through controlled expansion of urban areas; • assist in safeguarding the countryside from encroachment; 	<p>PPW11 in respect of green wedges.</p>	<p>minor and would not alter IIA findings.</p>

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<ul style="list-style-type: none"> • protect the setting of an urban area; and • assist in urban regeneration by encouraging the recycling of derelict and other urban land. <p>12.42 The review has also had regard to whether each existing green barrier has been the subject of previous or current development pressure. Proposals for new green barriers or extensions to existing green barriers which were put forward as part of Candidate Site submissions have also been assessed in the same manner. The objective is to ensure that in each case a green barrier wedge designation is necessary and justifiable over and above settlement boundary and open countryside policies and fulfils the purpose of green barriers wedges in PPW. The approach to the review and designation of green barriers wedges is in line with guidance with Planning Policy Wales. Although PPW uses the term 'green wedges' rather than 'green barriers', para 3.60 of PPW10 advises 'Local planning authorities need to consider establishing Green Belts and making local designations, such as green wedges'. The term green barrier is therefore appropriate and in line with national guidance.</p> <p>12.43 Planning Policy Wales provides specific guidance on the consideration of planning applications within green barrier wedge designated areas. It emphasizes the importance of maintaining the openness of the land, provides a presumption against inappropriate development and outlines the very exceptional circumstances when other considerations outweigh the importance of protecting the openness of the land. Given that PPW provides such clear and detailed advice it is not considered necessary for it to be repeated within this policy. Any proposals for inappropriate development in a green barrier wedge will be treated as a departure from the Plan.</p>		
<p>MAC 098</p>	<p>EN13</p>	<p>In policy wording make the following changes:</p> <ul style="list-style-type: none"> • In criteria a) delete 'For large scale', replace 'solar' with 'Solar' and in brackets delete '5', add 'Less than 10' and delete 'and above' • In criteria b delete 'For' • Delete the policy wording 'Land is specifically allocated..... proposals maps' • amend the proposals maps by deleting the two solar allocations. <p>The revisions to the policy wording and reasoned justification are as follows:</p> <p>Renewable or low carbon energy generation development may be permitted for:</p> <ol style="list-style-type: none"> For large scale Solar PV farms (5 Less than 10 MW and above) within the Solar Indicative Local Search Areas identified on the proposals map; For small scale and/or community based proposals (less than 5MW) for wind, solar, biomass, energy from waste, anaerobic digestion and hydropower in appropriate locations; <p>subject to satisfying the relevant policy tests below.</p>	<p>To reflect updated guidance in PPW11 and Future Wales and the grant of planning permission on the two solar allocations.</p>	<p>Further IIA consideration required - see section 3.4.13.</p>

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments												
		<p>Land is specifically allocated for solar PV farms at Crumps Yard, Connah's Quay and at Castle Park, Flint, as shown on the proposals map.</p> <p>12.46 The Council has undertaken a Renewable Energy Assessment (REA), in line with the Welsh Government guidance to identify the potential for renewable energy generation. This will help work towards achieving the Welsh Governments targets for Renewable Energy Generation as set out in para 5.7.4-614 of PPW101 and also contribute to reducing carbon emissions.</p> <p>12.47 In relation to the development of wind farms, the County does not fall within one of the Strategic Search Areas (SSAs) 'Pre-Assessed Areas for Wind Energy' identified by Welsh Government in Future Wales on the basis of substantial empirical research, and considered to be the most appropriate locations with a presumption in favour of large scale for strategic scale on-shore wind farm development (over 2510MW (megawatts)). The REA has therefore focused on the potential for identifying Indicative Local Search Areas (ILSA) which are suitable to accommodate large scale wind farms of 5MW and above. Having carried out the REA assessment in line with the Welsh Government Toolkit and applying statutory and local constraints, there are no ILSAs for wind farms identified on the proposals map due to the extent of a number of nationally strategic constraints including the NATS Aviation Radar Safeguarding Zone constraint.</p> <p>12.48 In relation to solar, the County has seen in recent years a number of proposals for large scale solar farm developments. The REA has focused on the potential for identifying ILSAs which are suitable to accommodate solar farms of up to 510MW and above. The REA has adopted the same Toolkit based GIS mapping assessment as for wind. From this assessment, 18 initial ILSAs have been were identified for solar potential which have then been refined via a Landscape Sensitivity Assessment to 11 sites shown in the table below, and are shown on the proposals map. Although the REA has focused on wind and solar as the two primary technologies with the greatest spatial impacts, it will has also considered the potential from other sources of energy, such as energy from waste and heat, particularly considering the industrial activity in parts of the County, and the potential from all of the assessed sources is shown in the subsequent table below.</p> <p>Indicative Solar Areas of Search</p> <table border="1"> <thead> <tr> <th>ILSA Ref</th> <th>ISLA Name</th> <th>Size (ha)</th> <th>Potential Capacity (MW)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Buckley 2 (west)</td> <td>39</td> <td>5</td> </tr> <tr> <td>2</td> <td>Buckley 3 (south)</td> <td>117</td> <td>10</td> </tr> </tbody> </table>	ILSA Ref	ISLA Name	Size (ha)	Potential Capacity (MW)	1	Buckley 2 (west)	39	5	2	Buckley 3 (south)	117	10		
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11	Penyffordd & Penymynydd	89	10																																									
ISLA Total			70																																									
		<p>12.49 The Council has adopted a pro-active approach in respect of its own land assets and has developed two solar farms on former landfill sites. Two further proposals are being developed at Crumps Yard, Connah's Quay and Castle Park, Flint and these are allocated in the Plan. This is directly in line with the targets for renewable electricity generation set by the Welsh Government and the requirement for local ownership of a proportion of this generation.</p> <p>12.50 The policy also sets out a criteria based approach which will enable detailed development proposals to be assessed against a robust set of criteria. This will be particularly useful to enable the assessment of smaller or community based renewable energy proposals of less than 5MW which may arise over the Plan period, as well as larger schemes that may arise that are not within an ILSA but may still be appropriate subject to assessment against the criteria- and provision of suitable mitigation. It is also relevant to note that for proposals of 10MW or more, the determination of these will be made by the Welsh Ministers against policy 18 of Future Wales, under the Developments of National Significance (DNS) process and not by the Local Planning Authority.</p> <p>Insert completed updated tables 28 and 29 From REA [LDP-EBD-RE1} when available.</p>																																										
MAC 099	EN13 12.50	The following text should be added at the end of para 12.50 of the explanation to policy EN13 'Renewable and Low Carbon Energy Development':	To provide additional commentary in respect of possible																																									

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		'The Council is aware that the energy sector is going through significant changes in the light of the need to de-carbonise energy production. Innovative new energy sources such as hydrogen are being developed and there may be opportunities for such development within the County given its long standing energy production role'	new renewable and low carbon energy developments in the County	
MAC 100	EN14 New para	Add a new paragraph at the end of the explanation to policy EN14 as follows: 'A Flood alleviation scheme for Mold was granted planning permission in 2015. This scheme sought to primarily divert key watercourses in the catchment above Mold to alleviate the existing issues with flooding in parts of the town. When evaluated further on the basis of viability and deliverability, the approved scheme was not capable of being implemented and a review of the options was undertaken for the Council by consultants. A Feasibility study and options map was produced in 2017 and this made a series of recommendations, some of which are currently being taken forward to an advanced business case stage to test feasibility, design and cost.'	To provide an update on the Mold Flood Alleviation Scheme.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 101	EN15	Policy wording of EN15 to be amended as follows: EN15: Water Resources Development affecting water resources will only be permitted if: a. it would not have a significant adverse impact on the capacity and flow of groundwater, surface water, or coastal water systems; b. it would not pose an unacceptable risk to the quality of groundwater, surface water, or coastal water; c. it would have access to adequate water supply, sewerage and sewage treatment facilities which either already exist, or will be provided in time to serve the development, without detriment to existing abstractions, water quality, fisheries, amenity or nature conservation; and d. there is no adverse effect on the integrity of the River Dee and Bala Lake SAC in particular through the treatment of waste water. This can be achieved through implementation of mitigation measures and associated supplementary planning guidance. Mitigation will involve, either: 1. Delivery of measures specified in the Dee Catchment Phosphorus Reduction Strategy (DCPRS), which will require: i. Developer contributions/community infrastructure levy funds to deliver measures identified within the DCPRS to reduce phosphorus levels within the catchment. ii. Phasing of development to meet the delivery milestones within the DCPRS, and delaying development if milestones have not been met;	To ensure that the policy includes a specific safeguard in respect of phosphates.	Further IIA consideration required - see section 3.4.14.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>OR</p> <p>2. Using alternative mitigation approaches to those mentioned in 1. above. Where further evidence demonstrates that adverse effects on the integrity of the River Dee and Bala Lake SAC can be avoided using alternative mitigation, these must be agreed with the Council, in consultation with Natural Resources Wales.</p> <p>Amendments to explanatory wording awaiting final agreement with NRW.</p>		
MAC 102	EN23	<p>In criteria e) add after 'minerals' the text ', including Mostyn Docks and Padeswood Cement Works (as shown on the proposals maps),'.</p> <p>The revised criteria is as follows:</p> <p>'essential infrastructure that supports the supply of minerals, including Mostyn Docks and Padeswood Cement Works, (as shown on the proposals maps), would not be compromised or would be provided elsewhere.'</p> <p>Add the following additional explanatory paragraph 'Land is also safeguarded through this policy at two sites which have an important existing or potential role as minerals infrastructure. Padeswood Cement Works has an active rail link and has the potential to distribute minerals. Mostyn Docks has the potential to distribute minerals by either train and / or boat. Both sites have the potential to reduce the number of road based minerals journeys and are therefore safeguarded through the policy as transport hubs for minerals.'</p>	To ensure that potential minerals infrastructure which can sustainably move minerals products, are safeguarded in the Plan.	Further IIA consideration required - see section 3.4.15.
MAC 103	EN25	<p>Update the table accompanying policy EN25 as follows:</p> <ul style="list-style-type: none"> Ddol Uchaf Quarry – replace '1.4 million' with '900,000'. Fron Haul Quarry – replace '900,000' with '500,000'. 	To update the Plan in respect of two minerals allocations	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC 104	12.84	<p>The North Wales Regional Technical Statement (RTS second review) and accompanying appendix for North Wales 1st Review has identified a requirement for Flintshire to allocate at least 4.4 3.543 million tonnes of sand and gravel and at least 3.84 35.928 million tonnes of crushed rock. The allocations identified within Policy EN25 are not sufficient to meet the identified need over the Plan Period. In relation to crushed rock, the allocations could each, in isolation, meet the requirement identified in the RTS. The decision to allocate both sites has been made in recognition of the economic importance of these sites to Flintshire and the region and to help support their viability over the longer term. In both cases, the mineral would be extracted over a period beyond the LDP and would release mineral which,</p>	To provide an update on the minerals requirement and the approach to meeting it through new allocations and a collaboration with	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		<p>although currently consented, is currently unavailable due to the practicalities of removing it. Therefore, the council will work in collaboration with Denbighshire County Council and Wrexham County Borough Councils in order to provide the apportionments identified. A Statement of Sub-Regional Collaboration has been entered into in order to provide certainty that the identified need will be met over the plan period.</p>	Wrexham and Denbighshire.	
MAC 105	EN27 12.90	Add at the end of para 12.90 'The management of secondary and recycled aggregate includes a wide range of processes including crushing, sorting, screening, stockpiling, storage and transfer' .	To clarify the types of uses that take place within the context of secondary and recycled aggregates	No further IIA considerations required - change is minor and would not alter IIA findings.
13. Monitoring				
MAC 106	Para 13.8	<p>Amend para 13.8 and the accompanying action bullet points as follows:</p> <p>13.8 If trigger points are hit then it will be necessary to investigate the reasons why policies or proposals are not being implemented as intended or objectives not being met. The process of reflection will help determine what action might be necessary to take. Consideration will need to be given to the delivery of all of the indicators collectively, their interrelationship, and the magnitude of any under delivery. It is acknowledged that some indicators may be more significant than others in terms of delivering the Plan's Strategy and this will be reflected in any future actions. The specific actions that might need to be taken will be dependent on the magnitude of any variance. The Monitoring Framework seeks to include sets out the options from for what actions which might be taken, as stated in Development Plans Manual 3. These include:</p> <ul style="list-style-type: none"> • Continue monitoring (if development plan policies are being implemented effectively) • Training required for Officers / Members (if development plan policies are not being implemented as intended and further training is required) • Further supplementary planning guidance required (if development plan policies are not being implemented as intended and further guidance is required) • Policy Review required (if development plan policies are not being implemented and are failing to deliver) • Plan Review required (if development plan policies are not being implemented and the plan's strategy is not being delivered, this could trigger a formal review in advance of the statutory 4-year review). 	To provide additional guidance in respect of the monitoring actions as specified in DPM3.	No further IIA considerations required - change is minor and would not alter IIA findings.

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
MAC 107	Monitoring Table	Update the monitoring table as set out in accompanying document	To update the monitoring table in line with other changes to the Plan.	
MAC 108	Monitoring table	<p>Amend the existing Monitoring Indicator MI17 by adding a Monitoring Indicator for each of the four G&T allocations:</p> <p>MI17.1 Magazine Lane, Ewloe</p> <p>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 9 pitches to be provided by 01.04.25</p> <p>Trigger Point - 1. No planning permission on allocated site by 01.04.23 - 2. No pitches delivered by 01.04.25</p> <p>MI17.2 Gwern Lane, Cae Estyn, Hope</p> <p>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 4 pitches to be provided by 01.04.25</p> <p>Trigger Point - 1. No planning permission on allocated site by 01.04.23 - 2. No pitches delivered by 1.4.25</p> <p>MI17.3 Riverside, Queensferry</p> <p>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 10 pitches to be provided by 01.04.26</p> <p>Trigger Point -1. No planning permission on allocated site by 01.04.23 - 2. No pitches provided by 01.04.26</p> <p>MI17.4 Castle Park, Flint</p> <p>Target - 1. Planning permission to be granted on allocated site by 01.04.23 - 2. 6 pitches to be provided by 01.04.26</p> <p>Trigger Point - 1. No planning permission on allocated site by 01.04.23- 2. No pitches provided by 01.04.26</p>	To provide targets and triggers to inform the monitoring of progress on the G&T allocations.	No further IIA considerations required - change is minor and would not alter IIA findings.
MAC	Monitoring Table	For MI26 and MI27 make the following changes:	To add clarity to the information sources	

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments																					
109		<ul style="list-style-type: none"> Replace 'Review of RTS' with 'Regional Technical Statement 2nd review & accompanying appendix North Wales' Replace RAWP Reports' with 'North Wales Regional Aggregate Working Party' 	within the monitoring table.																						
MAC 110	Monitoring Table	In MI19 replace 'green barriers' with 'green wedges '	Conformity with PPW11	No further IIA considerations required - change is minor and would not alter IIA findings																					
MAC 111	Monitoring Table	In M1 do not include 'over 10%' as is shown in Council Hearing Statement Appendix 1 - revised monitoring table (M20.01).	To conform with DPM3.																						
MAC 112	Monitoring Table	<p>Include monitoring indicators for SPG preparation as detailed below:</p> <table border="1"> <thead> <tr> <th>SPG Topic</th> <th>Status</th> <th>Timescale</th> </tr> </thead> <tbody> <tr> <td>New SPG 'Services, Facilities & Infrastructure'</td> <td>New SPG to be prepared and to include review of the existing Developer Contributions to Education SPG No 23</td> <td>Within 1 year of the LDP adoption date.</td> </tr> <tr> <td>Extensions and Alterations to Dwellings</td> <td>Existing SPG No.1 to be reviewed and updated</td> <td>Within 2 years of the LDP adoption date.</td> </tr> <tr> <td>Space Around Dwellings</td> <td>Existing SPG No.2 to be reviewed and updated</td> <td>Within 2 years of the LDP adoption date</td> </tr> <tr> <td>Trees and Development</td> <td>Existing SPG No.4 to be reviewed and updated</td> <td>Within 2 years of the LDP adoption date</td> </tr> <tr> <td>Conversion of Rural Buildings</td> <td>Existing SPG No.1 to be reviewed and updated within 6 months of the LDP adoption date.</td> <td>Within 2 years of the LDP adoption date</td> </tr> <tr> <td>Nature Conservation and Development / Great Crested Newt Mitigation Requirements</td> <td>Existing SPG No.8 and SPG 8a to be reviewed and updated</td> <td>Within 2 years of the LDP adoption date</td> </tr> </tbody> </table>	SPG Topic	Status	Timescale	New SPG 'Services, Facilities & Infrastructure'	New SPG to be prepared and to include review of the existing Developer Contributions to Education SPG No 23	Within 1 year of the LDP adoption date.	Extensions and Alterations to Dwellings	Existing SPG No.1 to be reviewed and updated	Within 2 years of the LDP adoption date.	Space Around Dwellings	Existing SPG No.2 to be reviewed and updated	Within 2 years of the LDP adoption date	Trees and Development	Existing SPG No.4 to be reviewed and updated	Within 2 years of the LDP adoption date	Conversion of Rural Buildings	Existing SPG No.1 to be reviewed and updated within 6 months of the LDP adoption date.	Within 2 years of the LDP adoption date	Nature Conservation and Development / Great Crested Newt Mitigation Requirements	Existing SPG No.8 and SPG 8a to be reviewed and updated	Within 2 years of the LDP adoption date	To ensure that progress on preparation is monitored.	No further IIA considerations required - change is minor and would not alter IIA findings.
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Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change			Reason	IIA Comments
		Affordable Housing	Existing SPG No.9 to be reviewed and updated	Within 1 year of the LDP adoption date		
		New Housing in the Open Countryside, Re: Infill Development in Groups of Housing	Relevant part of SPG No.10 to be reviewed and updated	Within 2 years of the LDP adoption date		
		Parking Standards	Existing SPG No.11 to be reviewed and updated	Within 2 years of the LDP adoption date		
		Retention of Local Facilities	Existing SPG No.24 to be reviewed and updated.	Within 2 years of the LDP adoption date		
		SuDS and the Management of Surface Water in New Development	Existing SPG No.29 to be reviewed and updated	Within 2 years of the LDP adoption date		
		Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)	Recently prepared and adopted jointly by Flintshire, Denbighshire and Wrexham – no intention to review or update.	n/a		
		Outdoor Playing Space and New Development	Existing draft SPG No.13 to be reviewed and updated	Within 1 year of the LDP adoption date		
		Houses in Multiple Occupation	Existing draft Advice Note to be reviewed and updated within 1 year of the LDP adoption date.	Within 2 year of the LDP adoption date		
		Warren Hall	New SPG to be produced	Within 1 year of the LDP adoption date.		
		Phosphates Developer Contributions	New SPG to be produced in conjunction with the Dee Catchment Phosphorous Reduction Strategy	Within 1 year of the LDP adoption date.		
14. Appendix 1 – Housing Commitments						

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments																																																																																																
MAC 113	Housing Commitment s	Update the list of housing commitments as follows:	To reflect updating of Plans Housing Balance Sheet to 01/04/20	No further IIA considerations required - change is minor and would not alter IIA findings.																																																																																																
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Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	I/A Comments
		Flint Working Men's Club	45 11	
		Earl Lea Site	73	
		Pandy Grange, Oakenholt	16	
		Garden City		
		Rear of St Andrews Church	12	
		Gronant		
		East of Gronant Hill	41	
		Gwernymynydd		
		Rainbow Inn, Ruthin Road	44 4	
		Land adj Siglen Uchaf	10	
		Hawarden		
		Land at Friar's Gap	4 2	
		Higher Kinnerton		
		Land at Kinnerton Lane	56 12	
		Holywell		
		Lluesty Hospital	89	
		East of Halkyn Rd	44	
		HCAC		
		Ty Carreg, Stryt Isa	49 15	
		Mold		
		Former Bromfield Timber Yard	122	
		Former Broncoed Works	48 9	
		94 Wrexham Road	2	
		Bryn Awel Hotel	23	
		Mostyn		
		Ffordd Hiraethog, Maes Pennant	10	
		Mynydd Isa		
		Issa Farm	59	
		Rose Lane / Sunnyside	58	
		New Brighton		
		New Brighton Service Station	23	
		Northop Hall		
		Cae Eithin, Village Rd	9	

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
		Penyffordd		
		Llys Dewi	27	
		Off Rhewl Fawr Road	8	
		Land north of Coed Mor	23	
		Penyffordd / Penymynydd		
		Rhos Road, Penyffordd	40	
		Hawarden Rd., Penyffordd	32	
		Queensferry		
		1-3 Pierce Street	16	
		Rhes y Cae,		
		The Stores House	7	
		Saltney		
		Allied Bakeries	74	
		Sychdyn		
		Sewage Works, Wats Dyke Way	43	
		Whitford		
		Altbridge House	41	
		Public Sector		
		Buckley		
		Buckley Health Centre, Padeswood Rd North	24	
		Flint		
		Ystrad Goffa Court	49	
		Holywell		
		East of Halkyn Rd	45	
		Ysgol Fabanod, Perth y Torfyn	55	
		Mynydd Isa		
		Rose Lane / Sunnyside	58	
		Total Commitments	4774 1221	
15. Appendix 2 – Supplementary Planning Guidance				
MAC 114	Appendix 2	Update list of SPG's, add 'Services, Facilities and Infrastructure' to list of SPG's and add timescales for each, as shown in MAC112:		No further IIA considerations required - change is

Schedule of Matters Arising Changes

Ref	Policy/Para	Matters Arising Change	Reason	IIA Comments
				minor and would not alter IIA findings.
Appendices				
MAC 115	Appendices	<p>Add a new appendix as section 16 'Appendix 3 – Housing Tables' - renumber '16 – Technical Terms and Glossary' as section 18 with the following tables:.</p> <ul style="list-style-type: none"> a) The timing & phasing of allocations b) The timing & phasing of sites with planning permission c) Updated AABR trajectory d) Trajectory graph 	To reflect the incorporation of certain housing tables in the written statement as per DPM3	No further IIA considerations required - change is minor and would not alter IIA findings.

Appendix B

Schedule of Inspector matters Arising Changes

IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
STR3B Warren Hall Strategic Site				
IMAC 001	STR3B Warren Hall	Deletion of housing element (300 units) from the strategic site. This leads to a number of consequential changes to the Plan as set out in the IMACs below (including those also arising from other Action Points to the policy):	To reflect the Inspectors concerns that the site is not in a suitable location for housing development.	Further IIA consideration required - see section 3.3.4.
IMAC001.1	STR3B Policy Title	Amend title of STR3B by deleting 'Mixed Use and 'and housing'. The policy title reads 'STR3B Warren Hall Mixed Use Development Site: Employment and Housing '.	To reflect the deletion of housing element	
IMAC001.2	STR3B Policy wording	In second sentence of opening part of policy wording replace 'Two' with ' The following ' and replace 'sites' with ' site '.	To reflect the splitting policy STR3 into two policies	
IMAC01.3	STR3B	Retain policy wording relating to STR3B Warren Hall from subdivision of original policy STR3 under MAC031	To reflect the splitting policy STR3 into two policies	
IMAC01.4	STR3B Policy criteria	Delete criteria i) '300 new homes, including affordable' and renumber subsequent criteria	To reflect the deletion of housing element and splitting policy STR3 into two policies	
IMAC01.5	STR3B Policy criteria	Amend criteria ii to read ' 22.7 19.1 ha of B1 and high quality B2 employment land'	To reflect the updating of employment element of site as a result of aerodrome safeguarding considerations and height of development.	

Schedule of Inspector matters Arising Changes

IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
IMAC01.6	STR3B Policy criteria	Amend criteria iii to read ' 1.3ha commercial hub involving comprising hotel, leisure, local centre and retail and local convenience shop, with high quality public realm as a focal point for the development '	To add clarity to the uses within and role of the commercial hub.	
IMAC01.7	STR3B Policy criteria	Amend criteria iv to read 'Strategic landscaping and multi-functional green infrastructure network'	To add clarity to the role of green infrastructure within the site.	
IMAC01.8	STR3B Policy criteria	Amend criteria v as follows 'Sustainable transport links within the site in terms of walking and cycling and provision for bus service and links with nearby settlements and a link with the section of the Mold – Deeside Active Travel route between Penynydd and Broughton...'	To add clarity to the sustainable transport provisions	
IMAC01.9	STR3B Policy criteria	Include a new criteria 'safeguarding built heritage assets within and adjoining the site'	To highlight the need to safeguard heritage assets	
IMAC01.10	STR3B Policy criteria	Include a new criteria ' ecological avoidance and mitigation measures '	To highlight the need for ecological measures.	
IMAC01.11	STR3B Policy criteria	Include a new criteria ' employment development not to exceed 12m in height '	To add clarity to the height of employment development having regard to aerodrome safeguarding considerations.	
IMAC01.12	STR3B Policy criteria	Include a new criteria ' Appropriately designed SuDs, landscaping, waste management and lighting as part of a scheme of aerodrome safeguarding measures '	To highlight the need for appropriate aerodrome safeguarding measures.	
IMAC01.13	Para 5.17	Delete para 5.17	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.

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IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
IMAC01.14	Para 5.18	Delete para 5.18	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.15	Para 5.19	In para 5.19 delete the text 'The Northern Gateway infrastructure investment' and incorporate the wording from para 5.20.	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.16	Para 5.19	Amend para 5.19 as follows: <ul style="list-style-type: none"> Replace 'The two strategic allocations are both sites' with 'This strategic allocation is a site' Replace 'has been secured through outline planning consents' with 'has previously been secured through planning consents' Replace 'but where it is vital to revisit both sites in different ways' with 'but where it is vital to revisit the site' Replace 'to ensure they come forward' with 'it comes forward' In second sentence add after 'has' the word 'previously'. 	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.17	Para 5.20	Delete last sentence 'In order to improve the viability and deliverability of the development, the site is being re-presented as an allocation for mixed use development comprising employment, housing and commercial hub as well as an extension to the site area.'	To reflect the deletion of housing element	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.18	Para 5.21	Delete para 5.21	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.

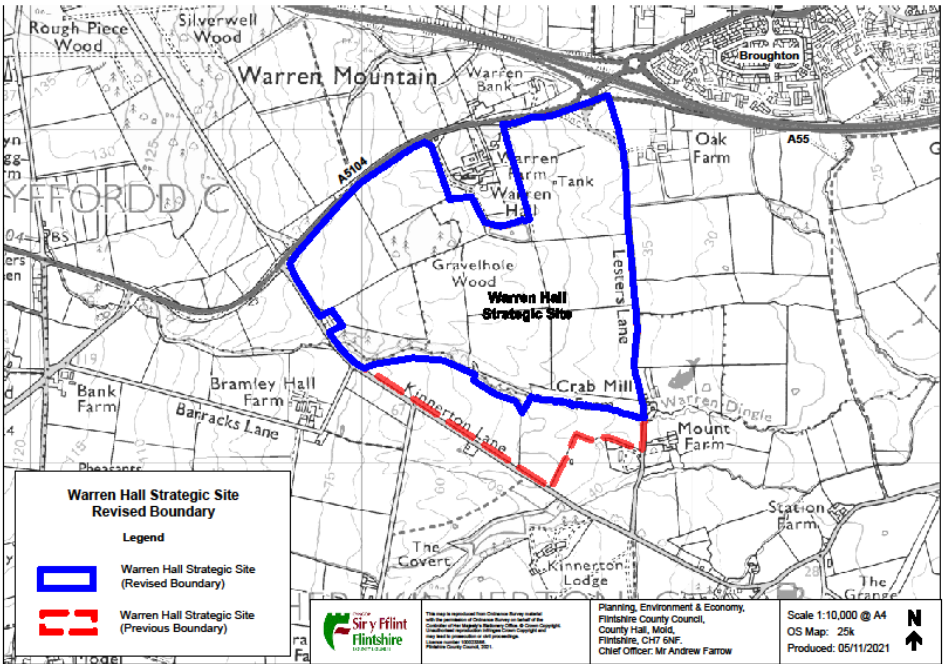
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IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
IMAC01.19	Para 5.22	Delete para 5.22	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.20	Para 5.23	Amend para 5.23 as follows: <ul style="list-style-type: none"> In third sentence redraft 'As part of this allocation the mix of land uses has been amended and site area extended to 74.63ha to also include housing development and a broader range of supporting uses including convenience retail as part of a commercial hub. Delete the fourth sentence 'The mixed use element will improve the viability and deliverability of the site'. 	To reflect the deletion of housing element	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.21	Para 5.24	Reword para 5.24 and add a reference to the preparation of a Supplementary Planning Guidance Note so as to read 'The Warren Hall strategic site provides a unique opportunity to embody placemaking principles in creating a large scale, high quality mixed-use development. The Council will, after the adoption of the Plan prepare a Supplementary Planning Guidance Note to provide further details to guide the formulation of detailed development proposals '. Renummer paragraphs accordingly.	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.22	Policy Explanation	Include an amended Masterplan as part of the reasoned justification to the policy.	To reflect the deletion of housing element and splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.23	Policy Context Table	In 'LDP Objectives' delete 'objective 8'	To reflect the deletion of housing element	No further IIA considerations required - change is minor and would not alter IIA findings.

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IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
IMAC01.24	Policy context Table	In 'Key Evidence' delete 'Topic Paper 10'	To reflect the deletion of housing element	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.25	Policy Context Table	In 'Key Evidence' delete "Northern Gateway Masterplan and Delivery Statement' in the Policy Context Table'	To reflect the splitting policy STR3 into two policies	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.26	STR11 / 7.11 Housing Balance Sheet	In Housing Balance Sheet: <ul style="list-style-type: none"> • amend 'Less LDP Strategic Allocations' to read 'Less LDP Strategic Allocation' • amend the 'Notes' section by deleting reference to 300 units at Warren Hall. [For amended Housing Balance Sheet see MAC038] 	To reflect the deletion of housing element	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.27	Ch13 Monitoring Table	Remove Monitoring Indicator MI16 relating to Warren Hall and re-number subsequent Monitoring Indicators.	To ensure the Monitoring Table reflects changes to the Plan.	No further IIA considerations required - change is minor and would not alter IIA findings.
IMAC01.28	Proposals Maps	Amend Proposals Map 02 Front and Proposals Map 03 Front by drawing back the strategic site boundary to exclude the housing element. See map below:	To reflect the deletion of housing element	No further IIA considerations required - change is minor and would not alter IIA findings.

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IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
		 <p>The revised policy wording and explanatory text for STR3B is as follows:</p> <p>STR3B Strategic Site Warren Hall: Mixed Use Development Site: Employment and housing:</p> <p>The majority of new development in Flintshire during the Plan period will be provided by a combination of commitments and new sites located in accordance with the sustainable settlement hierarchy. The following key strategic site will make an important contribution to the overall provision for growth in Flintshire over the Plan period:</p> <ul style="list-style-type: none"> ii. 19.1ha of B1 and high quality B2 employment land iii. 1.3ha commercial hub comprising hotel / leisure and local convenience shop, with high quality public realm as a focal point for the development iv. Strategic landscaping and multi-functional green infrastructure network v. Sustainable transport links within the site in terms of walking and cycling and provision for bus service and links with nearby settlements and a link with the 		

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IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
		<p>section of the Mold – Deeside Active Travel route between Penynydd and Broughton</p> <ul style="list-style-type: none"> vi. safeguarding built heritage assets within and adjoining the site vii. ecological avoidance and mitigation measures viii. Employment development not to exceed 12m in ix. Appropriately designed SuDs, landscaping, waste management and lighting as part of a scheme of aerodrome safeguarding measures. <p>Explanation</p> <p>The strategic allocation is a site where the principle of development has previously been secured through planning consents but where it is vital to revisit the site to ensure that it comes forward and contributes to the economic growth of the County and also contribute to meeting its housing needs. The Warren Hall site has had planning permission for a business park for a number of years and has seen considerable public sector investment comprising junction improvements at the interchange of the A5104 and A55(T). The delivery of the site has been held up by the effects of the global recession and also the availability of sites elsewhere. However, the site is in a strategic location and is important in contributing economic growth over the Plan period.</p> <p>The Warren Hall site is located on the south side of the A55(T) and Broughton and is located on the south side of the A5104 which runs between Chester and Penyffordd / Penymynydd. The site presently has outline planning consent for a 76,395 sqm business park comprising of B1 units as well as a hotel and leisure facilities. As part of this allocation the mix of land uses has been amended and site area extended to 63ha to include a broader range of supporting uses including convenience retail as part of a commercial hub. The employment element will still comprise B1 development and will need to be of high quality in terms of siting, form, design and materials which respects the setting of the site.</p> <p>The Warren Hall strategic site provides a unique opportunity to embody placemaking principles in creating a large scale, high quality development. The Council will, after the adoption of the Plan prepare a Supplementary Planning Guidance Note to provide further details to guide the formulation of detailed development proposals.</p> <p>Policy Context</p>		

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IMAC Ref	Policy / Para	Matters Arising Change	Reason	IIA Comments
		<p>LDP Objectives</p> <p>8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors.</p> <p>9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region.</p>		
	<p>PPW11</p>	<p>Para 4.1.37</p> <p>Section 5.4</p>		
	<p>Well-Being Goals</p>	<p>A prosperous Wales</p> <p>A resilient Wales</p>		
	<p>Key Evidence</p>	<p>Flintshire and Wrexham Employment Land Review Study</p> <p>Flintshire Further Employment Growth Scenario Assessment</p> <p>PPW11</p> <p>TAN23</p> <p>Deeside Plan</p> <p>Topic Paper 7 – Spatial Strategy</p> <p>Topic Paper 8 – Economy and Employment</p> <p>Warren Hall Masterplan and Delivery Statement</p>		
	<p>Monitoring</p>	<p>The monitoring framework is set out in Chapter 21 Monitoring.</p>		
	<p>Detailed Policies</p>	<p>This strategic policy will need to be read alongside a broad range of detailed policies on relevant and specific issues.</p>		

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