

Flintshire Local Development Plan 2015 - 2030

Preferred Strategy Consultation Document Background Paper

Consideration of Strategic Options Consultation and Assessment of Options

November 2017

Introduction

This Background Paper has been published alongside the Preferred Strategy document in order to provide an overview of the consultation responses on the Strategic Options document and to provide a commentary explaining the choice of the preferred growth and spatial option.

Background

The Strategic Options were the subject of a series of engagement events which led up to a 6 week public consultation exercise. The engagement events comprised:

- A Member Training Workshop on Friday 23rd September
- A Key Stakeholder Forum Workshop on Wednesday 12th October
- Town and Community Council Workshops on Friday 21st October, Monday 24th October and Tuesday 25th October

The six week public consultation exercise commenced on 28th October 2016 and ended on 9th December 2016 comprising:

- A main consultation document
- An 'easy read' consultation document
- A summary leaflet
- A comments form
- Public exhibitions at County Hall and at libraries on a staged basis, generally for 3 weeks at a particular venue
- Prominent coverage on the Council website

The engagement events and the public consultation were both assisted by Planning Aid Wales. The engagement events were all facilitated by Planning Aid Wales in conjunction with Officers and conducted so as to be interactive with audience participation in the form of workshop exercises and question and answer sessions. This reflects the intention to make a genuine attempt to engage with key stakeholders and Town and Community Councils as well as elected Members. The engagement events were generally well received both by those acting as facilitators and by attendees. The use of Planning Aid Wales enabled a different perspective to be taken in presenting and discussing material and to do so in a neutral and impartial manner. Planning Aid Wales were also involved in drafting the suite of 'easy read' documents which accompanied the main consultation document as well as the display material for engagement events and exhibitions.

Attendance at the Key Stakeholder Forum meeting was slightly disappointing with notable absences from key participants. During the early stages of Plan preparation, the Council was seeking to involve stakeholders in helping to shape the Plan through engagement. The absence of key organisations, when discussing strategic options, makes it difficult to establish working relationships and ultimately consensus on the Plan.

A summary of the attendance at the various engagement events is provided in Appendix 1. At each event, feedback and evaluation forms were available to participants. Notes were also made by Officers on questions arising during the workshops and the feedback from the group activities. These have all been collated and presented in summary in Appendix 2. The detailed notes from each meeting are set out in Appendix 3.

Generally speaking the event feedback responses were positive with only a handful of negative or critical comments. Most participants found the events to be informative and interesting and particularly welcomed the interactive manner in which they were conducted. The notes of the Key Stakeholder Forum meeting have been provided to all members of the Forum. All Town and Community Councils have been sent notes of all three Town and Community Council workshops as well as the notes of the Key Stakeholder Forum workshop.

In analysing the feedback at the events there were clear messages emerging about both the growth and spatial options. In terms of the growth options the favoured options were clearly Option 4 (2014 based 10 year highest migration 2008 headship rates – 6,600 new homes / 440 per annum) and Option 6 (Employment led projection 8,000 to 10,000 new jobs – 6,350 to 7,350 new homes / 440-490 per annum). In terms of the Spatial Options the favoured option was Option 5 (Sustainable Distribution and Refined Approach to Rural Settlements) although there was some support for Option 4 Transport Hubs and Corridors.

Consultation Feedback on Strategic Options

The comments received on the consultation document are summarised and presented in Appendices 4 to 7 and accompanying each comment is a response. The comments have been organised according to the structure of the questions in the Comments Form:

Appendix 4 includes:

- General Comments
- Q1 How Many new Homes?
- Option 1 – 3,750 / 250pa (2011 based 10 year migration)
- Option 2 – 4,800 / 320pa (2014 based 15 year migration)

Appendix 5 includes:

- Option 3 – 8,250 / 550pa (2014 based 15 year migration – 2008 headship rates)
- Option 4 – 6,600 / 440pa (2014 based 10 year highest migration)
- Option 5 – 10,350 / 690pa (2014 based 10 year highest migration – 2008 headship rates)
- Option 6 – 6,350 – 7350 / 440 – 490pa (employment led projection based on 8,000 to 10,000 jobs)
- Q2 Are there any alternative Growth Options?

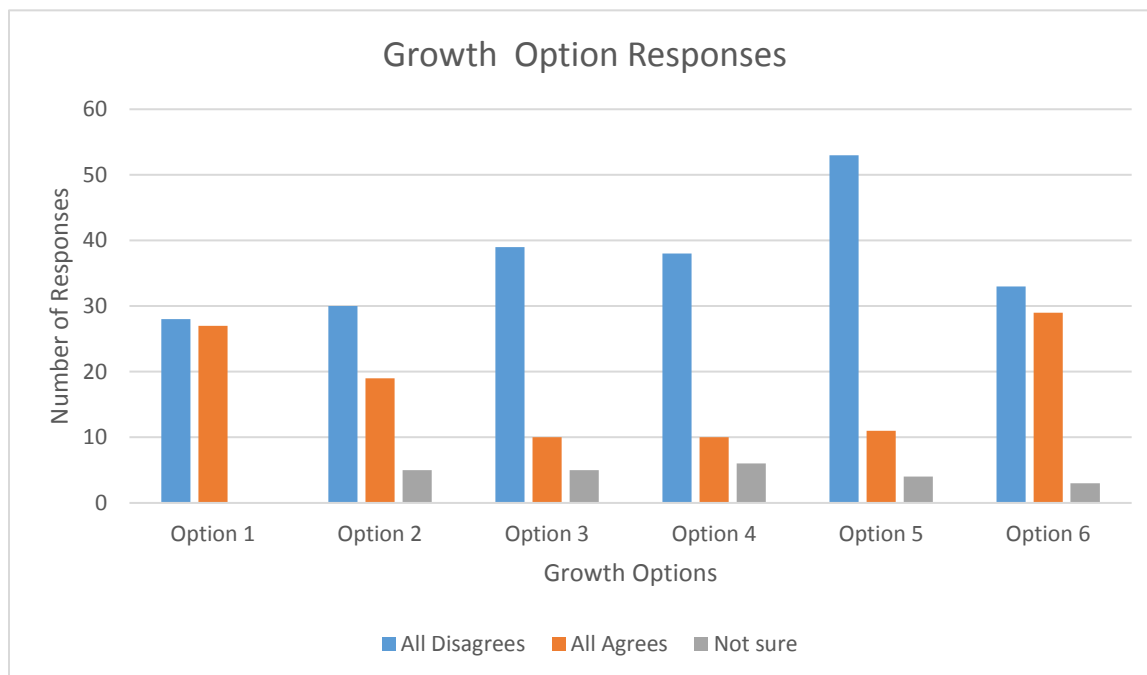
Appendix 6 includes:

- Q3 Where should the new homes go?
- Option 1 – Proportional Distribution
- Option 2 – Focussed Urban Growth
- Option 3 – Growth Area

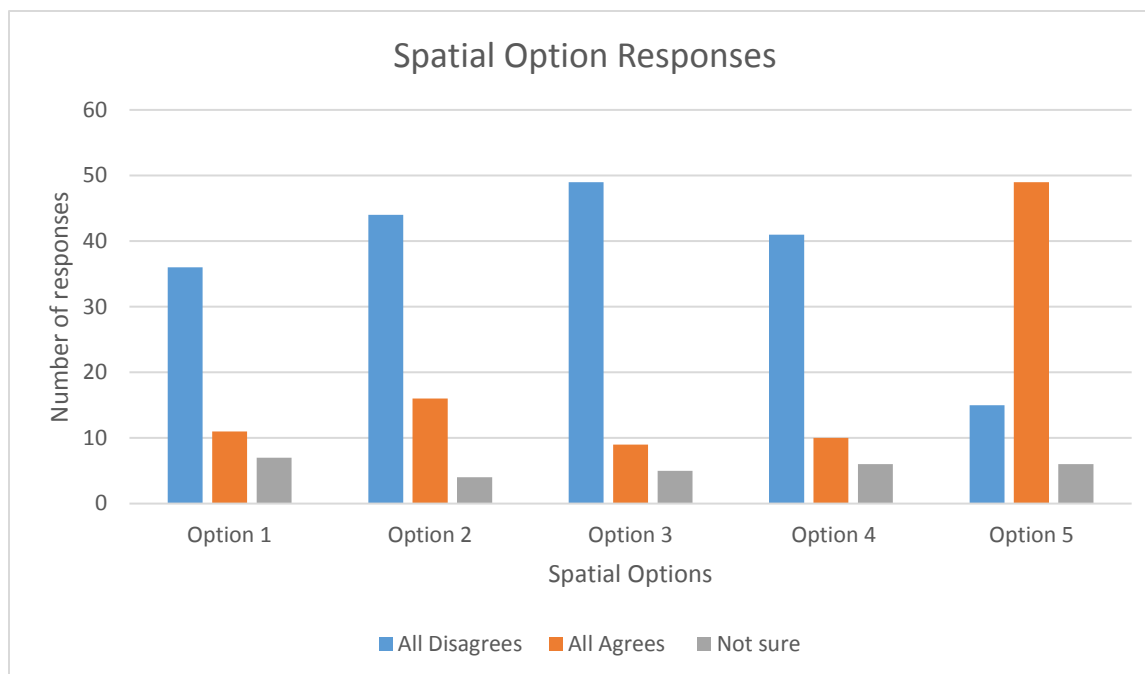
Appendix 7 includes:

- Option 4 - Hubs and Corridors
- Option 5 – Sustainable Distribution (plus refined approach to rural settlements)
- Are there any alternative spatial options?
- Are there any other comments?

An analysis of the consultation responses has been presented in the form of two graphs which illustrate the numbers agreeing with or disagreeing with options. With the growth options there is strong support for growth option 1 and this is due to the large number of objectors wishing to prevent development in certain settlements by supporting the lowest level of housing provision. There is also strong support for option 6 which is the employment led scenario but there is greater disagreement with the higher growth options, particularly within option 5.



In looking at the spatial options there is a more even set of results for options 1 – 4 but there is clear support for option 5.



The information contained in the graphs is useful in that it provides a quick visual representation of the views of those commenting on the consultation document. It must be stressed that whilst there is a need to gain a level of consensus on the Plan in order to move forward to the Preferred Strategy stage with confidence, the preparation of the Plan is not a popularity contest. It is also necessary for the choice of the preferred growth and spatial options to be based on sound evidence and to represent the most appropriate strategy and way forward for the Plan and County. It is therefore necessary to look at each option in turn in more detail as set out in the following sections of the report.

General Consultation Issues

The first section of the consultation document sets out the vision for the Plan, the Issues to be faced and the objectives for the Plan. It also sets out the key messages arising from earlier consultations as well as the preferred settlement hierarchy. This was previously consulted upon as part of the Key Messages document and in this regard it is disappointing to see comments focussing back on these matters.

This first part of Appendix 4 incorporates all comments on the above elements as well as any general comments not directly attributable to specific growth or spatial options. The conclusion from the introductory sections of the consultation document is that there is little disagreement with the vision for the Plan, issues to be faced by the Plan, and the objectives for the Plan.

With the exception of repeated comments on the settlement hierarchy concerning Hope Caergwrle Abermorddu and Cefn y Bedd, there is general consensus that the settlement hierarchy is soundly based and fit for purpose.

Hope Caergwrle Abermorddu Cefn y Bedd (HCAC)

A key issue arising throughout the consultation comments in Appendices 4-7 is the manner in which Hope, Caergwrle, Abermorddu and Cefn y Bedd (HCAC) has been identified as a single settlement and positioned within the second tier of the settlement hierarchy as a 'Local Service Centre'. A recurring theme when perusing the consultation comments in the appendices is the amount of responses relating to HCAC.

Objectors have made comments in each part of the standard comments form. However, the comments are often only loosely related to the particular growth or spatial options themselves but rather, were presented in the shape of a belief in that HCAC has been 'unfairly' treated in terms of i) the manner in which the 4 settlements of Hope, Caergwrle, Abermorddu and Cefn y Bedd have been grouped together into a single settlement of HCAC and ii) the positioning of HCAC in the second tier in the settlement hierarchy as a 'Local Service Centre'.

The comments repeatedly point to both the previous and future overdevelopment of HCAC and at one point refer to the approach of the Council as being 'unethical'. The key points arising from the analysis of these comments are set out below:

- the four settlements of Hope, Caergwrle, Abermorddu and Cefn y Bedd have been grouped as a single settlement in planning terms in the Alyn & Deeside Local plan, the UDP and now the emerging LDP
- the grouping of settlements into a single settlement in planning terms is by no means unique to HCAC and it in no way affects each settlement having its own character and identity both on the ground and in terms of community spirit
- The approach in HCAC whereby it had a single settlement boundary was specifically addressed by the UDP Inspector and found to be sound and sensible
- The four settlements all physically adjoin each other and share facilities and services and are located on a sustainable transport corridor
- HCAC has a good range of service and facilities and performs the function of a Local Service Centre in that it supports the local area
- The settlement of HCAC compares favourably in terms of size, character and services and facilities with the other Local Service Centres
- The settlement of HCAC sits considerably above the tier of settlements below i.e. Sustainable Villages, being of a different size, character and having a greater level of facilities and services
- The settlement has not experienced overdevelopment in the UDP period as actual growth did not even reach the bottom of the 8-15% growth band
- There is no evidence presented in the Strategic Options document to fuel the belief that HCAC will be overdeveloped in the LDP plan period

In conclusion HCAC is considered to be logically presented as a single settlement in planning terms and its inclusion as a Local Service Centre is based on sound evidence as contained in the Settlement Audit and in the Key Messages document which set out alternative approaches to defining a settlement hierarchy.

UDP 'add – on'

A general and recurring point throughout many of the developer based comments is that the UDP 'under-delivery' of its housing requirement figure, should be added on to the LDP housing need figure. As a matter of principle and indeed logic, it is not necessary or appropriate to simply add on the undelivered part of a previous development plan onto the next development plan. The UDP housing need was calculated using the best available data and assumptions at that time and the task now in preparing the LDP is to take a fresh look at calculating housing need based on current data and assumptions having regard to the advice in PPW. In essence the slate has to be 'wiped clean'. To merely add a previous element of unmet housing need onto a newly calculated housing need, is not comparing like with like. It would be perverse to simply add on the UDP 'under-delivery' on top of the LDP housing need figure. However, it will be necessary for the LDP to provide for a sufficient level of flexibility on top of the 'new allocations' element to allow for any sites that might not come forward at all or not come forward as quickly as expected.

Growth Options

The consultation document presented 6 growth options with the first 5 of these being 'projection' led and the 6th being employment growth led. The objective of providing a larger number of options was to illustrate the effects of using different datasets and assumptions and to encourage engagement and debate. Whilst accepting that not all of the options are in themselves likely to result in a 'sound' Plan, they have been presented as they are part of 'telling the story' as to how the Plan has evolved. The growth options were also presented in Table 4 in Appendix 2 of the Strategic Options Main Document in the form of an illustrative Housing Balance Sheet to illustrate the effects of each Option in terms of the need for and level of new housing allocations. The scenario ranged from Option 1 and 2 which required no new allocations to Option 5 which would require significant allocations.

Option 1 – 3,750 dwellings (250 pa)

The consultation document makes it clear that this option is the baseline position in that it is the most up to date Welsh Government official household projection. In 'normal' circumstances PPW advises that it would represent the 'starting point' in formulating housing projections for a development plan. However, in this case the publication of the projections was quickly followed by a Ministerial letter advising caution in the use of the projections as they were based on a period of recession and therefore underplayed the housing needs for each County. The letter states *'The Plan should reflect all aspects of the evidence base, and it is not prudent for a Plan, looking 15-20 years ahead to replicate a period of exceptionally poor economic performance'*.

In looking at the range of consultation comments on Option 1 they range from those who wish to oppose development in particular settlements who support the figure, to those representing the development industry who object to the figure. Having regard to

the Ministerial letter it is evident that this option would not be looked upon favourably and would be highly unlikely to result in a 'sound' Plan at examination. Furthermore, given the economic and employment growth ambitions of the Plan which are emerging through the evidence base, this option would not produce a level of housing development to support economic development. It would also perform poorly in terms of providing affordable housing and could result in house prices increasing due to lack of supply.

For a variety of reasons Option 1 would not provide a sufficient level of housing development and can be discounted.

Option 2 – 4,800 dwellings (320 pa)

This option is similar to Option 1 but differs in that it uses a more up to date population base and uses a 15 year migration trend rather than a 10 year trend. Although it produces a slightly higher dwelling requirement (4,800 / 320 compared with option 1 of 3,750 / 250) it is still unlikely to be found sound at examination and is insufficient to deliver the economic aspirations of the County as expressed in the emerging evidence base for the Plan. As with option 1 in looking at the consultation comments they range from those who wish to oppose development in particular settlements who support the figure, to those representing the development industry who object to the figure.

For a variety of reasons Option 2 would not provide a sufficient level of housing development and can be discounted.

Option 3 – 8,250 dwellings (550 pa)

This option is similar to option 2 but uses 2008 headship (household formation rates) rather than the 2011 based headship rates used in option 2. It is evident that this produces a much higher dwelling requirement figure of 8,250 / 550pa. This is because the 2008 headship rates are out of date as they originate from the 2001 Census. When updated 2011 headship rates were calculated, the 2008 rates were found to be exaggerating actual household formation rates by quite some margin. Many developer derived representations support option 3 and argue that as the economy improves, headship rates will return to the 2008 rates. In reality, headship rates are not that dynamic and do not ebb and flow in line with the economic cycle in the way some objectors argue. In formulating projections for the LDP, housing need must be based on accurate and up to date information, not outdated and unrealistic information and assumptions.

Welsh Government are unlikely to be going backwards in time to use old and outdated headship rates for future projections. Comments on this option seem to demonstrate a lack of understanding of the components on which it is based, with many objectors referring to higher levels of migration being harmful. As explained above the key assumption within this option is the 2008 headship rates which are outdated and unreliable. Nevertheless, many developer based comments argue that these figures are still 'sound' and 'relevant' and that the Council should be taking a more positive approach to economic development and housing. Whilst there is nothing inherently wrong with an LDP taking a positive approach to economic growth and housing provision, this must still be based on credible evidence and be realistic and achievable,

which is clearly not the case here. It is reassuring to see that some comments have recognised that it is based on dated assumptions about household formation rates which have not materialised in practice and therefore unrealistic. Interestingly some developer based comments support this option because it produces a housing need figure of 8,250 which is broadly similar to the UDP figure of 7,500. This is a very simplistic approach which attempts to justify a higher figure because it compares relatively well with the UDP planned level of housing provision. It must be recognised that the UDP housing need figure was calculated many years ago, using different data and assumptions. The task now is to formulate a housing need figure for the LDP based on up to date data and assumptions, and to compare the figures as suggested is not a robust or sound approach.

It has been demonstrated above that the use of the 2008 headship rates is not appropriate or reliable and would over-inflate the housing need for the LDP. **For these reasons the option can be discounted.**

Option 4 – 6,600 dwellings (440 pa)

This option is similar to option 2 in that it uses a 2014 population base and a 2011 based headship rate. The difference is that it uses the highest level of in-migration from the last 10 years and projects this forward whereas option 2 used a trend based approach to migration over a 15 year period. The option produces a housing requirement figure of 6,600 dwellings or 440pa. The value of this option is that it provides a corroboration of option 6 which is the employment led growth scenarios (6,550 / 7,350 dwellings or 440 / 490pa). Based on current demographics the level of need to match the level of housing required from the employment led scenarios, would require higher levels of population change as a result of net migration than has been experienced in recent years. Historically Flintshire has, until the last 5- 10 years, attracted people moving to the County for economic reasons so there was a healthy level of in-migration. In effect, in order to deliver an economic growth led strategy for the Plan, there is a need to re-create these conditions in order to fill jobs that are intended to be created, as they will not all be filled by local labour.

Some comments seek to object to this option on the basis that relating a housing forecast to an arbitrary view on migration is not a reliable approach. Other comments argue that there is a lack of economic growth and that there is no justification for people moving to live in the County. At the other extreme, several developer based comments pick up on the commentary in the consultation document for this option which refers to such levels of migration being 'a radical change' and 'difficult to achieve', and countering this with the need for the County to plan positively for economic growth. In preparing the evidence base for the Plan, Flintshire is at the hub of a sub-regional economy comprising North East Wales and West Cheshire. The County has an Enterprise Zone and key economic investment sites at Northern Gateway and Warren Hall. Furthermore, the County is part of the Mersey Dee Alliance, Northern Powerhouse and North Wales Economic Ambition Board initiatives and has a clear role to play in the economic improvement of the sub-region. In this context, it is quite right that one of the key messages for the LDP is to pursue an economic, growth led strategy where housing

is provided alongside and in support of that economic growth. The option merely identifies, in the context of a projection led housing figure, what would need to change in order to deliver that economic growth.

This option has value in that it identifies that net migration would need to be increased if the economic ambitions of the Plan are to be achieved. It therefore provides the 'projection' led growth option which sits comfortably with the employment led scenarios in option 6. **This option clearly has merit in formulating the Plan's housing requirement figure.**

Option 5 – 10,350 dwellings (690 pa)

This option uses the same assumptions as option 4 except that it uses the 2008 based headship rates. In a similar manner to option 3 this results in a much higher dwelling need figure but in this option it also uses the highest rate of migration from the last 10 years. Not surprisingly, the dwelling need figure arising from this option is much higher than any of the other options at 10,350 / 690pa.

Some comments arising from the development sector unsurprisingly favour this option, arguing that it plans positively for economic growth and housing provision. A typical statement is *'There is absolutely nothing wrong with taking a positive approach to growth using the latest population data, and optimistic migration and headship rates which do no more than reflect previous rates prior to the recession, such an approach addresses the obvious limitation of Option 4. However it is not understood why the commentary apparently dismisses this option out of hand, it is an entirely realistic scenario'*. A further quote is *'We strongly agree with this strategy as it uses most accurate projections of population forecasts, reliable household formation rates and 15 year migration rates, which are expected to continue to grow based on the economic development proposed'*. Those objectors opposing development in particular settlements have objected strongly to this option in terms of its lack of realism particularly in the context of Brexit and uncertain economic times. However, there are other comments from the development industry who also disagree with this option on the basis that this option is *'high risk'* with little *'certainty'* and that *'such a level of development is not considered to be appropriate'* for Flintshire.

The commentary alongside option 3 above set out in detail the dangers involved in using the 2008 based headship rates, and those comments are equally applicable to option 5. It results in a level of housing need which is not based on up to date and sound empirical evidence. It is accepted that the Plan should take a positive approach to economic growth and housing provision but this option is unrealistic and over-exaggerated in terms of i) it exceeds by some margin a soundly based and evidence 'projection' based housing need and ii) exceeds by some margin the employment led growth scenarios in Option 6 where even the higher scenario results in a housing need of 7,350 / 490pa.

Having regard to sound projection data and assumptions and the realistic economic growth ambitions for the Plan, option 5 results in a level of housing which is excessive

and not based on sound or up to date evidence. **For the Plan to provide for such a level of growth would be potentially harmful and would be unlikely to be found to be 'sound' at examination. For these reasons option 5 can be discounted.**

Option 6 – 6,550-7,350 dwellings (44-490 pa)

Whereas the preceding options are all 'projection' based with different data and assumptions being used, option 6 takes a different approach. It takes the findings of the Background Paper 'Further Employment Growth Scenarios Assessment' and the target of 8,000-10,000 jobs to be created over the County in the Plan period and then works out a level of housing need which would be needed to support that job creation. The approach leads to a housing need of between 6,550 and 7,350 or 440-490pa. This option is corroborated by option 4 which, as explained above, sets out what demographic changes would be needed to deliver such economic growth and that this is a return to more historical levels of in-migration.

There seems to be widespread support for this option when compared to other options. As would be expected, comments arising from those seeking to prevent development in certain settlements object to it on the basis of lack of economic prospects for the County, particularly in the light of Brexit. Several comments support the option in that they recognise the need for an increased level of net migration to provide an adequate labour supply to attract inward investment. Several comments point to the need for the more ambitious jobs target of 10,000 (7,350 houses / 490pa).

In looking at the evidence base which has informed the Plan and emerging key messages from previous consultations it is evident that the economic growth of the County should be a strong stimulus in underpinning the Plan Strategy. It is therefore appropriate to show some 'ambition' in terms of economic growth and housing provision. In the light of this advice it is considered that the employment led scenarios represent a sound basis with which to plan for. Whilst it is not as high a figure as sought by some parts of the development industry, it is based on a sound employment growth scenario assessment and is also corroborated by a projection led option (Option 4).

The table below seeks to undertake a high level comparison of each growth option against the Plan objectives.

	LDP Objective	Growth Option 1 3,750	Growth Option 2 4,800	Growth Option 3 8,250	Growth Option 4 6,600	Growth Option 5 10,350	Growth Option 6 6,550 – 7,350
	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						
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 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 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						

	LDP Objective	Growth Option 1 3,750	Growth Option 2 4,800	Growth Option 3 8,250	Growth Option 4 6,600	Growth Option 5 10,350	Growth Option 6 6,550 – 7,350
13	Promote and enhance a diverse and sustainable rural economy						
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						
19	Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land						

Meets Objective	
Partly Meets Objective	
Uncertain	
Not applicable	
Does Not Meet Objective	

The demographic migration led housing requirement in Option 4 (6,600 units / 440pa) is broadly in line with the employment led projections in Option 6 (6,550-7,350). These two sources of evidence clearly present a direction of travel which underpins the Plan whereby there is a close link between housing and employment within the context of an overall growth agenda. In setting the Plan's housing requirement figure it is important to show ambition in providing a level of housing which matches and supports economic growth aspirations. Option 6 has an upper and lower figure and it is considered that a mid-point of the two represents an ambitious yet realistic and sustainable level of growth. This results in a housing requirement figure of 6,950 or 463 per annum and on top of this a 10% flexibility would be applied which results in a total housing provision of 7,645 or 509 per annum. This level of housing provision is double that of the baseline position in Option 1.

The mid-point of the employment scenarios in option 6 has considerable merit and is considered to represent an appropriate yet ambitious and realistic level of growth.

Spatial Options

The Strategic Options consultation document identified the 'large' list of possible spatial options along with a short commentary as to which options were carried forward into a 'small' list for more detailed assessment. Five spatial options were presented with each option comprising a description, list of settlements affected, pros and cons and a summary plus an illustrative map. The objective was to present a range of different options and to bring about engagement with stakeholders.

In the Strategic Options Main Document a detailed commentary on and assessment of each option against a standard set of criteria. This assessment is re-presented in Fig 1 at the end of this document. The appraisal criteria are listed below:

Sustainable locations for development – ensuring that the spatial option has regard to the sustainability information which underpins the chosen settlement hierarchy

- ☐ **Infrastructure capacity** – ensuring infrastructure capacity either exists or can be provided
- ☐ **Constraints** - having regard to key physical or environmental constraints [what about policy constraints]
- ☐ **Commitments** – having regard to the location of and likely delivery of existing commitments
- ☐ **Candidate Sites** - Acknowledging the availability and distribution of Candidate Sites
- ☐ **Accessibility** – ensuring convenient accessibility to key services, facilities and employment as well as transport nodes and corridors
- ☐ **Services and Facilities** – ensuring that services and facilities are available
- ☐ **Local housing market conditions** – ensuring that the strategy has regard to key characteristics of local housing market areas in the LHMA

- **Housing Land Supply** – ensuring that a 5 year housing land supply can be maintained
- **UDP Comparison** – comparing each option with the approach adopted in the UDP
- **PPW Conformity** – ensuring conformity with the principles in PPW
- **Flexibility** – ensuring an option is sufficiently flexible to withstand unforeseen circumstances e.g. the need to identify additional sites at examination
- **Conformity with emerging Plan** – ensuring that each option sits comfortably with the Key Messages and objectives for the Plan.

Option 1 – Proportional Distribution

This option is similar in many respects to the UDP approach except that it uses the preferred 5 tier settlement hierarchy. In order to spread growth proportionately amongst settlements, based on the settlement hierarchy, it is necessary to have some form of numerical formula whether this be growth band, growth target, minimum growth level etc. Some comments supported option 1 in that it was similar to the UDP approach and therefore had a certain familiarity. By contrast, a lot of comments were quite critical of this option, although even these comments generally supported the 5 tier settlement hierarchy when compared with the 3 tier hierarchy in the UDP. However these comments pointed to the regimented, numerical approach to apportioning development, whether based on growth bands, targets, minimum levels etc being out of accord with the need to promote sustainable development.

It is clearly the case that the preferred settlement hierarchy with its 5 tiers is far more robust than that used in the UDP, given that it is based on an up to date settlement audit process which sought to establish the sustainability of each settlement in terms of services, facilities, accessibility, character, role and form. The position of a settlement in the hierarchy reflects its relative sustainability. In this context the settlement hierarchy is well placed to deliver a sustainable pattern of development. However, this option functions on the basis of apportioning specific amounts of development to different tiers. It leads to the assumption that every settlement must grow and also that every settlement can sustainably accommodate a specified level of growth. In practice this is simply not the case, as settlements are different even within the same tier of the settlement hierarchy in that some settlements have particular constraints or designations affecting them. The Plan would end up being based on a 'planning by numbers' approach rather than planning based on sustainability. Growth would also be spread too thinly across the County. In the context of a Plan where the evidence base is demonstrating a need for the strategy to be based on sustainability, option 1 represents a rather dated, crude and regimented means of apportioning development across the County. **It is not considered to be suitable basis on which to formulate the Plans spatial dimension. Option 1 should therefore be discounted.**

Option 2 – Focussed Urban Growth

This option directs all development to urban centres i.e. the upper two tiers of the settlement hierarchy (Main Service Centres and Local Services). It seeks to reflect the

findings of the settlement audits whereby the top two tiers are generally the most sustainable settlements.

There is some support from those making comments where they seek to protect certain settlements from development. There is also some support from developer based comments whereby it is argued that growth would be generally located in the growth triangle area, close to key employment opportunities. However there is a considerable body of comments which state that the option ignores the potential of other sustainable settlements in the lower three tiers, particularly the third tier 'sustainable villages'. Comments also point out that the option is not a County wide option as it ignores the rural part of the County. It is interesting that some comments recognise that not all higher tier settlements will be able to accommodate focussed growth due to their physical, environmental or policy constraints and designations or infrastructure capacity issues. In such cases, more pressure would be placed on the remaining settlements in the upper two tiers, possibly resulting in 'overheating' in some settlements.

At first glance, focussing growth in upper two tiers, appears to be a sensible and sustainable way forward in that it concentrates growth in the most sustainable settlements. However, in practice there are a number of difficulties as set out above. Furthermore, given the number of tier 1 and 2 settlements, compared with the number of settlements in the remaining settlements in the lower tiers, particularly the Sustainable Villages, it is debatable whether all planned growth could be accommodated within the Main Service Centres and Local Service Centres. In recognising that some settlements in the top two tiers are limited in their ability to sustainably accommodate development, increased pressure would be placed on the remaining settlements. Bearing in mind that a key principle in identifying the preferred spatial option, is to ensure flexibility to withstand subsequent changes, this option is far too 'rigid' and focussed to provide flexibility.

Having regard to the above commentary it is evident that option 2 does not provide a sustainable basis for the Plans spatial strategy and should be discounted.

Option 3 – Growth Area

This option focusses development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan. All settlements falling within the growth triangle would be treated the same, irrespective of their position in the settlement hierarchy. There is an element of support in the comments on this option as it focuses growth on the growth area in the Wales Spatial Plan but some of these comments appear to assume that all settlements in the growth area have the necessary infrastructure to support growth.

Many comments point out that it is not a strategy for the whole County as it ignores all areas outside of the growth area. Comments identify that it focuses too much development in a part of the County and could place too much pressure on certain settlements, especially given that some settlements do not have the infrastructure

capacity to deliver development, or are affected by constraints. Comments recognise that the option treats all settlements the same, regardless of their position in the settlement hierarchy with the result that small rural settlements within the growth area would need to accommodate development, without having the services, facilities and infrastructure to support it. It is interesting to note that several comments pick up on the commentary on this option in the consultation document, where it recognises that this option may not have sufficient merit to be the sole basis for the Plans spatial strategy, but that it could be considered as a higher level consideration, in conjunction with another option. In a similar manner to option 2 it is not considered to have sufficient flexibility to withstand changes as the Plan progresses.

It is evident that a spatial strategy which has regard to the growth area in the Wales Spatial Plan, has some merit. However, this option has a number of deficiencies in that it is not a strategy for the whole County and is too focussed and inflexible. **Rather than being the basis for a spatial strategy it is better being considered as a higher level consideration alongside the preferred option.**

Option 4 – Hubs and Corridors

In this option development would be distributed based on key road and rail hubs and routes. All settlements located on key transport corridors or at key hubs would be treated the same, irrespective of their position in the settlement hierarchy. The option of focussing development in those settlements which fall on or at key transport corridors and hubs appears to be quite sensible. However, this option produces a mixed bag of results in that it is based on both key rail corridors as well as key road corridors.

One comment perhaps summed up the core problem of this option in that the established pattern of settlements has not always evolved based solely on key transport routes and hubs. Whilst there is some support for this option in the consultation comments there are a large number of comments which point out limitations and difficulties. Initially, the option has no regard to the settlement hierarchy so if a settlement lies on a key transport route then, under this option, it is suitable for growth. In reality, not all settlements along transport routes will have the necessary infrastructure, services or facilities to be able to sustainably accommodate development. In a similar vein, there are settlements elsewhere in the County which have the capacity to sustainably accommodate growth, yet would be unable to do so under this option as they do not lie on a key transport route or hub. As with Option 3, some comments have picked up on the commentary on this option in the consultation document that it could be considered as a higher level consideration alongside the preferred spatial option. Identifying a spatial strategy which has regard to key transport corridors and hubs clearly has merit.

This option has a number of deficiencies in that it is not a strategy for the whole County and is too focussed and inflexible. More fundamentally it does not necessarily have regard to the picture on the ground in terms of the pattern of settlements. Rather than being the basis for a spatial strategy it is better being considered as a higher level consideration alongside the preferred option. In this

context the need for growth to be in settlements which have good accessibility to key road and rail corridors and hubs, as well as public transport more generally, is a sound planning consideration that should be applied as part of any preferred spatial option.

Option 5 – Sustainable Distribution plus Refined Approach to Rural Settlements

In this option development would be focussed on the top three tiers of the settlement hierarchy i.e. Main Service Centres, Local Service Centres and Sustainable Villages. In the lower two tiers a more refined and innovative approach will be developed to deliver local needs housing in sustainable rural settlements. The option is not based on numerical controls or parameters, but on the broad position within the settlement hierarchy and identifying the most sustainable settlements. In comparison with the other spatial options, there is widespread support for option 5. Comments have recognised the fact that it is based on the sustainability information which informs the settlement hierarchy. Linked to this is the fact it seeks to identify the most sustainable settlements to accommodate growth, rather than relying on numerical means of apportionment. It is therefore supported as being a 'tailored' and 'sensitive' approach which has regard to the particular characteristics of each settlement. Comments have noted that it seeks to focus growth in the top three tiers of the settlement hierarchy, which are generally the most sustainable settlements, but that the option does not forget about the smaller settlements in the rural part of the County which comprise the lower two tiers of the settlement hierarchy.

Several comments have supported the fact that this option is a flexible option and has the potential to withstand change as the Plan progresses. However, some of these comments have then gone on to demand that 'minimum targets' are ascribed to settlements to ensure that the Council maintains its 5 year housing land supply. These latter comments rather misunderstands the principle behind option 5 in that it seeks to move away from the numerical means of apportionment and the notion that every settlement must grow.

In looking at negative comments on this option there are several comments which point to the need for greater clarity to be provided as to the 'refined and innovative' approach to be taken in respect of settlements in the lower two tiers of the settlement hierarchy. There are also some comments which argue that this option would result in growth manifesting itself in unsustainable travel to work patterns and also being too disconnected from the economic ambitions in the Wales Spatial Plan. However, most of the settlements in the upper three tiers are either well placed to be accessible to key transport routes and hubs and also employment opportunities, or perform the role of acting as service centres for rural areas. This is where some of the comments from options 3 and 4 come into play, as in looking at option 5 and which settlements are best able to sustainably accommodate development, it will be necessary to have regard to the growth area concept from the Wales Spatial Plan as well as the availability of and accessibility of settlements in terms of transport links.

Option 5 is considered to be the most 'well rounded' spatial option in that it is based on a soundly evidenced settlement hierarchy and seeks to direct growth to the most sustainable settlements whilst not ignoring the needs of rural areas. Rather than being based on numerical or mechanical means to apportion growth it seeks to take a more informed approach to each settlement, utilising information in the settlement audits, to identify which settlements are sustainably able to accommodate development. The broad scale of development would be based on the position of a settlement within the settlement hierarchy and based on the particular characteristics of settlements. **Option 5 is considered to represent the most suitable spatial option with which to formulate the Plans spatial strategy.**

Alternative Spatial Options

Comments have suggested other ways of spatially distributing development across the County and these are set out and commented on below:

Focus on smaller villages and not towns - The evidence which informed the settlement hierarchy demonstrates the relative sustainability of different tiers in the settlement hierarchy. Generally speaking the smaller rural settlements are the least sustainable settlements as they have fewer services and facilities and often have limited or no public transport which means that residents are essentially car dependent. A spatial strategy which seeks to direct most development to such villages would not represent a sustainable approach and would be unlikely to be found to be sound. Rather, the approach in option 5 seeks to recognise there are some smaller rural settlements which may be able to sustainably accommodate new development and also identifies the need for a more innovative policy approach to ensure that local needs housing in such villages can be better delivered.

New town – this option was assessed as part of the initial 'large' list of possible spatial options but was not considered to have sufficient merit to be short listed for further consideration. PPW adopts a cautionary stance towards new settlements advising that they will rarely be justified in Wales. Having regard to the need for the LDP to deliver (from adoption) a 5 year housing land supply, this would not be achieved if the bulk of growth was in the form of a new town as the lead in times for infrastructure provision etc would mean that completions of houses would not be delivered until well into the Plan period.

Development of brownfield sites first – a general principle embodied in PPW is that *'Previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites'* However, PPW goes on to recognise that not all brownfield land is suitable for development. This is very much the case in Flintshire as the greatest occurrence of brownfield land occurs along the Dee Estuary and comprises former industrial and landfill sites where there are significant constraints in respect of flood risk, nature conservation and contamination. Wherever suitable brownfield sites can be identified as being viable and deliverable, they will be allocated. However, to

specify that these sites must be developed before greenfield sites would not assist in establishing and maintaining a 5 year housing land supply.

Hybrid of option 1 and 5 – some objections proposed to distribute growth more - evenly over the County –based on the preferred settlement hierarchy but are quite different in how they distribute development, as set out in the commentary above. It is not considered that a hybrid represents an improvement on preferred option 5.

The table below seeks to undertake a high level comparison of each spatial option against the Plan objectives

	LDP Objective	Spatial Option 1 Proportional Distribution	Spatial Option 2 Focused Growth	Spatial Option 3 Growth Area	Spatial Option 4 Hubs and Corridors	Spatial Option 5 Sustainable Distribution
	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					
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					

	LDP Objective	Spatial Option 1 Proportional Distribution	Spatial Option 2 Focused Urban Growth	Spatial Option 3 Growth Area	Spatial Option 4 Hubs and Corridors	Spatial Option 5 Sustainable Distribution
10	Redefine 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 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					
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					
19	Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land					

Conclusions

From the assessment of consultation responses, and in addition to the consensus that emerged from the pre-consultation workshops, there is a clear support for spatial option 5. Option 5 is considered to be most 'well rounded' spatial option in that it is based on a soundly evidenced settlement hierarchy and seeks to direct growth to the most sustainable settlements whilst not ignoring the needs of rural areas. Rather than being based on numerical or mechanical means to apportion growth it seeks to take a more informed approach to each settlement, utilising information in the settlement audits, to identify which settlements are sustainably able to accommodate development. The broad scale of development would be based on the position of a settlement within the settlement hierarchy and based on the particular characteristics of settlements. Option 5 is therefore considered to represent the most suitable spatial option with which to formulate the Plans Spatial Strategy.

Fig 1 Commentary on Spatial Options

Option 1 – Sustainable Distribution

Description

Developing a settlement hierarchy which allows for a proportional distribution of development based on sustainability principles

Assessment

Criteria	Commentary
Sustainable locations for development	This option is based on the chosen settlement hierarchy and has regard to the settlement audits and is therefore based on sustainability principles. However, by apportioning growth based on the settlement hierarchy it has similarities to the UDP approach and suggests the need for growth bands, rates or quotas. This has the effect of a planning by numbers approach whereby each settlement could be expected to deliver growth irrespective of whether each settlement could accommodate growth due to physical, environmental or infrastructure constraints. Ultimately this rigid proportional distribution does not fully embrace sustainability principles. It is also questionable whether it will address the limitations of the UDP approach which did not provide sufficient flexibility in the rural areas whereby the needs of rural communities can be met in sustainable locations.
Infrastructure capacity	By distributing development based on an informed approach to the sustainability of each settlement and the settlement hierarchy then the option should have regard to the availability and capacity of infrastructure. However, the proportional distribution gives the impression that all or most settlements will need to grow or have an allocation, and this could result in spreading growth too thinly and having a less focused approach on sustainability.
Constraints	By spreading growth based on a proportional distribution, the impression is given that each settlement will experience growth or an allocation. This could result in a less focused approach where constraints may not full be taken into account, or in some consequences compromised.
Commitments	The option should enable the existing commitments to be taken into account in terms of a robust assessment of their likely future delivery.
Candidate Sites	The option should have sufficient flexibility to be able to have regard to the locations of candidate sites and whether they have passed the 'technical' assessment. However, the most sustainable settlements and sites may be overlooked in the quest to spread growth across each tier in the settlement hierarchy.
Accessibility	This option is based on the chosen settlement categorization and has regard to the settlement audits and is therefore based on sustainability principles, which will include accessibility. If the amount of growth is generally being d based on the settlement hierarchy, then it is generally those higher order settlements which have the greatest provision of services and facilities and also public transport.

Services and Facilities	If the amount of growth is distributed proportionally based on the position within the settlement hierarchy, then the option should have regard to the availability and capacity of facilities and services
Local housing market conditions	By distributing growth proportionally across the settlement hierarchy this option may not be able to have full regard to the strength of the local housing market in terms of implications for the type of allocation and planning obligations which could be viably delivered.
Housing Land Supply	<p>The apportionment of growth across the settlement hierarchy suggests spreading that growth thinly and having a large number of small size. Such sites are no longer favoured by many developers, who are looking for economies of scale. And could slow down or even prevent attaining and maintaining a 5 year housing land supply, based on viability and deliverability.</p> <p>The option should be able to ensure a good mix of sites in terms of location, type and size to enable housing land supply to be maintained.</p>
UDP Comparison	This is fairly similar to the UDP approach except the 5 tier settlement hierarchy is more refined in terms of having regard to the sustainability evidence set out in the settlement audits. By spreading growth based on a planning by numbers approach still has many of the limitations of the UDP approach embodied within policy HSG3. A more refined, focused approach which is fully based on sustainability would be more beneficial.
PPW Conformity	This option is considered to conform with the sustainability principles in PPW
Flexibility	The option has sufficient flexibility to allow for unforeseen circumstances such as an Inspector identifying the need for further allocations at examination.
Conformity with emerging Plan	The key emerging principle for the Plan is the concept of taking a more holistic approach to employment and housing growth and development as part of promoting sustainable development. However, rather than focusing on the most sustainable settlements and sites to deliver the growth ambitions of the Plan, this option seeks to spread growth thinly by a planning by numbers approach. Given that the higher tier settlements either generally have employment provision or are close to the major employment centres at Deeside ensures that the option sits comfortably in terms of what the Plan is seeking to achieve.

Summary

This option has many similarities to the UDP, albeit that it is based on a 5 tier settlement hierarchy, which is informed by a sustainability assessment embodied in the settlement audits. However, this spatial option requires some sort of numerical means by which to apportion growth to the different tiers in the settlement hierarchy. This suggests that growth will be spread thinly, where sites are chosen based on some form of numerical control rather than by focussing on which are the more sustainable settlements and sites to deliver growth.

Option 2 – Focused Urban Growth

Description

Directing all development to urban centres i.e. the upper two tiers of the settlement hierarchy

Assessment

Criteria	Commentary
Sustainable locations for development	This option focuses growth on the upper two tiers of the settlement hierarchy i.e. main service centres and local service centres and it is these settlements which tend to be the most sustainable locations to accommodate growth. However, there are sustainable settlements lower down in the settlement hierarchy which are sustainable locations yet would be denied growth in this option. By focussing development on such a small number of settlements it could place pressure on those settlements.
Infrastructure capacity	By focusing growth on the upper two tiers of the settlement hierarchy, this option provides less opportunity and flexibility to have regard to the availability and capacity of infrastructure. Some settlements would be under pressure to deliver development but where there may be infrastructure capacity issues.
Constraints	By focussing growth on only the upper two tiers of the settlement hierarchy there may be difficulties in having regard to key physical or environmental constraints. Flexibility may be compromised as a result of certain constraints in some settlements which cannot be overcome and may place undue pressure on other settlements. Relatively unconstrained and sustainable settlements outside the higher order tiers of the hierarchy would be prevented from contributing some growth.
Commitments	Although a significant proportion of recent completions and commitments are in the upper two tiers of settlements, some fall outside the higher settlement tiers. This option, by focussing solely on such a small number of settlements, ignores the potential role that local service centres can play in contributing to sustainable development.
Candidate Sites	Although a significant proportion of the candidate sites fall within the upper two settlement tiers, there are candidate sites in and around other settlements. Perfectly valid candidate sites in other sustainable settlements would be prevented from being considered.
Accessibility	This option is based on the chosen settlement hierarchy and has regard to the settlement audits and is therefore based on sustainability principles, which will include accessibility. However, in focussing only on higher order settlements it fails to have regard to the fact that there will be some settlements in the lower tiers of the settlement hierarchy which are accessible and will have capacity to accommodate some growth.
Services and Facilities	This option is based on the chosen settlement hierarchy and has regard to the settlement audits and is therefore based on sustainability principles, which will include accessibility. It is generally those higher order settlements which have the greatest provision of services and facilities and also public transport. However, there are other lower order settlements which have

	services and facilities and would be sustainable locations to accommodate some growth but would not be permitted in this option.
Local housing market conditions	The upper settlement tiers will contain a variety of local housing market areas ranging from strong to relatively weak. Focussing all growth in the stronger housing market areas would not be sustainable and it would for instance not bring about regeneration of settlement. If new development is spread throughout the top two tiers of settlements, then it is necessary to have a tailored approach in terms of being able to viably deliver key planning obligations
Housing Land Supply	Focussing growth on the top two tiers of settlements should ensure that there is a variety of sites available in terms of location, type and size and this should enable a 5 year housing land supply to be maintained. However, the experience of the UDP was that some of the category A settlements did not deliver planned development. There will also be other lower tier settlements which would be able to deliver sustainable development and which might ensure a more varied and balanced portfolio of sites to assist housing delivery.
UDP Comparison	The UDP sought initially to focus most growth in the higher order category A and B settlements although in reality the Inspector considered that this was not borne out and therefore made amendments to the settlement strategy through policy HSG3. This option focuses all growth on the upper two tiers of settlements but unlike the UDP doesn't allow for development in lower order settlements.
PPW Conformity	By focussing development on sustainable locations in the top two tiers of settlements the option generally accords with PPW. However, PPW also seeks to meet the needs of rural areas by promoting sustainable development in rural settlements as well. In this respect this option performs poorly.
Flexibility	By only looking at higher order settlements this option may not have the flexibility to withstanding changes e.g. an Inspector seeking additional allocations at examination. Perfectly reasonable sites outside of the higher order settlement tiers would be discounted.
Conformity with emerging Plan	Focusing growth in the upper two tiers of settlements sits well with the emerging Plan theme of ensuring employment and housing are planned more closely, as these settlements will have employment provision and will generally be close to main employment centres. However, the Key Messages document also places considerable weight on the need to have regard to the needs of the rural areas and the rural economy and this is not addressed by this option.

Summary

This option focuses growth on the upper two tiers of the settlement hierarchy i.e. the main service centres and local service centres and given that these are generally the most sustainable settlements, represents a sensible approach. It focusses on building upon the County's key settlements and ensuring key facilities, services and infrastructure are either available or are enhanced. However, the option lacks flexibility and represents a strategy for only of the County in that it firstly, ignores sustainable

lower tier settlements which might be suitable and capable of accommodating some growth and secondly, ignoring the rural parts of the County.

Option 3 – Growth Area

Description

Development would be focused by directing all development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan.

Assessment

Criteria	Commentary
Sustainable locations for development	<p>At face value a strategy option which seeks to confine growth to within a defined growth area boundary would appear to be sustainable. However, it deprives that part of the County outside of the growth area from having the opportunity to deliver sustainable development to meet the needs of those settlements. Furthermore, within the growth area there would be no controls over which settlements would experience planned growth. Each settlement, regardless of its sustainability would be seen as a growth opportunity and could have harmful implications for small settlements.</p> <p>The option also ignores the fact that not all development is located within the growth triangle as there are important areas of employment along the A548 Coast Road. This option therefore ignores a growth 'spur' taking in Flint, Bagillt, Greenfield and Mostyn Docks. Such locations would be denied the opportunity of contributing to growth and meeting their own needs.</p>
Infrastructure capacity	By focusing growth on only part of the County, this geographically focused approach may put undue pressure on infrastructure especially in those smaller settlements within the growth area.
Constraints	By focusing growth on only part of the County, this option may put undue pressure on a wide range of physical, environmental constraints in and around certain settlements.
Commitments	A good proportion of commitments fall within the higher order settlements, most of which fall within the growth area, although some of these remain undeveloped. Also, some of the existing commitments fall outside the defined growth zone approach. By focussing only on the growth area, the role of other sustainable settlements outside it, are overlooked.
Candidate Sites	Not all of the candidate sites will fall within the defined growth zone. Candidate sites in other sustainable settlements would be prevented from being considered. Significant areas of brownfield land for instance along the Coast would be excluded from consideration as part of this option.
Accessibility	Whilst the growth zone (focused on Deeside, Wrexham and Chester) is highly accessible with the existence of strategic highways and the Wrexham – Bidston and North Wales Coast rail lines, there are

	problems within the area. The congestion on the A494/A55/A548 highways hub is well documented and a strategy which sought to focus all growth to the area would have the effect of adding to congestion, in the absence of a clear direction as to Welsh Governments proposals regarding the recent red and blue consultation routes. The two railways have a very low level of patronage and given present infrequent services are unlikely to be able to respond to any great degree to such a focused approach.
Services and Facilities	The growth area tends to have the settlements from the upper tiers of the settlement hierarchy. In this sense growth should take place in those settlements which have a good range of services and facilities. However, the growth area approach does not distinguish between settlements in terms of their size, role or character and therefore could result in growth in settlements which do not have a good range of services and facilities.
Local housing market conditions	The defined growth area will contain a variety of local housing market areas ranging from very strong such as Higher Kinnerton to relatively weak such as in the Deeside settlements. Focussing all growth in the stronger housing market areas would not be sustainable and therefore if all new development is spread throughout the growth area then it is necessary to have a tailored approach in terms of being about to viably deliver key planning obligations.
Housing Land Supply	Focussing all growth in a geographically defined area could result in new housing development taking place in close proximity to each other. This could make it difficult for each developer to establish a market for their development as the 'catchments' would be overlapping. The approach could have implications for housing land supply.
UDP Comparison	This option is much more focused than the UDP as it restricts growth to a defined physical area. Whilst it picks up on the Inspectors concerns about directing more growth to higher order settlements / urban areas, it fails to provide for the needs of rural settlements. Furthermore, it is quite different from the UDP approach in that there is no structure within it to define or order settlements in terms of their sustainability. All settlements within the growth area would be treated similarly.
PPW Conformity	The growth area concept is well established through the Wales Spatial Plan, although it does not identify the scope for growth of key settlement and employment areas along the Coast Road. Although there are aspects of the approach which would conform with guidance in PPW there are clear drawbacks whereby the approach which would not be supported by PPW such as placing undue growth on smaller settlements which would be unable to sustainably accommodate it. PPW also identifies the role of rural areas and settlements and this is not reflected in this option.
Flexibility	By focussing all growth within a defined geographical area, there may be less flexibility to accommodate change (such as an Inspector

	identifying the need for additional allocations) as many otherwise sustainable settlements would fall outside the growth area.
Conformity with emerging Plan	The concept of focusing on a growth area at face value appears to be well related to the LDP objective of a joined up approach to employment and housing growth. However, when looking at the growth area concept in the WSP in more detail it also seeks to spread the benefits of the growth area to surrounding towns and rural areas. By focussing all growth on such a narrow geographical area, the approach deprives the opportunity for other sustainable settlements from seeking to grow and provide for their own needs.

Summary

This option appears to tie in strongly with the employment growth aspirations of the emerging Plan, by focussing development within a defined growth area. Whilst it reflects the Wales Spatial Plan growth triangle, it does not recognise firstly, the existence of a growth 'spur' along the Coast Road and secondly, the need to spread a certain level of growth out to other parts of the County. The option places pressure on small settlements within the growth area which may not be able to sustainably accommodate development. Rather than being the sole basis for a spatial strategy, the growth area approach could also sit as a higher level consideration which provides a context for and informs the chosen spatial strategy.

Option 4 – Hubs and Corridors

Description

Development would be distributed based a strict interpretation of key road and rail transport hubs and routes.

Assessment

Criteria	Commentary
Sustainable locations for development	<p>Focusing growth on transport hubs and corridors would have mixed results. On the one hand settlements along the two railway lines would represent sustainable locations for growth provided that the railway services offered could provide a step change in service provision having regard to their present low patronage. The proportion of the population within easy walking distance of a railway station is not sufficient with which to justify formulating a spatial strategy. Growth which was located in reasonable walking distance of bus routes and nodes e.g. town centres, would represent sustainable development but this would be achieved through other spatial options.</p> <p>The option also brings into questions the role that the railway network in the County plays in terms of where people travel using the railway, compared to other forms of travel. Limited numbers commute either to Wrexham or to Liverpool using the Wrexham – Bidston line and the North Wales Coast line is likely to be used primarily for longer distance journeys rather than for local everyday journeys. This context questions the extent to which the railway network is capable of supporting the development needs of the County and the transport requirements of the population.</p> <p>In terms of the strategic road network this is less clear as the highways function of roads such as the A55 and A494 is to facilitate longer distance journeys. This would be compromised by having too much growth focused around the A55/A494/A548 hub in terms of exacerbating congestion. Locating growth at various junctions along the A55 would not represent sustainable development as it would not be related to existing settlements.</p>
Infrastructure capacity	<p>Considerable development pressure would be placed on those settlements along transport corridors and at strategic hubs. Such an approach would place undue pressure on existing infrastructure and there may be settlements which simply so not have the level of services and facilities to support growth. Conversely, there will be interchanges along the A55 which will be set within open countryside where there is no existing infrastructure on which to base new development. The ability of the A55 and A494 Trunk Roads to function as strategic highways could be compromised.</p>
Constraints	<p>The North Wales Coast railway runs through areas of the County which experiences a number of constraints including flood risk, contaminated brownfield sites, green barrier and proximity to international nature conservation designations. The Wrexham Bidston line also passes through extensive areas of open countryside and green barrier where it would be difficult to accommodate the scale of development likely under this option.</p>

	The location of development along the A55 would result in unsustainable car based development in open countryside locations.
Commitments	Some of the existing commitments fall within the settlements alongside the two railway lines and other locations on strategic highways. However, other commitments fall outside the hubs and corridors approach. This questions how valid such a focused approach is when it has little regard to the wider picture over the whole County.
Candidate Sites	Most but not all of the candidate sites will fall within the hubs and corridors zone. Candidate sites in other sustainable settlements would be prevented from being considered.
Accessibility	<p>The area in the vicinity of the two railway lines initially appears to be accessible. However, with the North Wales Coast line there are several settlements which do not have a station e.g. Mostyn Docks, Greenfield, Bagillt, Connah's Quay, Queensferry, Broughton which limits the scope of the line to accommodate focussed growth. At Shotton which sits at the intersection of the two lines there is little or no scope to accommodate growth. The two railways have a low level of patronage and given present infrequent services are unlikely to be able to respond to any great degree to such a focused approach to growth.</p> <p>The congestion on the A494/A55/A548 highways hub is well documented and a strategy which sought to focus growth to the area would have the effect of adding to congestion, in the absence of a clear direction as to Welsh Governments proposals regarding the recent red and blue consultation routes. The A55 is presently struggling to cope with the volume of traffic on a daily basis and the slightest incident has significant impacts on traffic flows and this would be exacerbated by a strategy which sought to focus development at each junction.</p>
Services and Facilities	Whilst the area covered by the hubs and corridors option is highly accessible with the existence of strategic highways and the Wrexham – Bidston and North Wales Coast rail lines, there are problems within the area. The congestion on the A494/A55/A548 highways hub is well documented and a strategy which sought to focus all growth to the area would have the effect of adding to congestion, in the absence of a clear direction as to Welsh Governments proposals regarding the recent red and blue consultation routes. The two railways have a very low level of patronage and given present infrequent services are unlikely to be able to respond to any great degree to such a focused approach.
Local housing market conditions	The settlements which are not only alongside the railway lines, but also having stations will feature a mix of housing market areas. By contrast, locating all development at locations along the strategic highways, particularly in open countryside locations along the A55 would be in strong market areas and attractive to the market.
Housing Land Supply	This option has uncertainty as to whether it would contribute to achieving and maintaining a 5 year housing land supply.
UDP Comparison	This option differs significantly in that there is no settlement structure built into it. Rather, it is based solely on proximity to key transport corridors and hubs on strategic highways and key public transport interchanges such as on the two railway lines. Whereas the UDP at least had a structured approach, this option would have a random approach as there is huge variation in terms of the two strands (highways vs public transport) pulling in different directions.

PPW Conformity	Seeking to identify growth in areas with good public transport routes and nodes is supported as a principle in PPW. However, PPW advocates the need to have regard to the needs of both urban and rural areas and this option fails to offer a strategy approach to large rural parts of the County as well as several key settlements. The approach of focusing considerable growth in the vicinity of the Deeside hub would exacerbate existing congestion and transport problems. PPW would not support 'footloose' development at junctions along the A55 if it was unrelated to existing settlements and infrastructure.
Flexibility	The option is not considered to have a sufficient level of flexibility to withstand unforeseen circumstances such as an Inspector at examination identifying the need for further allocations. Ignoring large chunks of the County as well as key settlements would not give the necessary flexibility to identify additional sites.
Conformity with emerging Plan	Directing growth based on proximity to transport corridors and nodes, particularly the A494/A55/A548 hub to a large extent picks on the relationship between housing and employment development given that it is in this part of the County that significant employment is found. However, the option is not an option for planning sustainably for rural areas and settlements and locating growth along major roads would bring about unsustainable patterns of development.

Summary

In some respects, elements of this strategy are similar to the growth area approach in that they focus on the Deeside area. However, the option is not a County wide option in that it ignores large parts of the County, especially rural areas, yet perversely could allow for unsustainable growth in rural settlements or possibly at junctions along the route of key strategic roads. It is also questioned in terms of the role that the railway network could play in terms of accommodating the needs of the County for development and its ability to provide for their movement requirements. Rather than being a robust basis to justify a spatial strategy in its own right, it is perhaps more suitable as a higher level context to inform the chosen spatial strategy.

Option 5 – Sustainable Distribution plus refined approach to rural settlements

Description

Development would be focused on the first three tiers of the settlement hierarchy, based on identifying the most sustainable settlements and sites. In the rural settlements a more refined policy approach would be developed to ensure that a more flexible approach is taken to bringing about and delivering local needs housing.

Assessment

Criteria	Commentary
Sustainable locations for development	<p>This approach is based on sound sustainability principles in that it is informed by the settlement audits and settlement hierarchy. Focussing growth on the top three tiers of the settlement hierarchy should ensure a sustainable approach to development locations is achieved. However, it addresses the shortcomings of several other options by recognising the need for a more tailored and innovative policy approach to managing and delivering growth in the rural settlements.</p> <p>Rather than identifying a numerical based methodology for apportioning growth between each of the settlement tiers, this option uses sustainability principles to identify the most sustainable settlements to accommodate growth and to identify sites and growth levels which are broadly in line with the position of a settlement within the settlement hierarchy.</p>
Infrastructure capacity	<p>By having regard to the settlement audits and settlement hierarchy, and seeking to identify the most appropriate and sustainable settlements and sites this option should ensure that the availability and capacity of infrastructure is a key consideration.</p>
Constraints	<p>By distributing development based on an informed approach to the sustainability of each settlement and emerging evidence base then the option should have regard to the presence of constraints.</p>
Commitments	<p>The option enables the existing commitments to be taken into account in terms of a robust assessment of their likely future delivery, across a whole spectrum of settlements.</p>
Candidate Sites	<p>The option should have sufficient flexibility to be able to have regard to candidate sites across a wide spectrum of settlements.</p>
Accessibility	<p>This option is based on the chosen settlement hierarchy and has regard to the settlement audits and is therefore based on sustainability principles, which will include accessibility. If the amount of growth is generally being directed to the most sustainable settlements, then it is likely that these settlements have the greatest provision of services</p>

	and facilities and also public transport. The approach also recognises that there will be accessible rural settlements which can serve as sustainable hubs to meet the needs of rural areas.
Services and Facilities	If the amount of growth focused on the most sustainable settlements having regard to the settlement hierarchy, then the level of sustainability of each settlement in terms of the availability of services and facilities will be assessed. However, the approach recognises that within the settlement hierarchy there will be other rural settlements which have services and facilities with which to support some growth. The approach allows a more focussed and tailored approach to be taken in respect of key settlements in terms of their character, role and attributes. In this way each key settlement can be planned for by addressing its particular needs rather than taking a more regimented or numerical approach to apportioning growth.
Local housing market conditions	The option recognises that many rural parts of the County, particularly certain attractive villages are part of strong housing market areas yet are in areas where average earnings do not enable many local people to enter the housing market. The approach, which will need to be developed further, as part of policy formulation, recognises the need to develop new and innovative measures to manage and deliver growth in rural areas and settlements. In general, a 'looser' application of the settlement hierarchy will enable a more informed approach to be taken in identifying sustainable locations and sites and this can have regard to housing market areas.
Housing Land Supply	By concentrating development in the most sustainable settlements, based on a 'looser' interpretation of the settlement hierarchy should ensure a range of sites by location, type and size can be identified which are more likely to be viable and deliverable. This should work towards ensuring that housing land supply is maintained. Although development in the rural areas and settlements will be relatively modest it will still make a contribution to supply.
UDP Comparison	By comparison with the UDP, this option should ensure that growth is focused on a more soundly based and evidenced settlement hierarchy. It moves away from the numerical growth rate approach in the UDP and seeks to take a more tailored and focussed approach whereby sustainability underpins each settlement and site identification. Inherent in this option is the concept that not every settlement will experience planned growth. The option should also ensure that the difficulties experienced in implementing housing development in rural settlements can be reviewed and new approaches developed.
PPW Conformity	The approach of basing growth on a settlement strategy is supported by the guidance in PPW as is the approach of recognising the role, character and needs of key settlements in terms of facilitating sustainable development. Furthermore, PPW also recognises the importance of planning for rural area as well as urban areas and this forms a key part of this option.

Flexibility	This option should ensure sufficient flexibility exists to cater for unforeseen circumstances e.g. the Inspector at examination identifying the need for additional allocations, as the settlement hierarchy should form the basis for additional sites to be found.
Conformity with emerging Plan	The option retains the concept of a settlement hierarchy but a more refined approach is taken whereby a 5 tier settlement hierarchy is used, and informed by settlement audits. Rather than using a numerical growth rate approach the option seeks to identify the most sustainable settlements and sites, rather than spreading growth thinly. It also recognises that each settlement is different rather than a 'one size fits all' approach. In this context it is inherent that not every settlement will experience planned growth sits comfortably by ensuring that growth is focussed on the upper tiers of the settlement hierarchy and these tend to the settlements which either have employment provision or are in close proximity to employment development

Summary

This option is based upon the sustainability evidence in the settlement audits which informed the preferred settlement hierarchy. It does not seek to apportion growth based on a numerical approach of assigning different growth levels to different tiers in the settlement hierarchy, as the problems in implementing and monitoring such an approach is well documented in respect of the UDP. Instead, this option takes a looser approach to the settlement hierarchy whereby there is greater scope to have regard to the individual nature of settlements by seeking to address their particular needs and to make an informed choice in determining which settlements and sites are able to sustainably accommodate and deliver new development. The option also recognises the need for a new approach to ensuring that the needs of rural settlements are met through new policy approaches, which will need to be developed further.

