



Flintshire Local Development Plan

Consultation and Engagement Document

Developing the LDP Strategy

Strategic Options for:

- Planned Growth
- Spatial Strategy



October 2016

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Flintshire Local Development Plan

Strategic Options

1. Introduction

The Council is preparing a Local Development Plan (LDP) to cover the 15 year period 2015 to 2030 and when adopted this will replace the adopted Unitary Development Plan (UDP). The LDP will contain policies and proposals which together will provide for the development needs of the County over the Plan period as well as protecting the social and environmental assets of the County.

In order to understand the development needs that the Plan should provide for, this document introduces a series of potential growth options and spatial options. The engagement and consultation exercise on these options will assist in selecting a growth and spatial option to form the basis of the Plan's Preferred Strategy. In order to set the scene for the growth and spatial options this document includes the vision for the Plan, the issues to be addressed by the Plan, the objectives for the Plan and the chosen settlement hierarchy. Although these have been consulted upon as part of the Key Messages document it is considered important to include them in this document to provide a context for the growth and spatial options and the emerging LDP overall.

The document comprises this main report and is supplemented by three appendices which are:

- App 1 – Issues to be faced by the Plan (as referenced above)
- App 2 – A background paper explaining in more detail the growth options
- App 3 – A background paper explaining in more detail the spatial options

The views of key stakeholders, the public and any other interested persons are invited on this important document. Further details of how and when to comment on the growth and spatial options are set out at the end of this main report.

2. Where are we now?

The Council is in the early stages of Plan preparation and the various stages are set out in the Council's Delivery Agreement. A summary of progress to date is set out below:

- undertaken a **Call for Candidate Sites** and published a **Register** of all valid site submissions
- undertaking **Candidate Site Assessments** of the 734 sites involving internal and external consultations on the candidate sites as part of the on-going assessment

- consulted upon a **Candidate Site Assessment Methodology Background Paper** setting out the methodology by which candidate sites will be assessed and subsequently published an amended paper
- consulted upon a suite of 18 **Topic Papers** on a range of topics and issues and published amended versions where changes made
- appointed with Wrexham County Borough Council (CBC) a joint **Local Housing Market Assessment** undertaken by Arc4 consultants which has been published
- appointed Arc4 to undertake a **Housing Occupancy Survey** on all properties constructed / converted in the last 5 years to gain a better understanding of the local housing market
- appointed Arc4 to undertake a **Gypsy and Traveller Needs Assessment**
- jointly commissioned with Wrexham CBC an **Employment Land Needs Study** which will be published shortly. Follow up work on forecasting economic and jobs based growth scenarios has also been completed and this feeds into population and household modelling work
- appointed consultants jointly with Wrexham to undertake initial **viability** work on development sites
- held the first meeting of the **Key Stakeholder Forum** which will act as a sounding board at key stages in the Plans preparation and has considered the Plan's vision and objectives
- appointed Hyder (Arcadis) Consulting to undertake a **Strategic Environmental Assessment (SEA)**, **Sustainability Appraisal (SA)** and **Habitats Regulations Assessment (HRA)** and the draft SA Scoping Report has been consulted upon.
- undertaking a range of other studies including **green barrier review**, **urban capacity study**, **Welsh Language Assessment** and **Strategic Flood Consequences Assessment**
- appointed **COFNOD** (North Wales Environmental Information Service) to undertake biodiversity mapping in relation to the County's main towns and settlements within areas of development pressure
- undertaken an **assessment of settlement services and facilities** and consulted with Town & Community Councils
- Consulted on a **Key Messages Document** which included the vision, issues and objectives as well as key messages and options for devising a settlement hierarchy

The website provides a range of information about various aspects of the LDP as well as any completed studies and can be found at the following web address: <http://www.flintshire.gov.uk/en/Resident/Planning/Flintshire-Local-Development-Plan.aspx>

3. Where are We Trying to Get to?

The Council is presently working towards preparing and consulting upon the Pre-Deposit Consultation Draft Plan which will set out the Council's Preferred Strategy i.e. the amount of growth to be provided by the Plan and how that growth is to be distributed spatially across the County, as well as key strategic policies and proposals. Before this the Council is consulting on and engaging with the public and a variety of stakeholders on a range of growth and spatial options.

4. The Vision for the Plan

Each LDP needs to be based on a vision as to what it is seeking to achieve over the Plan period. The Council has drawn up a draft Vision which has been debated by the Key Stakeholder Forum and this is considered to represent a sound basis for the preparation and subsequent implementation of the Plan. The vision is also informed by the Council's Community Strategy / Single Integrated Plan. The vision was consulted upon as part of the Key Messages document and no changes were made as a result of this. The Plans vision is set out below

The LDP is about people and places. It seeks to achieve a sustainable and lasting balance which provides for 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 identity.

5. The Issues Facing the Plan

In drawing up the Plan a number of issues have been identified which need to be addressed as the Plan is progressed. Each of the earlier Topic Papers (available on Council website) set out a number of issues and also the growing evidence base has resulted in further issues being identified. The key issues have been grouped under the general themes of sustainable development i.e. **enhancing community life, delivering growth and prosperity** and **safeguarding the environment**. Under each of the three themes are a number of 'headline' issues and each of these refers to a number of key issues or considerations. The issues were consulted upon as part of the Key Messages document and amendments have been made to a number of issues and these can be inspected on the Council's website in the form of an amended Key Messages document. By grouping and identifying key issues under 'themes' and 'headline' issues, it begins to form the basis for addressing them through the subsequent formulation of objectives and policies. The issues are set out in Appendix 1.

6. The Objectives for the Plan

The vision for the Plan and the issues to be addressed by the Plan provide the basis for drawing up a set of strategic objectives. These objectives aim to capture the broad range of issues and considerations and set out what the Plan is aiming to achieve. The objectives can also form the basis for monitoring the implementation of the Plan. In drawing up the objectives these have again been organised according to the three themes of sustainable development. The objectives were consulted upon as part of the key Messages document and amendments have been made. The objectives are set out below:

Enhancing Community Life	
1.	Ensure communities have access to a mix of services, community and cultural facilities, to allow community life to flourish to provide for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community and 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 Culture
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
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 biodiversity, landscape, cultural heritage and natural, historic and built environments
17.	Maintain and enhance green and blue 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 and promoting the development of brownfield land

7. Key Messages

The vision for the Plan, the issues and the objectives need to be read alongside the emerging evidence base in order to begin the process of devising a Plan Strategy which identifies the amount of growth for the Plan, the spatial distribution of that growth and the formulation of strategic policies and proposals. In conjunction with this is the need to review the lessons learned from the UDP. These key messages were consulted upon as part of the Key messages document and amendments have been made. The key messages emerging to date can be briefly summarised as follows:

- *The County is seen as an economic driver for the economy of the North East Wales sub – region alongside the West Cheshire and Chester sub-economy, as reflected in the designation of the Enterprise Zone*
- *The job growth and economic development ambitions for the County should form the basis for identifying and delivering a supporting level of housing development*
- *The 2011 based Welsh Government household projections underestimate future housing requirements as they are based on a period of economic downturn and should be used only as a starting point, alongside a range of other considerations*
- *Whether and the extent to which the under-delivered housing over the UDP Plan period should feed into the new housing requirement figure*
- *The County, in conjunction with Wrexham forms a self-contained local housing market area. Although there are key movements in the north east of the County with Chester (which has also been recognised as a self-contained local housing market area and capable of meeting its own housing needs in the Inspector's Report on the Local Plan – Part One) the Plan needs to primarily provide for its own housing needs*
- *The Wales Spatial Plan identifies a key triangle of growth comprising the Wrexham, Deeside and Chester area*
- *The County has a number of market towns and a larger urban area focussed on the various settlements comprising Deeside, together with a wider rural hinterland*
- *The County has extensive areas of brownfield land but this is generally located in and around the River Dee and Dee Estuary, in areas at risk of flooding and / or of international nature conservation importance and this is likely to result in the need for greenfield site allocations*
- *The County has a range of physical and environmental constraints in the form of the AONB, Dee Estuary and areas at risk of flooding*

- ***The County has an ageing population with particular housing needs and a continuing need for affordable housing and the implications of such a trend longer term in ensuring a supply of skilled labour to meet the needs of modern employers***
- ***The need to assess the comments of the UDP Inspector who considered that the approach to defining settlement boundaries based on individual settlements rather than identifying urban areas was backward looking and also considered that the time was rapidly approaching whereby a fundamental review of open countryside and green barriers in parts of the County was needed.***
- ***The need for new development to be in the most sustainable locations and bring with it necessary infrastructure improvements***
- ***The need for new housing sites to be viable and deliverable in terms of contributing to housing land supply and other Plan objectives.***
- ***The need for some development in rural communities to help retain service provision***

In summary, the County is a key gateway to Wales and an important part of a regional economic hub. The Plan needs to consolidate and build upon that economic role by providing for a level of economic growth that is aspirational but realistic. This needs to be supported by an appropriate amount of housing development which is appropriate in terms of location and type in order to support economic growth whilst at the same time providing for the housing needs of the County.

A strategic focus for the Plan is therefore the growth zone between Deeside, Wrexham and Chester, but this should not be at the expense of the remainder of the Plan area. The Plan needs to ensure that the benefits of economic growth are distributed to sustainable settlements and locations throughout the County. Given that much of the County is rural the Plan must ensure that the economic and housing needs of rural areas are provided for in a sustainable and innovative manner.

8. Settlement Categorisation and Hierarchy

The Key Messages document provided an overview of the settlement survey work which informed the preparation of a number of alternative approaches to defining a settlement hierarchy. The identification of a settlement hierarchy is important as this acts as a framework to develop the Plans spatial strategy.

Settlement Surveys

Each of the settlements identified in the UDP, in addition to other possible settlements, has been assessed in terms of their services and facilities alongside their size, population and character and whether they are readily identified as settlements. The purpose of this study is to undertake a robust assessment of the sustainability of settlements and to provide the evidence base with which to test whether the UDP settlement hierarchy is still fit for purpose and to devise and test a range of other approaches. Full details of this are set out in Appendix 1 to the Key Messages document. The supporting individual settlement audits can be found on the Councils website.

The UDP adopted a three tier settlement hierarchy of category A (urban), category B (semi urban – main villages) and category C (small villages). The Study has identified that there is considerable variation of settlements within category B and C settlements in terms of the size, role and character of settlements. There is also variation in the category A settlements between the towns of Mold, Flint, Buckley and Holywell, which are recognisable towns and Connah's Quay, Queensferry and Shotton / Aston which appear to function as part of a larger urban area rather than towns in their own right. The Study has identified that there are a number of settlements which share facilities and services as well as smaller settlements which are able to use the facilities and services in larger towns. In looking at settlements based on the settlement boundaries in the UDP there is considerable confusion as to where one settlement begins and another ends.

Settlement Categorisation

The settlement survey assessments has established a good evidence base for each of the settlements and provided the framework with which to look at options for categorising settlements in the LDP. The UDP approach has been assessed alongside a number of alternative approaches and is available in Appendix 2 of the Key Messages document. It identified a number of alternative approaches and for each sets out pros and cons. In summary, the approaches presented in the Key Messages document were as follows:

- Option 1. No Change – Continue with the UDP settlement hierarchy unchanged

- Option 1a. same approach as option 1 but amend the settlement hierarchy to move / reclassify selected settlements based on their sustainability
- Option 2. the three category approach in the UDP is expanded to a 5 tier category with settlements, categorised based on their sustainability
- Option 2a. The same approach as in Option 2 above but with adjustments to the categorisation of certain settlements based on their close proximity and functional relationship to higher level settlements
- Option 3. A fresh approach for the LDP defining settlement categories based primarily on whether settlements are urban or rural areas
- Option 4. A hybrid approach combining the 'urban areas' defined in Option 3 with the lower three bands from Option 2a

Representations on the settlement hierarchy options were reported to the Council's Planning Strategy Group on 25th May 2016. There was general consensus that the UDP approach was rather basic and somewhat outdated and that there was a need for a more refined and informed approach to categorising settlements. Although there was some support for the concept of urban areas, a five tier hierarchy was considered more appropriate in terms of representing settlements which exist now and are easily recognised, rather than seeking to create 'new' groupings of settlement into urban areas, which would not be recognisable to, or supported by the public. The settlement audit findings in respect of the relationships and linkages between settlements resulted in the 5 tier settlement hierarchy being further refined to account of these settlement relationships (Option 2a). In these circumstances, some settlements appeared higher up the hierarchy than they would normally do on account of the proximity to higher order settlements which had greater services and facilities.

The Plan's settlement hierarchy is therefore Option 2a i.e. a 5 tier settlement hierarchy adjusted to take account of proximity and functional relationships to higher level settlements. This option is considered to take a much more refined approach than that contained within the UDP and is based on sustainability considerations. The settlement hierarchy provides a flexible and logical basis for the formulation of a number of spatial options. The preferred settlement hierarchy is as follows:

A Refined Five Tier Approach to Settlement Categorisation & Defining Settlement Relationships			
<p>This proposes the use of five settlement categories, however to better reflect the sustainability and relationship of some settlements, it also enables the close proximity of settlements to be taken into account. This means taking a common sense approach to re-categorising some settlements based on their relationship and proximity to other sustainable settlements. For example Buckley is classified as a Main Service Centre and as such is considered to be a sustainable location to live, relative to other locations within the County. There are a number of settlements that are in close proximity to Buckley and that are reliant on its status as a Main Service Centre for the facilities and services it provides. The settlements of Mynydd Isa (Local Service Centre) and Drury (Sustainable Village) are correctly categorized, but Alltami would be categorized as an undefined settlement based on the results of the Settlement Survey work. This is an anomalous position particularly as some of Buckley's main facilities such as the Elfed High School and new Health Centre are within walking distance of Alltami. In this respect Alltami is considered to be a sustainable village.</p>			
1. Main Service Centres Settlements with a strategic role in delivery of services and facilities			
Aston & Shotton	Connah's Quay	Holywell	Queensferry
Buckley	Flint	Mold	Saltney
2. Local Service Centres Settlements with a local role in the delivery of services and facilities			
Broughton	Garden City	Hawarden	Mynydd Isa
Ewloe	Greenfield	Hope, Caergwrle, Abermorddu & Cefn y Bedd	
3. Sustainable Village Settlements which benefit from some services and facilities and are sustainably located			
Alltami	Coed Talon / Pontybodkin	Mancot	Penyffordd / Penymynydd
Bagillt	Drury & Burntwood	Mostyn (Maes Pennant)	Sandycroft
Bretton	Ffynnongroyw	New Brighton	Sychdyn
Brynford (inc Calcoed & Dolphin)	Gronant	Northop	Treuddyn
Caerwys	Higher Kinnerton	Northop Hall	
Carmel	Leeswood	Pentre	
4. Defined Village Settlements which benefit from some facilities and facilities with which to sustain local needs			
Cilcain	Nannerch	Rhydymwyn	Whitford
Flint Mountain	Pantymwyn	Nercwys	Ysceifiog
Gwernaffield	Pentre Halkyn	Trelawnyd	
Gwernymynydd	Pen-y-Ffordd	Trelogan & Berthengam	
Lixwm	Rhosesmor	Talacre	
5. Undefined Village Settlements which have few or no services and facilities and which are not of a size or character to warrant a settlement boundary			
Afonwen	Dobs Hill	Llanfynydd	Rhewl Mostyn
Cadole	Gorsedd	Pontblyddyn	Rhes-y-Cae
Cymau	Gwaenysgor	Halkyn	
Ffrith	Gwespyr	Llanasa	

9. Growth Options

A key part of the present engagement phase of Plan preparation is to provide stakeholders and the public with the opportunity to comment on and influence the Plan at a relatively early stage. One of the most important elements of the Plan is the amount of development that it will seek to provide over the Plan period. This section of the document therefore puts forward a range of growth options that have been developed in order to gauge opinion and secure feedback.

Planning Policy Wales explains how Welsh Government household projections should be used when planning for new homes and it makes it clear that the latest Welsh Government local authority level household projections should form the starting point for assessing housing requirements. PPW is clear that local planning authorities should consider the appropriateness of projections for their area, based on all sources of local evidence. In February 2014 a new set of household projections for Wales, based on the 2011 Census, were published by Welsh Government's Knowledge and Analytical Service.

In April 2014 Carl Sargeant, the Minister for Natural Resources published a letter explaining that the assumptions underlying these projections are based on past trends, which have been significantly affected by recent past economic conditions resulting from the global economic crisis. As a consequence they may give rise to lower household projections and higher household sizes than in previous projections. The Minister 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.... For the avoidance of any future doubt, local planning authorities must seek to provide for the level of housing required as the result of analysis of all relevant sources of evidence rather than relying on the Welsh Government household projections*'. In essence therefore, whilst Welsh Government are seeking a housing figure above their projections, they do not provide any further guidance on what that level should be. The Council is therefore required to determine this figure based on the emerging evidence base and a variety of relevant issues and considerations.

The growth options presented below are based on a variety of different assumptions being fed into modelling software and are intended to show how a change in one assumption or baseline data can bring about vastly different results. They are based on established data sources but also certain assumptions about what possible future trends might occur. The identification of a housing requirement figure for a Plan, through using forecasting and modelling techniques, is not an exact science. Rather, it is about making an informed decision about the level of growth likely to be required over the Plan period having regard to the vision and objectives for the Plan. The Council is not identifying a preferred option at this stage and feedback is sought on the range of options presented.

Table 1 below provides a summary of each of the growth options as well as an explanation of the assumptions underlying each option. For each option, the increase in the number of households over the Plan period is stated and this is then converted into the number of dwellings over the Plan period. The third figure is an annual figure for the number of dwellings to be provided each year of the Plan period. The approach to formulating and presenting the growth options is set out in detail in a Background Paper in Appendix 2.

Table 1 Growth Option Scenarios

Growth Option	Explanation	Household Growth	Households To Dwellings	Annual Figure
Option 1 - 2011 based 10 year migration trend		3,600	3,750	250
Selected as it is the higher variant Welsh Government projection and therefore a starting point or baseline for comparison with other scenarios.				
Option 2 – 2014 based 15 year migration trend		4,650	4,800	320
Uses the same assumptions as in option 1 except uses 2014 population base and a longer 15 migration trend as recommended by the RTPI research and in line with the LDP plan period.				
Option 3 - 2014-based 15 year migration trend – 2008 headship rates		8,000	8,250	550
Uses the same assumptions as for option 2 except substituting the latest 2011 based household formation rates with the previous 2008 rates, which were rolled forward from the 2001 Census. This is to illustrate the over-exaggerated expectations around household formation (particular smaller households) embodied in the 2008 rates, that didn't materialise empirically and as expected when the rates were recalculated using 2011 Census data. This also assists in understanding how assumptions made about household formation and growth that informed the UDP housing requirement, did not materialize into demand.				
Option 4 – 2014 based 10 year highest migration trend		6,400	6,600	440
This option uses a 2014 population base and 2011 household formation rates but for migration, takes the highest level of net migration experienced in the past ten years, and projects forward at this level for the 15 year LDP plan period. This would be a radical change in the migration component of population change and difficult to maintain for the whole plan period, particularly given the profile of migration over the preceding 15 years.				
Option 5 - 2014-based 10 year highest migration trend – 2008 headship rates		10,050	10,350	690
Uses the same assumptions as for option 4 except replacing the latest 2011 based household formation rates with the previous 2008 rates, rolled forward from the 2001 Census. This is to again illustrate (as per options 3 and 4) the significant and compounding impact on the outcome of using outdated and/or unachievable assumptions.				
Option 6 - Employment-led projection 8-10,000 new jobs		6,350-7,100	6,550 – 7,350	440 - 490
This is an employment-led projection where the projections model is essentially run in reverse. The target of 8-10,000 new jobs is derived from existing aspirations around the Enterprise Zone and the need to ensure key strategic employment sites (Northern Gateway and Warren Hall) deliver significant employment during the LDP plan period, as well as the wider Flintshire economy.				

10. Spatial Options

This document has so far, set out a number of growth options which are presented as County wide figures. In addition to the amount of growth to be provided over the Plan period it is also necessary to consider how that growth will be distributed 'spatially' across the County. The objective is again to test a number of spatial options to ensure that the Plan's chosen spatial strategy represents the most sustainable means of distributing development across the County and to the most appropriate settlements and locations.

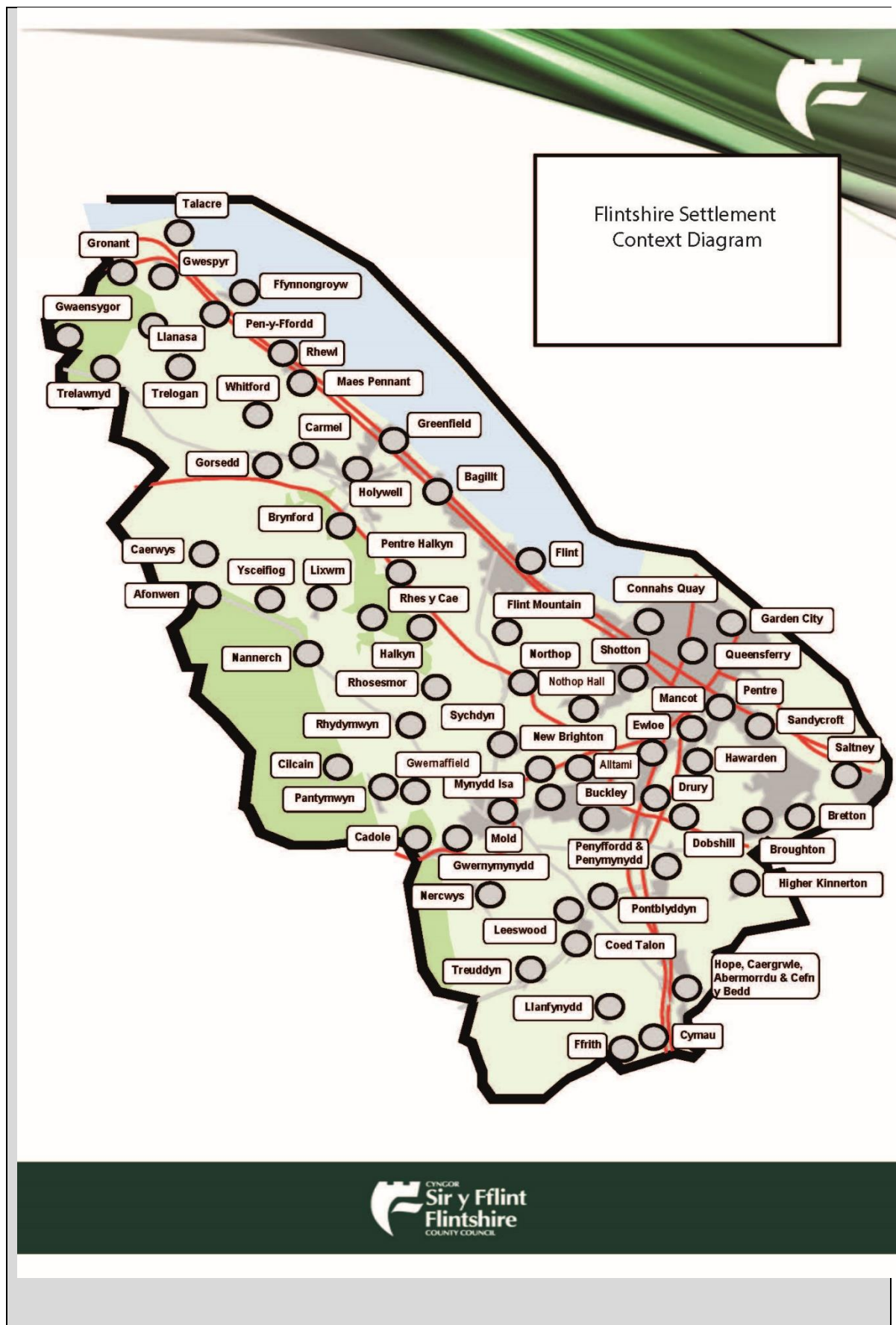
In preparing this document a 'large' list of spatial options has been the subject of an initial assessment and this has resulted in a 'small' list of 5 spatial options. Three of these spatial options (nos, 1, 2 and 5) are based on the settlement hierarchy presented earlier in this document and the remaining two are based on freestanding themes. Although comments are primarily sought on the small list of spatial options this does not preclude comments being made on any of the other spatial options in the 'large' list or indeed, any other spatial options being suggested.

The table below shows the full range of options considered and which of these are had sufficient merit to justify them being carried over to a small list of options for further assessment. Appendix 3 (Spatial Options Background Paper) provides details of the initial assessment of the large list of options and provides the reasoning as to why certain options have carried over to the small list for more detailed assessment.

Large List	Carried Over to Small List following initial assessment
Proportional Distribution	Yes (Option 1)
Focussed Urban Growth	Yes (Option 2)
New Settlement	No
Dispersal	No
No Strategy	No
Market Led	No
Growth Area	Yes (Option 3)
Hubs and Corridors	Yes (Option 4)
Sustainable distribution plus refined approach to rural settlements	Yes (Option 5)
Regeneration Led	No

The tables on the next few pages provide an explanation of each of the spatial options as well as identifying which settlements fall within a particular option. A summary of the key pros and cons of each option is also provided, along with a spatial illustration of the option in map form. The approach to formulating and presenting the spatial options is set out in detail in a Background Paper in Appendix 3. This background paper sets out a more detailed assessment of each spatial option against a range of criteria. In order to assist in the identification of settlements in each of the illustrative maps accompanying each spatial option, a simple Settlement Location Map is provided below for reference.

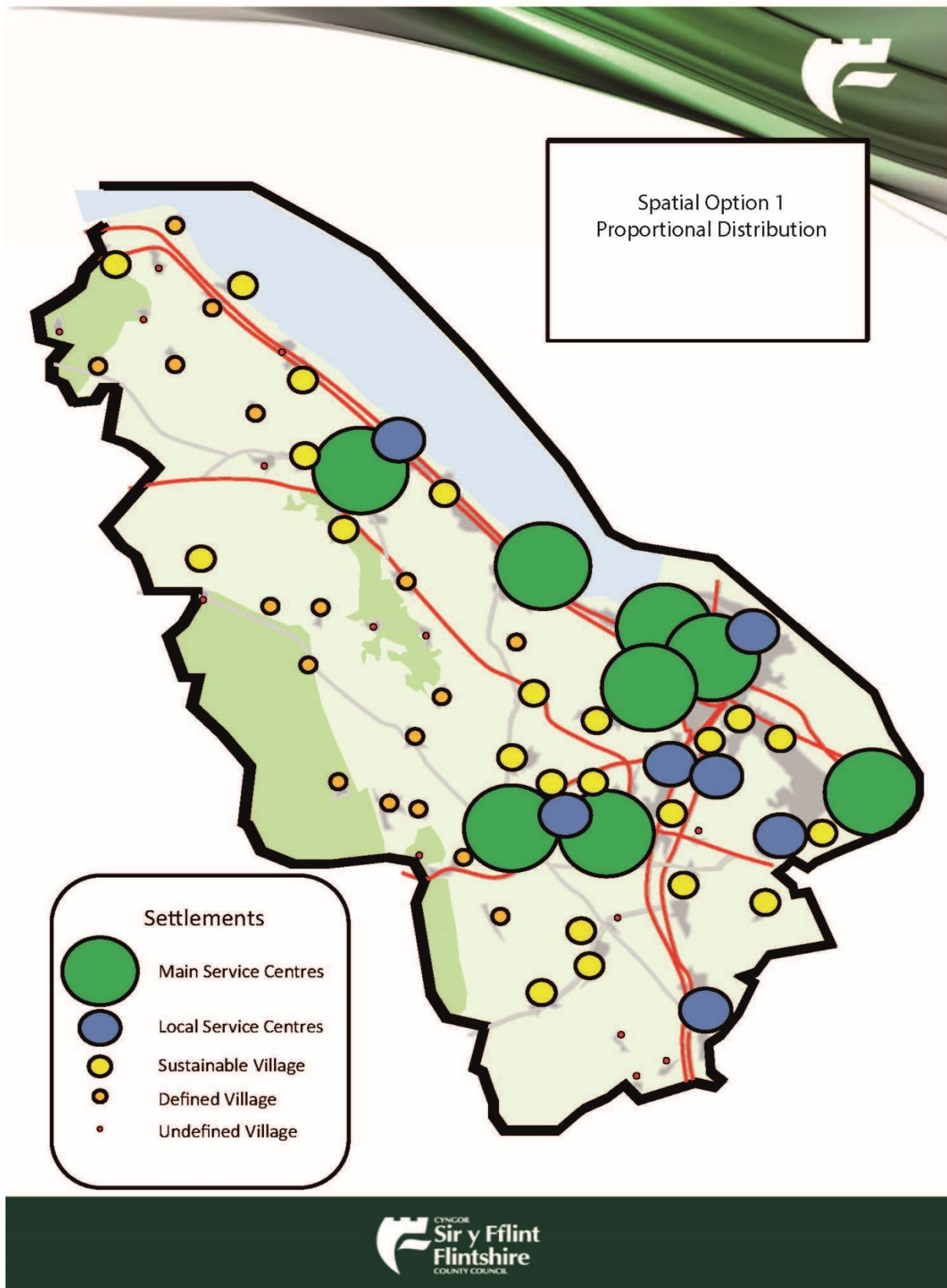
SETTLEMENT LOCATION MAP



Option 1 – Proportional Distribution			
Description Developing a settlement hierarchy which allows for a proportional distribution of development based on sustainability principles			
Spatial Expression / Settlements Affected This option is based on the 5 tier settlement hierarchy as set out below:			
Main Service Centres			
Aston & Shotton	Connah's Quay	Holywell	Queensferry
Buckley	Flint	Mold	Saltney
Local Service Centres			
Broughton	Garden City	Hawarden	Mynydd Isa
Ewloe	Greenfield	Hope, Caergwrle, Abermorddu & Cefn y Bedd	
Sustainable Village			
Alltami	Coed Talon / Pontybodkin	Mancot	Penyffordd / Penymynydd
Bagillt	Drury & Burntwood	Mostyn (Maes Pennant)	Sandycroft
Bretton	Ffynnongroyw	New Brighton	Sychdyn
Brynford (inc Calcoed & Dolphin)	Gronant	Northop	Treuddyn
Caerwys	Higher Kinnerton	Northop Hall	
Carmel Carmel	Leeswood	Pentre	
Defined Village			
Cilcain	Nannerch	Rhosesmor	Whitford
Flint Mountain	Nercwys	Rhydymwyn	Ysceifiog
Gwernaffield	Pantymwyn	Talacre	
Gwernymynydd	Pentre Halkyn	Trelawnyd	
Lixwm	Pen-y-Ffordd	Trelogan & Berthengam	
Undefined Village			
Afonwen	Ffrith	Halkyn	Rhes-y-Cae
Cadole	Gorsedd	Llanasa	Rhewl Mostyn
Cymau	Gwaenysgor	Llanfynydd	
Dobshell	Gwespyr	Pontblyddyn	
Key Points – Pros <ul style="list-style-type: none"> • Settlement hierarchy based on sustainability principles • Provides certainty by defining scale of growth for settlements in each settlement tier • Ensures growth is spread amongst settlements • Flexibility to deal with unforeseen circumstances 		Key Points – Cons <ul style="list-style-type: none"> • Suggests the need for growth bands, targets or quotas to apportion growth between settlement tiers • Planning by numbers rather than planning for sustainability • Spreading growth too thinly • Gives the impression each settlement needs to grow • Suggests smaller sites which may struggle to deliver infrastructure 	

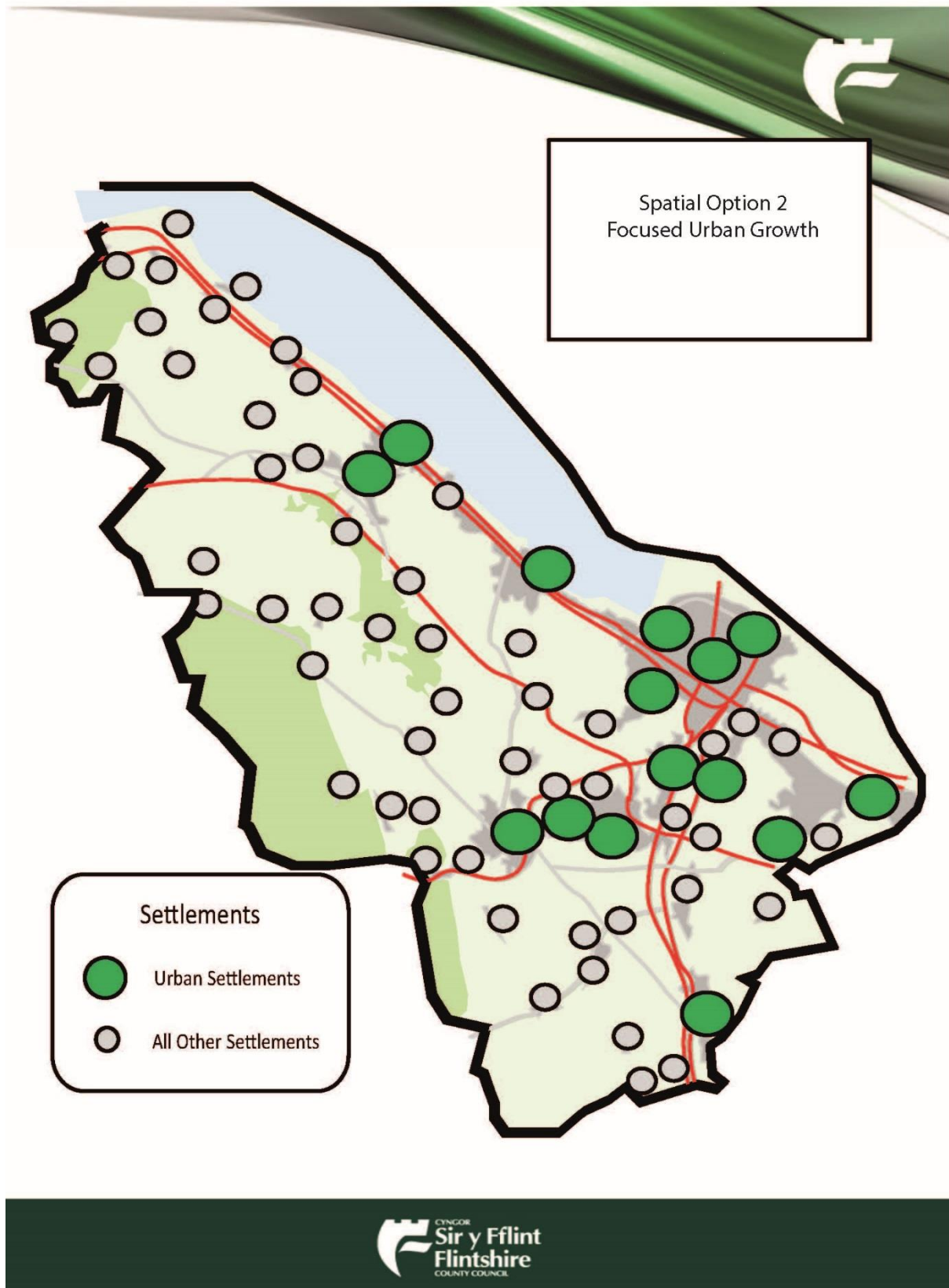
	<ul style="list-style-type: none"> • Suggests smaller sites which are not favoured by some developers • May perpetuate problems experienced by UDP (Policy HSG3) • May not fully address the needs of rural settlements
<p>Summary</p> <p>This option has many similarities to the UDP, albeit that it is based 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 numerical considerations and controls rather than by focusing on which are the more sustainable settlements and sites to deliver growth.</p>	

Map – Option 1



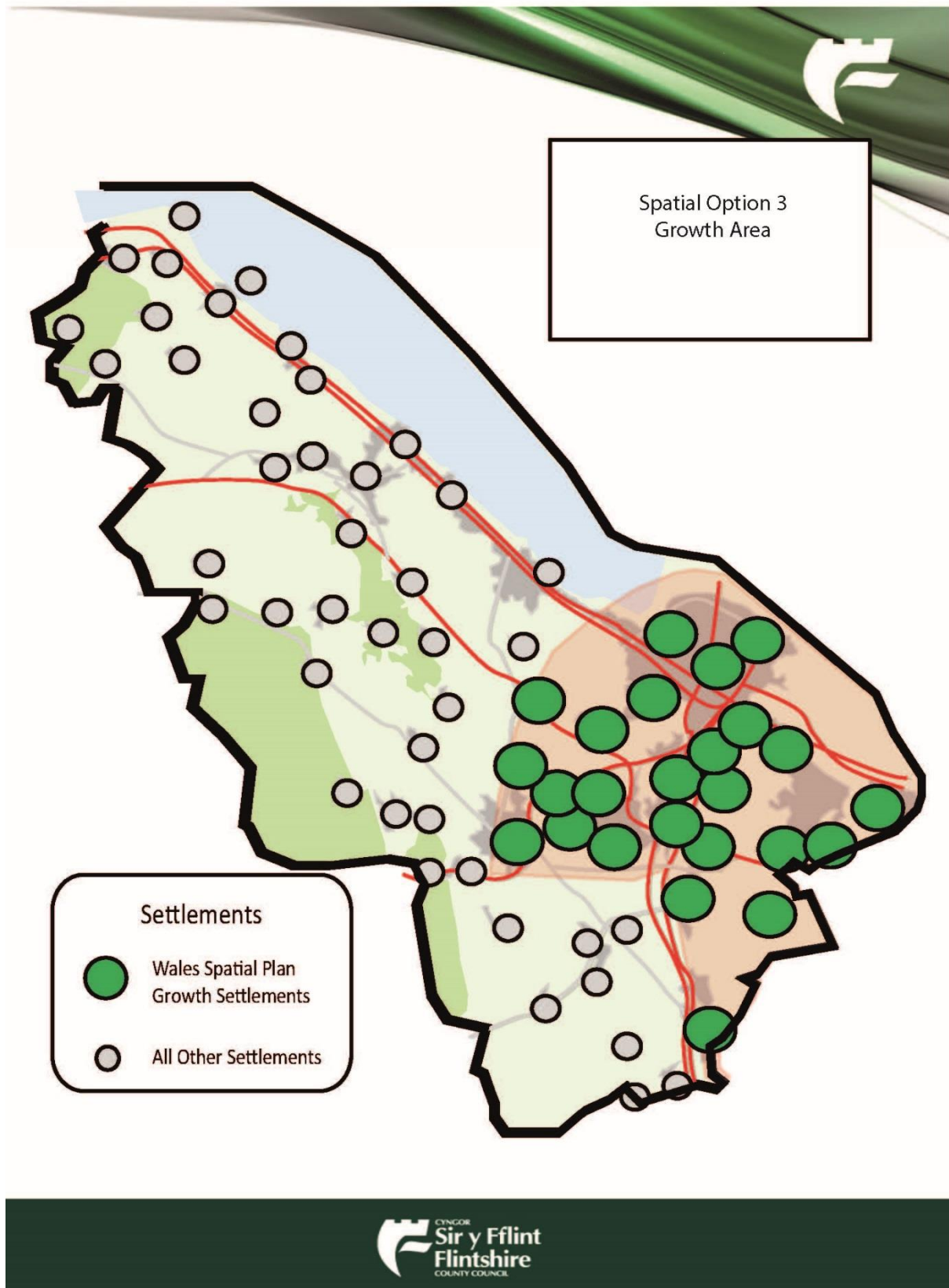
Option 2 – Focussed Urban Growth			
Description Directing all development to urban centres i.e. the upper two tiers of the settlement hierarchy			
Spatial Expression / Settlements Affected This option is based on the top 2 tiers of the 5 tier settlement hierarchy as set out below:			
Main Service Centres			
Aston & Shotton	Connah's Quay	Holywell	Queensferry
Buckley	Flint	Mold	Saltney
Local Service Centres			
Broughton	Garden City	Hawarden	Mynydd Isa
Ewloe	Greenfield	Hope, Caergwrl, Abermorddu & Cefn y Bedd	
Key Points – Pros <ul style="list-style-type: none">• Focuses growth on the larger settlements which should be the most sustainable• Suggests larger sites which should be viable and deliverable and ensure infrastructure provision• Consistent with Plans economic objectives and growth area		Key Points – Cons <ul style="list-style-type: none">• Not all of the upper two tiers of settlement hierarchy can accommodate growth due to constraints or lack of development opportunities and places pressure on other settlements• May lack flexibility to deal with unforeseen circumstances• Does not recognise opportunities in sustainable settlements (Tier 3)• Ignores rural settlements• Development could be too focused in one part of County• Could have infrastructure implications for some settlements	
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 part 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.			

Map – option 2



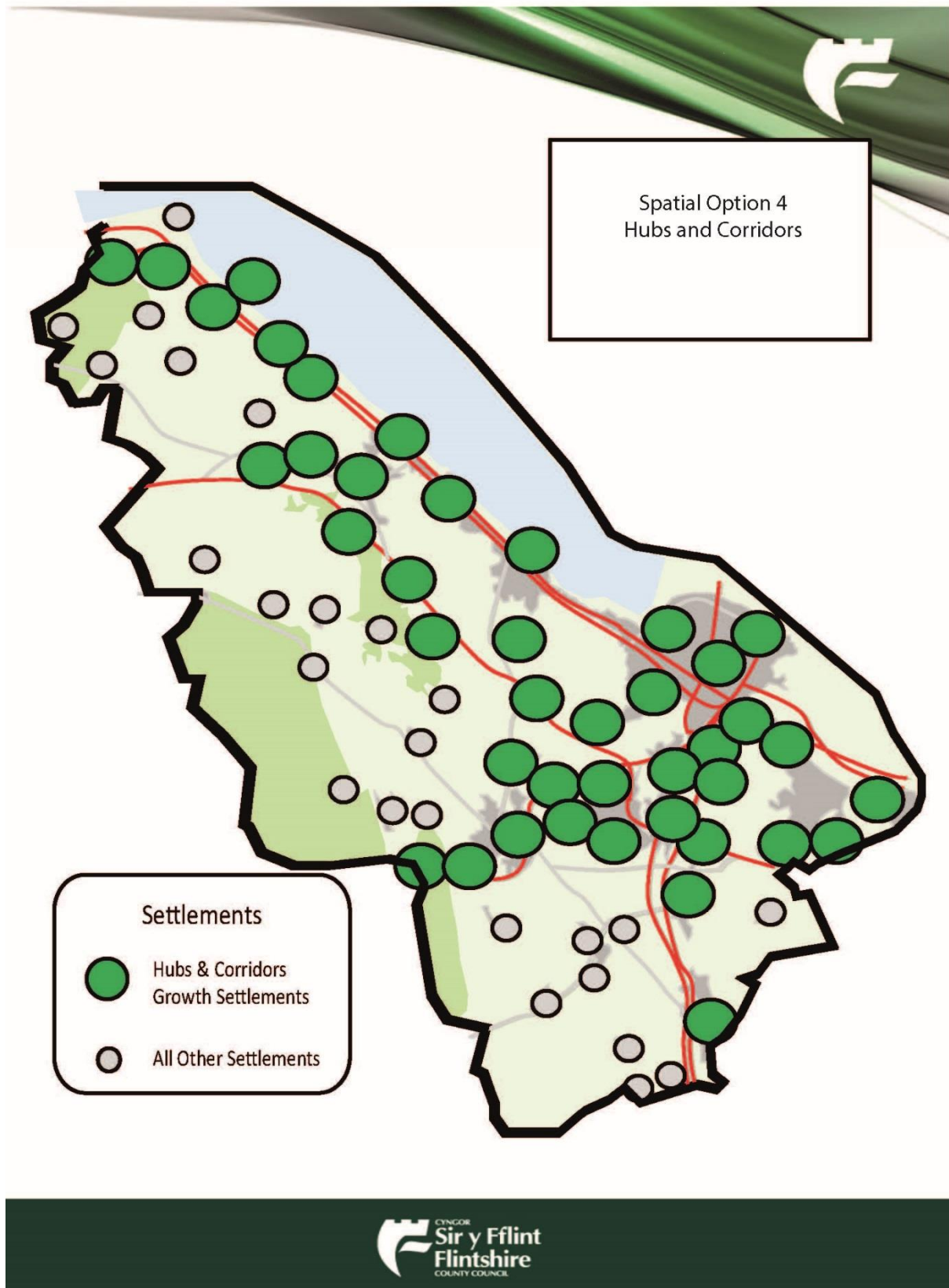
Option 3 – Growth Area	
Description Development would be focused by directing all development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan.	
Spatial Expression / Settlements Affected This option is based on delineating a boundary in map form which is based on the growth area triangle in the Wales Spatial Plan. It would encompass the following settlements:	
Settlements Deeside Settlements, Mold, Sychdyn, New Brighton, Buckley, Mynydd Isa, Alltami, Penyffordd / Penymynydd, Hope Caergwrle, Abermorddu and Cefn y Bedd, Broughton, Saltney, Ewloe, Hawarden, Mancot, Northop, Northop Hall, Higher Kinnerton, Pontblyddyn, Dobshell	
Key Points – Pros <ul style="list-style-type: none"> • Consistent with Plans economic objectives and growth area • Growth prioritised within growth area rather than a settlement hierarchy 	Key Points – Cons <ul style="list-style-type: none"> • Ignores the rest of the County outside of the growth area • Ignores other economically important areas of the County • Places pressure on areas and settlements which attractive to the housing market • No guidance over the level of growth appropriate for settlements • May place pressure on infrastructure in some settlements
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.	

Map option 3



Option 4 – Hubs and Corridors		
Description Development would be distributed based on a strict interpretation of key road and rail transport hubs and routes.		
Spatial Expression / Settlements Affected This option is based on identifying the key strategic transport hubs and corridors and would focus on both public transport and key roads. The settlements that would fall within these hubs and corridors are as follows:		
Settlements with Stations on Railway Corridors		
Wrexham – Bidston Line: Cefn y Bedd, Caergwrle, Hope, Penyffordd, Buckley (Little Mountain), Hawarden, Shotton, Hawarden Bridge		North Wales Coast Line: Flint, Shotton
Settlements on Key Strategic Roads		
A494(T): Deeside Settlements, Ewloe, Alltami, New Brighton, Mynydd Isa, Mold, Sychdyn, Gwernymynydd, Cadole	A55(T): Broughton & Bretton, Dobshill, Ewloe, Northop, Northop Hall, Drury & Burntwood, Flint Mountain, Halkyn, Pentre Halkyn, Carmel, Brynford, Gorsedd.	A548: Deeside Settlements, Saltney, Flint, Bagillt, Greenfield, Mostyn. Ffynnongroyw, Penyffordd, Gwespyr, Gronant
Key Points – Pros <ul style="list-style-type: none"> • Seeks to bring about growth based on key transport hubs and corridors • Growth prioritized based on transport considerations rather than a settlement hierarchy • Consistent with Plans economic objectives and growth area 		Key Points – Cons <ul style="list-style-type: none"> • Rail system may be limited in accommodating significant growth • Compromising the role of the A55 and A494 as strategic roads • Strategic road corridors could result in growth in unsustainable locations • Would place significant development pressure on settlements along transport corridors which may have infrastructure or other constraints to development • Ignores the role of sustainable settlements elsewhere in the County
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.		

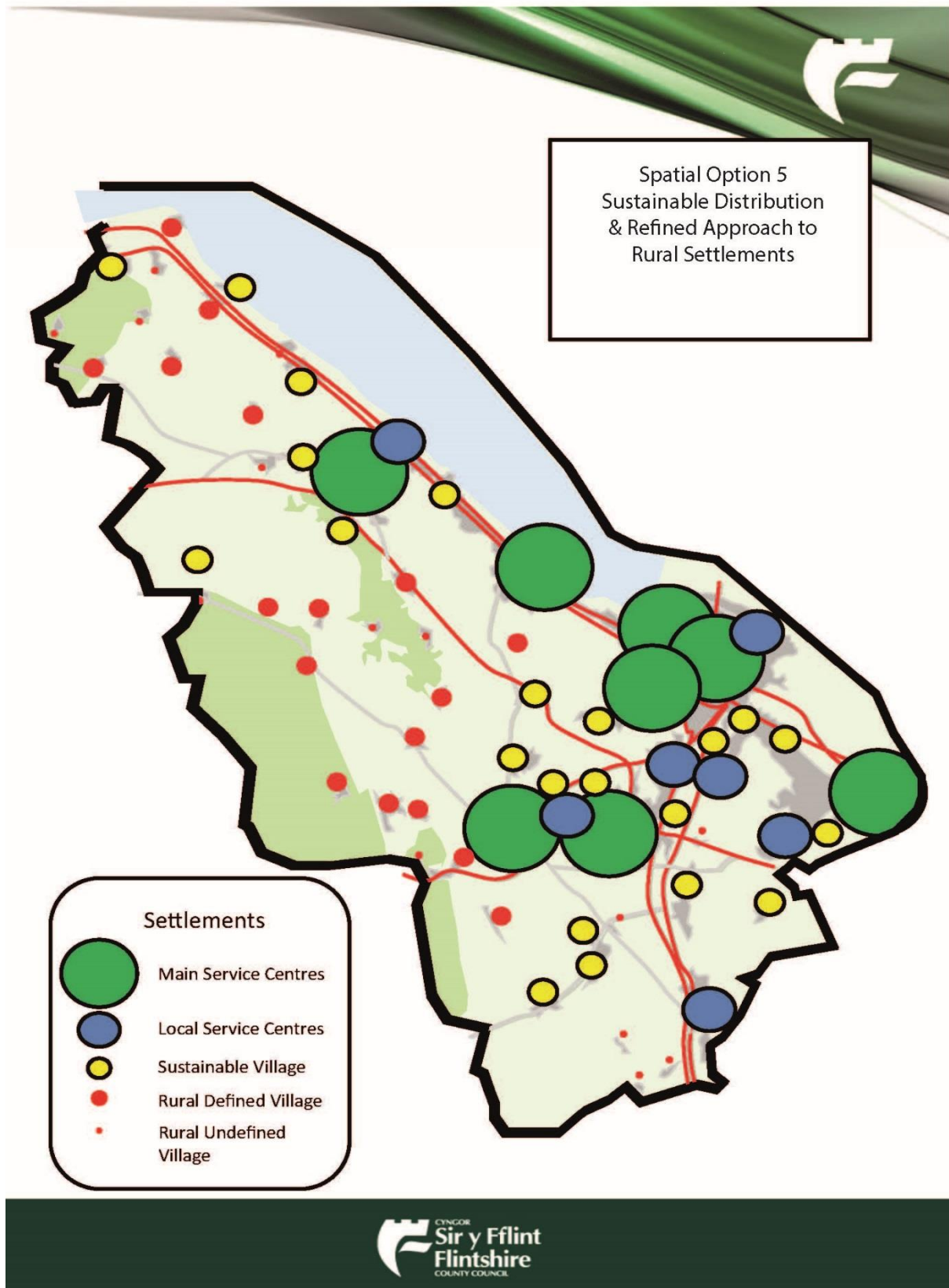
Map option 4



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.			
Spatial Expression / Settlements Affected This option is based on the first three tiers of the settlement hierarchy as shown below:			
Main Service Centres			
Aston & Shotton	Connah's Quay	Holywell	Queensferry
Buckley	Flint	Mold	Saltney
Local Service Centres			
Broughton	Garden City	Hawarden	Mynydd Isa
Ewloe	Greenfield	Hope, Caergwrle, Abermorddu & Cefn y Bedd	
Sustainable Village			
Alltami	Coed Talon / Pontybodkin	Mancot	Penyffordd / Penymynydd
Bagillt	Drury & Burntwood	Mostyn (Maes Pennant)	Sandycroft
Bretton	Ffynnongroyw	New Brighton	Sychdyn
Brynford (inc Calcoed & Dolphin)	Gronant	Northop	Treuddyn
Caerwys	Higher Kinnerton	Northop Hall	
Carmel Carmel	Leeswood	Pentre	
For the following tiers in the settlement hierarchy a more refined policy approach will be developed which seeks to embrace more innovative methods of delivering development in a sensitive, needs driven, sustainable manner.			
Defined Village			
Cilcain	Nannerch	Rhosesmor	Whitford
Flint Mountain	Nercwys	Rhydymwyn	Ysceifiog
Gwernaffield	Pantymwyn	Talacre	
Gwernymynydd	Pentre Halkyn	Trelawnyd	
Lixwm	Pen-y-Ffordd	Trelogan & Berthengam	
Undefined Village			
Afonwen	Ffrith	Halkyn	Rhes-y-Cae
Cadole	Gorsedd	Llanasa	Rhewl Mostyn
Cymau	Gwaenysgor	Llanfynydd	
Dobshell	Gwespyr	Pontblyddyn	
Key Points – Pros <ul style="list-style-type: none"> Focuses growth in the top three tiers of settlement hierarchy which are the most sustainable settlements 		Key Points – Cons <ul style="list-style-type: none"> Further consideration needed to address present lack of detail on the approach to rural settlements 	

<ul style="list-style-type: none"> • Growth based on sustainability considerations rather than a numeric approach • Allows a focused approach based on the needs of particular settlements • Identifies the need for a more innovative and focused approach to rural areas and settlements • Provides an opportunity for a range of sites in terms of location, size and type • Ensures flexibility to deal with unforeseen circumstances • Should ensure infrastructure and constraints are fully embraced 	<ul style="list-style-type: none"> • Needs some means of monitoring the broad distribution of growth across the County
<p>Summary</p> <p>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.</p>	

Map option 5



11. Next Steps

It is important to the Council that the Plan is progressed in a step by step manner whereby the opportunity is given through engagement and consultation for interested parties to be able to comment and be involved. In this way, the Plan should be able to gain consensus as it progresses. This should enable the Council to proceed through the next few stages with a clear steer at each stage, thereby avoiding the need for previous stages to be revisited and to avoid people being presented with the 'finished article'.

The Council would therefore welcome your input and views on the growth options and spatial options. The Council needs to be confident that it can move towards a Preferred Strategy whereby a level of growth and its distribution can form the basis for determining which of the assessed Candidate Sites best 'fit' that emerging Strategy. It is understandable that many people only wish to be involved in the development plan process when it comes to objecting to allocations. However, the process which the Council is following with the LDP is seeking to ensure that there is more opportunities for up front engagement and consultation, whereby people have the opportunity to influence at an earlier stage, the way the Plan is prepared.

12. How to Comment

This is an opportunity to let the Council know your views on the growth options and spatial options. Please feel free to make any comments on this document either in writing or by e-mail. The document is available on the Council's website in a word format for those wishing to complete it. Alternatively a hard copy is available on request from the LDP team. Copies of this document are available for inspection during normal opening hours at Council Offices and Libraries.

The closing date for the submission of comments on the Key Messages document is 5pm on 09/12/2016. Please forward your comments to:-

Andrew Farrow
Chief Officer (Planning and Environment)
Flintshire County Council
County Hall
Mold, Flintshire
CH7 6NF

Further Information and Advice can be obtained from the policy team by e-mailing developmentplans@flintshire.gov.uk or contact the LDP helpline on 01352 703213.

Flintshire Local Development Plan 2015 – 2030

Appendix 1 Issues to be faced by the Plan

Andrew Farrow
Chief Officer Planning & Environment

Enhancing Community Life

- 1. Ensure communities have access to a mix of services, community and cultural facilities, to allow community life to flourish to provide for the health and well-being, social, educational, spiritual, recreational, leisure and cultural needs of the community and particular groups such as the elderly**

Issues and Considerations:

- Lack of facilities and services
- Addressing quantitative and qualitative deficiencies in open space
- Ensuring new housing development incorporates or contributes to well-designed open space which is properly managed and maintained
- Accessibility of / to facilities and services
- Financial pressure on facilities and services – numbers / location / accessibility i.e. it is not realistic for all settlements to have a comprehensive range of facilities and services but recognising the availability of services and facilities in adjacent or nearby settlements
- Should facilities and services respond to development or direct where development should go?
- Provision of health centres and facilities
- Ensure that facilities exist for education either exist or can be provided
- Ensure that new development contributes where necessary to school improvements where capacity issues exist with the present level of accommodation
- Ensure that education facilities are accessible to local communities especially younger children in a safe and convenient way
- Safeguard and protect community identity
- Ensure the principles of equality are applied in preparing the Plan

- 2. Encourage the development of town and district centres as the focus for regeneration**

Issues and Considerations:

- recognising the role of town / district / local centres in terms of provision of services and facilities and seeking to maintain or enhance through regeneration or other measures
- Seeking to address decreased vitality and viability resulting in associated problems with management and maintenance of both public realm and also built fabric with vacant units and poor maintenance.
- The means to attract new investment to traditional town centres

- 3. Promote a sustainable and safe transport system that reduces reliance on the car**

Issues and considerations:

- need for joined up transport system involving road, rail, bus, cycling and walking and recognising the role of town centres as transport hubs

- social exclusion in rural areas
- social exclusion to certain groups of population
- access to jobs for those without private car e.g. improved accessibility to Deeside Industrial Park (DIP)
- addressing the potential for improvements to the railway system both for freight and passengers e.g. the need for new or improved rail station at DIP and the electrification of the Wrexham Bidston Railway
- public transport nodes and routes
- identifying disused trackbeds and other potential routes for recreation / commuting
- identifying capacity and congestion hotspots and scope for either new road schemes or road improvement schemes
- recognise the health benefits of promoting alternative method of transport such as walking and cycling'
- Safeguarding the continued operation of Hawarden Airport
- consider the role of Mostyn Docks and River Dee as a transport corridor
- designing and managing roads to reduce journey times, increase safety and reduce congestion
- the outcome and implications of the Welsh Government consultation on the blue (improvements to the A494(T)) and red (new route linking Dee Bridge with A55 at Northop) options for improving the A494T/A55T/A548 route corridor

4. Facilitate the provision of necessary transport, utility and social / community infrastructure

Issues and considerations:

- water treatment capacity and network
- water supply capacity
- lack of timely investment in infrastructure eg water treatment to deliver development – pressure on service providers to respond – feeding into service provider plans and providers
- need better understanding of infrastructure provision
- energy provision – renewable energy generation and improving energy efficiency and conservation'
- understanding the scope for renewable energy within the County in order to inform the development of suitable policies and proposals

5. Facilitate the sustainable management of waste

Issues and considerations:

- identifying future waste management and disposal needs – North Wales Residual Waste
- the need for firm allocations rather than areas of search
- contributing towards an adequate network of waste disposal and management installations
- design of housing and other development to facilitate increased recycling

- ensure risks posed by active or former landfill sites, given the landfill legacy in parts of the County, are minimised by directing sensitive development away from inappropriate sites
- reviewing existing employment sites to identify those which can accommodate waste management facilities

6. Protecting and supporting the Welsh Language

Issues and considerations:

- Identify the use of Welsh Language within the County and identify trends whereby the language is flourishing or declining
- assess the impacts of proposed housing allocations on the Welsh Language, including Welsh Language Schools, where necessary and appropriate

7. Create places that are safe, accessible and encourage and support good health, well-being and equality

Issues and considerations:

- Placing emphasis on the creation of safe and good quality public realm as part of new development
- Ensuring new development is accessible to all users
- Ensuring that new development creates the conditions which are conducive to healthy living

Delivering Growth and Prosperity

8. Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors

Issues and considerations:

- Recognising the importance of the Flintshire economy to Wales and West Cheshire and Chester / Wirral
- Have regard to the Mersey Dee Alliance and Northern Powerhouse agendas in terms of implications for the economy of Flintshire
- Over-reliance on manufacturing yet Deeside Enterprise Zone (DEZ) focus on 'advance' manufacturing
- Focus on storage and distribution at Northern Gateway
- Underdeveloped / disjointed tourism industry – outcomes of tourism destination management project.
- Accessibility to work opportunities
- Need to review older industrial allocations – new uses?

- Ensure key existing employment sites and allocations are protected from inappropriate development
- Lack of understanding as to what the market is likely to need over Plan period in terms of location, size and type of sites
- The need to ensure an adequate and appropriately skilled and trained labour supply is maintained
- What is the Council's / Welsh Government's target in terms of job creation and how does this translate into supporting development requirements?
- Addressing the needs of and implications of special and hazardous industries and protecting community
- The need to ensure a sustainable supply of minerals over the Plan period in which the economic importance of minerals extraction is balanced against environmental effects

9. Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region

Issues and considerations:

- Need to identify and deliver the right strategic sites – location, size, type to meet present / future needs (more informed view than traditional approach of over – allocation) either through allocations or a flexible but robust policy approach
- Recognising key economic drivers such as Airbus, Tata, Toyota etc
- Address the impact of Northern Gateway and DEZ and setting the scene for the remainder of the Plan period
- Recognising growth hubs and linkages with surrounding settlements to spread wealth and regeneration
- Recognise the benefits of mixed use development sites

10. Reinforce and improve Flintshire's town and district centres as vibrant destinations for shopping, leisure, culture, learning and business

Issues and considerations:

- Addressing the effects of the economic downturn and cultural changes such as on line shopping
- Will economic recovery bring back town centres to their former glory or has their 'shopping' role changed fundamentally
- Need to address the role and function of town centres – is it predominantly retail or is it a mix of uses
- How to control / prevent the loss of shops in town centres – review of core retail area policy and consideration of alternative policy approaches
- Importance of night time economy – assisted by people living in town centres eg above shops.
- Is there a need to control specific types of development e.g. hot food takeaways as part of healthy living concerns?

- Need to re-look at retail hierarchy – role and function of each town / district / local centre i.e. are specific policies needed for each town centre or one size fits all?
- Utilising the information contained within existing town centre masterplans and health checks
- Determining whether there is a need for further retail floorspace and if so, the Identification of sites for new retail development having regard to the town centres first principle
- determining whether park and ride has a role to play in facilitating and supporting healthy town centres
- the need to retain and facilitate local and rural shopping facilities

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

Issues and considerations:

- Providing an amount of housing which meets local needs and a reasonable level of in-migration which supports the economic growth aspirations of the Plan
- understanding and addressing the under- delivery of housing in the UDP
- undertaking a robust assessment of existing housing land bank and making informed allowances for small sites and windfalls
- The provision of housing which meets the needs of the general market as well as affordable housing and specialist housing such as elderly persons accommodation and gypsy and travellers’.
- Set an appropriate and achievable level of affordable housing for the plan area based on local need and viability
- ensure that a 5 year housing land supply can be sustained throughout the Plan period
- develop a policy framework to identify what developer contributions, through CIL or otherwise, will be required towards the community and infrastructure impacts of development.

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

Issues and considerations:

- Need greater emphasis on the delivery of housing – viability and deliverability
- Ensuring housing allocations deliver associated infrastructure upgrades where necessary
- Ensuring housing allocations are in sustainable locations based on a sustainable settlement and locational strategy and detailed audits of settlements
- Ensure that a range of physical, environmental and social infrastructure, including for instance an adequate road network and public transport (rail and bus) is available or can be made available

- Ensuring housing allocations are well related to economic growth areas
- Ensuring housing allocations are in areas where there is sufficient viability to deliver affordable housing etc
- Ensure full and realistic assessment is made of the existing housing landbank before identifying new housing allocations
- Review green barriers and settlement boundaries
- Adopting a site search sequence focussing initially on the availability and suitability of brownfield land
- Making the most efficient use of land

13. Promote and enhance a diverse and sustainable rural economy

Issues and considerations:

- Recognise the contribution of the agricultural economy and the need for diversification in the rural economy either as part of farm diversification or through development in and on the edge of settlements – site allocations or flexible policies?
- How realistic is it to achieve employment re-uses of rural buildings such as barns?
- Utilizing natural assets such as renewable energy
- Ensure that a sensitive and sustainable approach is taken to meeting housing needs in rural areas e.g. local needs and rural enterprise dwellings and investigating the delivery of affordable housing as part of mixed tenure schemes

14. Support the provision of sustainable tourism development

Issues and considerations:

- Underdeveloped / disjointed tourism industry – outcomes of tourism destination management project ‘in terms of a strategic framework for tourism in the County e.g. accommodation and attractions’
- Recognising changes in tourism – increased short breaks and new / innovative forms of accommodation
- Recognising that tourism is increasingly all year round
- Recognise the tourism role of market towns
- Need for flexible policies to allow for changes in the tourism industry reflecting changing consumer preferences’
- Safeguarding and enhancing natural and heritage assets i.e. coast, key landscapes etc
- Recognising the importance of tourism ‘events’ such as Mold Food Festival
- In addition to improving existing attractions such as Greenfield Valley, the need to consider and develop new tourism destinations such as Holywell and Hawarden.

Safeguarding the Environment

15. Minimise the causes and impacts of climate change and pollution

Issues and considerations

- Recognising that parts of the County are susceptible to flooding (coastal and fluvial) e.g. along Dee Estuary but also recognizing local flooding hotspots e.g. surface water flooding
- Understanding the degree of flood risk in the County in terms of tidal, fluvial and surface water
- Recognises that extreme weather events are more likely
- Adopting a precautionary and long term approach to the location / siting / design of development and travel patterns / arrangements as part of understanding the effects of climate change and sustainable transport alternatives
- Ensuring new development has built in resilience to climate change e.g. through design measures such as SUDS
- Addressing light, noise, air and other types of pollution within the County as part of identifying development sites
- Identifying physical constraints to development in terms of contaminated and unstable land (having regards to site search sequence' in PPW and preference for brownfield land.
- Recognising the role that a sustainable pattern of development can play, for instance through promoting a modal shift from car to public transport, in tackling climate change

16. Conserve and enhance Flintshire's high quality environmental assets including biodiversity, landscape, cultural heritage and natural and built environments

Issues and considerations:

- Ensure the proper status of the Clwydian Range and Dee Valley Area Of Natural Beauty (AONB) is recognised as being of equal importance to national Parks, as there is a perception by some that it is regarded as being of lesser importance
- Presence of several European designations and other protected habitats and species throughout County and implications for spatial strategy.
- Presence of great crested newts in and around several settlements particularly Buckley
- Culturally seen by some as having closer links with NW England than the rest of Wales
- Using the knowledge and information built into the Landmap system to ensure that the characteristics and features of the landscape are recognised and are considered as part of development proposal's
- Incorporating existing landscape and biodiversity features as part of development proposals and improving the ecological value of sites
- Assessing whether the Plan should identify special or local landscape designations
- Identification of a coastal zone and the review of the existing policy approach

- Safeguarding the County's rich and varied built and historic environment including listed buildings, conservation areas, scheduled ancient monuments, archaeology sites and historic landscapes, parks and gardens whilst allowing sensitive managed change.

17. Maintain and enhance green and blue infrastructure networks

Issues and considerations:

- Identifying existing networks and gaps where linkages are needed
- Recognising the Dee Estuary as a strategic linear open space opportunity and improving local accessibility to it
- Using networks as links to open countryside but also as links to facilities, services, public transport i.e. as part of everyday life
- Recognising the different roles of green (land based) and blue (water based) infrastructure networks – landscape, wildlife, movement, recreation, amenity and food production etc
- Ensuring that new development contributes where necessary to maintaining / enhancing existing networks or providing missing links
- Protecting built heritage at risk and sensitively managing change in the historic environment

18. Promote good design that is locally distinct, innovative and sensitive to location

Issues and considerations:

- Identifying and valuing what is the character of our settlements – layout, form design, materials etc
- Ensuring that the vernacular character or local distinctiveness is incorporated into new development
- Using design principles and policies to recognise local distinctiveness yet not stifling of innovative design

19. Support the safeguarding and sustainable use of natural resources and promoting the development of brownfield land

Issues and considerations:

- General support for renewable energy in terms of addressing climate change
- Identifying what scope / capacity there is for renewable energy in the County – wind, solar
- Does / should the Plan set targets for renewable energy
- Safeguarding minerals of economic importance and reviewing whether the minerals safeguarding designation in UDP needs to be further refined
- Reviewing whether the UDP mineral buffer zones are still fit for purpose

- Ensuring a sustainable supply of minerals is maintained over the Plan period and assessing whether present reserves of minerals are sufficient for the Plan period or will new sites or extensions to existing sites be required for aggregates and hard rock
- Protection of best and most versatile agricultural land
- Protecting water quality and conserving water supply

Flintshire Local Development Plan 2015 – 2030

Strategic Options Consultation Appendix 2 - Background Paper Strategic Options – Planned Growth

**Andrew Farrow
Chief Officer Planning & Environment**

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1. Introduction and Context

- 1.1 A fundamental role of the Local Development Plan (LDP) is to consider the need for growth and development, and to make appropriate provision for this growth, in the most sustainable locations.
- 1.2 The principle needs that the LDP must plan for relate to the need for employment development and job growth, the need for new housing, and the need for commercial and retail development. The processes for assessing the need associated with each are quite different, yet the outcomes need to be as closely matched as possible in order to achieve a sound, joined-up, and sustainable development plan.
- 1.3 The growth options discussed in this paper relate primarily to the amount of new housing that the plan should make provision for, as it is this element of most development plan processes that attracts most significant levels of interest, scrutiny, and invariably contention.
- 1.4 That said, the plan is about much more than just the provision of housing and it will be important to set the provision of land for housing in context with the other aims and objectives of the plan overall, and in particular the links between housing need and economic growth. This is not only to ensure that this element of the plan is given a proportional amount of scrutiny by all interested parties, but that those who are meant to be responsible for the delivery of housing (i.e. house builders and developers), understand the role they should play in delivering the wider objectives and strategy of the LDP.
- 1.5 It is also the case that the Council is planning for a new plan period, 2015 – 2030, and within it a new assessment of housing need. There is a perception amongst some observers, particularly members of the development industry, that the Unitary Development Plan (UDP) has somehow failed to deliver all of its housing requirement and as such this under-delivery should transfer over into the LDP time period (i.e. that the ‘unmet need’ from the UDP should be added onto the LDP housing requirement figure). There is no logic in reality to this ‘numbers game’, as it is not the case the UDP failed to deliver its housing requirement, for the simple reason that the UDP did not and cannot ‘deliver’ housing on the ground per se. The plan makes provision for enough land to meet the housing requirement – it is the interaction of the market and development industry that determines if and how many of these homes are actually delivered. In Flintshire as elsewhere this was severely curtailed by the economic recession from 2008 onwards which caused demand to be stifled, viability to become a significant issue in the decision to develop, and the significant limitation on the availability of finance for developers and home buyers alike. The assessment of housing need undertaken to inform the UDP is not the same as the assessment of need now

being carried out to inform the LDP in terms of differing economic, social and demographic considerations. To add elements of one onto the other would not be comparing 'like' for 'like'.

- 1.6 Whilst the current method of monitoring housing land supply might not show a 5 year supply, this does not mean that there is not a significant quantum of available housing land with consent and awaiting construction in Flintshire. The supply calculation therefore belies the actual supply of land in reality. This is a significant factor not in the sense of justifying an under-provision to be transferred, because it doesn't, but rather that there are significant 'commitments' that must be assessed and taken into account as part of the 'housing balance sheet' when identifying an appropriate and sustainable housing requirement for the LDP, and the means to make provision for it.
- 1.7 The assessment made to date of the emerging LDP evidence base has revealed a number of key messages in relation to the provision of an appropriate level of housing in the plan:
 - The County is seen as an economic driver for the economy of the North East Wales sub – region alongside the West Cheshire and Chester sub-economy, as reflected in the designation of the Enterprise Zone;
 - The job growth and economic development ambitions for the County should form the basis for identifying and delivering a supporting level of housing development;
 - The 2011 based Welsh Government household projections underestimate future housing requirements as they are based on a period of economic downturn and should be used only as a starting point, alongside a range of other considerations;
 - Whether and the extent to which the under-delivered housing over the UDP Plan period should feed into the new housing requirement figure;
 - The County, in conjunction with Wrexham forms a self-contained local housing market area, and Chester West and Cheshire is also a self-contained housing market area, able to meet its own housing needs.
- 1.8 These messages have in turn informed the development of the main objectives for the plan in relation to the broad aim of Delivering Growth and Prosperity:
 - Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors;
 - Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region;
 - Redefine the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport;

- 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;
 - 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.
- 1.9 The sequence of these objectives is deliberate in that the evidence base is clearly pointing the Council towards developing a plan strategy that has economic recovery and growth at its heart, and where housing provision is an important part of the supporting infrastructure.
- 1.10 The purpose of this background paper at this stage is not to recommend a particular growth option. Instead it is a matter of understanding the range of potential growth options that have been developed to date, using robust projections, and to present all options for public and stakeholder engagement and consultation. The feedback from this process will be reported to Members of Planning Strategy Group with the purpose of selecting a preferred growth option.

2. Background

- 2.1 Planning Policy Wales (Edition 8) sets out the basis for planning for the provision of new housing in the LDP and advises in para 9.2.2 that:

*‘Local planning authorities will need to have a clear understanding of the factors influencing housing requirements in their area over the plan period. **The latest Welsh Government local authority level Household Projections for Wales,** alongside the latest Local Housing Market Assessment, will form part of the plan’s evidence base together with other key issues such as what the plan is seeking to achieve, **links between homes and jobs**, the need for affordable housing, Welsh language considerations, the provisions of corporate strategies and the deliverability of the plan. **Household projections provide estimates of the future numbers of households and are based on population projections and assumptions about household composition and characteristics.** In certain elements of the projections, such as births and deaths, will remain relatively constant throughout the plan period. However other elements, such as migration and household formation rates, have the ability to influence outcomes significantly. **Local planning authorities will need to assess whether the various elements of the projections are appropriate for their area, and if not, undertake modelling, based on robust evidence, which can be clearly articulated and evidenced, to identify alternative options.** The level of housing provision to be proposed over a plan period must be considered in the context of viability and deliverability. **Where housing market areas cross local authority boundaries, authorities must consider potential implications with neighbouring authorities when formulating a level of housing provision.** Effective monitoring of these issues is essential to ensure that there is an adequate and continuing supply of housing to meet the identified requirement throughout the plan period’.* (My emphasis in **bold**).

- 2.2 For the purposes of assessing an appropriate housing requirement for the LDP, the elements highlighted in bold above are key and can be summarised as:

- The latest Welsh Government Projections are a starting point;
- It is important to try to establish the relationship between jobs and homes;
- Household projections are based on assumptions and varying the components can change the outcome significantly;
- Local or policy based projections might be more locally realistic than the Welsh Government projections;
- Need and potential provision in the wider housing market area must be taken into account;
- Sufficient provision must be made to ensure an adequate supply of housing throughout the plan period.

- 2.3 The latest Household projections released by the Knowledge and Analytical Services Department of the Welsh Government were published in 2014 and use a 2011 base year. These projections were the first to use data from the 2011 Population Census which as a consequence, provided a substantial adjustment to earlier 2008 based projections whose assumptions had been continually rolled forward from 2001. The Welsh Government published two projection options: the principal projection which uses a 5 year migration past trend as its key assumption; and a variant projection which uses a longer 10 year migration past trend.
- 2.4 Whilst the experience from most other local authorities in Wales who have progressed with their LDPs is that at examination, the Welsh Government projections are usually given significant weight by Inspectors when assessing the proposed housing requirement of LDPs, with the 2011 Welsh Government projections an almost immediate ‘health warning’ was issued by the Minister for Housing and Regeneration following their publication. In a letter to Chief Planning Officers in 2014 the Minister advised that the principal projection in particular should be treated with caution when used for LDPs because its trend assumptions coincide with the period of economic downturn caused by the recession. As a consequence the Minister stated therefore that:
- “.. it is not prudent for a Plan, looking 15-20 years ahead to replicate a period of exceptionally poor growth”.***
- 2.5 What the letter did not say was why the Welsh Government projections are apparently given more weight when the trend period used coincides with high growth, and why therefore it is appropriate to project such high growth forward 15-20 years. Whilst relevant to the general debate about the accuracy of projections, it is a moot point in a Flintshire context as the 2011 household projections for Flintshire, whether principal (using a 5 year migration trend) or variant (using a ten year migration trend), show an implausibly low level of projected housing need.

Table 1 2011 based Welsh Government Household Projections: FLINTSHIRE

FLINTSHIRE	Projected households 2015	Projected Households 2030	Projected Household Change 2015-2030
Principal Projection	65,271	68,710	3,439
Variant Projection	65,324	68,947	3,623

NB: figures should be rounded to the nearest 100

- 2.6 The significant element of doubt surrounding the Welsh Government projections means that they are to a greater degree of no material use to the Council in setting its housing requirement figure, save of course for the fact that they are “too

low”. The Council must therefore rely on producing its own policy based figures and the rationale for them.

- 2.7 These in turn must be realistic, sustainable, viable, and capable of being delivered by the development industry as if not, then it will simply result in the same scenario as the UDP where an appropriate amount of housing land was provided by the plan and is available, but due to the poor performance of the development industry and the effects of recession, the planned homes were not delivered. It begs the question whether it would be better in such circumstances to use the LDP plan review process to re-evaluate housing land supply, than over-allocate without good justification. In truth, it is this scenario that the present and flawed Joint Housing Land Availability process is forcing most local authorities into in any event. That said, the Council will need to identify a housing trajectory that illustrates for the housing requirement figure we select, how this can be provided throughout the plan period and ensure a 5 year land supply is maintained.
- 2.8 Notwithstanding the doubt over the latest Welsh Government projections, there are also some clear demographic factors and changing trends which do have a clear bearing on the assumptions made with any projection, and which in turn influence the outcome. These factors include:
- An ageing population structure and a slow-down in positive natural change;
 - A slowing down of migration trends, in particular the low/negligible effect net migration has on population change in Flintshire;
 - A reduction in household formation rates.
- 2.9 These are the principal assumptions or variables used in making population and household projections, and the rationale behind the projection options presented later in this report, are based on the assumptions made about each of these elements.
- 2.10 Evidence from a number of sources has been used to develop the growth options for the LDP. A key source of such evidence is the Local Housing Market Assessment (LHMA) carried out jointly for Flintshire and Wrexham in 2014/15, which confirms that Flintshire’s population is stable/stagnant in terms of change, and that from a review of market signal data, whilst local demand for housing may appear strong, household and population projections only show a very modest level of need, and future aspirations for economic growth need to be factored into future housing requirements.
- 2.11 In summary, some of the key findings from the LHMA that inform the development of housing requirement options include:
- Taken together, Flintshire and Wrexham’s local housing markets are relatively self-contained (i.e. households moving within the combined market area);

- House prices have risen slowly since 2010 and combined with relatively low average rates of new build, indicates an underlying low level of confidence in the local economy;
 - Welsh Government projections reveal low levels of household growth, but these do not factor in aspirations to support future economic growth;
 - There is an annual shortfall of 246 affordable dwellings across Flintshire (based on a snapshot of a backlog of need and assuming it will be cleared over the next five years). This does not therefore necessarily represent the target over the LDP period;
 - The preferred affordable housing tenure split is for 56% social/affordable rented, and 44% intermediate tenure;
 - Around 37% of all households in need can afford an intermediate affordable house priced at £100,000 or less;
 - A need exists for smaller dwellings and larger 4 bed dwellings as the housing stock is well catered for with 3 bed properties;
 - The implications of an ageing population in terms of providing bungalow or other specialist accommodation.
- 2.12 As a follow up to the LHMA, the Council has also carried out a New Housing Occupancy Survey which sought to gain a more detailed understanding of the dynamics of the local housing market. This identified that although there is movement between Eastern Flintshire and Chester, the Flintshire local housing market is largely self-contained.
- 2.13 Recently, research has been carried out by Cardiff University School of Planning and Geography for the Royal Town Planning Institute into the Process for Developing Robust Housing Evidence for Local Development Plans in Wales. The research was carried out in response to some uncertainty and concerns raised by local authorities in relation to the interpretation of household projections. The main findings of the research again help in the development of housing growth options and include:
- Local authorities can deviate from Welsh Government projections where robust evidence is provided;
 - The Ministerial letter issued in 2014 clarifies the Welsh Government's policy position on the use of national projections;
 - Varying certain elements of the projections, in particular migration and household formation rates, can lead to widely differing household numbers;
 - Local authorities are encouraged to share local expertise to ensure a sound defence of housing requirement figures at examinations;
 - The Welsh Government projections are given considerable weight in Examination of LDPs, and examination processes are effective in identifying inconsistencies in the arguments and evidence presented at examination.

2.14 The research made a number of recommendations to the Welsh Government focusing on:

- Delivering further training and skills development opportunities to local authorities;
- Making amendments and clarifications to Planning Policy Wales;
- Preparing a good practice guide on the use of household projections in preparing LDPs;
- Exploring the use of longer-term trend data in Welsh Government projections, to better reflect the character and purpose of the planning system.

2.15 It is not clear as yet that any of these recommendations have been responded to or taken up by the Welsh Government.

3. Rationale and approach to defining Growth Options

3.1 From the preceding discussion and background and the limited value of the Welsh Government household projections, the Council needs to develop a robust and evidenced approach to defining growth options for its LDP. Without useable Welsh Government projections, the Council is left to define a sound policy basis for setting a sustainable and deliverable housing requirement for the LDP. From the preceding assessment, there are a number of factors which contribute to defining the approach to be taken and its rationale, and these include:

- The emerging messages from the LDP evidence base, particularly in relation to the need to focus on an employment-led LDP strategy based around economic recovery, job growth, capitalizing on Enterprise Zone status, and with housing providing supporting infrastructure;
- The scale of existing housing commitments and the need to ‘sweat this asset’ before wholesale release of new green field sites;
- Developing a realistic housing balance sheet for the options to factor in commitments (once reviewed), assumptions about windfall and small site development, and completions as they occur during the plan period;
- Factoring in concerns regarding the sub-regional capacity of the development industry to bring forward 40,000+ homes within a very similar timeframe;
- The need to set a reasonable and achievable housing requirement that is deliverable by the market/development industry;
- Avoid unnecessary land banking and address any supply shortfalls via the Plan Review process;
- Utilising longer trend data for migration in line with the RTPI research recommendations;
- Seeking expert advice in relation to the preparation of policy based projections.

3.2 It is considered appropriate that a combination of demographic projections and employment-led projections have been produced to inform the selection of growth options to be considered as part of developing the core strategy of the LDP. To assist with this process, Conwy County Borough Council’s Corporate Research and Information Unit has been commissioned to provide this technical expert support. The senior researcher from that unit has considerable experience in this field, and has recently produced similar work to inform the Conwy, Denbighshire and Wrexham LDPs. The researcher is also a founder member of the Welsh Government sub-national projections working group, and a member of the Office for National Statistics Central and Local Government advisory group on population. Projections were produced using the POPGROUP suite of software, which is the same system used by Welsh Government to produce its projections. Where appropriate the same methodology and base data has been used as for

the Welsh Government projections, though assumptions about key variables relating to growth levels and trends have been varied.

- 3.3 A number of initial growth options have been considered and developed, using a variety of alternative assumptions in order to test the range of likely (and unlikely) scenarios that the County may experience over the life of the LDP. In terms of main assumptions supporting these projections, it was agreed from the outset that the latest available population base information should be used for all options being considered. At the time of producing the projections, the 2014 Mid-Year Population Estimates produced by the Office for National Statistics were the latest available and therefore used.
- 3.4 Other key assumptions relating to migration and household formation rates have been varied to examine likely/unlikely future trends and also to examine trends pre and post-recession. An employment-led projection has also been produced, which is based on a job growth target for the County over the Plan period of between 8-10,000 new jobs. This range has emerged from the Employment Land Review carried out by the Council's advisors B E Group, as part of updating the LDP evidence base, with some additional work by B E Group to forecast potential job growth by looking specifically at the potential of strategic employment sites at Northern Gateway and Warren Hall to be delivered over the plan period.
- 3.5 The following table lists and describes all of the initial growth options considered, the main assumptions they are based on, and the rationale behind their inclusion.

Table 2. LDP Projected Growth Scenarios and their rationale

PROJECTION GROWTH SCENARIO	ASSUMPTIONS AND RATIONALE
1. WELSH GOVERNMENT 2011-BASED 10 YEAR MIGRATION TREND	Selected because it is the higher variant Welsh Government projection and therefore a starting point or baseline for comparison with other scenarios.
2. 2014-BASED 15 YEAR MIGRATION TREND	Uses the same assumptions as in option 1 except uses 2014 population base and a longer 15 migration trend as recommended by the RTPi research and in line with the LDP plan period.
3. 2014-BASED 15 YEAR MIGRATION TREND – 2008 HEADSHIP RATES	Uses the same assumptions as for option 2 except substituting the latest 2011 based household formation rates with the previous 2008 rates, which were rolled forward from the 2001 Census. This is to illustrate the over-exaggerated expectations around household formation (particular smaller households) embodied in the 2008 rates, that didn't materialise empirically and as expected when the rates were recalculated using 2011 Census data. This also assists in understanding how assumptions made about household formation and growth that informed

	the UDP housing requirement, did not materialize into demand.
4. 2014-BASED 10 YEAR HIGHEST MIGRATION TREND	This option uses a 2014 population base and 2011 household formation rates but for migration, takes the highest level of net migration experienced in the past ten years, and projects forward at this level for the 15 year LDP plan period. This would be a radical change in the migration component of population change and difficult to maintain for the whole plan period, particular given the profile of migration over the preceding 15 years.
5. 2014-BASED 10 YEAR HIGHEST MIGRATION TREND – 2008 HEADSHIP RATES	Uses the same assumptions as for option 4 except replacing the latest 2011 based household formation rates with the previous 2008 rates, rolled forward from the 2001 Census. This is to again illustrate (as per options 3 and 4) the significant and compounding impact on the outcome of using outdated and/or unachievable assumptions.
6. EMPLOYMENT-LED PROJECTION – 8-10,000 NEW JOBS	This is an employment-led projection where the projections model is essentially run in reverse. The target of 8-10,000 new jobs is derived from existing aspirations around the Enterprise Zone and the need to ensure key strategic employment sites (Northern Gateway and Warren Hall) deliver significant employment during the LDP plan period, as well as the wider Flintshire economy.

- 3.6 The above growth options represent a logical and representative set of scenarios to test what the future population and household growth in Flintshire is likely or otherwise to be. The next section presents in summary form the results from running these projection scenarios, as well as commenting on the likelihood of the scenarios being achieved, and therefore their appropriateness as options for further consideration.

4. Draft Projected Growth Options

- 4.1 This section of the background paper summarises the outcome of running the projections defined in section 3, focusing on the household growth and equivalent dwelling impact. A more detailed technical projections background paper will be produced to explain in more detail the projections methodology and process and the key assumptions and inputs, as well as the complete set of results including population change, working age population change, household change, and dwelling implications.
- 4.2 Table 3 on the following page presents the draft growth options across the range of scenarios:

Table 3. Draft Projected Growth Options for the Flintshire LDP

	WG 2011-based 10 year migration trend	2014-based 15 year migration trend	2014-based 15 year migration trend – 2008 headship rates	2014-based 10 year highest migration trend	2014-based 10 year highest migration trend – 2008 headship rates	Employment-led projection – 8-10,000 new jobs
Household growth	3,600	4,650	8,000	6,400	10,050	6,350-7,100
Households to dwellings ¹	3,750	4,800	8,250	6,600	10,350	6,550-7,350
Annual figure	250	320	550	440	690	440-490

¹Households are converted to dwellings by applying an allowance for vacant dwellings of 3 - 5% to allow for turnover in the housing market and to accommodate potentially 'hidden' households.

- 4.3 The projections show a range of housing requirements over the plan period that range from 4,800 dwellings up to 10,350 dwellings. This excludes the Welsh Government projection of 3,750 as this is considered as no more than a baseline to compare against and not, given Ministerial clarification, an option that should be given serious consideration. The range in terms of annual provision of housing is between 320 dwellings per annum (dpa) and 690 dpa. This is a very broad range of provision and one which also gives scope to refine the likely options to be selected from within the range of initial projections.
- 4.4 It is not the purpose of this paper at this stage to recommend one option or other, as the options will need to be further tested, taking into account the feedback from stakeholder and public consultation. The options will also need to be run through the Sustainability Appraisal process to look at the sustainability implications of each.
- 4.5 To fully consider the potential impacts and consequences of the projected scenarios in table 4, the potential range of housing requirements need to be assessed against the various components that go to make up the provision of housing as part of the LDP. This involves compiling a housing provision balance sheet which takes the projected requirement shown in each scenario, and assesses the contribution a number of elements make to housing provision before arriving at a residual requirement figure, which represents new sites required as part of the LDP process.
- 4.6 These elements include the number of housing completions during the plan period to date; the number of commitments that exist (sites with planning permission/adopted plans and genuinely available); allowances made for small site development and windfall site development over the plan period; the need to consider at what level a contingency or flexibility allowance is built into the process of setting a housing requirement figure.
- 4.7 It is only when potential projected housing requirement options are compared against these other components of housing provision that the overall impact of each option can be fully considered, particularly in terms of what this means for the plan in terms of a residual requirement (i.e. new sites required), and the amount of flexibility to add to that. Table 4 presents a composite housing requirement balance sheet that compares each of the initial projected scenarios for comparison. The amount of commitments as at the base date of the Plan has been decreased by 500 units in each option. This is an indicative figure and will be updated subsequently following a robust review of housing commitments in terms of their likelihood of being delivered.

Table 4. Flintshire LDP 2015-2030: Housing Growth Options Balance Sheet

	WG 2011-based 10 year migration trend	2014-based 15 year migration trend	2014-based 15 year migration trend – 2008 headship rates	2014-based 10 year highest migration trend	2014-based 10 year highest migration trend – 2008 headship rates	Employment-led projection – lower range 8,000 new jobs	Employment-led projection – upper range 10,000 new jobs
REQUIREMENT (2015-30):	3,750	4,800	8,250	6,600	10,350	6,550	7,350
Less completions:							
2015-16	0	0	0	0	0	0	0
2016-17	0	0	0	0	0	0	0
2017-18	0	0	0	0	0	0	0
2018-19	0	0	0	0	0	0	0
Total Completions	0	0	0	0	0	0	0
REVISED REQUIREMENT:	3,750	4,800	8,250	6,600	10,350	6,550	7,350
Less Commitments:							
Sites with PP & in adopted Plan	4,529	4,529	4,529	4,529	4,529	4,529	4,529
Sites with PP & in adopted Plan unlikely to come forward	-500	-500	-500	-500	-500	-500	-500
REVISED REQUIREMENT:	-279	771	4,221	2,571	6,321	2,521	3,321
Less allowances:							
Small sites allowance (<10 units) 60 pa*	600	600	600	600	600	600	600
Windfall allowance (>10 units) 50 pa	750	750	750	750	750	750	750
Total Allowances	1350	1350	1350	1350	1350	1350	1350
Total Commitments & Allowances	5,379	5,379	5,379	5,379	5,379	5,379	5,379
RESIDUAL REQUIREMENT:	-1,629	-579	2,871	1,221	4,971	1,171	1,971
LDP allocations	-1,629	-579	2,871	1,221	4,971	1,171	1,971
LDP allocations including Over allocation/flexibility (+15%)	-1873	-666	3302	1404	5717	1347	2267

4.8 Apart from the need to consider whether the range of projection scenarios is appropriate and forms the basis to develop spatial options around, there are also a number of components of the balance sheet that need to be scrutinized further. These relate to the variable elements of the balance sheet, where assumptions have been made about appropriate levels or allowances. These elements relate to:

- A thorough review of all existing commitments to consider those that are unlikely to come forward/be developed. This will use evidence from the annual Joint Housing Land Availability process and should particularly focus on those sites that have been in the study for a long time and where permissions have continually been renewed but where there are no apparent signs that the site is coming forward. In many cases these sites are already not counted towards genuine land supply in the JHLAS. The balance sheet shown in table 5 assumes that 500 commitments will not come forward;
- The allowances for small site and windfall site development have been set in the balance sheet in table 5 at the levels used in the UDP balance sheet. Again these need to be compared with the actual trends in small and windfall site development recorded as part of the JHLAS process together with an assessment of the likely level at which such supply will become available throughout the LDP plan period;
- It will be expected at Examination that an allowance has been made for allocated sites not coming forward during the plan period. This is commonly referred to as a contingency or flexibility allowance and in essence requires an over-allocation of sites in order to ensure (as far as a development plan can) the delivery of the preferred housing requirement figure. The balance sheet shown in table 5 assumes a 15% flexibility allowance, in line with that used as part of the UDP. Given that the balance sheet comprises a large level of commitments, and notwithstanding the point above about assessing the proportion of these not likely to come forward, it may still be necessary to consider a flexibility allowance as high as 20% to cater for ongoing issues with delivering existing commitments.

4.9 Aside from the essential mechanics and assumptions behind the projections, and the vagaries of the market, there is also a significant concern in relation to the ability and capacity of the development industry in Flintshire and the wider sub-regional area to deliver new housing over the plan period. This is because within the same or very similar time frame, all of the local authorities in the sub-regional area are planning for a significant release of housing land:

Table 5 Sub-regional local authority Housing Requirements: 2010-2030*

Local Authority	LDP/LDF Housing Requirement	Annual Requirement	Current average completion rate
CWAC	22,000	1,100	802 (72.9%)
Wrexham CBC	11,700	780	450 ((57.7%)
Flintshire	6-8,000 [?]	400-533 [?]	420 (105%-78.8%)
Total	39,700-41,700	2,280-2,413	1,672 (73-69%)

*Respective Plan periods – CWAC 2010-2030; Wrexham 2013-2028; Flintshire 2015-2030

[?]Indicative - not yet determined

- 4.10 What is clear from the above table is that whilst there is significant growth ambition particularly in Chester West and Wrexham, the rate at which homes are currently being delivered by the industry does not match up to this ambition. The average completions refer to the trend over the last five years (3 years in Wrexham's case), so this is outside of the worst of the recessionary period, and where 'steady economic recovery' has been the general trend. Whilst it will be argued that a lack of land availability has curtailed completions there is little empirical evidence of this from a developer perspective, particularly when a significant quantum of housing land exists in Flintshire. To meet the above sub-regional requirement, developers will have to match the highest levels of completion in the recent past, and achieve these consistently year on year over the respective life of the Plans shown. This is a tall order, and again one where convincing evidence of the industry's capacity to deliver is required.

**Flintshire Local Development Plan
2015 – 2030**

**Strategic Options Consultation
Appendix 3 - Background Paper
Strategic Options – Spatial Options**

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1. Introduction and Context

- 1.1 A fundamental role of the Local Development Plan (LDP) is to consider the need for growth and development, and to make appropriate provision for this growth, in the most sustainable locations.
- 1.2 A number of growth options have been identified based on an objective assessment of 'need'. These involve a range of projection based scenarios as well as an employment led scenario. The growth options are presented as County wide options and it is necessary to consider how these growth options might be expressed 'spatially' i.e. how growth will be distributed across the County.
- 1.3 Flintshire is at the gateway to North East Wales and forms an important part of the sub-region along with Wrexham, Cheshire West and the Wirral. It is important to the economy of Wales given the presence of Deeside Industrial Park and key employers such as Airbus and Toyota and this is reflected in the grant of Enterprise Zone status. The Deeside area takes the form of a developed area comprising several settlements at the intersection of the A494(T) and A548 and two railway lines, and along the Dee Estuary. Elsewhere the County is largely rural in nature with a series of market towns and smaller settlements. It features the Clwydian Range and Dee Valley AONB which is a landscape of national importance and also the Dee Estuary which is of international ecological importance. It is this great contrast, and the diverse nature of the County which makes formulating a spatial strategy a challenging task.
- 1.4 The Wales Spatial Plan, in terms of North East Wales, identifies an urbanised and industrialised border including the Wrexham-Deeside-Chester hub, the coastal belt and the rural hinterlands. Although the Wales Spatial Plan is now somewhat dated, and will be replaced by the National Development Framework, it presently remains the only 'higher level' national spatial policy context or framework against which the LDP can be prepared. It identifies the following key elements in realising the vision for North East Wales:
 - Strengthening key hubs as a focus for investment in future employment, housing, retail, leisure and services. Outside the hubs, strong sustainable

communities will be fostered within coastal, border and rural towns and villages to provide locally accessible jobs and services across the Area

- Developing sustainable accessibility between hubs, coastal and border towns and rural parts of the Area. Improving accessibility on key road and rail corridors to maintain economic growth and provide development opportunities to the west
- Improving the quality and diversity of the economy, with a focus on high value manufacturing and services, including a high quality year-round tourism sector
- Developing, in a focused and strategic manner, the skills and education of the current and potential workforce. It is vital that the Area's children and young people develop the basic education, skills, wider knowledge and aspirations to enable them to access good job opportunities and meet the needs of local employers
- Promoting sustainable development, which is at the heart of the strategy, in part driven by the wealth of natural and built heritage within the area. The need to protect and enhance this is paramount along with the need to address and respond to climate change.

1.5 The North East Wales West Cheshire Sub Regional Spatial Strategy was developed as a non-statutory framework for greater cross-border co-operation and development between North East Wales and West Cheshire over the period 2006-2021. The main strands of the Strategy are:

- Supporting the existing strategic centres within the sub-region;
 - For Deeside the Strategy identified the need to enhance public transport accessibility and the need to consider coastal flooding issues and environmental quality
- Focusing on areas in need of regeneration including the rural hinterland
 - The Strategy identifies the need to focus on regeneration in areas such as Flint, Holywell, Mold, Shotton, Mostyn, Ffynnongrowyw and Gronant
- Enhancing links between areas of opportunity and areas of need;

- The Strategy identifies various links between settlements and centres with some corridors being purely transport links whereas others provide opportunities for development at accessible locations. The relevant links are i) The Flintshire coastal corridor, linking the Deeside strategic centre with the regeneration areas of Shotton, Flint, Holywell, Mostyn, Ffynnonogroyw and Gronant ii) the Wrexham-Bidston railway corridor, which provides a sustainable link between Wrexham, Deeside and the Liverpool region iii) corridors radiating out from Chester including the A55 and M53 corridors as critical transport links
- Placing emphasis on existing and future roles of settlements and centres within the sub region.
 - The Strategy identifies the prowess of Broughton as a centre of excellence for aerospace and related activities is being increasingly recognised and the exciting developments in new Airbus projects are likely to reinforce that role. For Deeside the Strategy identifies that the successful economic restructuring and repositioning of the Deeside area – across a wide range of manufacturing and related service activities – has firmly established Deeside as a major, modern employment centre for both the sub-region itself and neighbouring areas, including the Liverpool City region.
- Protection and enhancement of sensitive areas of natural, built and historic Importance
 - The Strategy recognized that there are environmental sensitivities to be aware of and protect, for example, flooding and internationally important nature conservation sites

1.6 The implications of the Strategy in terms of specific corridors, settlements and centres in Flintshire are as follows:

Deeside:

- Promotion of strategic sites such as Northern Gateway which will accommodate a wide range of land uses to promote sustainable development

- Reinforcement of the role of Deeside as a key location for manufacturing industry and related service activities
- Review of environmental implications of future development in this area, notably in connection with flood-risk and implications for international environmental designations.
- Enhancement of transport links between Deeside and other strategic settlements and centres within and close to the sub-region, including Wrexham via the Wrexham-Bidston line, Chester and the Flintshire coastal towns and westwards to the coastal settlements of Denbighshire

Flintshire Coastal Towns:

- Consideration of potential of the coastal towns for accommodating future housing development
- Reinforcement of the sub-regional role of Mostyn Docks, although any further expansion of the Docks area should recognise the environmental constraints of its surrounds and be subject to environmental appraisal to avoid significant adverse impacts being incurred upon the Dee Estuary Special Protection Area, Ramsar site and possible Special Area of Conservation
- Identification of strategic sites along the North Wales coastal corridor for the location of employment and mixed-use development
- Enhancement of principal links between the coastal towns and strategic settlements, including public transport accessibility

The rural hinterland:

- Development within the rural hinterland is likely to be for local needs only, in accordance with existing and new development plans
- Opportunities in this area to improve transport links and accessibility between rural areas and the main settlements and centres
- Opportunities for sustained indigenous growth and micro-industries

1.7 The assessment made to date of the emerging LDP evidence base has revealed a number of key messages in relation to the provision of an appropriate spatial strategy in the plan:

- The County is seen as an economic driver for the economy of the North East Wales sub – region alongside the West Cheshire and Chester sub-economy, as reflected in the designation of the Enterprise Zone;
- The Wales Spatial Plan identifies a growth triangle between Cheshire, Wrexham and Deeside;
- The job growth and economic development ambitions for the County should form the basis for identifying and delivering a supporting level of housing development;
- The need to have regard to the existing pattern of development and infrastructure as well as key constraints;
- The information contained in the settlement audits in terms of the sustainability of settlements and relationships between settlements;
- The preferred method of categorising settlements based on Option 2a (a 5 tier settlement hierarchy adjusted for settlement relationships).
- The need to have regard to existing commitments (to be reviewed) and the submitted Candidate Site suggestions;
- The County, in conjunction with Wrexham forms a self-contained local housing market area, and Chester West and Cheshire is also a self-contained housing market area, able to meet its own housing needs

1.8 These messages have in turn informed the development of the main objectives for the plan in relation to the broad aim of Delivering Growth and Prosperity:

- Facilitate growth and diversification of the local economy and an increase in skilled high value employment in key sectors;

- Support development that positions Flintshire as an economically competitive place and an economic driver for the sub-region;
- Redefine the role and function of Flintshire's town centres as vibrant destinations for shopping, leisure, culture, learning, business and transport;
- 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 in sustainable locations;
- 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.

1.9 The sequence of these objectives is deliberate in that the evidence base is clearly pointing the Council towards developing a plan strategy that has economic recovery and growth at its heart, and where housing provision is an important part of the supporting infrastructure.

1.10 The purpose of this report at this stage is not to recommend a particular spatial option. Furthermore, it is not at this stage seeking to identify allocations or settlement boundaries. Instead it is a matter of understanding and endorsing the range of potential spatial options that have been developed to date, and to present all feasible options for public and stakeholder engagement later this year. It is the feedback from this process that will inform recommendations to Members and selection of a preferred option.

2 Background

2.1 Welsh Government provide the framework for preparing the Plans spatial options in terms of guidance in Planning Policy Wales and the LDP Manual. Para 2.2.2 of PPW advises that the Plan '*should incorporate a concise, long-term vision and strategy indicating clearly the plan's main objectives along with the broad direction of change and the key spatial locations for development and infrastructure required to achieve them. The clear focus should be on planning for places*'. Para

4.2 of PPW emphasizes that the underlying principle with which to prepare a development plan is the presumption in favour of sustainable development.

2.2 In paragraph 4.7.2 of PPW, Welsh Government state ‘Development plans need to provide a framework to stimulate, guide and manage change towards sustainability. They should secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities. In their land allocation policies and proposals, local planning authorities should:

- promote sustainable patterns of development, identifying previously developed land and buildings, and indicating locations for higher density development at hubs and interchanges and close to route corridors where accessibility on foot and by bicycle and public transport is good;
- maintain and improve the vitality, attractiveness and viability of town, district, local and village centres;
- foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings;
- locate development so that it can be well serviced by existing infrastructure (including for energy supply, waste management and water);
- ensure that development encourages opportunities for commercial and residential uses to derive environmental benefit from co-location;
- locate development in settlements that are resilient to the effects of climate change, by avoiding areas where environmental consequences and impacts cannot be sustainably managed. Where development takes place in areas of known risks, ensure that the development is designed for resilience over its whole lifetime;
- ensure that tackling the causes and consequences of climate change is taken into account in locating new development.

- 2.3 Further advice is contained in para 9.2.5 of PPW which states *'In producing their development plans, local planning authorities should devise a settlement strategy which establishes housing policies in line with their local housing strategy and a spatial pattern of housing development balancing social, economic and environmental needs. The settlement strategy will be informed by a sustainability appraisal and should be fully justified. It should be developed and integrated as part of an overarching strategy in the development plan. Local planning authorities and house builders are encouraged to work together constructively to identify housing land in the most appropriate locations for development'*.
- 2.4 The Local Development Plans Manual recognises the value attached to the process of identifying and testing strategy and policy options as part of the participation and public consultation stage. The Manual recognises that this is essential for effective community and stakeholder engagement with the plan and in building consensus. A key stage in the Manual is the emphasis on identifying realistic options that reflect the evidence, vision and objectives for the Plan and in this context the Manual is clear that spatial options should not be devised for their own sake.

Key Messages document and Settlement Categorisation

- 2.5 As part of the earlier Key Messages document the Council consulted upon and firmed up the vision for the Plan, the issues to be faced by the Plan and the objectives for the Plan. The Key Messages document sought to ensure that the future direction for the Plan in terms of its progression to date, was soundly based and evidenced.
- 2.6 In particular, the Key Messages document introduced work undertaken in respect of settlement audits which involved some 80 plus settlements, ranging from towns down to hamlets, being assessed in terms of their services and facilities and their role, character and accessibility. This in effect gives a measure of the sustainability of each settlement.

2.7 The settlement audits informed the drawing up of a 10 tier banding based on relative levels of key services and facilities. This was used to inform the identification of a number of alternative methods of categorising settlements which were compared against the existing UDP approach. Briefly, the options were:

- Option 1 – the existing UDP approach
- Option 1a – the existing UDP approach amended for certain settlements
- Option 2 – a five tier approach
- Option 2a – a five tier approach amended to have regard to settlement relationships
- Option 3 – Urban areas
- Option 4 – Hybrid approach of option 3 and the lower three tiers of option 2a

2.8 Following consideration of representations and responses, the Council considered that Option 2a (a 5 tier settlement hierarchy adjusted to have regard to settlement relationships) was the option which best reflected a flexible and sound basis to distribute growth. Given that the spatial strategy for the Plan needs to embrace the principles of sustainable development then both the settlement audits and the settlement categorisation will be an important consideration in the identification of spatial options.

3 Rationale and approach to defining Spatial Options

3.1 The adopted UDP considered a number of spatial options and these were assessed as part of the Sustainability Appraisal of the UDP and it was established that there were pros and cons for each option. The final spatial strategy which was embodied in the UDP was very much a hybrid strategy embracing the positive elements of several of the options. The spatial options were briefly as follows:

- Locating all development along public transport corridors (railway lines)

- Spreading development evenly across settlements based on a rigid interpretation of settlement growth bands
- Identification of a new settlement
- Locating development based on an assessment of the capacity to accommodate new development
- Locating development only where it would bring about regeneration
- Locating development only in areas of market demand.
- Business as usual scenario

3.2 The earlier Topic Paper ‘Spatial Strategy’ (No. 7) provided a summary approach to developing the spatial strategy in the Plan. This contains a number of possible spatial options to be developed further and these include:

- **Sustainable distribution** – developing a settlement hierarchy which allows for a proportional distribution of development based on sustainability principles
- **Focused urban growth** – directing most development to urban centres which have the capacity and infrastructure to accommodate development
- **New Settlement** – the identification of a new settlement based on a sustainable transport corridor
- **Dispersal** – distributing development evenly to settlements across the County
- **UDP Strategy** – repeating the UDP strategy and settlement hierarchy
- **No strategy** – decisions on new development would be made on an ad hoc basis according to their individual merits
- **Market led** – a free market approach whereby development would take place in those areas of the County where viability is greatest

3.3 As identified in Welsh Government guidance, the key objective is to identify a set of realistic spatial options. In this context it would be inappropriate and potentially confusing to Plan users to consult on too great a variety of spatial options. Instead an initial assessment of a broad range of potential options has been undertaken in

order to identify a smaller set of realistic options which can be the subject of consultation.

- 3.4 The initial list of possible spatial options have been assessed briefly in the following table:

Spatial Option	Description	Assessment	Take Forward?
Proportional Distribution	Using the settlement hierarchy to allow for a proportional distribution of development based on sustainability principles	<p>This approach would be based on the information contained in the settlement audits and the settlement hierarchy and would seek to distribute growth based on a proportional amount attributed to each tier in the settlement hierarchy (similar to the growth rate approach in the UDP). A key principle in this approach is that not every settlement would be able to sustainably accommodate a housing allocation.</p> <p>This option is considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	Yes
Focused Urban Growth	Directing all development to urban centres i.e. the upper two tiers of the settlement hierarchy	<p>Focusing growth in the urban centres is considered to be compatible with guidance in PPW in terms of identifying the most sustainable locations for development, as it is these larger settlements which generally have infrastructure, services and facilities. The approach also takes into account the sustainability principles embodied in both the settlement audits and the chosen settlement hierarchy.</p> <p>This option is considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	Yes
New settlement	Establishing a new settlement, either through an entirely 'new' new settlement or the expansion of an existing settlement into a new settlement.	<p>PPW advises that '<i>New settlements on greenfield sites are unlikely to be appropriate in Wales, and should only be proposed where such development would offer significant environmental, social and economic advantages over the further expansion or regeneration of existing settlements</i>'. The likely level of growth (in the form of new allocations) is not considered sufficient to make a new settlement a sustainable proposition as new settlements typically need in the region of 5,000 dwellings to be sustainable. Furthermore, the length of time necessary to deliver a new settlement, plus the lack of other housing allocations in the Plan, would mean that housing delivery in the early / mid Plan period would be severely restricted and this would not help address the present housing land supply deficit.</p> <p>This option is not considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	No
Dispersal	Distributing development evenly to all settlements irrespective of their position	This would for instance result in a percentage or quota of growth which would be applied to all settlements. Such an approach has little regard to the basis upon which the settlement hierarchy has been	No

	in the settlement hierarchy or sustainability	<p>drawn up and would have little regard to the particular role or character of each settlement in terms of sustainability or constraints. This would represent a planning by numbers approach and would not represent an informed or responsible approach. Furthermore, if every settlement were to grow at the same rate then this would exceed the overall housing requirement, given the sheer number of settlements in the County.</p> <p>This option is not considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	
No strategy	Development would take place in locations as and when development proposals arise.	<p>This 'unplanned' approach conflicts with the importance of the Plan led approach whereby growth is distributed based on a clear Plan strategy which has sustainability as its underpinnings. Growth would take place on a random and ad hoc basis and could only be controlled based on the site specific assessment of the merits of each proposal.</p> <p>This option is not considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	No
Market Led	Development would be directed to those areas of the County which have a strong local housing market.	<p>Development would be likely to take place in attractive locations which are accessible to major service and employment centres. Such locations tend to be characterized by a strong housing market where prices and viability are high. Although likely to be attractive to developers and lead to high delivery initially, there would be a limit as to what proportion of the population could afford such prices. This approach would result in an unbalanced delivery of housing, would have no regard to the regeneration benefits of housing in other locations and would result in social exclusion from the housing market.</p> <p>This option is not considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	No
Growth area	Development would be focused by directing all development based on a rigid definition of the growth area triangle embodied in the Wales Spatial Plan	<p>This approach would result in all growth being located within a tightly defined line in map form to represent the growth area. Growth would be deprived from other areas of the County. Also it would have the effect of encouraging growth in all settlements in the growth zone, regardless of each settlements position in the settlement hierarchy or its level of sustainability. However, given that it is an interpretation based on the approach in the Wales Spatial Plan it is worthy of further consideration as part of a short list of options.</p>	Yes

		This option is considered to have sufficient merit to warrant being carried forward to a short list of options.	
Hubs and Corridors	Development would be distributed based a strict interpretation of key road and rail transport hubs and routes	<p>A key principle in PPW is bringing about a sustainable distribution of development, underpinned by a sustainable transport system with an emphasis on public transport and other forms of sustainable transport. The County has a strategic road network comprising the A55 and A494 supplemented by a network of A roads such as the A541, A550 and A548. Focusing growth for instance solely on the A494 and A55 corridors may be at odds with the strategic transport function of such routes which could be compromised by encouraging local traffic and journeys. Likewise encouraging development at junctions along the A55 would not result in sustainable development. In terms of public transport there are two lines i.e. the Wrexham Bidston Line and the North Wales Coast railway which intersect at the heart of the growth area and urban centres. Given the present low level of present patronage, there may be scope for the rail system to play a greater role in the distribution of development.</p> <p>Overall, this option is considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	Yes
Sustainable distribution plus refined approach to rural settlements	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	<p>The bulk of new housing development would take place in the top three tiers of the settlement hierarchy based on sustainability principles and the role and character of settlements, having regard to the settlement audits. Sites would be identified based broadly on the position of a settlement in the settlement hierarchy and on the sustainability of a particular settlement in conjunction with identifying the most sustainable sites, rather than identifying growth rates, targets or quotas. The option recognizes that existing policy approaches have not performed well in delivering local needs housing in rural areas.</p> <p>This option is considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	Yes
Regeneration Led	Development would be focused in those settlements where development would bring about regeneration benefits	The settlements in need of regeneration tend to be poorer performing in terms of a local housing market area. Relatively lower viability would make it difficult to ensure a complete range of planning obligations could be secured (education, affordable housing) etc. The overall delivery of housing could be prejudiced and this would have	No

		<p>implications for housing land supply. Focusing development in such settlements might also have impacts on the capacity of local infrastructure, services and facilities. Although not considered appropriate to be carried forward as a formal option, there are elements of this approach that would need to be built into the preferred option to ensure that some growth takes place in settlements in need of regeneration.</p> <p>This option is not considered to have sufficient merit to warrant being carried forward to a short list of options.</p>	
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3.5 The preceding table sets out a number of spatial options of which some have been discounted early as a result of an initial assessment. With the exception of the new settlement option, it is evident that several of options have some merit, but are not appropriate to base a County wide spatial option on. For instance it would be appropriate for any preferred spatial option to have regard to the need for regeneration, balanced with the need to have regard to market factors and viability, but on their own these do not work as separate spatial options.

3.6 It is necessary to look at the performance of the shortlisted spatial options in more detail. This is best achieved by assessing each option against a standard set of criteria and the following have been identified:

- **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.

- 3.7 Each option has been assessed against the set of criteria to ensure a consistent and transparent process.

Option 1 – Sustainable Distribution

Description

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

Spatial Expression / Settlements Affected

This option is based on the 5 tier settlement hierarchy as set out below:

Main Service Centres			
Aston & Shotton	Connah's Quay	Holywell	Queensferry
Buckley	Flint	Mold	Saltney
Local Service Centres			
Broughton	Garden City	Hawarden	Mynydd Isa
Ewloe	Greenfield	Hope, Caergwrle, Abermorddu & Cefn y Bedd	
Sustainable Village			
Alltami	Coed Talon / Pontybodkin	Mancot	Penyffordd / Penymynydd
Bagillt	Drury & Burntwood	Mostyn (Maes Pennant)	Sandycroft
Bretton	Ffynnongroyw	New Brighton	Sychdyn
Brynford (inc Calcoed & Dolphin)	Gronant	Northop	Treuddyn
Caerwys	Higher Kinnerton	Northop Hall	
Carmel Carmel	Leeswood	Pentre	
Defined Village			
Cilcain	Nannerch	Rhosesmor	Whitford
Flint Mountain	Nercwys	Rhydymwyn	Ysceifiog
Gwernaffield	Pantymwyn	Talacre	
Gwernymynydd	Pentre Halkyn	Trelawnyd	
Lixwm	Pen-y-Ffordd	Trelogan & Berthengam	
Undefined Village			
Afonwen	Ffrith	Halkyn	Rhes-y-Cae
Cadole	Gorsedd	Llanasa	Rhewl Mostyn
Cymau	Gwaenysgor	Llanfynydd	
Dobs Hill	Gwespyr	Pontblyddyn	

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 focussed 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 focussed 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	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. 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.
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

Spatial Expression / Settlements Affected

This option is based on the 5 tier settlement hierarchy as set out below:

Main Service Centres			
Aston & Shotton	Connah's Quay	Holywell	Queensferry
Buckley	Flint	Mold	Saltney
Local Service Centres			
Broughton	Garden City	Hawarden	Mynydd Isa
Ewloe	Greenfield	Hope, Caergwrle, Abermorddu & Cefn y Bedd	

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.

Spatial Expression / Settlements Affected

This option is based on delineating a boundary in map form which is based on the growth area triangle in the Wales Spatial Plan. It would encompass the following settlements:

Settlements
Deeside Settlements, Mold, Sychdyn, New Brighton, Buckley, Mynydd Isa, Alltami, Penyffordd / Penymynydd, Hope Caergwrle, Abermorddu and Cefn y Bedd, Broughton, Saltney, Ewloe, Hawarden, Mancot, Northop, Northop Hall, Higher Kinnerton, Pontblyddyn, Dobshell

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.

Spatial Expression / Settlements Affected

This option is based on identifying the key strategic transport hubs and corridors and would focus on both public transport and key roads. The settlements that would fall within these hubs are as follows:

Settlements with Stations on Railway Corridors				
Wrexham – Bidston Line: Cefn y Bedd, Caergwrle, Hope, Penyffordd, Buckley (Little Mountain), Hawarden, Shotton, Hawarden Bridge			North Wales Coast Line: Flint, Shotton	
Settlements on Key Strategic Roads				
A494(T): Deeside Settlements, Ewloe, Alltami, New Brighton, Mold, Gwernymynydd, Cadole		A55(T): Broughton, Dobshill, Ewloe, Northop, Halkyn, Pentre Halkyn		A548: Deeside Settlements, Flint, Bagillt, Greenfield, Mostyn. Ffynnongroyw, Gwespyr, Gronant

Assessment

Criteria	Commentary
Sustainable locations for development	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

	<p>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. The location of development along the A55 would result in unsustainable car based development in open countryside locations.</p>
Commitments	<p>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.</p>
Candidate Sites	<p>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.</p>
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</p>

	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.
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.

Spatial Expression / Settlements Affected

This option is based on the first three tiers of the settlement hierarchy as shown below:

Main Service Centres			
Aston & Shotton	Connah's Quay	Holywell	Queensferry
Buckley	Flint	Mold	Saltney
Local Service Centres			
Broughton	Garden City	Hawarden	Mynydd Isa
Ewloe	Greenfield	Hope, Caergwrle, Abermorddu & Cefn y Bedd	
Sustainable Village			
Alltami	Coed Talon / Pontybodkin	Mancot	Penyffordd / Penymynydd
Bagillt	Drury & Burntwood	Mostyn (Maes Pennant)	Sandycroft
Bretton	Ffynnongroyw	New Brighton	Sychdyn
Brynford (inc Calcoed & Dolphin)	Gronant	Northop	Treuddyn
Caerwys	Higher Kinnerton	Northop Hall	
Carmel Carmel	Leeswood	Pentre	

For the following tiers in the settlement hierarchy a more refined policy approach will be developed which seeks to embrace more innovative methods of delivering development in a sensitive, needs driven, sustainable manner.

Defined Village			
Cilcain	Nannerch	Rhosesmor	Whitford
Flint Mountain	Nercwys	Rhydymwyn	Ysceifiog
Gwernaffield	Pantymwyn	Talacre	
Gwernymynydd	Pentre Halkyn	Trelawnyd	
Lixwm	Pen-y-Ffordd	Trelogan & Berthengam	
Undefined Village			
Afonwen	Ffrith	Halkyn	Rhes-y-Cae
Cadole	Gorsedd	Llanasa	Rhewl Mostyn
Cymau	Gwaenysgor	Llanfynydd	

Dobs Hill	Gwespyr	Pontblyddyn	
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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	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.
Constraints	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.
Commitments	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.
Candidate Sites	The option should have sufficient flexibility to be able to have regard to candidate sites across a wide spectrum of settlements.
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. 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 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.