





## **Introduction**

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

## **Background**

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

- A Member Training Workshop on Friday 23rd September

- A Key Stakeholder Forum Workshop on Wednesday 12th October

- Town and Community Council Works0(e)-3



Appendix 6 includes:

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

Appendix 7 includes:

- Option 4 - Hubs and Corridors
- Option 5 – Sustainable Distribution (plus refined approach to rural settlements)
- Are there any alternative spatial options? n 2A 4 M re there any ati% w

The information contained in the graphs is useful in that it provides a quick visual representation of the views of those commenting on the consultation document. It must

**Hope Caergwrle Abermorddu Cefn y Bedd (HCAC)**

A key issue arising throughout the consultation comments in Appendices 4-7 is the manner in which Hope, Caergwrle, Abermorddu and

**UDP 'add – on'**

A general and recurring point throughout many of the developer based comments is that the UDP 'under-delivery' of its housing requirement figure, should be added on to the LDP housing need figure. As a matter of principle and indeed logic, it is not necessary or appropriate to simply add on the undelivered part of a previous development plan onto the next development plan. The UDP housing need was calculated using the best available data and assumptions at that time and the task now in preparing the LDP is to take a fresh look at calculating housing need based on current data and assumptions having regard to the advice in PPW. In essence the slate has to be 'wiped clean'. To merely add a previous element of unmet housing need onto a newly calculated



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

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

#### **Option 2 – 4,800 dwellings (320 pa)**

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

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

#### **Option 3 – 8,250 dwellings (550 pa)**

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

Welsh Government are unlikely to be going backwards in time to use old and outdated headship rates for future projections. Comments on this option seem to demonstrate a lack of



is provided alongside and in support of that economic growth. The option merely

and not based on sound or up to date evidence. **For the Plan to provide for such a level of growth**

	<b>LDP Objective</b>	<b>Growth Option 1</b> 3,750	<b>Growth Option 2</b> 4,800	<b>Growth Option 3</b> 8,250	<b>Growth Option 4</b> 6,600	<b>Growth Option 5</b> 10,350	<b>Growth Option 6</b> 6,550 7,350	<b>–</b>
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	LDP Objective	Growth Option 1 3,750	Growth Option 2 4,800	Growth Option 3 8,250	Growth Option 4 6,600	Growth Option 5 10,350	Growth Option 6 6,550 7,350
13	Promote and enhance a diverse and sustainable rural economy						
14	Support the provision of sustainable tourism development						
	<b>Safeguarding the Environment</b>						
15	Minimise the causes and impacts of climate change and pollution						
16	Conserve and enhance Flintshire's high quality environmental assets including landscape, cultural heritage and natural and built environments						
17	Maintain and enhance green infrastructure networks						
18	Prc						

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

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

## **Spatial Options**

The Strategic Options consultation document identified the 'large' list of possible spatial options along with a short commentary as to which options were carried forward into a

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

### **Option 1 – Proportional Distribution**

This option is similar in many respects to the UDP approach except that it uses the preferred 5 tier settlement hierarchy. In order to spread growth proportionately amongst settlements, based on the settlement hierarchy, it is necessary to have some form of numerical formula whether this be growth band, growth target, minimum growth level etc. Some comments supported option 1 in that it was similar to the UDP





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

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

#### **Option 4 – Hubs and Corridors**

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

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

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

context the need for growth to be in settlements which have good accessibility to key road and rail corridors and hubs, as well as public transport more generally, is a sound planning consideration that



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

**Hybrid of option 1 and 5 –**



**LDP Objective**

<b>Spatial Option 1 Proportional Distribution</b>	<b>Spatial Option 2 Focused Growth</b>	<b>Spatial Option 3 Urban Growth Area</b>	<b>Spatial Option 4 Hubs and Corridors</b>	<b>Spatial Option 5</b>
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## **Conclusions**

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



## Fig 1 Commentary on Spatial Options

### Option 1 – Sustainable Distribution

#### Description

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

#### Assessment

Criteria	Commentary
Sustainable locations for development	This option is based on the chosen settlement hierarchy and has regard to the settlement audits and is therefore based on sustainability principles. However, by apportioning growth based on the settlement hierarchy it has similarities to the UDP approach and suggests the need for growth bands, rates or quotas. This has the effect of a planning by numbers approach whereby each settlement could be expected to deliver growth irrespective of whether each settlement could accommodate growth due to physical, environmental or infrastructure constraints. Ultimately this rigid proportional distribution does not fully embrace sustainability principles. It is also questionable whether it will address the limitations of the UDP approach which did not provide sufficient flexibility in the rural areas whereby the needs of rural communities can be met in sustainable locations.
Infrastructure capacity	By distributing development based on an informed approach to the sustainability of each settlement and the settlement hierarchy then the option should have regard to the availability and capacity of infrastructure. However, the proportional distribution gives the impression that all or most settlements will need to grow or have an allocation, and this could result in spreading growth too thinly and having a less focused approach on sustainability.
Constraints	By spreading growth based on a proportional distribution, the impression is given that each settlement will experience growth or an allocation. This could result in a less focused approach where constraints may not full be taken into account, or in some consequences compromised.

Services and Facilities	If the amount of growth is distributed proportionally based on the position within the settlement hierarchy, then the option should have regard to the availability and capacity of facilities and services
Local housing market conditions	By distributing growth proportionally across the settlement hierarchy this option may not be able to have full regard to the strength of the local housing market in terms of implications for the type of allocation and planning obligations which could be viably delivered.
Housing Land Supply	<p>The apportionment of growth across the settlement hierarchy suggests spreading that growth thinly and having a large number of small size. Such sites are no longer favoured by many developers, who are looking for economies of scale. And could slow down or even prevent attaining and maintaining a 5 year housing land supply, based on viability and deliverability.</p> <p>The option should be able to ensure a good mix of sites in terms of location, type and size to enable housing land supply to be maintained.</p>
UDP Comparison	This is fairly similar to the UDP approach except the 5 tier settlement hierarchy is more refined in terms of having regard to the sustainability evidence set out in the settlement audits. By spreading growth based on a planning by numbers approach still has many of the limitations of the UDP approach embodied within policy HSG3. A more refined, focused approach which is fully based on sustainability would be more beneficial.





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

## Option 3 – Growth Area

### Description

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

### Assessment

Criteria	Commentary
Sustainable locations for development	

	<p>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.</p>
Services and Facilities	<p>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</p>

	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**

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

UDP Comparison

<p>PPW Conformity</p>	<p>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.</p>
<p>Flexibility</p>	<p>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.</p>
<p>Conformity with emerging Plan</p>	<p>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.</p>

# Option 5 – Sustainable Distribution plus refined approach to rural settlements

## Description

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

## Assessment

Criteria	Commentary
Sustainable	

	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

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.



