From: <redacted>

Sent: 15 July 2022 16:30

To: DevelopmentPlans

Subject: Flintshire LDP - MAC Consultation - Representation

Dear Mr Farrow

June. In a similar vein the holding text on the website was vague and did not state the simple explanation “Consultation will begin on 17th June, at which point the consultation documents will be made available online”.

Whilst I appreciate the council giving early notification to the public of the consultation, the lack of clarity in their communications, lack of follow up with links to the relevant documentation, and lack of thought about how to engage with the key public stakeholders who are not dealing with planning language or processes every day, has resulted in a flawed consultation. Carrying out a brief survey of local residents who received the same FCC communication, most didn’t have a clue about what the council was trying to say, and those that clicked on the link provided couldn’t find the information referenced. They therefore gave up. Literally numerous people have asked me “what an earth was that email all about”. I would this flawed engagement to be demonstrated by the limited number of consultation responses you receive.

I am only able to grasp the meaning of the communications from FCC about this consultation because I look yet more time to engage with the council’s officers to find out what was actually going on. This point questions the soundness of the consultation process if the council’s actions have prevented the majority of consultees from engaging with the material.

2) Needless complexity of documentation, preventing meaningful scrutiny by the public.

Further to the point above, the consultation document itself is extremely poorly set out in terms of providing easy understanding and comment by consultees. I appreciate that the introductory text gave a good overview of some of the main changes to the plan, but the rest of the document is almost entirely unfathomable without spending a significant amount of time cross referencing other LDP documents. Such a document is a useful administrative aid to document every change, but this is inappropriate as the consultation document for members of the public.

In particularl if would have been easy and helpful to provide a statement on each and every allocation site and whether any meaningful change had been proposed. IE summarising what hasn’t changed as well as what has as. Perhaps also including a statement about the number of public consultation responses received against any site, whether the inspector had reviewed them all, whether they have been covered in the hearing sessions, and whether there were any MACs or iMACs related to them.

* Council approves final inspected plan.

The above is a robust process with checks and balances to ensure the plan has been scrutinised by the public and an independent inspector – driving an optimum outcome for all.

However during the inspector hearings FCC advised informally that they had made NO changes to the plan following the public consultation. This was then confirmed formally

position, councillors need to consider the short and long term needs of their constituents and should be well placed to scrutinise the LDP.

However the 2nd email from Andy Roberts (copied below) states how the Inspectors Report and related changes is binding on the council. This demonstrates that since the draft plan was put forward for public consultation,

1) How many meaningful / focused changes did the council make to the plan following the public consultation and what (if any) they are. This would be changes to the size or allocation of any of the housing sites.

2) How many hours did the council spend preparing for, attending, and then responding to members of the public as part of the public consultation.

3) What was the cost to the public purse for carrying out this public consultation.

4) In considering the answers to 1 to 3, does the council consider that any value was achieved in carrying out the public consultation, other than enabling them to state that they completed a public consultation in accordance with guidance for carrying out a local development plan.

5) Can you council provide details of the guidance provided to council officers reviewing public consultations responses – and in particular how planning department members could use the responses to drive changes in the LDP.

Please acknowledge receipt of this submission. I am more than happy to discuss any of the points at a meeting or otherwise.

Regards

[redacted]

[redacted]

Copy of emails providing new evidence to be considered as part of the public consultation:

Dear [redacted]

Further to your email to my Chief Officer I have been asked to respond to your queries regarding the Council's recent LDP communication.

In terms of the points that you raise:

the Examination, it is difficult for either Adrian or I to second guess what will be in the Inspector's report.

That said I can't fault your logic and the MACs you have seen will be the ones available on Friday. It is the Council's expectation that as the Inspector didn't hold a session to consider alternative housing sites, then the sites within the LDP are likely to be found sound. As I say that is just our presumption and I can't say much more than that at present.

Just in relation to your point about the Council considering the Inspectors' recommendations and a straight vote for or against, remember that the LDP Regulations state that the Inspectors' report will be binding on the Council and should the Report find the plan sound with the MACs and iMACs added and

recommend adoption, that will essentially confirm what the Council's view was when it submitted the plan for Examination. This is because the Regulations are clear that a Council should only submit a plan for Examination that it considers to be sound and capable of being adopted. With a positive report from the Inspector, it would be perverse to not then endorse that view.

Remember also that at the planning application stage we will be considering the detail of how the site will be developed, where with plan adoption the broad scale and principle of development will have been established. Perhaps a better focus for the community at that time would be in ensuring that the best quality of development and integration is achieved.

I hope that helps with your further queries.

Regards Andy

Andy Roberts