

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

Date : 29 July 2022

Dear Mr Farrow ,

Flintshire Local Development Plan 2015 ±2030 : Inspectors Matters Arising
Changes

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SOHDVH ILQG EHZORZ UHSUHVHQW

Flintshire Local Development Plan Inspectors Matters Arising Changes, published for comment until 29 July 2022. These representations follow comments made in response to earlier stages of the planning process.

By way of background to these representations, operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy as well as local visitor economies. Within Flintshire, operates

The Company needs to regularly invest in to continue to attract new and repeat visitors to the local area. Such investment supports the local economy directly and indirectly through the provision of jobs and spending. The need to be able to upgrade the property and invest in the site/estate underpins the comments on the draft policies.

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1 Policy PC3 (Design) (ref. MAC 050);

2 Policy EN2 (Green Infrastructure) (ref. MAC 050);



The proposed MAC does not recognise that the policy needs to be capable of being met but does not recognise that there are different types of development. The emerging policy took a proportionate and pragmatic approach to delivering development, recognising





all nearby sensitive receptors, including holiday accommodation, which should be protected from any adverse impacts associated with resource recovery activities and minerals extraction, such as noise, odour and visual impacts. Failing to protect amenity risks adverse impacts upon operators if they cannot attract new and repeat visitors. This would have direct and indirect consequences for the local economy, including the retention of jobs. This in turn would undermine delivery of the emerging Plan.

As such, [redacted] proposes the following addition to Policy STR16:

Whilst meeting the needs of mineral resource management, the amenity of residents and other neighbouring land users will be protected from the potential adverse impacts of existing or proposed mineral extraction /processing I D F L O (Proposed additions underlined)

The proposed amendment will align Policy STR16 with PPW which states that, ³ P L Q H U D O V Z R U N L Q J V V K Q R W F D X V H X Q D F F H S W D E O H D G Y H U V H H Q (Paragraph 5.14.2) The proposed amendment to Policy STR16 would mean that these elements of the Plan would satisfy the first test of soundness which requires plans to have regard to the well-being goals

Policy PC6 (Active Travel) (ref. MAC 056)

[redacted] endorses the change to this emerging policy, and it reflects the position taken in our previous letter of representation.

Policy PE13 (Caravan Development in the Open Countryside) (refs. MAC 069 and MAC 070)

For [redacted] to continue to attract customers and respond to changing market conditions, the Company must invest regularly to maintain a product offer, so as to meet increasing customer expectations. In particular, [redacted] seeks to ensure that the accommodation and facilities at all of its sites are of good quality and well maintained, necessitating a programme of replacement and enhancement. Significant investment by [redacted] is made at its parks, resorts and hotels to achieve this. Should planning policies fail to support such investment the ability of the Company to continue to attract new and repeat visitors will



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