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

> 29 July 2022 04051/ 28/ NT/ EBo/

Dear Mr Farrow,

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 plan-making 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,

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.

- 1 Policy PC3 (Design) (ref. MAC 050);
- 2 Policy EN2 (Green Infrastructure) (refs. MAC 090 and MAC 091);
- 3 Policy EN11 (Green Barriers) (refs. MAC 097);
- 4 Policy STR16 (Strategic Planning for Minerals) (refs. MAC 045, MAC 046 and MAC 047);
- 5 Policy PC6 (Active Travel) (ref. MAC 056);
- 6 Policy PE13 (Caravan Development in the Open Countryside) (refs. MAC 069 and MAC 070);
- 7 Policy EN13 (Renewable and Low Carbon Energy Development) (refs. MAC 098 and MAC 099); and,
- 8 Policy PE15 (Telecommunications and Digital Technology Infrastructure) (ref. MAC 073).

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 that the criteria may not be applicable to every project. The modification to the policy is no longer practical or reasonable.

(Paragraph 5.5.6).

Paragraph 6.4.21 of PPW also states that enhancements should be achieved

-instated within the opening sentence to the policy, which will help to allow sufficient flexibility to deliver the Objectives of the Plan.

-quality green infrastructure network. However, requiring non-designated green spaces be given the same weight, in planning terms, as designated green spaces such as green wedges is more onerous than the wording of national policy and therefore fails the first test of soundness. Development Plans Manual (2020) states development management policies should

(Page 18).

Planning policies which

are ambiguous can deter development and therefore prevent investment into the community. Policies should be prepared to be unambiguous to provide clarity to local planning authorities and members, stakeholders and the community. As such, it is considered the modification to the policy fails the second test of soundness, which requires plans to be

In addition, the modification is contrary to PPW and the sustainable use of land within settlement boundaries nondesignated green spacq0 0 5946B40emnreW*n.996boo

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