

28/07/2022

For the attention of: Mr Andy Roberts

Dear Andy,

RE: FLINTSHIRE LOCAL DEVELOPMENT PLAN (LDP) ± MATTERS ARISING  
CHANGES CONSULTATION

Thank you for the above consultation, which we received on 16/6/2022.

We note that the following documents ha >>BDC q 0 0 59610 Tf 215.33 504.91 Td ( )Tj ET EMC Q /P

measures that could deliver phosphorus reductions which are technically feasible and could potentially be delivered.

We support the Council ~~to~~ ~~continue to~~ develop the DCPRS prior to Plan Adoption and as you know, we have separately provided you with detailed comments to assist in this regard (email from Tom Lewis dated 27<sup>th</sup> June 2022). With respect to further revisions prior to Plan adoption, we advise that the milestones need to be updated. Robust milestones are required to ensure that Category 1 measures do not SAC to favourable condition. The milestones also need revised deadlines for delivery and additional detail to explain who will be responsible for delivery.

As explained in SOCG012, the DCPRS is a living document, and it will further evolve over the lifetime of the LDP with regular reviews to reflect learning and to take account of any new evidence or information that may be available. We also note the intention that it will further develop under the umbrella of the Nutrient Management Board for the Dee. We welcome this approach and look forward to providing further advice and guidance as part of this work.

#### Other MAC matters

We note that the Schedule of the MACs also details a number of amendments that have been made in response to matters set out in our Statement of Common Ground dated January 2021 (SOCG006). These include matters relating to flood risk, protected sites, and