

13. Employment

13.1. General Issues

Representations:

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
52	17273	Tomos	DEP	O	No
3543	9006	Chester City Council	DEP	S	No
3731	9582	Amicus	DEP	O	No

Summary of Objections:

Rep No	Summary
17273	Chapter does not properly address tourism issues. Council has poor past performance. Amend wording of paragraph 13.11. No mention of tourism in identifying land for development
9582	Should be safeguards when planning permission is given to ensure local labour is used. Manufacturing is the backbone of Flintshire and must be given a higher profile

Key Issues:

13.1.1. Whether the policies should:-

- i) give a greater profile to the tourism and manufacturing sectors
- ii) promote the use of local labour.

Conclusions:

- 13.1.2. Tourism - Para 13.3 sets out the concerns of Chapter 13. It says it is principally concerned with industry, offices and warehousing whilst other chapters deal with other sources of employment such as tourism. The contribution tourism makes to employment and the economy is recognised in Chapter 16 which deals with all tourism related matters. The plan should be read as a whole and to include too many references to tourism within this chapter would lead to unnecessary duplication. Para 13.11 sets out only those key themes from the Flintshire Economic Development Strategy that are pertinent to Chapter 13. Elements from that strategy which relate to tourism are to be more appropriately found in Chapter 16. It would not be correct to amend the wording as suggested since this would not properly reflect the strategy.
- 13.1.3. The authority's performance in attracting major tourism development and the manner in which planning applications are determined are not matters for the UDP.
- 13.1.4. It is one of the functions of a land use plan to allocate land for general employment purposes. However, the tourism industry is much more footloose in terms of its location needs in comparison to the types of employment dealt with in this chapter and I do not consider the plan is deficient in not allocating sites for tourism development.
- 13.1.5. Manufacturing - The plan recognises the role of the manufacturing sector in the local economy. Para 13.9 refers to the *high-value* manufacturing employment

at Deeside Industrial Park and Airbus at Broughton. The Flintshire Economic Development Strategy, which provides the context in which the plan's policies seek to continue the County's economic development and regeneration, identifies building on the manufacturing strength as one of the key themes. The plan allocates land for various employment generating activities and I do not find the policies encourage other businesses at the expense of manufacturing.

- 13.1.6. Local labour - As I indicate in response to objections to STR3 in Chapter 3, the UDP cannot control who takes up jobs that are created. As a consequence, it is not appropriate to amend the plan as suggested.

Recommendation:

- 13.1.7. I recommend no modification to the plan.

13.2. Paragraph 13.13 -13.20

Representations:

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
477	921	Hawarden Estate	DEP	O	No
2334	4869	WAG - Dept Economy & Transport	DEP	O	No
3549	18356	Corus	PC	O	No

Summary of Objections:

Rep No	Summary
921	Inadequate provision - discount land held by companies for expansion. Allocated sites are unlikely to come forward at a rate to meet the assumed need. Allocate additional land
4869	Seeks an increase in allocated land
18356	This is dealt with below at EM1 Deeside with 9041

Key Issue:

- 13.2.1. Whether additional land should be allocated.

Conclusions:

- 13.2.2. Para 13.16 identifies an employment land need over the plan period *in the order of 300 hectares*. This figure includes an element of flexibility to cover various factors including delays in bringing sites forward. The employment land allocations have been reviewed in the light of the responses to the public consultation resulting in some allocations being deleted and others added.
- 13.2.3. Land held by companies for expansion forms part of the allocations rolled forward from existing plans. Such land could be developed within the plan period but the review acknowledges that these sites are not generally available. Additional land is allocated to compensate for the notional shortfall. I consider this is an appropriate methodology.
- 13.2.4. PC383 amends para 13.19 to reflect the revised situation and I support this change. PC382 and PC384 amend or replace the relevant text in paras 13.18 and 13.20. Whilst I support the editorial changes the figures will need to be further adjusted in the light of my recommendations relating to EM1(9) and EM1(24). The revised balance of allocations generally available does not

eliminate a slippage allowance and is not significantly out of line with the land requirements. My comments regarding the individual employment sites that make up these overall figures are to be found later in this chapter.

- 13.2.5. 4869 does not quantify how much additional land should be allocated or indicate how the trends should be included in calculating employment land requirements. It is not sustainable to allocate additional employment land without substantive and convincing evidence. A site specific objection is dealt with at EM1 land south of DARA below. EM4 would enable proposals for sites that are not allocated to be considered. Should, through monitoring, it become evident during the lifetime of the plan that a shortfall of employment land may occur, this could be addressed as part of the LDP process. This is more appropriate than allocating land which at present is not justified and which may not be as sustainable.
- 13.2.6. The land to north west of Garden City - EM1(14) accounts for some 34% of the allocations under EM1 (as amended). Given its strategic location and the allocations elsewhere in the County I do not consider this to be an over reliance on a single site. I acknowledge that the timing of delivery of HSG2A is tight. However, there is land within both the DZs and PEAs which although not specifically allocated under EM1 could nevertheless come forward for development under the criteria in EM3. Given these circumstances, it is not necessary for more land to be allocated under EM1.

Recommendations:

- 13.2.7. I recommend the plan be modified by
- i) PC 383
 - ii) adjusting the figures in paras 13.18 and 13.20 to reflect the revised situation.

13.3. EM1 General Employment Land Allocations

Representations:

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
364	450	Wrexham County Borough	DEP	S	No
2106	4601	Countryside Council for Wales	DEP	O	No
2106	4828	Countryside Council for Wales	DEP	O	No
2239	4293	Clayton	DEP	S	No
2420	5931	RSPB Cymru	DEP	S	No
2753	6617	Cheshire County Council	DEP	O	No
3543	9010	Chester City Council	DEP	O	No
6718	15638	Brock plc	DEP	O	No

Summary of Objections:

Rep No	Summary
4601	Need to consider implications of flood hazard maps; cross reference to EWP16 & GEN6
4828	Comments re floodplain; hedgerows/trees; public rights of way; impact on protected species
6617	Seeks clarification of the level of employment land being provided
9010	Review large greenfield allocations rolled forward. Consider impact of Warren Hall and Broughton allocations on infrastructure/traffic; phasing should favour brownfield sites
15638	Object to development of greenfield sites when alternative brownfield sites exist

Key Issues:

13.3.1. Whether the policy:-

- i) should be cross referenced
- ii) indicates the level of employment land provision
- iii) has appropriate regard to flooding and the allocation of greenfield/brownfield sites.

Conclusions:

- 13.3.2. Cross referencing - PC395 acknowledges the need to assess the potential impact some sites could have on international nature conservation designations. This brings clarity to the plan and I support the change. The change includes adding a reference to WB2 as a key policy. It is appropriate to include this cross reference to gain a full understanding of the issues involved in the light of proposed amendments to the supporting text. However, the same cannot be said of the need to cross reference to the policies suggested in 4601. Para 1.34 in the introduction to the plan sets out the Council's position. It is stressed that policies should not be read in isolation and that the plan should be read as a whole. Therefore I do not consider it is necessary to include cross references to EWP16 and GEN6.
- 13.3.3. Provision of employment land – EM1 indicates the employment land allocated. 6617 does not say what else is required and I am unable to comment further on this matter. My conclusions on objections made to specific site allocations and omissions are to be found later in this chapter.
- 13.3.4. The changes to the site allocations have a knock on effect on the site area totals at the bottom of the employment allocations table. It also requires changes to the supporting text. I support PCs385 and 386 which make the necessary editorial changes. FPC626 amends the introduction to PC385 to provide a better explanation of the reason for the proposed change.
- 13.3.5. FPC627 inserts additional text to follow PC386 to address the take up of high grade agricultural land at Hawarden Park/Manor Lane. In the light of my conclusions at EM1(2) Manor Lane/Hawarden Park Extension, Broughton on the objections to this allocation I consider it is appropriate to insert this additional text.
- 13.3.6. Flooding – The Council has reviewed all the sites in the light of TAN15 issued in July 2004. The TAN classifies general industrial and employment development as less vulnerable and not precluded from Zone C areas. Where sites fall within the flood zones I am informed that the site has been considered against the appropriate justification test in TAN15. I note that this process included dialogue with the EAW, the responsible body for flood risk issues. It has not objected to the employment allocations. On this basis I am satisfied that the appropriate consideration has been given to this matter.
- 13.3.7. Greenfield/brownfield sites – The text that follows the heading Employment Land Provision indicates that a critical examination of the employment land allocations in the Alyn and Deeside Local Plan and the Draft North Flintshire Local Plan was carried out to identify those allocations suitable to be rolled forward into the UDP. 9010 does not indicate what further considerations should be included in the review of greenfield sites over and above what the Council has already done. My conclusions with regard to the Warren Hall

allocation are to be found in EM2(1) and the Broughton allocations in EM1(1) and EM1(2) below.

- 13.3.8. The plan indicates that where possible brownfield sites have been identified as part of the employment provision. Whilst previously developed land should, wherever possible, be used in preference to greenfield sites PPW recognises that not all brownfield land is suitable for development. Because it is necessary to distribute land for employment throughout the County not all this provision can be met by using previously developed land. However, over 60% of the allocations are brownfield and I am satisfied that appropriate consideration has been given to this matter.
- 13.3.9. Other Matters – 4828 relating to hedgerows, trees and public rights of way are matters of detail that will be considered as part of the development control process and will be assessed against TWH2 and AC2. No further submissions have been made with regard to protected species and I am unable to comment on this element of the objection.
- 13.3.10. I note that allocations EM1(8) Connah’s Quay, EM1(21) Mold and EM1(22) Mostyn Port are not within Development Zones or Principal Employment Areas. These sites fall outside policies EM3 and EM4 and therefore there are no policies in this chapter against which to assess the acceptability of any development on them. I suggest this deficiency be addressed at the modification stage by setting out criteria, along the following lines: After *unless otherwise stated:* at the beginning of the policy insert *provided that the proposal:*
 - i. *is of an appropriate type and scale for both the site and its surroundings;*
 - ii. *will not unacceptably harm residential or other amenity or restrict neighbouring land uses;*
 - iii. *provides satisfactory on-site parking, servicing and manoeuvring space and that the highway network (including access and egress) is adequate to safely cater for the type and volume of traffic generated by the proposal; and,*
 - iv. *has no significant adverse impact on the integrity of nature conservation sites, the landscape and historic features.*

Recommendations:

- 13.3.11. I recommend the plan be modified by:-
 - i) PCs385, 386, 394, 395 and FPCs626, 627
 - ii) Amending the total and sub total figures at the bottom of the General Employment Land Allocations Table in the light of the revised situation
 - iii) establishing criteria that development in EM1 allocations will be tested against.

13.4. EM1(1) Chester Aerospace Park, Broughton

Representations:

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
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2106	4806	Countryside Council for Wales	DEP	O	No
2678	6423	North East Wales Wildlife	DEP	O	No

Summary of Objections:

Rep No	Summary
4806	Conservation of protected species should be safeguarded by an appropriate design brief
6423	Development design should safeguard water voles

Key Issue:

13.4.1. Whether the allocation is compatible with safeguarding protected species.

Conclusions:

13.4.2. The objections relate to matters of detail rather than questioning the principle of allocating this land. Development has already taken place on part of the site and I understand that appropriate nature conservation measures have been required as part of the planning process. The plan includes policies relating to wildlife and biodiversity. WB1 in particular will safeguard the concerns indicated by the objectors. Bearing in mind that development has already commenced and the safeguards that are already in place I do not consider it is necessary or appropriate to require the preparation of a development brief.

Recommendation:

13.4.3. I recommend no modification to the plan.

13.5. EM1(2) Manor Lane/Hawarden Park Extension, Broughton**Representations:**

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
59	78	Flintshire Green Party	DEP	O	No
477	693	Hawarden Estate	DEP	S	No
2106	4807	Countryside Council for Wales	DEP	O	No
2334	4896	WAG - Dept Economy & Transport	DEP	S	No
2350	5101	Welsh Assembly Government	DEP	O	Yes
2678	6425	North East Wales Wildlife	DEP	O	No
2750	6567	Clwyd Badger Group	DEP	O	No
3878	9971	Wakem	DEP	O	No

Summary of Objections:

Rep No	Summary
78	Important landscape and amenity area; questions the need; speculative and unsustainable; traffic problems and pollution; overdevelopment of Broughton
4807	Conservation of protected species should be safeguarded by an appropriate design brief
5101	Reason to believe that best and most versatile agricultural land affected by this allocation
6425	Development design should safeguard water voles
6567	Presence of badger sett; lovely wildlife area
9971	Adequate employment provision already; development will surround Broughton to detriment of the style of the village

Key Issue:

13.5.1. Whether the allocation is appropriate.

Conclusions:

- 13.5.2. The allocation is a logical extension to the existing Manor Lane Industrial Estate and adjoining Chester Aerospace Park allocation - EM1(1). It is acknowledged that the allocation includes the best and most versatile agricultural land. PPW indicates that such land should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable.
- 13.5.3. The allocation is identified as being *to cater for aerospace sector spin-offs*. I accept that, in view of its proximity to the aerospace activities at Hawarden airfield, the need to build on the strengths of the aerospace developments currently in the area and the absence of previously developed land or land of a lower agricultural grade, there is an overriding need for this allocation. I note that 5101 has been conditionally withdrawn. FPC627 adds additional supporting helpful text to address this issue.
- 13.5.4. My conclusions regarding the adequacy of the provision of employment land are to be found in my response to paras 13.13 – 13.20 above and I do not repeat them here. However, I support the overall levels of allocations. The allocation of land is not dependant on the identification of an end user. PPW states that land should be allocated *to meet both identified and as yet unidentified needs* (para 7.1.7).
- 13.5.5. The site is within reasonable proximity of settlements and is served by public transport it is not an unsustainable location. In the absence of any indication why 78 considers the allocation to be unsustainable I am unable to comment further. There is no evidence before me to support the assertion that the allocation will result in pollution or traffic problems. Indeed I understand that the Broughton Multi Modal Study found the traffic impact to be acceptable.
- 13.5.6. The airfield separates this area from the residential part of Broughton and I do not consider its development would have an unacceptable impact on the settlement's character or result in overdevelopment.
- 13.5.7. The Council indicates that a development brief will be produced which will include the protection of landscape and nature conservation features. I accept the need for such an approach and I consider it would be beneficial to make a reference to it in the supporting text.
- 13.5.8. Other Matters - PC387 deletes the eastern part of the allocation since this area is within the flight path area. I support this amendment which is in the interests of airport safety.

Recommendations:

- 13.5.9. I recommend the plan be modified by:-
- i) PC387
 - ii) FPC627
 - iii) including a statement in the supporting text that a development brief will be prepared for this site.
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provide the best option. Should it be the intention that the site would also provide open market housing, my conclusions at STR4 Chapter 3 indicate no further allocations are necessary to meet housing need. In this circumstance to allocate greenfield land would be contrary to the plan's spatial strategy and would be unsustainable.

- 13.36.8. There is no doubt that the farming industry has and is continuing to go through extensive change resulting in farms becoming uneconomic, but a similar argument could be applied to many other locations in Flintshire. It is not a matter which can be determinative of making an allocation. The planning permission which was granted for a hotel in 2002 has not been implemented and has expired. As the land can no longer be accessed and there is no permission on it, I have recommended at GEN5:16 in Chapter 4 that it be included within the green barrier. Without substantive evidence to the contrary the site's location within flood risk areas and its classification as amongst the best and most versatile of agricultural land also militate against its allocation.

Recommendation:

- 13.36.9. I recommend no modification to the plan.

13.37. EM2 High Quality Site Allocations

Representations:

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
2043	3767	Clwyd Powys Archaeological Trust	DEP	O	No
2334	4897	WAG - Dept Economy & Transport	DEP	S	No
2753	6618	Cheshire County Council	DEP	O	Yes
3543	9013	Chester City Council	DEP	O	No
6718	15639	Brock Plc	DEP	O	No
59	18084	Envirowatch	PC	S	No

Summary of Objections:

Rep No	Summary
3767	Policy should consider the historic environment
6618	Seeks clarification of the level of employment land being provided
9013	Review large greenfield allocations. Phasing should favour brownfield sites. Need to consider the impact of Warren Hall and Broughton allocations on infrastructure/traffic
15639	Objecting to development of greenfield sites when alternative brownfield sites exist

Key Issues:

- 13.37.1. Whether the policy:-

- i) should refer to the historic environment
- ii) indicates the level of employment land provision
- iii) has appropriate regard to the allocation of greenfield/brownfield sites.

Conclusions:

- 13.37.2. PC397 amends criterion a to include reference to historic interests. It is appropriate to safeguard these interests and I support this amendment.

13.37.3. My conclusions regarding the level of employment land and the allocation of greenfield and brownfield sites are to be found at EM1 above and I do not repeat them here. For the reasons given there I conclude these objections do not justify changes to EM2.

13.37.4. My conclusions with regard to the Warren Hall allocation are to be found at EM2(1) below and the Broughton allocations at EM1(1) and EM1(2) above.

Recommendation:

13.37.5. I recommend the plan be modified by PC397.

13.38. EM2(1) Warren Hall, Broughton

Representations:

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
59	3208	Flintshire Green Party	DEP	O	No
1096	1450	Hipkiss	DEP	O	No
2106	4809	Countryside Council for Wales	DEP	O	No
2239	4294	Clayton	DEP	O	No
2334	4878	WAG- Dept Economy & Transport	DEP	O	No
2350	5104	Welsh Assembly Government	DEP	O	Yes
2678	6428	North East Wales Wildlife	DEP	O	No
2750	6573	Clwyd Badger Group	DEP	O	No
3344	8412	Higher Kinnerton Community Council	DEP	O	No
3871	9936	Kinsella	DEP	O	No
3874	9963	Bradshaw	DEP	O	No
3883	11953	Mack	DEP	O	No
4699	17670	Parry	DEP	O	No
7387	18471	Airbus UK	PC	O	No

Summary of Objections:

Rep No	Summary
3208	Delete employment allocation and replace with green barrier
1450	Retain as farmland; inadequate road network
4809	Safeguard protected species, woodland, water bodies, watercourse and other semi natural vegetation
6428	
4294	Delete allocation and question the need
4878	Amend allocation to 78.9ha to ensure consistency between policy and proposals map
5104	Amend proposals map to reflect the true nature of the allocation
6573	Safeguard badger setts on part of the allocation
8412	Delete allocation and safeguard as open countryside
9936	Delete allocation
9963	Delete allocation in the light of malpractice in previous planning permissions
11953	Resist further commercial development in area
17670	Delete allocation; adequate B1 provision already; exacerbate existing traffic problems
18471	Acknowledge various aerodrome safeguarding restrictions

Key Issue:

13.38.1. Whether the allocation should be amended/deleted.

Conclusions:

13.38.2. In April 2008 planning permission (038744) was granted for the development, on part of the allocated land, of a business park (Class B1), hotel/leisure

facilities and associated infrastructure, including new slip roads from the A55(T). This is a *fait accompli* and cannot be changed by the development plan process. However, in view of the objections made to this allocation, I should point out that I support the principle of designating land for employment needs in this area. The allocation of a high quality employment site is in keeping with the WSP and the sub regional framework for West Cheshire and North East Wales. Allocating a number of dispersed small sites instead of this allocation as suggested in 4294 would not necessarily bring the benefits claimed.

- 13.38.3. PC396 amends the site area in the policy to 78.9ha to reflect the area identified on the proposals map. However, PC398 inserts additional text which states that *it is anticipated that the developable area of the site will extend to less than 30ha*. The imprecision of this figure is at variance with the change in wording proposed to the preceding text relating to employment land provision (PC382) which refers to *assuming a net area of 30ha at Warren Hall*. I find there is ambiguity about what the allocation actually amounts to and whether there has been a change from the 28.7ha originally identified in the deposit draft policy.
- 13.38.4. Furthermore, since neither the text nor the proposals map indicates which part of the allocation would comprise the *developable area* development could be distributed throughout the allocated land shown on the proposals map. This would not amount to the efficient or effective use of land or be a sustainable form of development. I do not support amending the wording of the policy to allocate a gross area of 78.9ha when in reality the net area is in the region of 30ha and it follows that I do not support PC398.
- 13.38.5. Since the plan's revised calculations of the amount of employment land needed within the plan period (para 13.20 - PC384) uses the net area at Warren Hall the allocation shown on the proposals map should be amended accordingly. Although I have no exact details, it seems to me that the area indicated for development in the recent planning permission would be a reasonable and realistic definition of the allocation. As the area covered by the planning permission may be slightly more or less than 30ha, the overall figure in the policy and supporting text will need to be adjusted accordingly. This matter should be addressed at the modification stage.
- 13.38.6. Other Matters – Some objections question whether development will actually take place given the long planning history. However, I note that the planning permission includes a scheme for off site works to provide an on/off slip road at the nearby A55 junction and that discussions are progressing with the appropriate highway bodies to ensure the local road network will cope satisfactorily with the anticipated traffic movements. On this basis it appears the development will be implemented during the plan period.
- 13.38.7. I have not been informed which part of the allocation shown on the proposals constitutes the best and most versatile agricultural land. If it is within the area of the recently granted planning permission, the Council has determined there is an overriding need for the development. If it is outside that area my recommendation means it will be preserved as a resource for the future. Similarly those areas that have nature conservation value and fall outside the area to be developed would no longer be allocated for development.
- 13.38.8. Given the extensive area of largely undeveloped open countryside to the west, development on the allocation (whether it be as the original or as I recommend

for modification) would not result in coalescence with Penyffordd/Penymynydd. No reasons have been put forward to justify designating the area a green barrier. It would not be appropriate to designate the area that has recently been granted planning permission green barrier since the permission overrides such a designation. The land to the east up to Lesters Lane is already green barrier. No evidence has been produced to indicate that the standard countryside policies are not robust enough to protect the area removed from the allocation or the surrounding countryside that is outside the green barrier designation. For the above reasons I do not support replacing the allocation with green barrier.

13.38.9. The allocation of land is not dependant on the identification of an end-user PPW states that land should be allocated *to meet both identified and as yet unidentified needs* (para 7.1.7). As 3208 does not specify which government planning policies are breached I am unable to comment on this element of the objection. AC12 safeguards the safe and efficient operation of Hawarden airport. The plan should be read as a whole and I do not consider it is necessary to refer to the safeguarding restrictions in this policy.

13.38.10. My conclusions relate to the planning merits of allocating the land. It is neither the purpose nor function of a UDP inquiry to consider allegations of malpractice or to carry out detailed investigation of matters relating to the planning history of a site. I make no comments on these matters raised in 9963.

Recommendations:

13.38.11. I recommend the plan be modified by:-

- i) amending the proposals map to reflect the land which is subject to this policy rather than the gross area that is currently shown
- ii) amending the land area given in EM2(1) accordingly.

13.39. EM2(4) Mold Business Park Extension, Mold

Representations:

Personal ID	Representation Number	Individual or Organisation	Stage of Plan	Object or Support	Conditional Withdrawal
1022	1344	Mold Town Council	DEP	S	Yes
2750	6564	Clwyd Badger Group	DEP	O	No
4919	17674	Williams – Allan	DEP	O	No
4992	12949	V Collet	DEP	O	No
5027	17693	G Collett	DEP	O	No

Summary of Objections:

Rep No	Summary
6564	Need to safeguard badger sett
17674	Give priority to reuse of redundant industrial land. Mold is a market town rather than an industrial and commercial centre
12949	Suggest as an alternative location for Mold Alexandra Football club
17693	Premature since not all available industrial land has been developed

Key Issue:

13.39.1. Whether the land should be allocated.