[redacted]

60174/06/RCA/TE
July 2022

1.1 On behalf of has been instructed to make representations in relation to the Flintshire Local Development Plan [FLDP] Examination Matters Arising Changes [MAC] (June 2022) Consultation. These representations have been written in respect of TW’s land interests in Flintshire and focusses on the site at Ffordd Fer, Mynydd Isa, which lies adjacent to the settlement of Mynydd Isa.

1.2 This Statement expands upon TW’s previous representations made throughout the Local Plan preparation process, including responses to the Matters, Issues and Questions raised by the Inspector for the Examination in Public [EiP] hearing sessions.

1.3 TW is seeking to bring forward a high quality sustainable and comprehensively masterplanned residential extension to land at Ffordd Fer, Mynydd Isa. TW considers that 9.96 T25T/79 the site should be identified as an allocation in the emerging Plan. The site is deliverable and would assist in the delivery of sustainable development within Flintshire by making a signifT.Rent within

2.6 TW does not consider that the FLDP meets:

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[redacted]

3.5 The supporting statement to Policy STR1 at §5.6 also

which is well-located to both Chester and Wrexham would support the Council and the wider strategic focus on this part of North Wales.

3.10 TW does not consider that the FLDP meets:

1 Soundness Test 2 as the evidence presented is insufficient and it is considered that the Councils Growth Strategy does not align with the with national aspirations to provide well located homes at the heart of communities and job opportunities.

4.1 MAC 029 & MAC 030 relate to policy STR2 and paragraph 5.13. The policy remains mostly unchanged, however the proposed apportionment of growth across the settlement tiers has been slightly amended. In addition, MAC 030 seeks to add in an additional table which breaks down the components of housing supply within each tier of the settlement hierarchy.

4.2 TW continues to support the application of a settlement hierarchy as this helps to ensure that development is directed towards the most sustainable locations. The 5-tier approach established within Policy STR2 is generally supported and it is appropriate to apportion a higher quantum of development to those settlements identified in Tiers 1 and 2 to ensure that housing development takes place in sustainable locations where sites are viable and deliverable.

role in the delivery of services and facilities along with Buckley and should be identified as a Tier 1 settlement.

4.6 It is clear that no further consideration to the settlement hierarchy has been had within the FLDP and there continues to be discrepancies in the settlement hierarchy.

4.7 Mynydd Isa is a sustainable settlement with a number of facilities and in TW's previous representations to the Deposit FLDP, it identified a number of local services and facilities which currently serve the local community which includes a primary and secondary school, pharmacy, convenience shop, cafes, Church, fitness centre, public house and restaurant and post office. The settlement therefore benefits from its own local facilities as well as those provided by Buckley and the Settlement Audit Reports[6] recognise this distinct interrelationship of service provision:

the generality of the policy, which may cause uncertainty for developers. As set out in previous representations[7] TW considers:

rates have remained close to the 463 dwellings per annum [dpa] set by the FLDP. However, it is difficult to fully determine the true nature of delivery in recent years, given no new evidence has been prepared since April 2020 (as set out within the latest housing Land Supply and Delivery Background Paper 10A, updated January 2021).

5.5 TW does not consider that the FLDP meets:

1 Soundness Test 3 as Policy STR11 is not effective and remains generalised which may cause uncertainty for developers and impact the delivery of site.

6.1 Policy HN1 continues to lack any significant details on the constraints affecting the allocated sites. The requirements for each site continue to be provided in a very short 'Summary Guidance' which is limited in detail and provides little context to what is needed on each site. For example, it makes limited statements such as and without any further expansion to explain what is required and why.

6.2 The precise policy requirements for each site are therefore unclear and the FLDP instead partially relies on t

1 Soundness Test 3 as it provides limited information on how each of the allocated site will be delivered. Further details on the delivery mechanisms for each site are required to ensure the FLDP is sound.

7.1 MAC 077 seeks to insert a table which sets out the components of affordable housing supply over the plan period.

7.2 The need for Affordable Housing as set out in the Future Wales 2040 (Policy 7) is significant, comprising 3,500 homes a year over the five-year period (10,7 T7 924. (wh)3.00Qq0 0 595.32 84

8.1 MAC 097 seeks to reword both Policy EN11 and the supporting explanatory text to reflect the changen "

8.7 TW agrees that the A494(T) [Mold Bypass] forms a firm and defensible boundary. However, TW considers that the Green Barrier Review takes an inconsistent approach to the function that this firm and defensible boundary serves. It goes on to state[13]:

8.8 TW's Ffordd Fer site sits to the west of Bryn y Baal Road. This land is also protected by the A494(T), which forms a firm and defensive boundary between the site and the wider Green Barrier. A Green Barrier would still be retained on the northern side of the Mold Bypass, between Mynydd Isa and New Brighton, if this land was removed from the Green Barrier, and the Bypass would provide a firm and defensible boundary.

8.9 Under this element of the Green Barrier, the Council set out that the roundabout junction between the A494(T), the A549, and the A541 "

". TW considers that this statement is contradicted by the development which has taken place adjacent to the roundabout, including the extension of the petrol filling station and the conversion of the Pen y Bont farmhouse into a pub/restaurant, both of which are referenced in the Green Barrier Review. Nevertheless, TW's Ffordd Fer site is clearly bound to the south by a thick mature tree belt which provides a clear physical visual barrier. Therefore, the site has no impact upon the openness of the narrowest portion of the Mold – Mynydd Ida Green Barrier which comprises the roundabout junction.

8.10 For the above reasons, TW considers that the findings of the Green Barrier Review are flawed. It is not robust and has not been applied consistently. TW maintains the view that the site at Ffordd Fer should be removed from the Green Barrier and allocated for residential development. This approach would be consistent with the approach taken to the release of the Green Barrier to the east of New Brighton.

8.11 The Site provides clearly identifiable physical features that can be used to establish defensible boundaries. It is well contained by the existing built environment to the east, by the Mold Bypass to the north and west, which provide a substantial physical barrier to the countryside, and to the south by a thick mature tree belt which provides a clear physical

8.13 TW does not consider that the FLDP meets:

1 Soundness Test 1 as the boundaries of the Green Wedge have not been appropriately assessed against the five purposes as outlined in PPW.

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