

Hearing Statement

Matter 10 Implementing Sustainable Development

A. The special character of Mold is not adequately considered in the planning context, as shown below.

Mold is a market town with an unusually diverse range of attributes. However, what is does not have is a railway station and this is a crucial issue to consider in the context of development. We know from the “Travel to Work” Study 2012 (p14, S2.19) that in Flintshire around 4% travel to work by bus, 2% travel to work by train, 10% walk, and 81% take the car. Large developments in Mold will only exacerbate the problem of car travel.

BP3 (S2.42) states about Flintshire: “road networks in this part of the country are operating at maximum capacity during peak times”. Decisions on the Red Route are currently stalled and Growth Track 360 will not benefit Mold directly. As for Active Travel, BP states that “existing cycling provision is mainly in Deeside” (S2.9) and Active Travel Routes must meet certain standards over and above mere leisure use (p13). To sum up, there are currently few planned transport improvements that will transform Mold into a sustainable town for development during the lifetime of this LDP.

Instead of focusing on the disadvantages of Mold’s location in relation to rail and major roads, let’s look at the things Mold is good at, and the other qualities that serve to make Mold unique amongst the group of Tier 1 settlements in Flintshire. It is more than just a dormitory town for Deeside.

1. Landscape quality and proximity to AONB & Moel Famau

The north-west corner of Mold is rolling lowland with the best peripheral landscape quality in the town. The views from Gwernaffield Road, include Moel Famau the highest point of the AONB with its Jubilee Tower, also the views towards the historic landed estates of Rhual and Gwysaney. This attractive green landscape has been used often by Mold Town Council to demonstrate the attractiveness of the town in printed brochures and reports.

The landscape, and the field HN1.6, help to differentiate Mold from other more urbanised parts of Mold, also from other towns within Flintshire and Deeside. They contribute to the sense of place and are fundamental to the quirky mix of rural and urban that define the character of Mold. My contention is that this has not been properly recognised in the analysis within the LDP

2. Mold’s vibrant cultural life: a specific entity in Flintshire

Not all towns in Flintshire conform to the established Deeside model of industry and manufacturing. Mold is a vibrant town of around 10,000 people with a healthy mix of

culture, languages, shopping opportunities, interesting events and places. It has a separate identity from Deeside that needs to be fully and properly recognised. The “Future Wales” document (p107) states that places can perform important functional roles within their region. They are key centres not just for employment but also for services, tourism, retail and culture. However, the only analysis I have seen of Mold as a distinct entity is from the Mold Town Plan document by MTC ([Draft Mold Town Plan - Mold Town Council](#))

FCC claim the LDP is in line with the Mold Town Plan. It isn't. With regard to settlement boundaries, MTC suggested a gradual pattern of incorporating new development. A specific example is that the Mold Town Plan recommended new development only on parts of the fields, north and south of Gwernaffield Road, and which were to be “filled in” with development, in a controlled manner, aligned to existing housing. FCC have in effect ridden roughshod over MTC's Town Plan by allocating a site for 238 houses in the field north of Gwernaffield Road, HN1.6, which will be overbearing in scale, and the largest ever development in Mold. This is inappropriate in a small market town with no railway station nor easy access to a railway station.

The scale of the development of site HN1.6 Gwernaffield /Denbigh Road (together with recent high levels of development in Mold) is in grave danger of undermining the overall package of qualities/services that Mold can offer and its unique cultural offering within Flintshire. This scale of housing would suggest that FCC's vision is for Mold's main role as being a dormitory town to support the development of Deeside.

This LDP fails to pay proper attention to the intangible factors vital to Mold as a town.

3. The Retail, Leisure and Tourism Offer in Mold

Mold has a busy street market and a busy livestock market, epitomising the rural /urban mix of Mold. There are relatively few empty premises in Mold, despite the pandemic, and there are many smaller businesses operating out of Mold. This is a very different model to Deeside, where large businesses and multinational corporations are the norm.

Gwernaffield Road is already one of the main routes that walkers take when out walking in the Mold area. There are circular routes that walkers can take in many directions. However, it should be noted that sections of Gwernaffield Road are without pavements, and are positively dangerous to walkers: a death has occurred in the past near Groes onnen Cottages.. Cars come down the hill towards Mold and towards Groes Onnen Cottages at high speed and which is dangerous to road walkers on the unpaved sections of road. (The southern edge of Denbigh Road is also lacking a pavement so walkers have to cross this road, and dodge the traffic thundering around the blind bend, to reach the pavement on the Synthiteside of the road.)

The new Bailey Hill Centre is about to open following a £1.3 million redevelopment scheme funded by Heritage Lottery Fund. The improvement of access to the Scheduled Ancient Monument of Mold's motte and bailey Norman castle dating from the 11th century should increase the use of the surrounding park and add new interest in Mold. There will be soon

(pandemic permitting) be a major marketing push for the site and there has already been media interest in the destination. The refurbished Bailey Hill Centre and new visitor facilities including toilets can host a much wider range of events in the future and this venture has the potential to transform the upper end of the High Street of Mold.

One of the major goals of the redevelopment was to improve access for wheelchair users and pram users. However, the Bailey Hill site has a lot of intrinsic interest to offer the visitor:

- exciting archaeological discoveries were made during the regeneration which are currently being analysed by Durham University;
- the renowned 19th century landscape gardener Edward Kemp influenced the design of the park so it is of interest to garden historians and everyday gardeners;
- the Gorsedd Stone Circle built in 1922 for the 1923 National Eisteddfod in Mold adds to the Welsh history of a border town
- green spaces for walking; a floriferous park, wooded sections, seating areas, performance areas, a motte summit.

All of the above add interest to various groups of people but there is more to offer in the form of annual events and creative/cultural spaces in the form of a multitude of Festival/Carnival/Theatr/Welsh Literature (Daniel Owen)/Music/Food/Drink/11th century castle and park.

But Mold's positioning as a destination relies on the preservation of this rural, urban, green, historic and culture-rich character. The north western approach roads (Denbigh Road and Gwernaffield Road) are a key rural component in showcasing the attractions of the market town of Mold. Key landscapes of Mold should not be undermined and the Mold Mix of retail, leisure, tourism, culture and history needs to be valued, nurtured and protected.

4. Welsh Language as a differentiator for Mold:

In Mold, 20.8% of the population speak Welsh. The town of Mold has the highest proportion of Welsh speakers in Flintshire towns. Only the scattered country villages have greater proportions, but with a population of around 10000, clearly Mold has a significant number of Flintshire's Welsh speakers. The local monthly Welsh language magazine "Papur Fama" has been in print (or online during the pandemic) for 419 editions as of April/May 2021: a success story.

Yr Wydddgrug (Mold) has hosted the National Eisteddfod in 1823, 1853, 1873, 1923, 1991, 2007 and is considered a bastion of Welsh culture and language. But this is not about the easy caricature of a few isolated elderly people speaking Welsh. It's about a community of people – young, old and middle aged - engaging with Welsh culture and the Welsh language. This community includes Welsh learners of all ages as well as native Welsh speakers. It's inclusive but not compulsory.

The planning point here is that Mold is the one town in Flintshire where FCC's LDP needs to pay utmost attention with regard to the Welsh Language. Too much development in Mold,

in too short a period of time, on very large sites, places too great a pressure on the language. The potential development of site HN1.6 plus the site to the south of Gwernaffield Road (currently listed as an alternative site) would involve the major increase in population - that the people of Mold have not been properly consulted on.

Background Paper 12 notes that Mold is an exception within Flintshire, being the only main settlement where there are relatively high levels of Welsh speaking (at 20%+). It quotes TAN 20 which states that the Welsh language is “*part of the social and cultural fabric*” of Welsh life (para 3.25). It also states in paragraph 3.26 that “*planning authorities must consider the likely effects of their development plans on the use of the Welsh language.*”

In paragraph 3.10 of BP12, it is claimed that housing development should be avoided in places where Welsh speaking is more common and might be diluted by too much development. Yet there is no attempt to give Mold special status in line with TAN 20 warnings. Paragraph 4.5 claims that housing development in recent years has had no detrimental effect in Mold. That may or may not be so, but the unanswered question is whether *even more* large scale development can continue to be absorbed.

The lack of a specific language policy with regard to Mold/Flintshire is against the spirit of the Welsh Government’s ambition to have 1 million Welsh speakers by 2050. Other local planning authorities in Wales have drawn up Welsh language policies, but Flintshire seems very reluctant to do so. I am unclear, however, whether this is in breach of PPW, given Mold’s key role in Flintshire’s contribution to the WG target.

Relevant Planning Law & Points	My comment
<p>Planning Policy Wales Ed 10 states in 4.14: Technical Advice Note 20 (TAN20): ‘Planning and the Welsh Language’ provides guidance on the consideration of Welsh language as part of the development plan and SA processes. In summary, LPAs must consider the likely effects of their development plan as part of the SA process and include a statement within the deposit plan on how this has been considered and/or addressed within the development plan.</p>	<p>Despite a negative analysis within BP12, FCC still recommends no mitigating action and no special plan for the Welsh language. This does not support Mold as the place in Flintshire with the highest number of Welsh speakers.</p>
<p>On p109, “Future Wales” states that “Development Plans should contain settlement hierarchies and strategies to distribute growth in such a way that creates the condition for Welsh to thrive and to be preserved – as the community language in many places where everyday life takes place through the medium of Welsh”</p>	<p>The over-concentration of housing in the north-west corner of Mold is not “distributing growth” but concentrating it in an unsustainable manner</p>
<p>Notably, the LDP Vision statement makes no mention of cultural factors.</p>	<p>This is at odds with modern notions of sustainability (i.e. social, economic and environmental factors plus cultural factors) and the well-being of future generations.</p>

<p>LDP-KPD-IIA4 (Int Impact Assess, SA/SEA Sept 2019) states: It is generally considered that no single community or settlement would be subject to development of a scale that could discernibly dilute rates of Welsh speaking.</p>	<p>The packaging up of the sites in the north west area of Mold)(i.e. land north and south of Gwernaffield Road where both sites would add up to 1000 houses in a small market town) presents, singly and cumulatively, a significant threat to (1) the ability of the Welsh language in Mold to thrive and to contribute to the WG target of 1 million speakers by 2050; and (2) Mold’s cultural identity as a place where Welsh is routinely spoken as a first language. Without a Welsh Language Plan for Flintshire, and proper guidance for how the planning function can play its role, FCC is stumbling around and failing to do all it can to support the Welsh language while it still has a chance to do so.</p>
<p>BP12 consultation states: “PPW 10....notes that it should be the aim of local planning authorities to provide for the broad distribution and phasing of housing development taking into account the ability of different areas and communities to accommodate the development without eroding the position of the Welsh language. Where possible, the planning system should seek to create conditions which are conducive to the use of the Welsh language.”</p>	<p>FCC’s view (in their response to my representations) seems to be that they have no power through the planning function , to create the conditions conducive to the use of Welsh language over this matter. This suggests they do not know how to operationalise the policy outline in PPW.</p>

5. Conclusions

- Mold needs a different form of analysis to Deeside
- The LDP treats Mold as an undifferentiated Tier 1 settlement
- Mold (like all towns) has a highly specific set of cultural factors to take into account
- Mold has a number of rural landscapes and historic assets to protect which contribute to its all-round appeal (retail, culture, heritage, tourism, rural, urban, Welsh, English, as well as a place for small scale employment, and a pleasant place to live)
- FCC’s LDP fails to tie in with the Future Wales agenda which accepts that places can perform different functions within their regions – not just employment, but also tourism, retail and culture.
- FCC’s Vision statement fails to recognise the importance of cultural factors in the sustainability agenda and so fails to fully acknowledge the cultural importance of Mold in its sustainability analysis.