

## Hearing Submission for Matter 12 – New Housing Development Proposals re Ash Lane Mancot/Hawarden

Colin Randerson, Hawarden Resident

Dear Inspector,

Together with Mr Rowlinson I submitted an objection to the FCC LDP as part of their consultation process, which you will have observed. Please accept the following as my hearing submission for matter 12 of the Independent Inspection of Flintshire LDP.

**1) Settlement Hierarchy.** As discussed at the hearing on Matter 4:

- a. FCC confirmed that there did not exist any data analysis of the settlement audit to place settlements into tiers;
- b. no criteria were produced or signposted at the hearing to aid the objective and transparent placing of settlements into tiers;
- c. FCC confirmed in the hearing that the findings of the audit ‘were ranked and ... this placed the settlements into tiers’. No evidence of such a ranking process was presented in the online documentation for the LDP nor at the hearing;
- d. FCC described the process of assigning settlements into tiers as requiring “the experience of a planner”; they evidenced this by stating that the reason Hawarden was in tier 2 was that it possessed a “defined village centre”; this qualitative feature did not form any aspect of the data that were collected for any settlement as part of the settlement audit; one could argue that Northop has a ‘defined village centre’ with boutique shops not too dissimilar to Hawarden, but this is classed as a tier 3 settlement.
- e. The settlement audit for Hawarden includes a service provision map with a symbol indicating “Local Centre with 10 or more shops”; Hawarden has 5 shops, 6 if the Post Office is included; to add up to a figure in excess of 10 “shops” then nail bars, chiropodist, estate agents, hair salons, and wellness centre would need to be included.
- f. The audit service provision map displays the site of the proposed Ash Lane development as Big Mancot (OS Map), not Hawarden

The above approaches transform that which a reasonable person could justifiably expect to be an objective and transparent process into a subjective and inconsistent process and as such, results in the misplacing of Hawarden – and no doubt other settlements - in the settlement tier hierarchy.

**In Summary:** the above data would indicate that either:

- i. Hawarden has been misplaced and should be in tier 3, if this were the case then the scale of the proposed Ash Lane development would be in excess of the LDPs own growth figures and national guidance; or
- ii. Hawarden should be in tier 2 if this were the case then FCC should be facilitating the development of suitable commercial premises as part of the LDP; even if the view is taken that Hawarden has been correctly assigned to tier 2, the scale of the development is such that it warrants being tied to a tier 1 settlement which is defined as “the main locations for new housing development which reinforces and contributes to sustainable settlements.” To align with the scale of development for a tier 2 settlement, the Ash Lane site would need to be defined as “more modest levels of new housing development”

- 2) **Brownfield Sites – County Hall, Mold.** As part of the consultation process, submissions were sought for alternative sites, and as such, I had highlighted that County Hall, Mold was signposted as green (ie “The site complies with the Council’s Preferred Strategy and may have potential to contribute to meeting future growth subject to a satisfactory technical assessment”) in the document: “ Background-Paper-Consideration-of-Candidate-Sites-against-the-Preferred-Strategy”. This is a brownfield site but has not been included in the deposit for the LDP. In their response to the 1200 representations concerning the Ash Lane site, FCC produced a 23 page response document covering all of the various points submitted. The reasoning behind the decision for the County Hall site to NOT be included in the LDP was cited as:

“County Hall, Mold – This site was considered as a candidate site – MOL017. The site is brownfield but it sits within a parkland landscape which comprises significant areas of green space, mature trees and a listed building. Any redevelopment of the site would need to work around not just these constraints but also the topography and protected species as well as the need to retain the law courts, the theatre and some FCC Council offices. The site is not an easy site to develop and will involve considerable demolition and reclamation costs and is unlikely to deliver housing until the latter part of the Plan period. In this context it is seen more realistically as a large windfall opportunity, in the form of additional flexibility, rather than as a housing allocation”

Further information from the FCC in their response cites:

“It is acknowledged that Welsh Government policy in PPW encourages the use of brownfield and previously developed land. However, it does not specifically prevent the development of greenfield sites. Para 3.40 states ‘Where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements’.”

**In Summary :** some of the inconsistencies in the approach to the allocation of sites in the LDP.

- a. There exist a number of striking similarities between the Ash Lane site and the description of the County Hall site (see highlighting above). However the County Hall site IS a Brownfield site; it IS attached to a tier 1 settlement; it was classified as GREEN in the consideration of candidate sites whilst Ash Lane was categorised as Amber; additionally it would NOT result in the coalescence of 2 settlements – unlike the scenario with the Ash Lane site – yet the County Hall site has been omitted from the LDP.
- b. There seems to be little correlation between the initial assessment of candidate sites and the inclusion of sites in the LDP.
- c. There is no evidence from FCC that could justify the use of green barrier land at Ash Lane, namely: “it has been clearly demonstrated that there is no previously developed land or underutilised sites”.
- d. The County Hall, Mold site should have been included in the LDP deposit and as a brownfield site this would take on a higher preference than the Ash lane site for a development of this scale.

### 3) Is the site deliverable?

There are a number of areas of concern highlighted in the Statement of Common Ground document for the Ash Lane site (SOCG003-HN1.8-Ash-Lane-Hawarden)

- a. section 5.4 states “The level of affordable housing .... represents an area of disagreement between the parties.”
- b. the owner/agents have commissioned a Surface Water Drainage Strategy which recommends the inclusion of a 1,000m<sup>2</sup> Balancing / Attenuation Pond of around 3 metre deep, which would result in a significant loss of land for dwellings;
- c. the site is earmarked to contribute in the region of £1.8million to local schools, presumably to help fund additional places.

**In Summary:** The above issues indicate that the site has a number of aspects, which may well have a bearing on the viability of the site, and brings into question whether the site is deliverable. FCC decided against including the County Hall, Mold site in the LDP deposit due to it being “not an easy site to develop” – an unsubstantiated and again subjective comment which again highlights the lack of consistency in FCC’s handling of the LDP process. Yet, ignoring all of the above, the statement of common ground section 9.1 states: “The Council and the landowner consider that the allocation is sustainable, viable and deliverable”

Taking the above into consideration, the SoCG seems to indicate that the Ash Lane site would ONLY be viable and hence deliverable if agreement is found regarding: the construction of a huge balancing/attenuation pond; a reduction in the number of affordable houses provided and the payment of a significant cash injection to help increase capacity in local schools.

### 4) Impact on local schools

In our joint submission to the consultation for the FCC LDP, I cited concerns about the capacity of local schools to manage the influx of such a large development. I have first-hand experience with the adjacent local authority, Cheshire West & Chester, and their use of sophisticated modelling techniques to calculate the likely numbers of children in each school age group that are typical arrivals with the construction of new developments. They use this data to model the likely impact of the influx of new families to a given location and apply 106 monies strategies to ensure that capacity in schools is planned for in advance; schools in that LA are kept informed of likely future plans to assist in planning for potential growth.

In their response to the objections to the Ash Lane Site, FCC responded to all the concerns about the impact on local schools, with:

“Whilst it is acknowledged that the schools in the area are popular and well subscribed, there is no objection from the Local Education Authority. It must be stressed that the Hawarden site will not deliver completed houses until 2023-24 with 18 completions forecast in the first year and 45 per year thereafter. The impact of development will therefore not be felt in ‘one hit’ and there is sufficient time for the Education Authority to support the delivery of growth that is identified in the Plan.”

This completely misses a number of the points that I raised about the potential impact on education (*see appendix 1*). Extracting funding from developers to enable local schools to grow will clearly help to provide more places, but what will be the impact on access to pupils’ first preference places that are currently available to families in Hawarden. Many younger families have moved to this village to ensure that their youngsters benefit from a village school setting. On the one hand, they may suddenly find that they need to travel further afield for their education if sufficient places are not forthcoming as existing places are gifted to the population on the Ash Lane Site. On the other hand, they may still be able to gain admission to the newly expanded Hawarden schools but the schools themselves may well have changed beyond all recognition in terms of their ethos and culture as they come to terms with significantly increased pupil numbers.

**In Summary:** by allocating the Ash Lane site, the influx in additional children will impact on the provision of the schools to the local community and permanently change the context of the schooling, and therefore the community identify. This is something PPW states should be avoided.

## Appendix 1

Extract from my original submission to consultation November 2019, page 25, re impact on education.

**Education:** “This site would be expected to lead to these (schools) being over-capacity”. The only mitigation suggested is for children to travel to other schools in the region. This demonstrates a total lack of local knowledge of existing issues surrounding access to Hawarden Village Primary School and of capacity of other local schools (Sandycroft, Ewloe Green and Penarlag). One of the attractions of moving to Hawarden for families, especially those with school-age children, would be a consideration of the proximity of high-performing local schools being within easy walking distance. If children living in Hawarden or Mancot are having to travel to settlements in Ewloe or Sandycroft, what does this say about the Community Identity of Hawarden and of Mancot? Children living close next door to each other may end up going to different schools; current residents of the two communities who have traditionally lived in a catchment area of one school for generations could suddenly find themselves now having to travel outside of their own village for education. Travelling to schools outside of the community would serve to further exacerbate the traffic congestion highlighted in Sec<sup>n</sup>. 5 below. This is wholly unacceptable.