

Archwiliad Cynllun Datblygu Lleol Cyngor Sir y Fflint 2015-2030
Flintshire County Council Local Development Plan 2015-2030
Examination

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Mr A Roberts
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Planning, Environment, and Economy
Ty Dewi Sant
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2nd June 2021

Dear Mr Roberts,

Flintshire LDP Examination: post hearings matters.

Let me begin by reiterating our thanks to you and your team, including those who hosted the Zoom sessions; your witnesses; the translators; all the participants; and the programme officer team, for the extremely helpful manner in which everyone contributed to the hearings.

Following completion of the main hearing sessions there are two outstanding matters. These are, firstly, the implications of the Hawarden Airport constraint on the Warren Hall site and, secondly, further work arising from NRW's interim guidance on phosphates and riverine SACs. We understand that you have these in hand and are making progress in respect of arranging the necessary meetings and other actions. Further hearings will be held on these two matters and we will also hold a third additional hearing to discuss the matters arising changes (MACs) schedule when it becomes available later in the process.

Warren Hall Strategic Site

The additional hearing with regard to Warren Hall will give us the opportunity for further discussion of those aspects of the allocation which we do not yet fully understand.

We are aware of the economic and employment objectives, and overall value of the Growth Deal to the Warren Hall site. It is important, however, that these pump-priming benefits do not have a disproportionate influence favouring the allocation of the site.

Warren Hall is a greenfield site; it is not within a settlement boundary, nor immediately adjacent to a settlement; and it is bordered by an area of green wedge. It is has been shown to have biodiversity value, considerable tracts of Grade 3(a) agricultural land,

and is adjacent to heritage assets. Its proximity to Airbus and Hawarden Airport places constraints on the location and height of development on the site, as well as resulting in high levels of noise at times. Furthermore, the site has had planning permission and been allocated in the UDP for employment use without any development having taken place for several decades.

The Development Plans Manual (DPM) states that, if allocations are rolled forward from a previous plan, they will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered.¹ In addition, the DPM advises that viability appraisals should be prepared by the LPA in conjunction with developers and site promoters for key sites prior to their allocation².

In advance of a further hearing to discuss the Warren Hall site we would, therefore, be grateful if you would answer the following questions and provide the following information for us.

Site selection

- What was the process and rationale for the selection of the site?
- What are the reasons for it having been rolled over as an allocation from the UDP?
- What are the substantial changes in circumstances demonstrating that it can be delivered?
- What are the benefits of the development on the site which have been taken into account in making the allocation?

Sustainable location

- What transport and other links and services currently exist?
- What measures are proposed to provide links or, if links exist, enhance existing services to improve sustainability of the site?
- Policy STR3 refers to the provision of a commercial hub but the masterplan and other documents identify only a hotel and pub/restaurant. A retail outlet and local centre could be essential to improving the sustainability of the site. What certainty is there that these would be provided?
- How would a significant increase in car journeys to and from the site, particularly the proposed housing, be avoided?
- How would the allocation of the site measure up to National Sustainable Placemaking Outcomes, especially in the categories of Facilitating Accessible and Healthy Environments and Making Best Use of Resources?

Housing & employment uses

- Given its distance from everyday facilities such as schools and shops, and other potential constraints such as noise, is the site suitable for housing development?
- How will the housing development proposed make the site more attractive for employment and commercial development?
- Is it appropriate to provide housing in a location affected by aircraft noise? Will the dwellings, and their gardens, be attractive and comfortable for occupiers?

¹ Development Plans Manual, Table 18, p120

² Ibid

- How important is the site for employment use in the light of the amount of employment land already available? What are the characteristics of the site which make it particularly valuable for the uses proposed?

Viability

- Please will you provide evidence of a complete viability appraisal of the site. If such evidence has been prepared for the site's consideration by Welsh Government but is subject to confidentiality restrictions, a summary or overall conclusions will be adequate.

Soundness implications

- We would like you to address the matter of the soundness of the LDP should we find that the Warren Hall site is not suitable for allocation, either in terms of the housing element or the mixed use package as a whole. We will discuss the implications for the LDP at the additional hearing.

We look forward to hearing from you in due course and will decide on the date for a further session when progress has been made in discussions with Airbus and WG.

If you have any queries about the content of this letter or any other aspect of the examination, please get in touch with us.

Yours sincerely

Siân Worden and *Claire MacFarlane*

Inspectors

2nd June 2021