

**FLINTSHIRE LOCAL DEVELOPMENT PLAN  
EXAMINATION IN PUBLIC  
MATTER 14 – GYPSY AND TRAVELLER SITES**

**SUBMISSION ON BEHALF OF FLINT TOWN COUNCIL**

This Statement is submitted on behalf of Flint Town Council in response to the proposed allocation of a Gypsy and Traveller site on land at Castle Park Industrial Estate, Flint (Site Ref. HN8-4).

The Town Council asserts that the proposed allocation would be in direct conflict with the adopted Flint Masterplan, which designates the site as a hard and soft landscaped area immediately adjacent to an existing/enhanced coastal footpath. An electronic version of the Flint Masterplan is appended to this submission for ease of reference. The Flint Masterplan has been adopted by Flint Town Council and approved by Flintshire County Council's Cabinet.

In light of the above, it is asserted that the proposed allocation does not meet the first 'test of soundness' ie. the proposed allocation does not fit with local planning policy.

Furthermore, it is advanced that the proposed allocation does not meet the second test of soundness, which is whether the allocation is appropriate for the area. This is because it conflicts with the Flint Masterplan which envisages the land in question as open space. Furthermore, the allocation would be isolated and it would relate poorly to existing development.

In addition, the Town Council questions the appropriateness of locating a Gypsy and Traveller site in close proximity to industrial operators. In the absence of any compelling technical evidence to the contrary, it is not certain that doing so would ensure that adequate living conditions could be provided for future occupiers of the site, particularly in terms of noise and disturbance. Equally, it would be unreasonable for the operations of the nearby existing industrial businesses to be restricted in order to safeguard appropriate living conditions for future occupiers of the proposed Gypsy and Traveller site.

Furthermore, bearing in mind the industrial heritage, there is a strong possibility that the land within the immediate area has suffered some degree of contamination. The Town Council questions whether a detailed and intrusive investigation has been undertaken to establish the exact ground conditions of the site. Whilst it is accepted that it is not uncommon for previously developed and contaminated land to be remediated to facilitate residential development, it is normally possible for the cost of this to be absorbed by the capital receipts generated by a traditional housing development.

It is questionable whether the value of the land as a Gypsy and Traveller site would make any such remediation viable. Clearly, it would not be acceptable for people to reside on a contaminated site. This factor raises serious questions as to whether a

Gypsy and Traveller site in this particular location is deliverable, which is the third test of soundness.

At this point in time and in the absence of any conclusive evidence, the Town Council also raises concerns about the following matters:

- The capacity of the local schools to absorb any additional demand from the proposed Gypsy and Traveller site;
- Whether the road and access to the Gypsy and Traveller site is of an adequate standard to service the development; and
- The implications for the proposed allocation in relation to the extant planning permission for the Solar Park.

Finally, Flint Town Council raises concerns in the manner in which this proposed designation was made. The site was allocated at a very late stage in the development plan process following the unforeseen removal of a previously designated site within Greenfield due to a potential public health issue. This resulted in no meaningful consultation with elected Ward Members and the general public.

In summary, the Town Council considers that the proposed allocation of a Gypsy and Traveller Site at Castle Park Industrial Estate does not pass the 'tests of soundness' for the following reasons:

- The proposal conflicts with the adopted Flint Masterplan which allocates the site for open space;
- Siting a Gypsy and Traveller Site close to an industrial estate could adversely impact on the living conditions of future occupiers of the site and could inhibit the existing industrial operations;
- There is a strong possibility that the site will have suffered some degree of ground contamination given its industrial heritage and the cost of remediation could render the site unviable and therefore undeliverable;
- It is not clear whether the local schools could absorb any additional demand generated by future occupiers of the site;
- It is not clear whether the road access is of an adequate standard to serve the site; and
- The implications of siting a Gypsy and Traveller site next to a potential solar park are also unclear.

In light of the above, the Inspector is respectfully invited to reconsider the soundness of this proposed allocation.

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26 April 2021