

MAC097rep1

Please forward any correspondence to either home address or email.

Mr Andrew Farrow,
Chief Officer (Planning Environment and Economy),
Flintshire County Council,
County Hall,
Mold
CH7 6NB.

Dear Mr Farrow,

**Re. Flintshire Deposit Local Development Plan
Examination Matters Arising Changes Consultation – (MAC/IMAC ??)
Representations of [REDACTED] 09-11-2019 and Additional Information 25th April 2021 (attached)
Re PEN 029 and PEN 030**

Further to the above, I wish the following response to the consultation be passed on to the Inspector for consideration as potential changes to the plan.

With regards to the specific aspect of this representation as required for the online form, I am unsure of the technical details requested as I have been unable to locate any reference to the changes I originally proposed, but understand that the village has not had any more sites put forward. I am therefore unaware if the proposals I made have been approved or dismissed, so please forgive any misunderstandings or failings I may be displaying in this representation.

As far as I am able to establish, if the plan does not include the Green Wedge locations of PEN029 and PEN 030 that I identified, I believe that the plan will fail to protect the ward as desired by myself and the vast majority of residents.

The purpose of this representation therefore, is to request a further review of the desire from my written representations and my statements at the hearing last year, and the original representation of the Community Council. This representation identified several areas for consideration of various nature, but of particular concern at this stage is the Green Wedges at PEN029 and PEN030.

I therefore wish to further express my concerns that if these locations are not moved to Green Wedge status, this land could be vulnerable to inappropriate development on land that is not only important agricultural land, but vital for retention as Green space for the physical nature and character of the village. Its retention is also important for the health and wellbeing of residents, where this natural open area is easily available to all, young, elderly, fit and disabled alike!

It is also a fact that given the close to border location of this settlement, the settlement is very vulnerable to speculative applications, which is evident from the four applications in the past five years being approved on appeal for development outside the current boundary, growing the village by over 35%! The potential of successful appeals after 2030 will therefore be far greater if we do not have Green Wedges in these locations!

As you can see from the plans I have provided, the village has nearly every blade of grass identified as candidate and alternative sites, especially to the east of the village. In my opinion, Green Wedge should help deter speculative applications and a desire to develop these sites in the future, which should therefore give added protection to this important agricultural and green space land.

I am hopeful that Mrs Worden will recall our discussions about this settlement at the hearings last year, and in particular my desire for an accompanied site visit that unfortunately never took place, which I assume was due to the issues of Covid at the time. There are some factors relating to these areas that I believe are not entirely clear without actually viewing with the benefit of local knowledge, and therefore believe that attending an accompanied site visit would be very helpful in making a decision, where I will happily attend if this request is agreed to.

I therefore hope this representation is in line with what is required at this stage, and apologise for any procedural errors I may have made. I do though feel that this is too important a matter not to address for the long-term future of this particular settlement.

Thank you for your time, tolerance and understanding, and I will happily attend and speak in English at any further hearings or site visits that may be deemed necessary.

Yours sincerely,

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25 July 2022

Supporting documents for reference.

1. LDP Consultation 09-11-2019 (on some documents for some reason comes up saved as Lifelong Learning/Development Control Meeting?)
2. Additional Info for Hearing – Cand Sites

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09/11/2019

Andrew Farrow
Chief Officer (Planning and Environment)
Flintshire County Council
County Hall
Mold
Flintshire
CH7 6NF

Dear Mr Farrow

Flintshire Deposit Local Development Plan Consultation – [REDACTED]

Further to the above, I would be grateful for my representation to be given full consideration taking into account the comments on the standard representation form and the details in this supporting letter. This representation is the same as the one of Pen-y-ffordd Community Council so can be considered with the same responses.

I appreciate that some of my proposals may not be appropriate and would welcome the opportunity to discuss and amend any flaws as necessary prior to full publication.

I therefore hope that all is in order for consideration and thank you, all your officers and elected embers for the excellent work carried out in producing this plan.

Yours sincerely,

[REDACTED]

[REDACTED]

Specific concerns:

- i. During the review of growth options in 2016, Pen-y-ffordd was designated as a *Sustainable Village!* As this aspect is a key consideration in growth under the LDP, it is believed that the village should be re-categorised as a *Rural Defined Village* for the following reasons.
 - Public transport has been slashed with the loss of the Mold-Wrexham service and recent loss of the Mold-Chester service through Pen-y-ffordd leaving no public bus service running through the village..
 - There is no medical centre.
 - Junior and local High schools are over subscribed
 - There is significant shortfall in Adult and Youth Open space provision.
 - Infrastructure is inadequate with over stretched services.
- ii. HN4D. Reference to acceptance the addition of developments of affordable homes adjacent, but outside, settlement boundaries. This is not qualified, either in scale, number of developments or site specific locations considered acceptable for affordable development. 9.2 says that development must be

controlled which contradicts this wording and leaves site open to potential exploitation. This is not qualified, either in scale, number of developments or site specific locations considered acceptable for affordable development. 9.2 says that development must be controlled which contradicts this wording and leaves site open to potential exploitation.

- iii. Place Plan and placemaking. There appears to be no reference to developer contributions / settlement needs connecting with communities and referring to Place Plans.
- iv. Pen-y-ffordd Specific – there is no green barrier on the land east of Vounog Hill, the view over which defines the character of the village for many or west of the A550. The old school playing field should be designated as a protected green space given the commitment made by the Local Authority to retain it as community open space.
- v. Warren Hall. Pragmatically, we recognise the thinking behind the re-designation of the Warren Hall site from mixed commercial use to include housing. This clearly stems from a lack of commercial interest in developing the site. However, despite the ‘placemaking’ assurances, we are questioning the compliance with national policy, specifically in not creating new communities. The location of the development is seemingly adjacent to Broughton but separated by the A55, it is separated from Higher Kinnerton and Pen-y-ffordd. This is likely to leave this community isolated and effectively a new settlement. The site potentially provides for 300 new houses and they would need to be allocated to sites elsewhere, but that is probably preferable in social terms, to a new isolated community.
- vi. PC4 must be enforced. Wales cannot reach its carbon target of 2030 if any new houses are built not using sustainable energy sources.
- vii. HN3 Affordable Housing. These percentages must be enforced other than by exception. It is too easy for developers to claim commercial reasons not to do it. The LDP needs to provide the authority with teeth or we will continue to make the housing problems worse.
- viii. Housing Mix. I may have missed the policies relating to housing mix. There has to be clear direction on the mix of houses, too many developments are revenue-driven and some control is needed to ensure the correct mix of properties to maintain communities.

Candidate site comments. Red font indicates suggested changes.

With reference to the Candidate and Alternative Site Assessments, Council are grateful that no further sites are being put forward, but concerned about some categorisations with regard to conformity with the preferred strategy. The following grid notes categorisation of sites and requested changes with justifications.

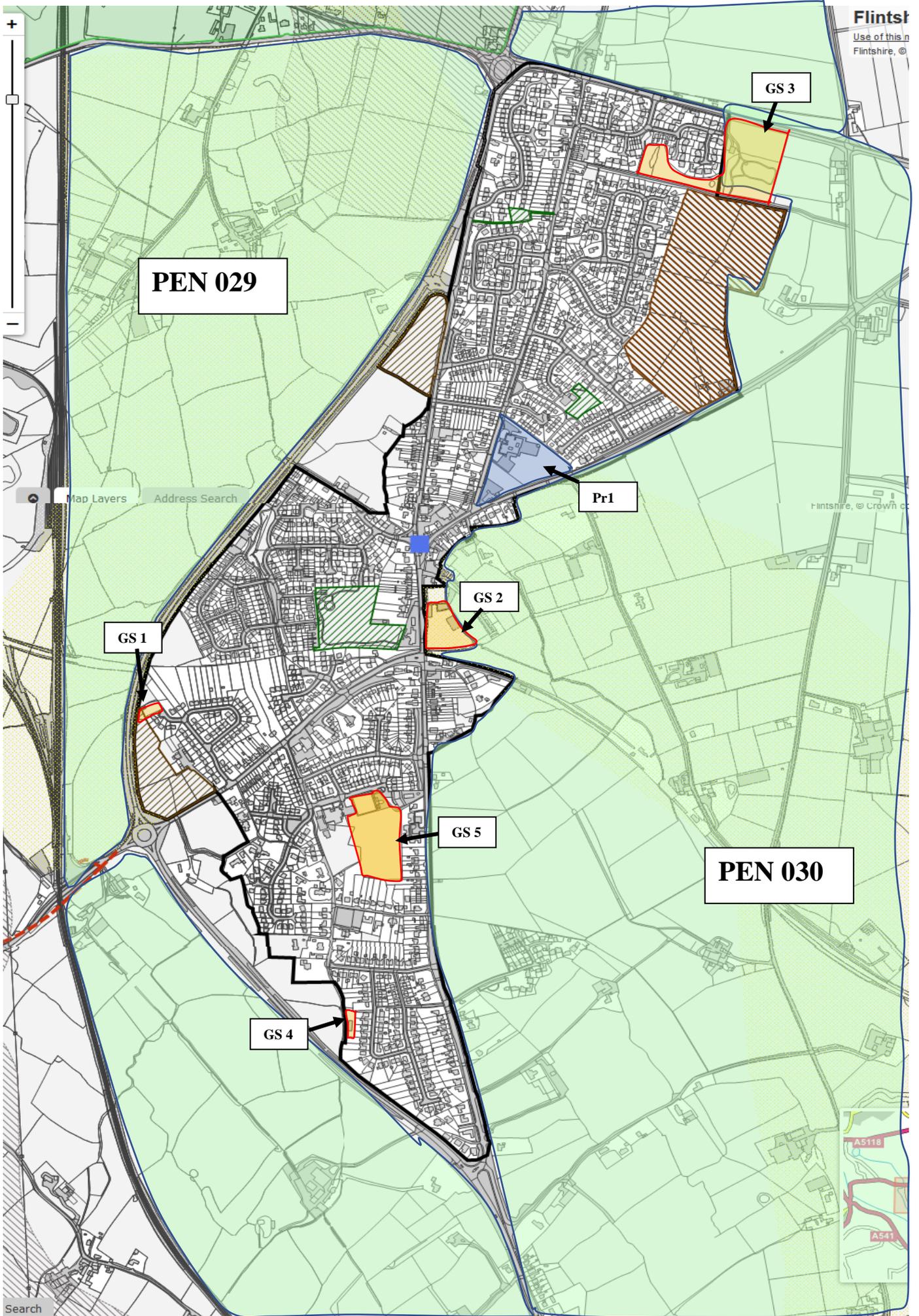
| Candidate site ref' | Recorded Preferred Strategy Colour | Amended Preferred Strategy Colour | Justification/Policy reasons for the proposed change of Category |
|---------------------|------------------------------------|-----------------------------------|---|
| PEN 001 | Amber | Red | The site is in a location in the open countryside divorced from the main settlement that can not justify an amber grading when preferred strategy is considered. Request inclusion in PEN 030 |
| PEN 002 | Red | Red | Agree |
| PEN 003 | Amber | Red | Identified in representation as suggested revisions for Green barrier. Preferred strategy can support this proposal |
| PEN 004 | Amber | Red | Peat bog that needs protection. Justifiable policy reasons for re-categorising |
| PEN 005 | Amber | Amber | Agree |
| PEN 006 | Green | Red | Strongly disagree to green category! Under the preferred strategy this can only be red. The site is encroaching on the open countryside so request inclusion in PEN 030 |

| | | | |
|---------|---------|--------|---|
| PEN 007 | Amber | Amber | Agree |
| PEN 008 | Red | Red | Agree |
| PEN 009 | Amber | Amber | Agree |
| PEN010 | Amber | Amber | Agree with category but given the fact that the ward is providing in excess housing for its size, the site should not be designated and identified as inappropriate for this LDP |
| PEN011 | Amber | Red | Include in PEN030 |
| PEN012 | Red | Red | Agree |
| PEN013 | Amber | Red | Include in PEN030 |
| PEN014 | Grey | Grey | Agree |
| PEN015 | Purple | ? | The existing use is established and could provide for small local opportunities so should be included in the plan for employment opportunity |
| PEN016 | Purple | Purple | Agree |
| PEN017 | No Code | Amber | Agree with statement |
| PEN018 | No Code | Amber | Agree with statement |
| PEN019 | No code | Amber | Suggest revised Amber category due to the fact that the ward is providing excess housing for its size, so should not be designated as white land and identified as inappropriate for this LDP |
| PEN020 | No Code | ? | Agree with statement and action with thanks! |
| PEN021 | No Code | Amber | Suggest revised Amber category due to the fact that the ward is providing excess housing for its size, so should not be designated as white land and identified as inappropriate for this LDP |
| PEN022 | No Code | ? | This is important play space and needs identifying as such. To remain white land could open the doors for speculative development. |
| PEN023 | No Code | ? | This is important play space and needs identifying as such. To remain white land could open the doors for speculative development. |
| PEN024 | No Code | ? | This is important play space and needs identifying as such. It also forms part of the approved development for Rhos road north where the play space is to be extended as noted on plan as GS1. |
| PEN025 | No code | ? | The field identified as GS5 is a shared community amenity and needs protection from potential development should the school need to be expanded. |
| PEN026 | No code | ? | Disagree with statement and as white land there is a potential to be abused. This is a well used play area that the community is investing in and needs protection. The written assessment is not a true reflection of this site. |
| PEN027 | No code | Amber | Remove and revise as PEN10 |
| PEN028 | No Code | ? | Accept statement but request review for a protection category. |
| PEN029 | No Code | ? | Disagree with statement. Important agricultural land that needs protection in the form of green barrier. Request re-submission and review of green barrier. |
| PEN030 | No Code | ? | Disagree with statement. Important agricultural land that needs protection in the form of green barrier. Request re-submission and review of green barrier. |
| PEN031 | Amber | Amber | Agree with category but given the fact that the ward is providing in excess housing for its size, the site should not be designated and identified as inappropriate for this LDP |
| PEN032 | Amber | Amber | Agree with statement |
| PEN033 | Amber | Amber | Agree with statement |
| PEN034 | Amber | Amber | Agree with statement. Remove from statements |
| PEN035 | Amber | Amber | Agree with statement. |
| PEN036 | Amber | Amber | Agree with statement |

| | | | |
|----------|---------|-------|---|
| PEN037 | Green | Amber | Request re-grading to Amber due to constraints of the site and the fact that the ward is providing in excess housing for its size, the site should not be designated and identified as inappropriate for this LDP |
| PEN038 | Amber | Grey | Agree with statement but site has planning permission so needs to be grey |
| PEN039 | Grey | Grey | Agree |
| PEN040 | Amber | Amber | Agree but comments for 036 and 037 in particular should be considered. |
| PEN041 | Amber | Amber | Agree with statement. Withdraw. |
| PEN042 | No Code | ? | Withdraw and include in PEN030 |
| PEN043 | Amber | Amber | Agree with statement. Withdraw. |
| PEN044 | Amber | ? | See comments for 031 & 032 |
| PEN045AS | Red | Red | Agree with statement and include in PEN029 |
| PEN046AS | Amber | Red | Revise category to be included in PEN030 |
| PEN047AS | Amber | Red | Revise category to be included in PEN030 |
| PEN048AS | Green | Red | Revise category to be included in PEN030 |
| PEN049AS | Amber | Red | Revise category to be included in PEN030 |
| PEN050AS | Amber | Red | Revise category to be included in PEN030 |
| PEN051AS | Amber | Red | Revise category to be included in PEN030 |
| PEN052AS | Amber | Red | Revise category to be included in PEN030 |
| PEN053AS | Red | Red | Agree with statement and include in PEN030 |
| PEN054AS | Amber | Red | Revise category to be included in PEN029 |
| PEN055AS | Green | Red | Revise category to be included in PEN030 |
| PEN056AS | Amber | Red | Revise category to be included in PEN030 |
| PEN057AS | Red | Red | Agree with statement and include in PEN030 |

Attached Map – Key and justifications.

- **PEN 029 and PEN 030** These proposals have not been designated in LDP 01 Green barrier! To protect this semi-rural settlement, it is believed these proposals should be added to the final plan.
- **GS 1,2 3 and 4** These locations noted on the map are village play spaces and need to be added to the plan. Particular attention needs to be paid to GS 1 that is a current play space that is being extended as part of the Rhos road development.
- **GS 5** This is the shared community play space that need to be added to the plan for protection.
- **Pr 1** This is the old school site as referenced at iii above and needs to be **Protected** from development.



PEN 029

GS 3

Pr1

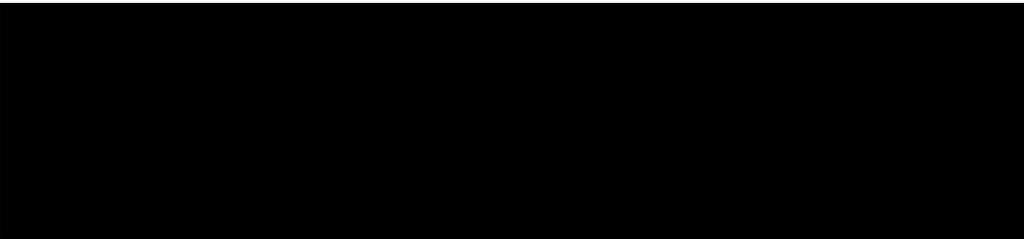
GS 2

GS 1

GS 5

PEN 030

GS 4



25th April 2021

Flintshire LDP Inquiry 2021 – Weeks 5 and 6 Submission statements.



Dear Mrs Worden,

Please accept the following information in support of the case we are making about the LDP for the ward of Pen-y-ffordd.

We have serious concerns about sustainability of the proposal for our ward under Implementing Sustainability, matter 10; Affordable housing matter 13; Natural Built Environment, matter 15; and Green Barriers matter 16.

The plans I have submitted below are a more concise version of those previously submitted, and hopefully they will be helpful to your understanding of the concerns we are raising during the hearing sessions.

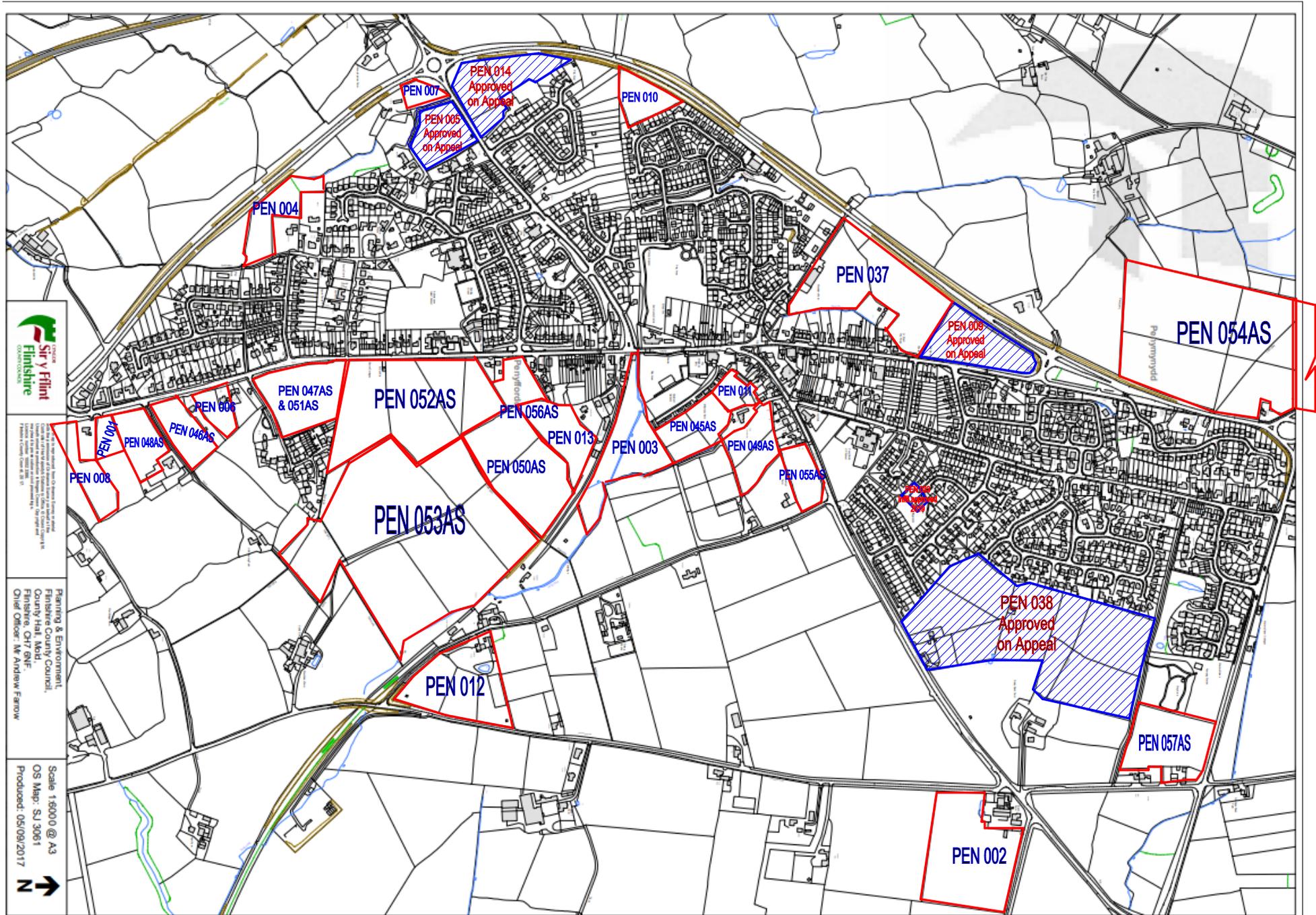
Please forgive me if the way I am doing this is not in line with normal procedure, as this is all completely new to myself and Community Council members. I am hopeful though, that they are acceptable in that as the information has previously been submitted, these plans will be easier to refer to and understand in the confines of a meeting.

Thank you for your time and assistance.

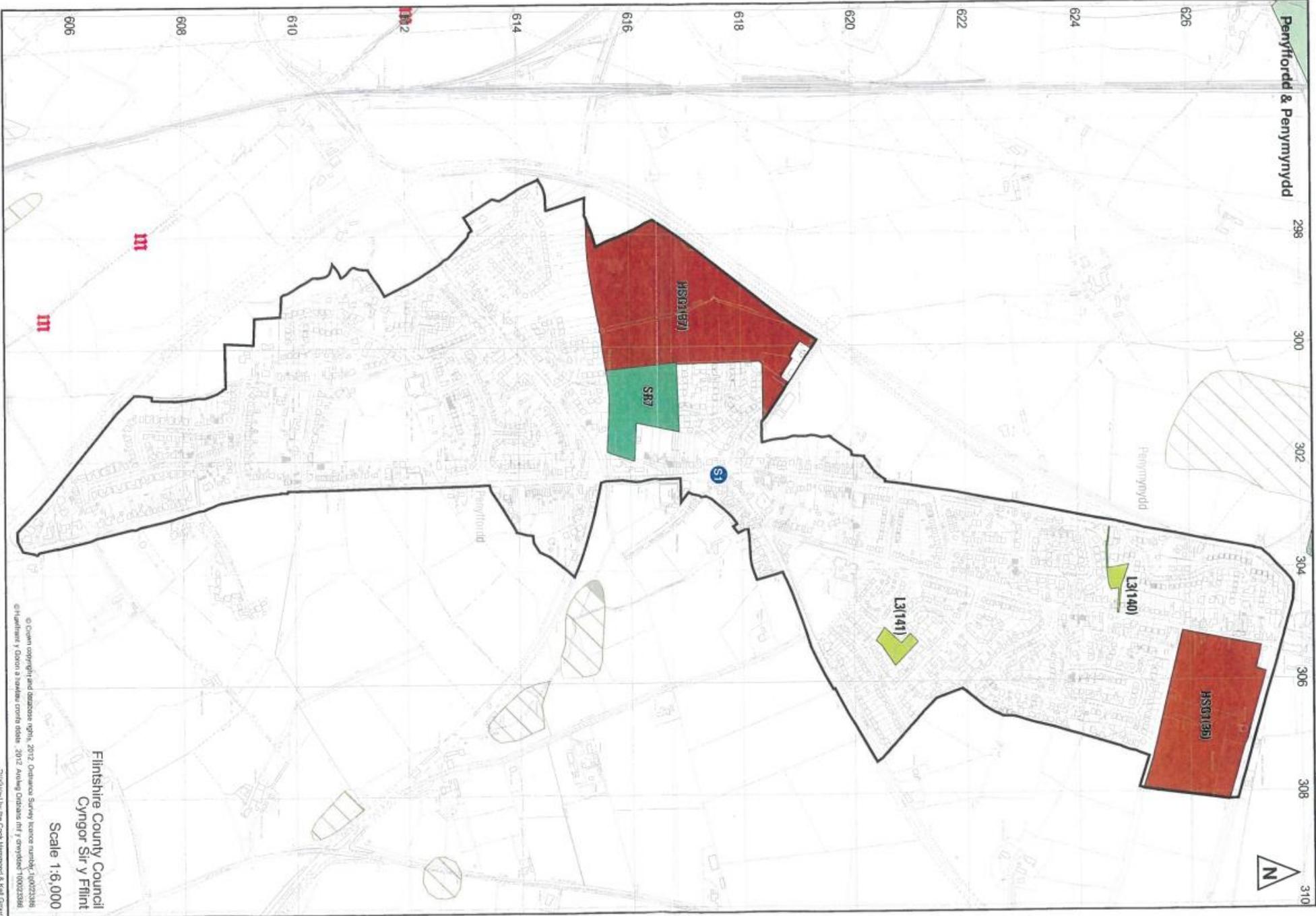
Yours sincerely,



Pen-y-ffordd Village – Candidate sites and alternative sites for housing.



Village boundary to 2015 under the UDP

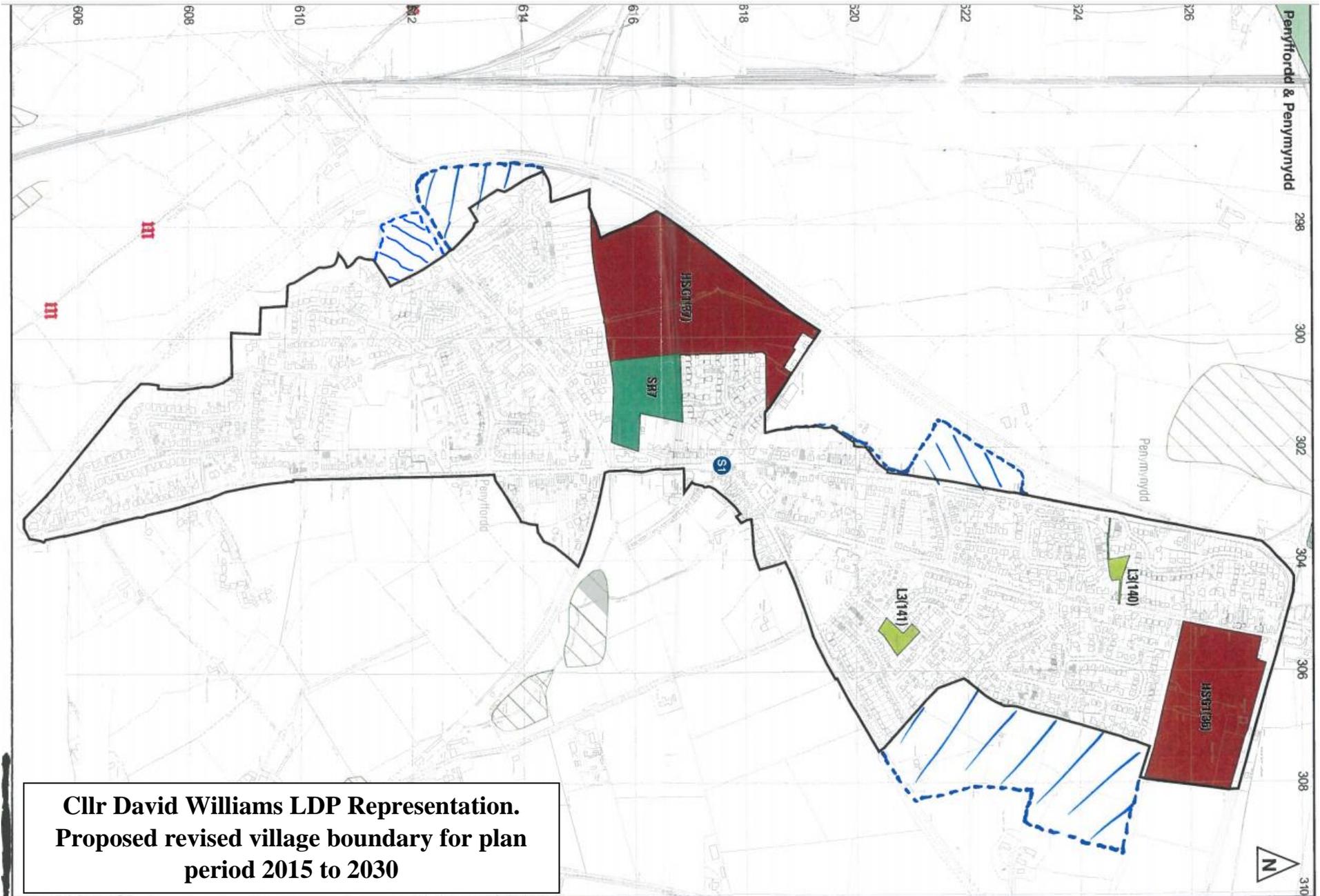


© Crown copyright and database rights, 2012 Ordnance Survey licence number: 100023386
© Hereford & Devon a specialist profile date: 2012 Available Ordnance data provided: 100023386
Produced by the Civic Hammond & Hill Group

Flintshire County Council
Cyngor Sir y Fflint

Scale 1:6,000

LDP 2015 to 2030
Proposed revised settlement boundary for Pen-y-ffordd and Penmynydd.

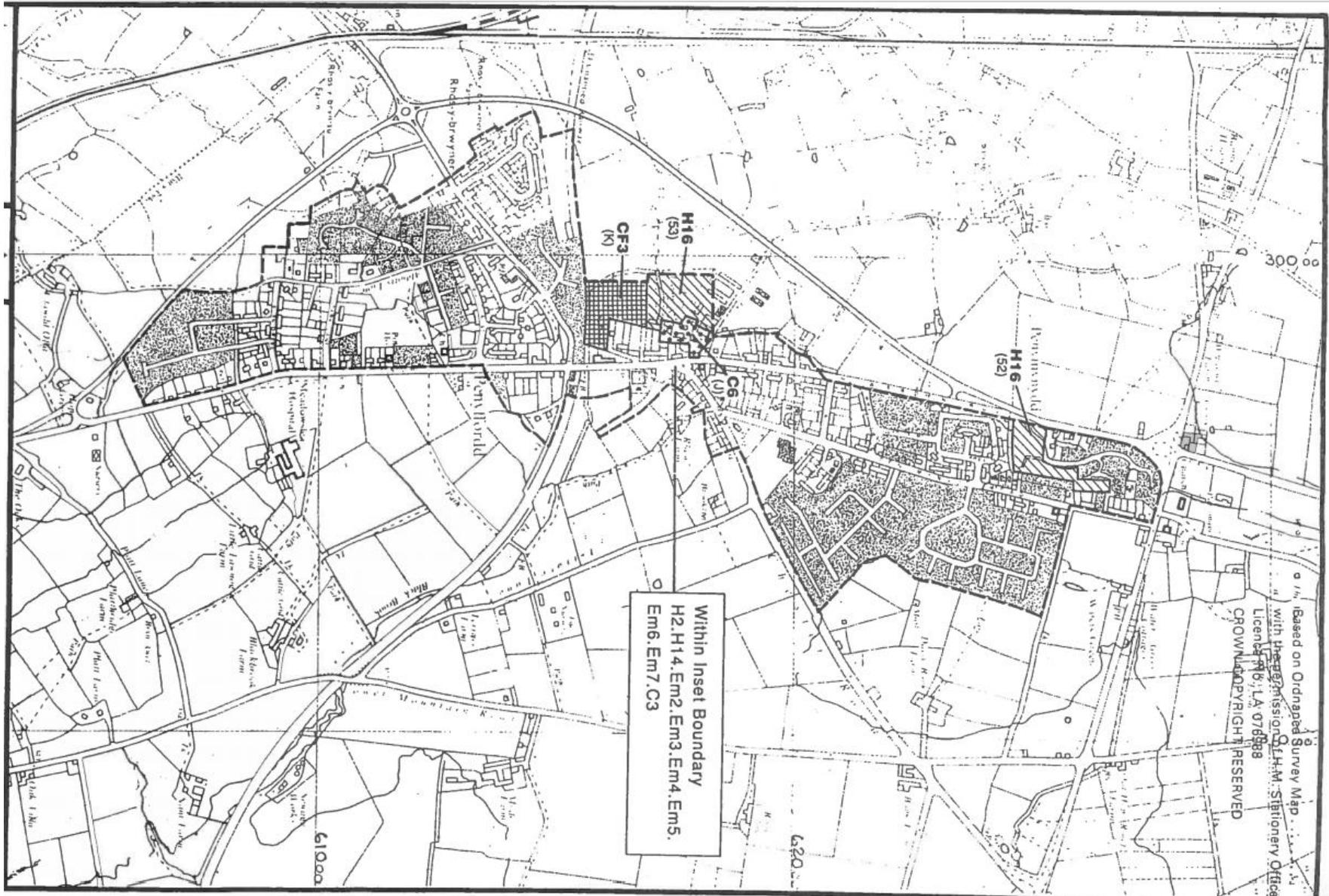


Alyn & Deeside Development Plan to 2000

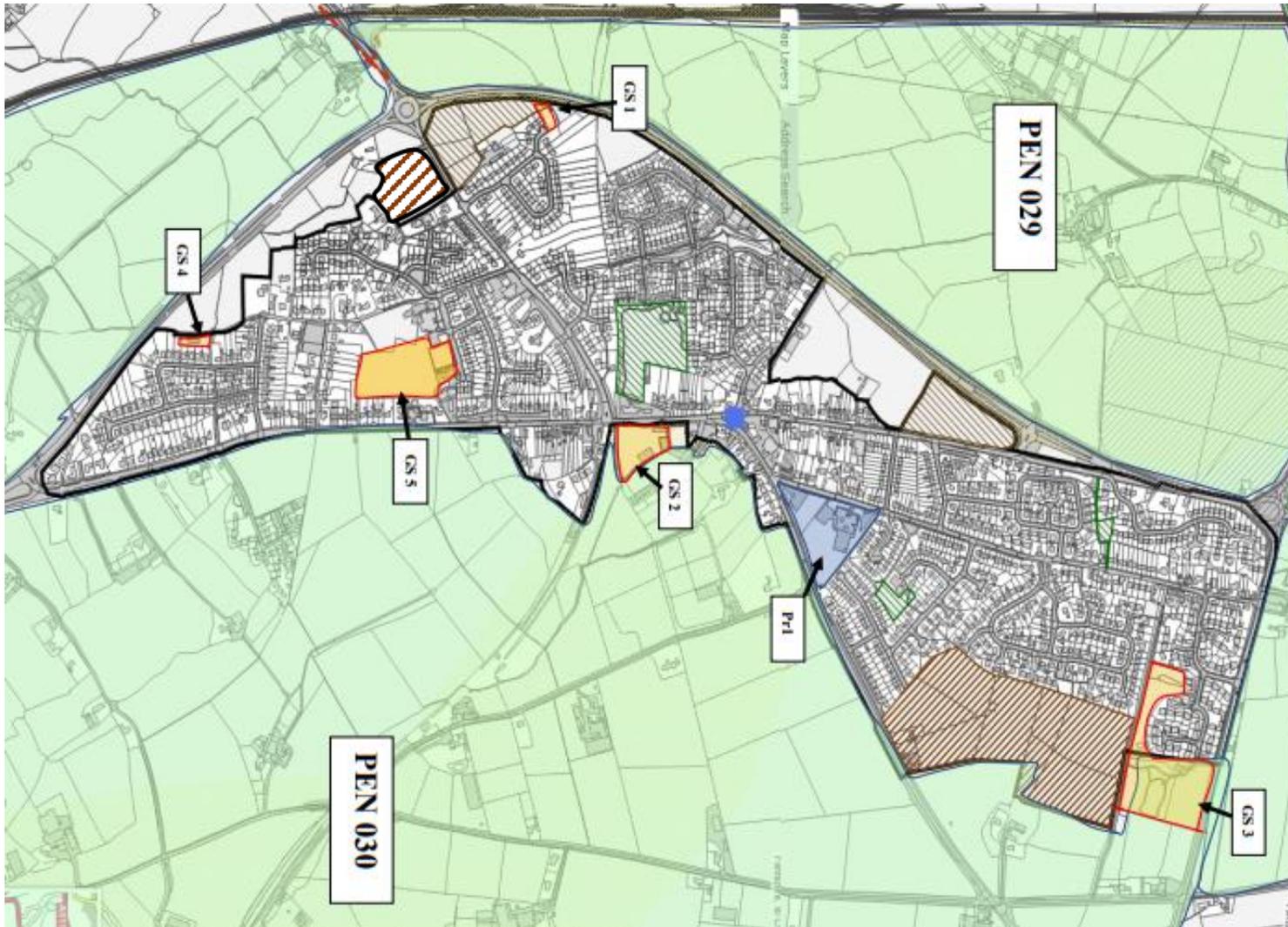
*Note

C6 Business was not provided!

CP3 POS was the same as provided in UDP with insignificant increase despite 224 new homes!



LDP - Proposed Changes to County Plan – Green Barrier Pen-y-ffordd & Penymynydd



Attached map – key and Justification for representation.

PEN 029 & PEN 030. These proposals have not been designated as Green Barrier in the proposed plan. In order to protect this semi-rural settlement, it is believed that these proposals should be added to the final plan.

GS 1, 2, 3 and 4. These locations noted on the map are village play spaces and need to be added to the plan. Particular attention needs to be paid to GS1 that is a current play space that is being extended as part of the Rhos road development!

GS 5 This is the shared community play space that needs to be added to the plan for protection.

PR 1 This is the old school site as referred at iii in the representation and needs to be protected from development.