

MATTER 12 NEW HOUSING DEVELOPMENT PROPOSALS BETWEEN DENBIGH ROAD & GWERNAFFIELD ROAD, MOLD HN1.6

SITE ASSESSMENTS OF CANDIDATE SITES MOL025 & MOL045, LAND NORTH OF GWERNAFFIELD ROAD, MOLD AND MOL044 LAND ADJACENT POOL HOUSE, DENBIGH ROAD,

I consider that the assessments of the candidate sites above and other sites around Mold has not been undertaken on a robust or credible evidence base, in accordance with the Flintshire County Council LDP or the planning guidance issued by the Welsh Government

in preparation of the LDP have failed to comply with the requirements of PPW11 in respect of Minimising the Loss of Best & Most Versatile (BMV) Agricultural Land

The field is shown to be grade 2 agricultural land on the Predicted Agricultural Land Classification Map, which I understand is the highest grade for land immediately surrounding Mold, where most of the land is graded 3a

agricultural land. The large area of Grade 2 Land to the west of Mold (Gwernaffield Rd/Denbigh Rd) MOL025 is omitted. Although land to the south and north west of Mold are listed (no specific sites given).841.92 re W* n BT /TT1 11.04 Tf 72.024 176.18 Td [(g)4.wldÆPF ÔòU ¥•2jS°Å G %ª a† Õ~Y%•(R©)

The site has a predicted loss of grade 2 BMV although a Site Survey by Reading Agricultural has identified that due to chemical limitations arising from previous development, the loss would not involve land of higher than grade 3b. Verification by Welsh Government is awaited. This Background paper was published

in September 2019 but no further evidence in support of this appears to have been provided to support this statement.

In the Hearing Statement by Flintshire County Council dated 9 March 2021 in response to question raised by the inspector in respect of what is the policy position on Best and Most Versatile Agricultural Land (L32 841.024 687r by Fr_ c3d [(Ag)7.00 (0)7.002 f 72.024 tMTT0 11ement.

In respect of the Woodlands Rd site the UDP inspector in allowing the green ~~barrier~~ the review, indicated that at some time in the future the land may prove suitable for development (Ref. page 17 of Background Paper 1: Green Barrier Review, September 2019).

Also, it is understood the UDP Inspector considered the land between Pool house Lane and Gwernaffield Road and determined that the site represented a significant incursion into open countryside.

C. CANDIDATE SITE ASSESSMENTS OF MOL025 & MOL045 LAND NORTH OF GWERNAFFIELD ROAD, MOLD AND MOL044 LAND ADJACENT POOL HOUSE, DENBIGH ROAD, MOLD

Candidate sites were subject to an assessment ~~with~~ a summary of the assessment is then published in Background paper 8 Assessment of Candidate Sites and Alternative ~~Sites~~. of all the candidate sites assessment forms ~~are~~ not made available to review online during the consultation period

The summary published in Background paper 8 do not appear to contain information that would have expected to have been included on the assessment. For example, in MOL045 no reference is made to the high-pressure water mains crossing this site even though a specific ~~query~~ appears on the model assessment form referred to in the above document.

In assessing site MOL009 Denbigh Road Candidate Site reference is made to its close proximity to

Little consideration appears to have been given towards the highway implications arising from the proposed development and to the impact of a considerable number of additional vehicles on the safety and environmental conditions of local residents. Any housing development on the west side of Mold will result in residents having to travel into, and in many cases through, residential areas of Mold to reach work, shops, schools or services. The east and south side of Mold has easy access to the A494s (ts)-3.995 (h)-4.004 (u) (s)7.92.998 (n)2.998 (s)11.005 (ed dev)6.9t998 (ts lik92.99[(h)14.004

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