





3.7 Flintshire's UDP has a criteria based policy (HSG14) to guide the determination of applications for Gypsy sites. This states that; Development of new permanent gypsy sites will only be permitted where: a. there is a demonstrable need; b. there are no suitable alternative sites either with planning permission or allocated for such uses; c. there is natural screening, or the site can be screened adequately; d. services can be provided at reasonable cost; e. there is no unacceptable impact on the amenity and character of surrounding areas due to noise, pollution, traffic or parking problems; and f. such sites should be within reasonable distance of main social and shopping facilities.

3.8 The Deposit LDP contains both a criteria based policy for the determination of Gypsy and Traveller sites through the planning process (HN9) and an allocation of 4 sites under Policy HN8. HN8: Gypsy and Traveller Sites Land is allocated in the following locations as shown on the proposals map to meet the identified needs of Gypsy and Travellers as detailed in the Flintshire Gypsy and Traveller Accommodation Assessment Update over the plan period: HN8-1 (Permanent) Magazine Lane, Ewloe (extension) 6-8 pitches HN8-2 (Permanent) Gwern Lane, Cae Estyn, Hope (extension) 6-8 pitches HN8-3 (Permanent) Riverside, Queensferry (extension) 10 pitches HN8-4 (Transit site) Castle Park Industrial Estate 6 spaces

3.9 The Council maintains that the sites identified had been selected taking into consideration guidance contained in WG circular 005/2018. However, looking at the location of these sites in relation to their proximity to settlement boundaries, health and education services, public transport, cycle and footpaths and off-site play areas it can be seen that none comply. Neither do they comply with all the criteria set out in HN9. These are that:

a. There is a clearly identified unmet need in accordance with the most recently undertaken Gypsy and Traveller Accommodation Assessment;

b. There are no suitable alternative sites either with planning permission or allocated for such uses which could accommodate the need;

c. The site is well related to suitable community facilities and services for the prospective occupants;

d. The site is capable of being served by utilities including sustainable waste disposal and recovery and emergency services;

e. The site affords satisfactory amenity standards5 (ng)2.9988 (c998 (t)-4.h (ces)12.998 ( )-3.998

3.11 The Gwern Lane site is even more isolated from the community being 1km from Hope and 1.5km from Caergwrle. T

settlement boundary is a logical extension to the urban form and well related to the local community and the services that it provides. The Ysgol Mynydd Isa Primary School is within 0.4km and the Argoed High School is 0.7km away. It is 0.8km to the local clinic, library and convenience store in Mercia Drive. P