

Cassidy+ Ashton

Architecture + Building Surveying + Town Planning

Land East of Aber Road, Flint Supporting Planning Statement

12th June 2023

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1.0 INTRODUCTION

1.1 Cassidy + Ashton have been instructed by The Hollins Murrery Group to oversee the preparation and submission of a Full Planning Application to Flintshire County Council.

1.2 The application site is **Land East of Aber Road, Flint, CH6 5EX**.

1.3 The application is for:

Redevelopment of existing hand car wash, for the construction of 2 no. industrial buildings (B2/B8 with ancillary B1 office), parking and all associated works.

1.4 This supporting planning statement sets out the context of the site and considers the planning merits of the proposal, reaching the conclusion that the proposed development is compliant with local and national planning policy.

1.5 This statement is to be read in conjunction with a series of plans and other documentation, comprising the planning application pack as a whole:

- Application Forms – *Cassidy and Ashton*
- Supporting Planning Statement – *Cassidy and Ashton*
- Design and Access Statement – *CUBE Architecture and Design*
- Location Plan – *CUBE Architecture and Design*
- Existing and Proposed Site Plan – *CUBE Architecture and Design*
- Proposed Floor Plans – *CUBE Architecture and Design*
- Proposed Roof Plans – *CUBE Architecture and Design*
- Proposed Elevations – *CUBE Architecture and Design*
- Preliminary Ecological Appraisal – *Sambrook Associates*
- Flood Consequence Assessment & Drainage Strategy – *Weetwood*
- Transport Statement – *Vectos*
- Pre-application Consultation Report (TBC) – *Cassidy and Ashton*

2.0 SITE AND CONTEXT

2.1 The application site is Land East of Aber Road, Flint, CH6 5EX.

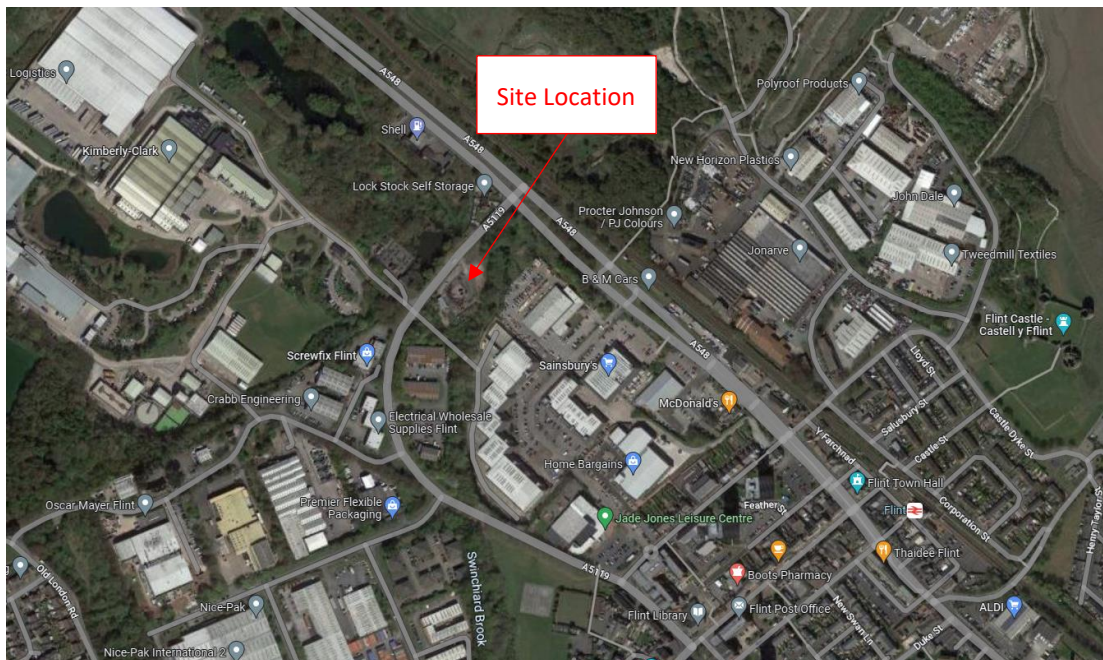


Fig. 1 Site Location [Source: Google Maps]

- 2.2 The Application site extends to 0.76 Ha encompassing an area of land currently used as a Car Wash.
- 2.3 The site is within Aber Park Industrial Estate and was previously occupied by a large industrial building (approximately 2,300m²), with associated infrastructure, hardstanding and car parking. The building has since been demolished and the current hardstanding area is being used as a hand car wash facility, with a small structure to the south-west.
- 2.4 The site is situated in Flint town centre and is surrounded by a variety of industrial and retail uses. To the North and West the site is bound by Aber Road, with industrial uses beyond in Aber Park Industrial Estate. To the East and South, the site is bounded by retail uses and light industrial. The Swinchiard Brook runs along the South-east of the site.
- 2.5 The site is generally level, with few landscape features.
- 2.6 The site is accessible off Aber Road, connecting to the A548 to the North, which is a key route running from Chester along the North Wales Coast, connecting to the A55 at Abergele.

- 2.7 As such, the site is highly accessible via private motor car, situated in close proximity to a number of key A-roads, with the A55 North Wales Expressway accessible c. 3.8 miles to the South-west.
- 2.8 The nearest bus stop is located 100m to the North on Aber Road, with frequent services to Holywell and Rhyl. Aber Park bus stop is located 300m to the East, with frequent services to Chester and Connahs Quay.
- 2.9 Flint Railway Station is situated 0.6 miles to the East. The primary rail operating companies are Transport for Wales and Avanti West Coast.
- 2.10 As such, it is considered that the site is in a sustainable and accessible location.

3.0 PLANNING HISTORY

3.1 An online search of the Flintshire Council Planning Register has highlighted a number of previous planning applications at the application site of relevance. These are set out below.

Ref. Number	Description of Proposal	Decision	Address	Date
047970	Retrospective change of use to provide drive through hand car wash facility and erection of floodlighting	Refused	Carwash, Aber Park, Aber Road, Flint, Flintshire, CH6 5EX	3 rd May 2011
048078	Construction of new builders merchant building with associated yard	Approved	Carwash, Aber Park, Aber Road, Flint, Flintshire, CH6 5EX	13 th May 2011
048784	Retrospective change of use for a drive-through car wash	Refused	Carwash, Aber Park, Aber Road, Flint, Flintshire, CH6 5EX	8 th August 2011
055161	Variation of condition no. 1 attached to planning permission ref: 048078 to allow further time period for the commencement of works	Approved	Carwash, Aber Park, Aber Road, Flint, Flintshire, CH6 5EX	2 nd June 2016
058473	Application for removal or variation of condition 1 following grant of planning permission (055161).	Refused	Carwash, Aber Park, Aber Road, Flint, Flintshire, CH6 5EX	23 rd April 2020

3.2 The above planning history shows that the site has been subject to a number of previous planning applications all relating to employment development.

4.0 PROPOSED DEVELOPMENT

- 4.1 The proposed development is for 6 no. B2 / B8 industrial units, accommodated within 2 no. buildings to be accompanied by associated parking and landscaping.
- 4.2 The access point to the site off Aber Road is to be retained and enhanced, with an access road through the site serving each of the buildings. Off the road through the site, each of the individual units have vehicular access and parking, with all units having a loading bay into the unit itself.



Fig. 2 Proposed Site Plan

5.0 PRE-APPLICATION CONSULTATION EXERCISE

- 5.1 Following the enactment of the Planning (Wales) Act 2015, the requirement for pre-application consultation on major development was implemented.
- 5.2 The statutory requirement to consult is imposed by Section 61Z of the Town and Country Planning Act 1990.
- 5.3 Pre-application consultation exercises must include:
- Making draft planning application documents available to view;
 - Notifying the right consultees of the consultation;
 - Providing a 28 consultation period; and
 - Reporting how the pre-application consultation was undertaken and how people's views were considered in a 'Pre-Application Consultation Report' submitted as part of the application.
- 5.4 A pre-application consultation exercise is being undertaken in line with these requirements prior to submission of a planning application. This will consult a variety of statutory and non-statutory consultees, who will be invited to make comment.

STATUTORY CONSULTEES

- Adjoining Owners & Occupiers (letter drop)
- Flint Town Council
- Ward Member(s) – Flint Coleshill and Trelawny

Councillor Paul Cunningham

Councillor Michelle Perfect

Councillor Vicky Perfect

SPECIALIST CONSULTEES

- Flintshire County Council Economy and Regeneration
- Flintshire County Council Highways Department

- Flintshire County Council Rights of Way Officer
- Flintshire County Council Biodiversity Officer
- Flintshire County Council Community Safety Officer
- Flintshire County Council Drainage & SAB Officer
- Flintshire County Council Public Protection Officer
- Natural Resources Wales
- Welsh Water

PRE-APPLICATION CONSULTATION REPORT

- 5.5 The details of this exercise, including representations made and a summary of responses will be set out within the Pre-application Consultation Report, which will be submitted with the Planning Application.

6.0 NATIONAL PLANNING POLICY

FUTURE WALES: THE NATIONAL PLAN TO 2040

- 6.1 Future Wales is a 20-year framework for planning the change and development of Wales to 2040, with a strategy for addressing key national priorities through the planning system. These priorities include: sustaining and developing a **vibrant economy**; achieving decarbonisation and climate-resilience; developing strong ecosystems; and improving the health and well-being of our communities.
- 6.2 The Welsh Government recognises and supports the important role of businesses of all sizes, from major international manufacturers to micro businesses, in strengthening, diversifying and increasing the resilience of our economy.
- 6.3 Future Wales sets out 11 ambitions/outcomes, supported by 36 specific policies.
- 6.4 **Outcome 1** states that our cities, towns and villages will be physically and digitally well-connected places, offering good quality of life to their residents.
- 6.5 **Outcome 6** sets out that Development plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation.
- 6.6 **Policy 2** defines the priority to grow and regenerate towns and cities, contributing to building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.
- 6.7 **Policy 6** states that significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region.
- 6.8 **Commentary**

The key objectives of Future Wales seek to encourage economic growth, investment and innovation. This is particularly the case in towns and cities, with the priority to create

sustainable places that are organised around mixed-use centres and public transport, and integrated with green infrastructure. The proposed development supports the principles of Future Wales by encouraging economic growth in the local area and beyond.

NATIONAL PLANNING POLICY

6.9 The Welsh Assembly Government's (WAG) land use planning policies are set out in Planning Policy Wales (PPW), plus Technical Advice Notes, Circulars and Ministerial Interim Planning Policy Statements.

The need to achieve sustainable development is at the heart of the aims of the policy guidance and the four broad objectives are:

- Social progress that recognises the needs of everyone;
- Maintaining high and stable levels of economic growth and employment;
- Effective protection of the environment; and
- Prudent use of natural resources.

PLANNING POLICY WALES (EDITION 11, FEB'21)

6.10 The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015.

6.11 Planning Policy Wales addresses each of the seven well-being goals of the Well-being of Future Generations (Wales) Act 2015, setting out how planning and development should work toward achieving these objectives.

6.12 Figure 7 of PPW sets out how proposals should be prepared within the context of key planning principles of the planning system, this is included below (Fig 2).

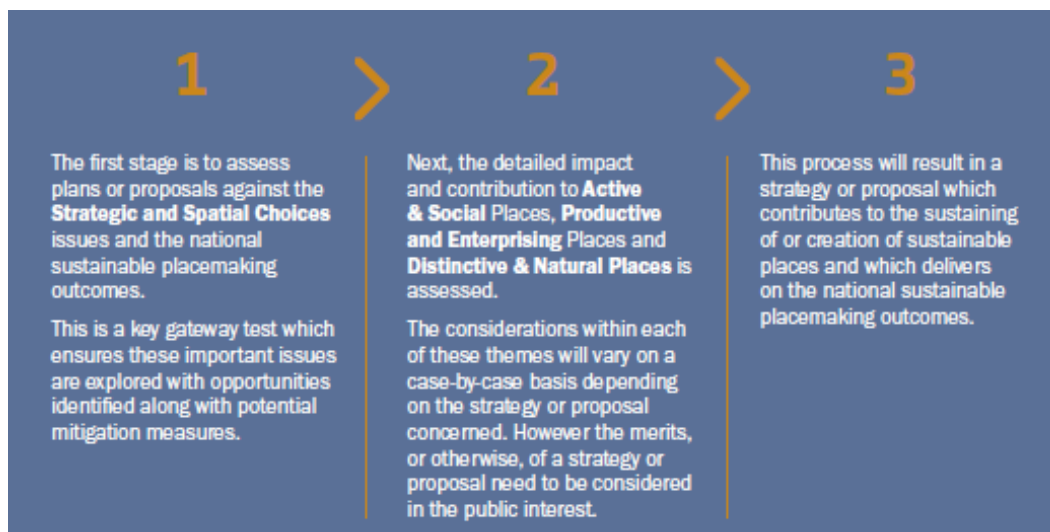


Fig. 5 PPW Extract

6.13 PPW states that the planning system should support sustainable development by improving the economic, social, environmental and cultural well-being of Wales. All of these elements must be achieved while acting in a manner that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Commentary

The proposed development of industrial units within an established town centre and designated employment area represents sustainable development. The proposals will create additional jobs and facilitate economic development in a sustainable location, well related to the town centre of Flint and wider Industrial Park within which it is situated.

This Statement concludes that no unacceptable harm will be caused as a result of the proposed development and, in particular, with respect to residential amenity, safety and wider environmental considerations. On the basis of the site location and characteristics, it is considered that the development will have a neutral / positive impact on the Environment. This is reinforced by the Preliminary Ecological Appraisal and Flood Risk Assessment.

CHAPTER 2 – PEOPLE AND PLACES: ACHIEVING WELL-BEING THROUGH PLACEMAKING

- 6.14 PPW states that Sustainable Places are the goal of the land use planning system in Wales; they are the output of the planning system rather than the process of achieving them. All development decisions, either through development plans policy choices or individual development management decisions should seek to contribute towards the making of sustainable places and improved well-being.
- 6.15 Sustainable development is built from social considerations, economic considerations; cultural considerations and environmental considerations. In achieving truly sustainable development, each of these objectives need to be considered in mutually supportive ways.

Commentary

The application site is located within a dedicated Employment Area and is a brownfield site which has previously been occupied by industrial development and is currently used as a Car Wash. The redevelopment of the site for a more formal industrial use will provide considerable economic and social benefit, in the form of economic uplift to the local area and employment provision. This will be achieved without detriment to environmental considerations, as evidenced within the supporting documentation with reference to ecology, flood risk and highways.

In relation to Development Management, this application provides all necessary information for the scheme to be considered in full detail and concludes that the scheme is an appropriate form of development for this location.

This Statement, in conjunction with the accompanying reports, confirms that the application proposal will secure sustainable development and that all relevant social, economic and environmental considerations are supported by the proposal.

CHAPTER 3 – STRATEGIC AND SPATIAL CHOICES

STRATEGIC PLACEMAKING

- 6.16 Preference for the re-use of land - previously developed (or brownfield) land should, wherever possible, be used in preference to greenfield sites, where it is suitable for development.
- 6.17 In developing their spatial strategy planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development.

Commentary

The site represents the epitome of previously developed land with limited constraints with regard to commercial development. The proposed use of the site is consistent with both its previous use and that characterised by surrounding development, being within an allocated Employment Area and existing Industrial Park.

COMMUNITY SAFETY

- 6.1 With regard to community safety, the aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' well-being goal.

Commentary

The proposed development is consistent with neighbouring land uses and can safely be accommodated on the Highway network, as evidenced in Vectos' report. Natural surveillance will be heightened through more active uses on the site.

CHAPTER 4 – ACTIVE AND SOCIAL PLACES

TRANSPORT

- 6.1 The planning system should enable people to access jobs and services through shorter, more efficient, and sustainable journeys by walking, cycling and public transport. The planning

system can improve choice in transport and secure accessibility in a way which supports sustainable development.

Commentary

As set out within the submitted Design and Access Statement and also within the Transport assessment the proposed development will support sustainable transport methods and has also provided appropriate car parking provision and cycle parking.

On the basis of the submitted information the scheme is supported by Chapter 4 of PPW.

CHAPTER 5 – PRODUCTIVE AND ENTERPRISING PLACES

ECONOMIC INFRASTRUCTURE

- 6.2 Productive and Enterprising Places are those which promote our economic, social, environmental and cultural well-being by providing well-connected employment and sustainable economic development.
- 6.3 The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim.

With regard to economic development, planning authorities should aim to:

- co-ordinate development with all forms of infrastructure provision such as transport and utilities;
- **support national, regional, and local economic policies and strategies;**
- **align jobs and services with housing and sustainable transport infrastructure, to reduce the need for travel, and dependency on travel by car;**
- **promote the re-use of previously developed, vacant and underused land;**
- deliver physical regeneration and employment opportunities to disadvantaged communities;
- control and manage the release of unwanted employment sites to other uses;
- propose specific locations for locally and strategically important industries which are detrimental to amenity and may be a source of pollution; and

- identify protection zones around land and premises that hold hazardous substances and protect the ability of existing businesses to operate or expand by preventing the incremental development of vulnerable uses in the locality. (our use of bold)

Commentary

The proposed development represents redevelopment of an underutilised site in the town centre of Flint, within a dedicated Employment Area and an existing Industrial Park.

As set out above the site is well located for staff to travel from established residential areas. It is expected the majority of staff will live within the surrounding area. On the basis of the above it can be confirmed that the scheme is compliant with Chapter 5 of PPW.

CHAPTER 6 – DISTINCTIVE AND NATURAL PLACES

DEVELOPMENT AND FLOOD RISK

6.4 In determining applications for development, local planning authorities should work closely with Natural Resource Wales, drainage bodies, sewerage undertakers, prospective developers and other relevant authorities to ensure that surface water run-off is controlled as near to the source as possible by the use of sustainable urban drainage systems. They should also ensure that development does not:

- Increase the risk of flooding elsewhere by loss of flood storage or flood flow route;
or
- Increase the problem of surface water run-off.

6.5 Clean air and an appropriate soundscape, contribute to a positive experience of place as well as being necessary for public health, amenity and well-being.

Commentary

This planning application is supported by a comprehensive Flood risk and drainage strategy which confirms that the development can safely be accommodated with no detrimental impacts.

There is a presumption in favour of growing the Welsh economy and achieving sustainable development principles, ensuring social, economic, cultural and environmental considerations are seen in mutually supportive ways. PPW defines the importance of suitably accommodating all other material considerations in achieving sustainable development, i.e. environmental sustainability, infrastructure capabilities and flood risk.

This planning application is supported by all necessary specialist reports that set out that the proposed development can be constructed with no negative impacts upon material planning considerations.

TECHNICAL ADVICE NOTES

- 6.6 Alongside PPW sit 24 Technical Advice Notes (TANs).
- 6.7 Technical advice notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. Of those available, the most pertinent to the proposal are as follows:
- Technical Advice Note 12 – Design
 - Technical Advice Note 15 – Development and Flood Risk
 - Technical Advice Note 18 – Transport
 - Technical Advice Note 23 – Economic Development
- 6.8 Of the above relevant TAN documents each has been dealt with in full by the relevant technical report produced to support the scheme.

TAN 12 - Design

- 6.9 All of the elements contained within TAN 12 have been addressed within the submitted Design and Access Statement.
- 6.10 The proposed development is located within a long-established employment area – notwithstanding this, the building's external appearance has been carefully considered to

provide an attractive development with the incorporation of elevational treatments to soften the building's appearance.

- 6.11 On the basis of the submitted Design and Access Statement and the conclusions reached the proposed development accords with TAN 12.

TAN 15 – Development and Flood Risk

- 6.12 Development and flood risk are closely related with the drainage strategy for the site. Weetwood have completed a comprehensive Flood Consequences Assessment and Drainage Strategy. With these documents all relevant aspects of TAN 15 have been addressed.

- 6.13 The Conclusion of the Flood Consequences Assessment considered the drainage strategy and are set out the below:

The assessment demonstrates that the proposed development may be completed in line with planning policy subject to the following measures:

- Finished floor levels to be set at a minimum of 7.13 m AOD and 7.16 m AOD for building A and building B respectively, and at least 0.15 m above adjacent ground levels following any reprofiling of the site, with ground levels sloping down from the buildings.
 - Levels of all ancillary areas to be set as illustrated on the plan provided in Appendix E
 - Compensatory storage to be provided to the north-east of the site in the form of a 1,600 m² area of land lowered to a level of 5.76 m AOD.
 - Flood Warning and Evacuation Plan to be developed in consultation with Flintshire County Council
- 6.14 On the basis of the submitted Flood Consequences Assessment and the conclusions reached the proposed development accords with TAN 15.

TAN 18 - Transport

6.15 As part of the planning submission Vectos have completed a Transport Assessment. This considers all of the relevant items identified within TAN 18 and the Transport Assessment reaches the below conclusion:

- The site has previously accommodated regular vehicle movements associated with a car wash and historical industrial activity;
- There are no known accident blackspots on the highway network in the vicinity of the site;
- The proposed development is considered to be accessible for pedestrians, cyclists and public transport users;
- The site layout, access, and servicing arrangements are appropriate and suitable;
- The parking spaces provided will be sufficient for the use of the development; and
- The development will experience a low trip generation, and as such will not have an adverse impact upon the safe or efficient operation of the local highway network.

6.16 On the basis of the submitted Transport Statement and the conclusions set out above reached the proposed development accords with TAN 18.

TAN 23 – Economic Development

6.17 TAN 23 deals predominantly with the allocation of economic development land within local plans. As part of this TAN 23 sets out that Local Authorities should recognise market signals and have regard to the need to guide economic development rather than prevent or discourage such development.

6.18 As the application site is located within an existing industrial area as allocated within the adopted development plan, it is considered that the proposed development meets the requirements set out within TAN 23.

7.0 LOCAL PLANNING POLICY

INTRODUCTION

- 7.1 This section provides an overview of the local planning policy relevant to the site.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications must be determined in accordance with the development plan unless material considerations of which PPW, together with emerging development plans, indicate otherwise.
- 7.3 The development plan relevant to this site is the Flintshire Local Development Plan 2015-2030 (adopted 24th January 2023).

FLINTSHIRE LOCAL DEVELOPMENT PLAN (2015 – 2030)

- 7.4 The Flintshire Local Development Plan was adopted by the Council on 24th January 2023.



Fig. 6 Local Plan Proposals Map

- 7.5 The site is situated within the Settlement Boundary of Flint (Main Service Centre) as indicated by the black boundary line. The site is also within the Principal Employment Area (Policy PE2) (purple boundary line).

7.6 **Policy PE2: Principal Employment Areas** states:

Within principal employment areas, as defined on the proposals map and listed below, the following types of employment development will be permitted:

- a. B1 business use;
- b. B2 general industry;
- c. B8 storage and distribution

provided that the proposal is of an appropriate type and scale for both the site and its surroundings and satisfies other Plan policies. Within these areas, development must also avoid adverse effects on European Sites. **Any development proposals on sites that may be located within a flood risk zone causing constraint will require further investigation in terms of firstly, avoidance of flood risk through layout and design measures and secondly, through a detailed site specific FCA at the development management stage.**

Commentary

The proposed development is consistent with neighbouring industrial development within an employment area. A flood consequence and drainage assessment has been undertaken by Weetwood which includes hydraulic modelling and confirms the development is acceptable with mitigation design measures. The proposal is therefore consistent with PE2.

7.7 The other relevant policies of the Local Development Plan are set out below.

7.8 **Policy STR1: Strategic Growth** highlights that In order to meet Flintshire’s economic ambition between 2015 and 2030, the Plan will make provision for:

- i. 8,000 – 10,000 new jobs;
- ii. 124.97 hectares of employment land;
- iii. 7,870 new homes to meet a housing requirement of 6,950 of which 2,265 will be affordable.

The focus of this development will be at sustainable employment locations and in accordance with the sustainable settlement hierarchy and spatial distribution strategy.

7.9 **Policy STR2: The Location of Development** states that

New development will be directed to the following locations:

- i. Allocated Sites;
- ii. **Principal Employment Areas as detailed in policy PE2;**
- iii. Sustainable settlements based on the first three tiers of the settlement hierarchy

Commentary

The application site is within a Principal Employment Area as set out above and therefore forms second in the hierarchy for the location of development, following allocated sites. With this in mind the principle of development in this location is supported by STR2.

7.10 **Policy STR4: Principles of Sustainable Development, Design and Placemaking**

To promote and create new sustainable places, all development will be designed to a high standard in line with the sustainable placemaking design principles and should achieve local distinctiveness, be inclusive and accessible, and mitigate and adapt to climate change.

To achieve this, all development should:

- i. Be designed to be adaptable, safe and accessible, to respond to climate change, and for housing, adapt to changing needs over time;
- ii. **Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;**
- iii. **Be accessible and connected, allowing ease of movement;**
- iv. **Make the best use of land, materials and resources;**
- v. Contribute to the well-being of communities, including safeguarding amenity, the public realm, provision of open space and recreation, landscaping and parking provision in residential contexts;
- vi. Incorporate new, and connect to existing green infrastructure, promoting biodiversity;
- vii. Incorporate where possible on-site energy efficiency and renewable energy generation;
- viii. Ensure there is capacity and availability of infrastructure to serve new development;

- ix. Manage water and waste sustainably;
- x. Ensure that it supports and sustains the long term well being of the Welsh language.

Commentary

The application site is within a Principal Employment Area and is well connected to existing infrastructure as well as surrounding development of a comparable nature. The design responds to local context and character in the employment area and makes best use of a currently underutilised site.

7.11 Policy STR7: Economic Development, Enterprise, and Employment

In order to sustain Flintshire's role as a sub-regional economic hub, the Plan will support this by:

- i. Facilitating the delivery of jobs from key strategic sites at Northern Gateway, Deeside, and Warren Hall, Broughton;
- ii. **Providing a range of general employment sites to enable a range of businesses to start-up, invest, innovate, expand and grow, benefitting from Flintshire's strategic location and positive quality of life;**
- iii. Emphasising Deeside and its area of influence as the economic focus for Flintshire's long term economic ambition;
- iv. **Providing the opportunity to realise the creation of 8-10,000 jobs in key sectors, over the plan period;**
- v. **Supporting the role of Flintshire's main towns as Main Service Centres, providing a range of employment, retail, leisure development, and services and facilities that are accessible to the wider communities they serve;**
- vi. Supporting development related to the provision of higher/further education facilities which offer vocational skills training and direct links to key employers;
- vii. In rural areas, recognise the continued contribution agriculture makes to the rural economy, whilst also supporting wider rural enterprise, tourism and diversification;
- viii. Supporting the widespread provision of high speed broadband infrastructure across Flintshire, as well as consistent telecommunications connectivity.

Commentary

The proposed development will make better use of an existing employment site to provide a range of unit sizes suitable to a range of business sizes, including start-ups. The development will encourage economic growth and employment in Flint Town Centre and is therefore consistent with Policy STR7.

7.12 **Policy STR8: Employment Land Provision**

A strategic and local supply of employment land is identified to satisfy the County's employment needs. Economic development will be guided to the most appropriate locations by providing a range and choice of sites in terms of location, quality, type and size which will comprise:

- i. Land currently committed for employment uses;
- ii. **Undeveloped land and existing premises within Principal Employment Areas;**
- iii. Employment land allocations including two key strategic sites of sub-regional significance referred to in Policies STR3, and STR7;
- iv. The safeguarding of existing employment sites and premises, where they play an important role in meeting future economic needs;
- v. Land and sites outside settlement boundaries, allocated sites, and Principal Employment Areas which can deliver sustainable employment development through the re-use of suitable buildings and land.

Commentary

The proposed development will make better use of an existing employment site within a Principal Employment Area and is therefore considered an appropriate location in accordance with Policy STR8.

7.13 **Policy PC2: General Requirements for Development**

All development should:

- a. harmonise with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/townscape;

- b. not have a significant adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard, or the adverse effects of pollution;
- c. take account of personal and community safety and security in its design and layout;
- d. maximise sustainable travel choice by having safe and convenient access by foot, cycle, public transport and vehicles;
- e. not have an unacceptable effect on the highway network or highway safety as a result of problems arising from traffic generation, inadequate and poorly located parking spaces, servicing and maneuvering;
- f. not result in or be susceptible to problems related to foul and surface water drainage, land stability, contamination, flooding, or pollution of light, air and water, either on or off site.

Commentary

The application site is located within a dedicated Employment Area and is a brownfield site which has previously been occupied by industrial development and is currently used as a Car Wash. This will be achieved without detriment to environmental considerations, as evidenced within the supporting documentation with reference to ecology, flood risk and highways.

In relation to Development Management, this application provides all necessary information for the scheme to be considered in full detail and concludes that the scheme is an appropriate form of development for this location.

7.14 Policy PC5: Transport and Accessibility

New development proposals must be supported by appropriate transport infrastructure, and depending on the nature, scale, location and siting of the proposal, will be required to:

- a. **Incorporate good access to the more sustainable modes of travel**, firstly by walking and cycling, secondly by public transport, then by low emission private vehicle and finally by private motor vehicle;

- b. not compromise the safe, effective and efficient use of the highway network and not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
- c. where significant adverse effects upon the transport network arising from the proposed development are unavoidable, they must be mitigated by, for example, improvements to transport infrastructure and traffic management;
- d. provide appropriate levels of parking, servicing and maneuvering space and in non-residential development, a minimum of 10% of parking spaces to have electric vehicle charging points;
- e. create well designed people orientated streets and make provision for people with restricted mobility including those with characteristics as defined by the Equality Act 2010;
- f. safeguard, enhance and expand the active travel network, particularly by means of improving connectivity to and from the proposed development.

Commentary

As evidences within the submitted Transport Statement, the development is accessible by sustainable modes of travel and includes appropriate provision for vehicular and cycle parking.

7.15 Policy EN14: Flood Risk

In order to avoid the risk of flooding, development will not be permitted:

- a. in areas at risk of fluvial, pluvial, coastal and reservoir flooding, unless it can be demonstrated that the development can be justified in line with national guidance and is supported by a technical assessment that verifies that the new development is designed to alleviate the threat and consequences of flooding;
- b. where it would lead to an increase in the risk of flooding on the site or elsewhere from fluvial, pluvial, coastal or increased surface water run-off from the site;
- c. where it would have a detrimental effect on the integrity of existing flood risk management assets: or

- d. where it would impede access to existing and proposed flood risk management assets for maintenance and emergency purposes.

Commentary

As evidences within the submitted Flood Consequence and Drainage Assessment, the proposal is justified in line with national guidance – meeting the justification test - and has been designed so as to alleviate the threat of flooding. In line with this, the development will not increase flood risk elsewhere and is therefore in accordance with Policy EN14 above.

8.0 OTHER MATERIAL CONSIDERATIONS

FLOOD RISK



Fig. 7 Flood Risk Map [Source: Natural Resources Wales]

- 8.1 As demonstrated by Figure 7 above, the majority of the site is at medium / high risk of flooding from rivers.
- 8.2 A Flood Consequence and Drainage Assessment has been prepared by Weetwood which concludes that the proposed development is acceptable in line with planning policy through a number of design measures.

HERITAGE

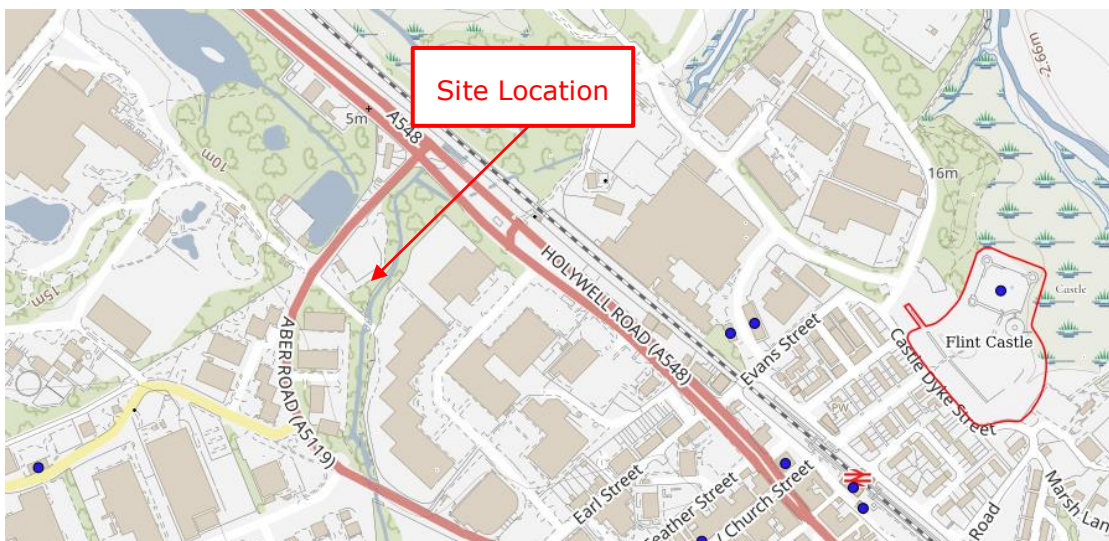


Fig. 8 Historic Protections [Source: CADW]

- 8.3 Figure 8 above shows the presence of Listed buildings. There are no listed buildings on or in immediate vicinity of the site and the site is not situated in a Conservation Area.

ECOLOGY / TREES

- 8.4 There are no Tree Preservation Orders (TPO) on or adjoining the site.
- 8.5 The Preliminary Ecological Appraisal prepared by Sambrook Associates highlights that the main ecological interest is the brook and associated habitats which, although outside of the site, forms a physical feature of the eastern and southern boundaries. There was no evidence that protected species are using this brook where it bounds the site but in the wider landscape, it provides a valuable corridor for many aquatic and terrestrial species.
- 8.6 The Ecological Report concludes that the proposed development is unlikely to result in significant effects on nearby designated sites, habitats or species. In line with this, mitigation and enhancement is set out to include bat boxes and bat friendly lighting.

9.0 CONCLUSIONS

- 9.1 The proposed development is for B2 / B8 Industrial Units at Land East of Aber Road, Flint. The site is situated within a Principal Employment Area, allocated as such under Policy PE2 of the Flintshire Local Development Plan and the principle of development in this location is therefore wholly acceptable in accordance with local planning policy.
- 9.2 Notwithstanding the fact that the site is situated in an area at risk of flooding, the Flood Consequence Assessment prepared by Weetwood confirms that the development is justified and acceptable in line with national guidance, meeting criteria of the justification test. Design measures have been incorporated to include finished floor levels and compensatory storage of surface water, to further deem the proposal acceptable in consideration of flood risk management.
- 9.3 There is clear support within Planning Policy Wales for delivering sustainable development, including industrial development and employment provision. There is support for making use of underutilised land and buildings, whilst encouraging business and wider economic growth. Notwithstanding this, protection of the natural environment is paramount.
- 9.4 The development represents redevelopment of a previously developed site and is within an existing employment area. On this basis the Transport Statement prepared by Vectos concludes that the development can be accommodated within the existing highway network.
- 9.5 On the basis of both national and local planning policy, the proposed development is considered wholly acceptable. The supporting technical reports conclude that there will be no unacceptable impacts to the environment or wider development management considerations.

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