

Flintshire Local Development Plan 2015-2030

Matter 5 Response on Behalf of Mrs EM Charlton Trust (March 2021)

- a) Does the LDP place sufficient emphasis on the benefits to sustainability of the use of brownfield land for development? How does the LDP encourage this?

Savills Response - None

- b) Is the wording of Policy STR4 unduly onerous; should it be qualified by 'where appropriate'? Will it have a serious, detrimental effect on the viability of development proposals?

Savills Response - None

- c) Has sufficient consideration been given to the need for Flintshire's transport infrastructure to align with those of neighbouring authorities?

Savills Response

As we have set out in previous submissions we do not consider that sufficient consideration has been given to the need for additional / replacement roadside service facilities on the new strategic link road proposed to the north west of Connah's Quay.

The A55 to A494 Network Resilience Study (2017) highlighted the links between the daily flows of traffic on the A55 and the loading and off-loading times of freight at the Port of Holyhead. As part of the proposals to deliver 13km of dual carriageway, new infrastructure should be provided that supports highway safety along this new route.

Planning Policy Wales¹ states "*Planning authorities should, in conjunction with key providers, take a strategic and long term approach towards the provision of infrastructure as part of plan making.*" It goes on to state (paragraph 3.63) that "*Development should be located so that it can be well serviced by existing or planned infrastructure.*". Additionally, Policy 11 (National Connectivity) of the Future Wales National Plan 2040 states that the Welsh Government will support the delivery of a Strategic Road Network and will "invest in road improvements to reduce journey times [and] deliver a safer and more resilient road network."²

Whilst Flintshire Council have clearly worked with a range of agencies and stakeholders on the delivery of the new road, little consideration has been given to the provision of roadside facilities to support the safety of drivers and passengers travelling along this new route. We consider that additional roadside facilities that are modern and fit for purpose are required along this new stretch of road for drivers to stop, either to take a break from driving or refuel.

The Mrs EM Charlton land we have identified and submitted to the Flintshire LDP process is considered to be an appropriate area of land for roadside services which could provide the infrastructure necessary to support highway safety along the new route. This site is considered to be an appropriate location for new strategic roadside services being sited adjacent to the proposed rebuilt/realigned Kelsterton junction.

¹ Planning Policy Wales (February 2021) Edition 11 paragraph 3.62

² Future Wales National Plan 2040 (February 2021) Policy 11

- d) Is it clear that there will be sufficient new facilities, for example for education, health, everyday shopping, public transport and so on, to meet the needs of future residents?

Savills Response

We do not consider that sufficient new roadside opportunities as part of the proposed new transport schemes have been appropriately considered by Flintshire Council in preparing the LDP. Whilst policy PC10 outlines five new transport schemes, it does not seek to provide new strategic opportunities, with our particular concern focussed on the new route proposed at the A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement. These proposals cut across my client's land and we have sought to engage the Council in proposal for supporting roadside services.

In our November 2019 representation we provided details of the existing roadside services which are located along the A55 (T) and how the new route will by-pass three existing roadside service facilities, leaving only one small BP garage at Saughall Services. We do not consider that the Council have appropriately assessed the provision of roadside services along the new proposed road or the proposals we submitted in our representations to the LDP process.

The new Northop to Shotwick (red route) Interchange Improvements, will be on one of the most important highways routes into Wales. It represents a £300 million road investment and will significantly improve the capacity of the A55. There appears to be a failure by FCC to acknowledge the high probability that the new road will be constructed within the timescale of the plan period and the opportunities that this will bring by supporting the need for strategic roadside services. The Welsh Government webpage (<https://gov.wales/a55-a494-a548-flintshire-corridor-overview>), highlights that the road will be the subject of a contract in 2021 and construction is planned to take place between 2024-2027. The LDP does not go far enough in recognising the significant strategic changes this new road will make to Connah's Quay or the need to positively plan for new roadside services, which will clearly be needed. This is considered to make FCC's LDP unsound.

Holyhead Port is the third largest port in Wales and provides an important trade gateway to North Wales. Following Brexit, it is considered that this route will become even more important for trade. The Department for Transport Freight statistics we included in our November 2019 submission, demonstrate that the level of freight movements through the port have steadily grown over the past 10 years. Recent investments have been made to the port by Stena Line and a fleet of new ferries with 50% more freight capacity demonstrate that further growth is expected. Without commensurate increase in supporting roadside facilities along the main transport route, we do not consider that the Flintshire LDP is going far enough in meeting the identified needs.

Without the appropriate infrastructure and supporting facilities then the existing facilities will become oversubscribed potentially leading to drivers taking longer journeys without stopping. This is considered to potentially give rise to highway safety issues where the increase in traffic on the roads is not met with an increase in driver facilities, especially where this section of the route will result in a reduction of available facilities. Please refer to Appendix 2 of the Savills November 2019 representations which shows the existing roadside service facilities between Holyhead Port and the M56 motorway at Chester.

- e) How will infrastructure for new development be provided and through what mechanisms? How will contributions be calculated? What is the position with regard to CIL?

Savills Response - None