<table>
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<th>The Case For NAW Transport Directorate</th>
<th>The Case For Burton Mere Fisheries</th>
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<td>THE CASE FOR FLINTSHIRE GREEN PARTY</td>
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The material points were:

12.1 The land at Shotwick Road was important in three respects: a) for food production; b) for wildlife; c) for its historical value. These were all essential ingredients of sustainable development. Environmental and industrial policies should be integrated to their mutual benefit, but the proposed development would promote industry at the expense of environment to the ultimate detriment of both aspects.

12.2 Sustainable development was about striking a better, more creative balance between economic development, environmental protection and social change. Economic growth alone destroyed sustainable
development and biodiversity. A sustainable economy was to be sought, not economic growth. The `primary principles' in section 3 of "Planning Guidance (Wales): Planning Policy" were wrong in putting emphasis on economic growth.

12.3 Development should be "conservation-based", and should conserve life-support systems, conserve biodiversity, and ensure that the use of renewable resources was sustainable. This should occur, not just at a global level, but also at a local level, as emphasised by Local Agenda 21. This involved, inter alia, local work in a strong local economy, and reducing the impact on the environment. The traditional
approach to industry and industrial investment was counter-productive even in economic terms and could not help but cause environmental damage, even when it attempted to ameliorate this by so-called mitigation.

12.4 The retreat from all forms of intensive farming meant that protection of top grade agricultural land was even more important. The land at Shotwick was said to be Grade 2, but was in fact Grade 1, a fact being corruptly suppressed by the Government. Even at Grade 2 it was rare, and should be protected from development that would diminish its use for food growing and wildlife. Farming methods of lower intensiveness would be labour-intensive and would generate
jobs that would be permanent, healthful, use local skills and help the local economy. If even 10% of UK food production was converted to organic methods, up to 18,000 extra jobs could be created in 10-15 years.

12.5 The Government was acting unlawfully in defining the boundary of the Dee Estuary SPA so narrowly as to exclude the application site. It had not taken measures, as required by the Birds Directive, to maintain or enhance the declining population of birds using the site for nesting and for breeding. Developing the land for industrial uses would cause the extinction of the last population of corn buntings in Wales (The Irish Government was being taken to the
European Court by the European Commission for allowing the extinction of corn buntings in Ireland. The corn bunting was covered by Article 3.1 of the Birds Directive. It would also increase the rate of decline of around 50 other UK priority species or birds subject to European protection.

12.6 The proposed landscaping would displace the rare and uncommon species and replace them with common species, because of the change of habitat. It would take decades or even longer, for a habitat to mature to the point where it sustained viable populations of the less-common species.
12.7 The location of badger setts, their social groups and foraging area had not been properly explored. Development, and the traffic it generated, would severely damage the local badger population.

12.8 The historic, estuarine landscape setting of the site would be changed by raising the levels, completely changing the historical location of Shotwick Castle, a sea defence castle.

12.9 The proposed development aimed to attract inward investment, rather than to promote local firms. Inward investment generated severe problems, often of a longer term and indirect nature, resulting in the local economy and community being handicapped in the longer term. Multi-nationals relocated to areas of lowest cost and highest
return, leaving dereliction behind. Small and medium enterprises (SME's) were better, but inward investment took scarce skilled workers away from SME's; and attracted skilled incomers to the detriment of local workers. There was no local need for the jobs that would be created.

12.10 It was proposed that the application site should be subdivided into smaller units, so any companies seeking sites could easily be accommodated on brownfield sites in the travel-to-work area. The County Council had not carried out any audit of brownfield sites/empty premises, so that to allow this development would be unlawful. Permission would also pre-empt the emerging UDP, and the National Assembly should leave the matter to
the local plan process.