

**Flintshire Local Development Plan  
Examination in Public  
Matter 12: New Housing Development Proposals HN1 (Allocations)**

This Statement is submitted on behalf of my client, Mr Mark Wynne of [REDACTED] [REDACTED] who objects to the proposed housing allocation for up to 298 dwellings on land at Holywell Road/Green Lane, Ewloe Green (Ref. HN1-7).

The site in question currently lies within the Green Barrier as defined by the adopted Flintshire Unitary Development Plan (UDP).

Planning Policy Wales (PPW) directs that when developing a spatial strategy, planning authorities must prioritise the use of suitable and sustainable previously developed land and/or underutilised sites for all types of development. It explains that when identifying sites in development plans, previously developed land and/or underutilised sites located within existing settlements should be considered in the first instance with sites on the edge of settlements considered at the next stage.

PPW goes on to say that where there is a need for sites, but it has been clearly demonstrated that there is no previously developed land or underutilised sites (within the authority or neighbouring authorities), consideration should then be given to suitable and sustainable greenfield sites within or on the edge of settlements. It states that the identification of sites in the open countryside must only be considered in exceptional circumstances.

PPW identifies the essential difference between a Green Belt and a Green Barrier as that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas Green Barrier policies should be reviewed as part of the development plan review process.

PPW explains that the main aim of Green Belts is to prevent urban sprawl by keeping land permanently open; and that the essential characteristics of Green Belts are their openness and their permanence. It goes on to explain that the purpose of Green Belts is to:

- prevent the coalescence of large towns and cities with other settlements;
- manage urban form through controlled expansion of urban areas;
- assist in safeguarding the countryside from encroachment;
- protect the setting of an urban area; and
- assist in urban regeneration by encouraging the recycling of derelict and other urban land.

PPW explains that Green Wedges/ Barriers are local designations which essentially have the same purpose as Green Belts. It also explains that Green Belt and Green Wedge/Barrier boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term.

Whilst it is clearly appropriate for Green Barrier designations to be reviewed as part of the Local Development Plan review process, it is asserted that the Green Barrier in this location continues to perform an important function in safeguarding the countryside from encroachment, preventing the coalescence of settlements (in this case the settlements of Northop Hall and Higher Shotton) and maintaining openness. The land in question performs entirely the same function as it did when it was considered appropriate for Green Barrier designation when the UDP was prepared and adopted.

Furthermore, policy STR2 of the emerging LDP directs that Tier 1 Main Service Centres (defined as settlements with a strategic role in delivery of services and facilities) should be the main locations for new housing development. Ewloe is defined by the emerging LDP as a Tier 2 Local Service Centre (defined as a settlement with a local role in the delivery of services and facilities) and as such, is deemed suitable for 'more modest' levels of new housing development.

Paragraph 5.13 of the emerging LDP explains that the Plan does not seek to apportion development spatially by the use of numerical or mechanistic methods relating to growth bands, rates, targets or quotas. Rather, the Plan seeks to distribute development in a sustainable manner having regard to the settlement hierarchy and by identifying the most sustainable settlements and sites. It goes on to say that the Plan intentionally avoids creating a perception that every settlement in every tier must contribute towards growth through having a housing allocation. Instead, the Plan looks at each settlement on its merits to determine whether it is able to sustainably accommodate an allocation. It explains that the Main Service Centres will be the main locations for growth whereas Local Service Centres will accommodate more modest levels of growth.

It is asserted that the proposed housing allocation at Holywell Road/Green Lane, Ewloe Green (Ref. HN1-7) conflicts with this logical approach to housing strategy. Ewloe Green has a distinct character and is separated from the main part of the settlement of Ewloe by the A55/A494 intersections. The introduction of an additional 298 dwellings would almost double this section of the settlement and it would amount to a disproportionate increase in its size.

This argument is supported by the fact that at up to 298 dwellings, the proposed allocation is larger than the largest of the Tier 1 allocations (246 dwellings on land between Gwernaffield Road and Denbigh Road - Ref. HN1-6). This in itself conflicts with the LDP housing strategy which quite logically directs that Tier 1 settlements should be the main locations for new housing development, whilst Tier 2 settlements should accommodate more modest levels of growth. The introduction of almost 300 dwellings (which is larger

than any proposed allocation for a Tier 1 settlement) cannot reasonably be described as modest.

In addition, the site does not enjoy a sustainable location. The majority of local services that one would expect to use on a daily basis are not within reasonable walking distance, whilst public transport services are limited. To this end, the proposed allocation is also in direct conflict with PPW which states that minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport are important considerations when selecting sites for new residential development (paragraph 3.38).

In summary, the proposed allocation of this site does not accord with at least two of the tests of soundness in so far as it does not 'fit' with the national planning guidance outlined and it is not of an appropriate scale in light of the settlement hierarchy of the emerging Local Development Plan itself.

In addition, the land sits adjacent to New Inn Brook, which is a wildlife site that continues on from the Deeside and Buckley Newts SAC. On this basis, it is not unreasonable to suggest that a range of ecological issues could frustrate the development of the site or at least reduce the number of dwellings that could realistically be delivered.

Accordingly, it is strongly asserted that the land at Holywell Road/Green Lane, Ewloe Green is not appropriate for a large scale residential development and the proposed designation does not meet the tests of soundness.

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