

M16.01

**Flintshire Local Development Plan 2015 – 2030  
EXAMINATION IN PUBLIC**

**Hearing Session Matter 16**

**Tuesday 18<sup>th</sup> May 2021**

**Green Barriers**

**EN11 Green Barriers**

**Hearing Statement by Flintshire County Council**

# Flintshire Local Development Plan (2015 - 2030) Examination in Public

## Flintshire County Council Statement: Matter 16: Green Barriers

This statement has been prepared by Flintshire County Council (FCC) in response to the Inspectors' hearing questions:

### Key Issue:

**Do the policies and proposals on this matter achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy? Are they based on robust and credible evidence?**

**Are the policies and requirements clear, reasonable and sufficient?**

### Response:

1. The Plan provides strategic guidance in respect of green barriers in policy STR13 Natural and Built, Green networks and Infrastructure. Criteria ii states 'Protect the open character and appearance of green barriers'. The 'Policy Context' section following the explanatory text signposts the more detailed guidance in policy EN11 Green Barriers.
2. The designation and protection of green barriers is considered to meet a number of LDP objectives in particular objectives 15, 17 and 19. It is also in line with the guidance in PPW which permits the establishment of local designations such as green wedges. The green barriers in the LDP have been based on a thorough and consistent review utilizing a methodology based on the guidance in PPW10 in terms of the purposes of green wedges, and this is unchanged in PPW11. The green barrier boundaries in the Plan are considered to facilitate the identified provision of housing land in order to meet the Plan's housing requirement figure. The green barriers do not unduly restrict development from taking place.
3. It is recognised that the draft NDF included a reference to a green belt for North East Wales. This has now been confirmed in the Future Wales – The National Plan. Policy 22 'Green Belts in the North' states '*The Welsh Government requires the Strategic Development Plan to identify a green belt around Wrexham and Deeside to manage urban form and growth. The Strategic Development Plan must consider the relationship of the green belts with the green belt in Cheshire West and Chester. Local Development Plans and development management decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan*'. A green belt for North East Wales, in particular the Wrexham – Deeside area is a matter that needs to be considered and taken forward at a more strategic level through the preparation of a Strategic Development Plan. It is not appropriate to be incorporated into the LDP at this time.

**Question a) Should the green barriers be renamed green wedges?**

**Council's Response:**

- a.1 In its response to the representation (id 1163) by Welsh Government, the Council noted that PPW11 states in para 3.64 '*This can be achieved through the identification of Green Belts and/or local designations, such as green wedges*'. The words 'such as' would suggest that Welsh Government are not taking a prescriptive approach to using solely the terms 'belt' or 'wedge'. The use of green 'barriers' is well established in Flintshire and the Council asserts is a clearer and definitive term that clearly indicates the purpose of the designation, to act as a barrier to development.
- a.2 Given the above, the Council will leave it up to the Inspector to determine whether there is an issue of consistency with PPW or not.

**Question b) Is the methodology of the green barrier assessment robust and has it been applied consistently?**

**Council's Response:**

- b.1 The Council published alongside the Deposit LDP a Background Paper BP01 Green Barrier explaining the approach to reviewing existing green barriers and presenting the detailed assessment of each green barrier. The review not only looked at existing green barriers in the UDP but also candidate site submissions which proposed new green barriers or the extension of an existing green barrier. It is accepted that the Background Paper would have benefitted from maps showing existing and proposed boundaries and this was rectified in an updated version of the Background Paper as part of the submission documents [LDP-EBD-BP1](#).
- b.2 Section 4 of the Background Paper sets out the methodology used which is essentially the 5 purposes of a green barrier as set out in para 3.67 of PPW11. This was presented in table form which included a further explanation and interpretation of each of the purposes. The methodology also included two other considerations which was firstly 'significant development pressure' ie whether there was a history of planning applications or development plan submissions and secondly, the existence of other policy designations. The main purpose of the latter two considerations was to provide additional context and information relative to each green barrier.
- b.3 The methodology used is considered to be in line with the guidance in PPW11 and robust in terms of providing the basis for a transparent review of green barriers in a consistent manner against a standard set of criteria.

**Question c) What is the relationship between areas of open countryside and areas of green barrier?**

**Council's Response:**

- c.1 The Plan uses settlement boundaries as a planning tool as explained in policy PC1 The Relationship of Developments to Settlement Boundaries, which is also

consistent with the advice in the DPM3. In summary, land which lies outside a settlement boundary is defined and treated as 'open countryside' in terms of applying policies in the Plan. The Plan and its framework of policies which seek to control development outside settlement boundaries accords with Welsh Government guidance in para 3.60 of PPW11 '*However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled*'.

c.2 Notwithstanding the protection afforded to open countryside by the planning system, it is also recognised in para 3.64 of PPW11 that '*Around towns and cities there may be a need to protect open land from development*'. Para 3.64 then goes on to explain that '*Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust*'. It is in this context that the Plan has sought to identify areas of the County where this additional level of protection is considered necessary around and between certain settlements.

c.3 This is not a new designation in the Deposit LDP as green barriers were established in the Clwyd Structure Plan, Local Plans and the adopted UDP. In line with the guidance in para 3.64 of PPW11 '*...green wedge policies should be reviewed as part of the development plan review process*', the Council undertaken a review of green barriers as part of the preparation of each development plan. Therefore the preparation of the LDP has involved a review of the green barriers in the adopted UDP as well as suggested green barriers submitted as part of Candidate Site submissions. Green barriers have therefore evolved over time and their retention in the LDP, following review, is essential in terms of retaining the openness of key tracts of land in the County.