

# EiP Statement

## Flintshire Local Development Plan 2015 – 2030

### Taylor Wimpey UK Limited

### Representor ID: 1224983

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**Our ref** 60174/05/CM/NMi  
**Date** April 2021

**Subject** **Matter 16: Green Barriers**

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#### **1.0 Introduction**

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [TW] to make representations on its behalf to the Flintshire Local Development Plan 2015 – 2030 [FLDP].
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 16 Examination in Public [EiP] hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 4: Location of Development
  - 2 Matter 3: Strategic Growth (inc Strategic Sites)
  - 3 Matter 7: Provision of Sustainable Housing Sites (including housing requirement)
  - 4 Matter 12: New Housing Development Proposals (incl Density and Mix)
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the FLDP [Representor ID: 1224983].
- 1.5 These representations are made in relation to Taylor Wimpey's land interests in Mynydd Isa, namely the development of the Ffordd Fer site [the Site]. The Site has been promoted for residential development through the emerging FLDP but has not been identified as an allocation. The Ffordd Fer site is free from planning, physical and ownership constraints, it is economically viable, and would support the creation of sustainable communities, and it is therefore considered to be 'deliverable'.
- 1.6 This statement expands upon TW's previous representations made throughout the FLDP preparation process in light of the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness in the Welsh Government's Development Plans Manual [DPM], Edition 3 (March 2020) and the relevant national planning guidance.

## **2.0 Planning Issues**

### **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?**

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

- 2.1 TW notes that Planning Policy Wales [PPW] refers to green wedges as mechanisms for managing settlement form and does not refer to green barriers. In order to ensure alignment with PPW and provide clarity on their status, TW suggests that it would be beneficial for the green barriers to be renamed green wedges.

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

- 2.2 TW considers that the Green Barrier Review fails to robustly assess the boundaries of Green Barrier area EN11.10 against the five purposes as outlined in PPW and considers that Policy EN11 is not sound. In particular, TW considers that part of the Green Barrier between Mold and Mynydd Isa does not meet any the five PPW purposes and should therefore be removed as a Green Barrier designation. We provide further detail on this matter below.

### **The Green Barrier Purposes**

- 2.3 In the Green Barrier Review, the Council assessed the Mold-Mynydd Isa/Sychdyn/New Brighton Green Barrier (EN11.10), which incorporates TW's Ffordd Fer site within a much larger parcel. The Green Barrier Review considers that this portion of Green Barrier contributes to four of the five PPW Green Barrier purposes. These are:

- 1 Prevent the coalescence of large towns and cities with other settlements;
- 2 Manage urban form through controlled expansion of urban areas;
- 3 Assist in safeguarding the countryside from encroachment; and,
- 4 Protect the setting of an urban area.

- 2.4 The Council's Green Barrier Review accepts that the site does not contribute to the function of the fifth Green Barrier purpose: assisting in urban regeneration by encouraging the recycling of derelict and other urban land. The release of the land at Ffordd Fer from the Green Barrier would not prevent the recycling of derelict land and other urban land as there is insufficient land in Flintshire to meet the requirement over the plan period.

- 2.5 In contrast to the Council's assessment, TW does not consider that its site at Ffordd Fer contributes to any of the purposes of the Green Barrier. TW considers that the Council should have reviewed the site in isolation in the September 2020 version of the Green Barrier Review<sup>1</sup> so that its contribution could be properly assessed in a transparent manner. Our

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<sup>1</sup> LDP-EBD-BP1 Flintshire Deposit Local Development Plan Background Paper 1 Green Barrier Review (with maps) Sept 2020

representations to the deposit FLDP summarised TW's assessment of the Site against the five purposes and this matter is considered in further detail below.

### **To prevent the coalescence of large towns and cities with other settlements**

- 2.6 The removal of the land from the Green Barrier at Ffordd Fer will not result in the coalescence of large towns and cities with other settlements. The Mold Bypass, agricultural fields and tree belts to the west of the Site are considered to represent clear defensible boundaries.
- 2.7 If the Ffordd Fer site is removed from the EN11.10 section of the Green Barrier, it will still function in its predominant purpose of separating Mold with New Brighton, Soughton and Mynydd Isa. The newly defined Green Barrier between Mynydd Isa and Mold would still represent a larger gap than currently exists in other parts of part of EN11.10 to the north of Mold. The development of the Site as proposed will result in a strategic gap between Mold and Mynydd Isa of at least 370m at its closest point.
- 2.8 Preventing the coalescence of settlements was given careful consideration when designing the Site Masterplan. The Masterplan leaves a strategic gap on the northern portion of the land at Ffordd Fer to retain an open aspect and prevent any coalescence with New Brighton to the north.

### **To manage urban form through controlled expansion of urban areas**

- 2.9 The land at Ffordd Fer is well contained by strong defensible boundaries. The land is bounded:
- To the north by the Mold Bypass;
  - To the east by residential properties which form part of the Mynydd Isa settlement;
  - To the south by a thick woodland tree belt; and,
  - To the west by the Mold Bypass.
- 2.10 The Site therefore provides clear identifiable physical features that can be used to establish defensible boundaries. These boundaries provide clear barriers which disconnect the site from the wider GEN4(11) Green Barrier allocation. The removal of the Site from the Green Barrier would not result in ribbon development given the containment that these clear defensible boundaries provide. As a result, the Site makes little contribution to the objectives of the Green Barrier.
- 2.11 The land at Ffordd Fer represents a suitable residential extension to Mynydd Isa. The land is visually contained by the mature woodland tree belt and Mold Bypass. The removal of the Site will not result in the unmanaged expansion of the built-up area of Mynydd Isa. Instead, it represents a site which forms a logical extension to the urban area, consolidating the established pattern of development with strong, permanent boundaries.

### **To assist in safeguarding the countryside from encroachment**

- 2.12 Taylor Wimpey acknowledge that the proposed development will result in the loss of countryside however this is the case with all Green Barrier land and is therefore not relevant when assessing the proposed development of the Site against Green Barrier purposes. The presence of strong physical boundaries is one of the important factors in safeguarding the countryside from encroachment. The Site is well contained by the road and built environment to the east which provide substantial physical barrier to the countryside.

- 2.13 The release of land at Ffordd Fer, Mynydd Isa would result in the natural extension of the existing built up area of Mynydd Isa. The Site does not form part of the open countryside and is well contained because of the shield that the Mold Bypass provides from the wider open countryside.
- 2.14 The Site is better described as being urban fringe in character because of the prominence of the existing residential development in Mynydd Isa on the east side of Mold Bypass. The existing residential development in Mynydd Isa also means that the Site will not have any significant impact of the prominent countryside views.
- 2.15 It is accepted that the Site would result in the loss of a small amount of open countryside. However, it is considered that the Site does not represent land of particular landscape importance and does not contribute to the open nature of the wider countryside.

### **To protect the setting of an urban area**

- 2.16 The topography of the Site falls off to the south-west which means that views from Mynydd Isa out to the wider countryside will not be impacted. It is acknowledged that the removal of the land at Ffordd Fer from the Green Barrier will have a limited impact upon the setting of Argoed Hall which is a Grade II listed building. However, any such impact would be mitigated through the careful design and layout of the proposed development and additional landscaping.
- 2.17 In respect of the Site as a whole, it is considered that the proposed development would contribute to the character of the surrounding settlements. The Site is not included in or adjacent to any Conservation Areas, Registered Battlefields or Registered Parks and Gardens.

### **Conclusions**

- 2.18 For the above reasons, the land at Ffordd Fer, does not explicitly contribute towards the PPW defined policy purposes of a Green Barrier. Taylor Wimpey considers that the Site is a sustainable urban extension to Mynydd Isa and should therefore be removed from the Green Barrier and allocated for residential development to meet the acute local housing need.
- 2.19 The Site would represent a sustainable location for new development on the edge of the existing settlement, and its allocation would align with national planning guidance, in the absence of suitable previously developed land (which is acknowledged in the §7.13 of the FLDP). The Site is supported by excellent local infrastructure and well located to access the existing services and public transport facilities in Mynydd Isa, as well as the wider area, including Buckley to which Mynydd Isa is physically connected.

### **Inconsistencies in the Green Barrier Review Methodology**

- 2.20 TW also considers that there are a number of inconsistencies with the Council's justifications and methodology for preserving or releasing certain segments of this Green Barrier to form Policy ENV11.10 in the FLDP. These concerns are set out below.

### **Mynydd Isa - New Brighton**

- 2.21 The Green Barrier Review recommends the removal of a portion of land to the east of New Brighton and this recommendation has been carried through onto the FLDP Proposals Map. In

the explanation for removing a portion of land east of New Brighton from the Green Barrier, the Review states<sup>2</sup>:

*“The line of the A494(T) forms a firm and defensible boundary to the eastern edge of New Brighton. The deletion of this part of the Green Barrier will provide scope for residential development without harming the maintenance of a gap between the settlement and Mynydd Isa.”*

- 2.22 TW agrees that the A494(T) [Mold Bypass] forms a firm and defensible boundary. However, TW considers that the Green Barrier Review takes an inconsistent approach to the function that this firm and defensible boundary serves. It goes on to state<sup>3</sup>:

*“The land to the east and west of Bryn y Baal Road forms part of a swathe of land which contributes to the objective of keeping separate the settlements of New Brighton, Mynydd Isa and Mold. This part of the green barrier should be retained”.*

- 2.23 TW’s Ffordd Fer site sits to the west of Bryn y Baal Road. This land is also protected by the A494(T), which forms a firm and defensive boundary between the site and the wider Green Barrier. A Green Barrier would still be retained on the northern side of the Mold Bypass, between Mynydd Isa and New Brighton, if this land was removed from the Green Barrier, and the Bypass would provide a firm and defensible boundary.

### **Mold – Mynydd Isa**

- 2.24 Under this element of the Green Barrier, the Council<sup>4</sup> set out that the roundabout junction between the A494(T), the A549, and the A541 *“sit within a rural context where open countryside extends right up to the roundabout”*. TW considers that this statement is contradicted by the development which has recently taken place adjacent to the roundabout, including the extension of the petrol filling station and the conversion of the Pen y Bont farmhouse into a pub/restaurant, both of which are referenced in the Green Barrier Review. Nevertheless, TW’s Ffordd Fer site is clearly bound to the south by a thick mature tree belt which provides a clear physical visual barrier. Therefore, the site has no impact upon the openness of the narrowest portion of the Mold – Mynydd Ida Green Barrier which comprises the roundabout junction.
- 2.25 For the above reasons, TW considers that the findings of the Green Barrier Review are flawed. It is not robust and has not been applied consistently. TW’s site at Ffordd Fer should also be removed from the Green Barrier and allocated for residential development and this approach would be consistent with the approach taken to the release of the Green Barrier to the east of New Brighton.
- 2.26 The Site provides clearly identifiable physical features that can be used to establish defensible boundaries. It is well contained by the existing built environment to the east, by the Mold Bypass to the north and west, which provide a substantial physical barrier to the countryside, and to the south by a thick mature tree belt which provides a clear physical visual barrier. These boundaries disconnect the Site from the wider Green Barrier allocation.
- 2.27 The Site therefore forms a logical extension to the urban area, consolidating the established pattern of development with strong, permanent boundaries. The Site does not meet any of the

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<sup>2</sup> LDP-EBD-BP1 Green Barrier Review September 2020, page 20

<sup>3</sup> LDP-EBD-BP1 Green Barrier Review September 2020, page 20

<sup>4</sup> LDP-EBD-BP1 Green Barrier Review September 2020, page 19

five PPW purposes and should therefore be removed as a Green Barrier designation and allocated for residential development.

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

2.28 TW has no comment to make on this matter.