



# Hearing Statement – Flintshire Local Development Plan (LDP) 2015-2030 examination

In relation to: Matter 16 – Green Barrier

for Mrs Stott and Mrs Haworth (Rep ID: 1233028)

Emery Planning project number: 14-065

Project : 14-065  
Hearing : Matter 16 – Green Barrier  
Client : Mrs Stott and Mrs  
Haworth (Rep ID:  
1233028)

Date : 29 April 2021  
Author : John Coxon

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited  
trading as Emery Planning.

# Contents:

1. Introduction	1
2. Response to Matter 16	1
3. Conclusions	5

## 1. Introduction

- 1.1 This hearing statement is prepared by Emery Planning on behalf of Mrs Stott and Mrs Haworth (Rep ID: 1233028) in relation to Matter 16 – Green Barrier. Our responses to the issues and questions on this matter are set out below.

## 2. Response to Matter 16

**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?**

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

- 2.1 Whether the designation is named as a Green Barrier or a green wedge is not important, as the policy outcome is the same. However, we do consider that the proposed designation has been applied far too widely and fails to accord with the guidance set out in PPW11 on green wedges. This is discussed further below in the context of our client's specific interest (the proposed Flint Mountain – Northop Green Barrier).

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

- 2.2 Our client's specific objection relates to the proposed Green Barrier known as area no. 6: Flint Mountain – Northop.
- 2.3 The relevant tests for the designation of green wedges are set out in PPW11. Paragraph 3.64 of states:

*"Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. **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.** The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas **green wedge policies should be reviewed as part of the development plan review process.**" (our emphasis)*

2.4 Paragraph 3.68 provides:

*“Green wedges are local designations which essentially have the same purpose as Green Belts. They may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. Green wedges should be proposed and be subject to review as part of the LDP process.”*

2.5 Paragraph 3.70 provides:

**“Green Belt and green wedge 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.”**

2.6 Paragraph 3.71 provides:

*“When including Green Belt and green wedge policies in their plans, planning authorities **must demonstrate why normal planning and development management policies would not provide the necessary protection.**” (our emphasis)*

2.7 National policy is therefore clear that the Green Barrier must be reviewed through this LDP process, and the tests set out above must be met.

2.8 The Council's justification for the proposed Green Barrier is provided in Background Paper 1: Green Barrier Review (LDP-EBD-BP1). The Flint Mountain-Northop Green Barrier is assessed under reference GEN4 (6). The assessment provided from page 11 onwards in our view falls significantly short of the justification required under PPW11 for the continued designation as a Green Barrier. We hereby provide our response to the evidence provided on area GEN4 (6) in LDP-EBD-BP1:

- The Green Barrier is not needed to prevent the coalescence of large towns and cities with other settlements. The Council states in Background Paper 1 that *“the number, pattern and type of settlements in the County results in some green barriers being necessary between ‘other’ settlements”*. The Council may consider that to be the case, but in this regard the approach is quite clearly inconsistent with national planning policy.
- It is stated that the designation seeks to prevent the coalescence of Northop with Coleg Cambria and the “built up area” of Maes Celyn. We cannot see how this is a legitimate policy aim. Coleg Cambria and the redeveloped pig farm at Maes Celyn (not a ‘built up area’ as described by the Council) are not separate settlements with individual identities. There is no evidence or policy justification for a restrictive designation

preventing their coalescence with Northop. Development between Northop and Maes Celyn would represent a logical rounding off of the settlement with no impact upon its identity, rather than a merging of settlements as described by the Council.

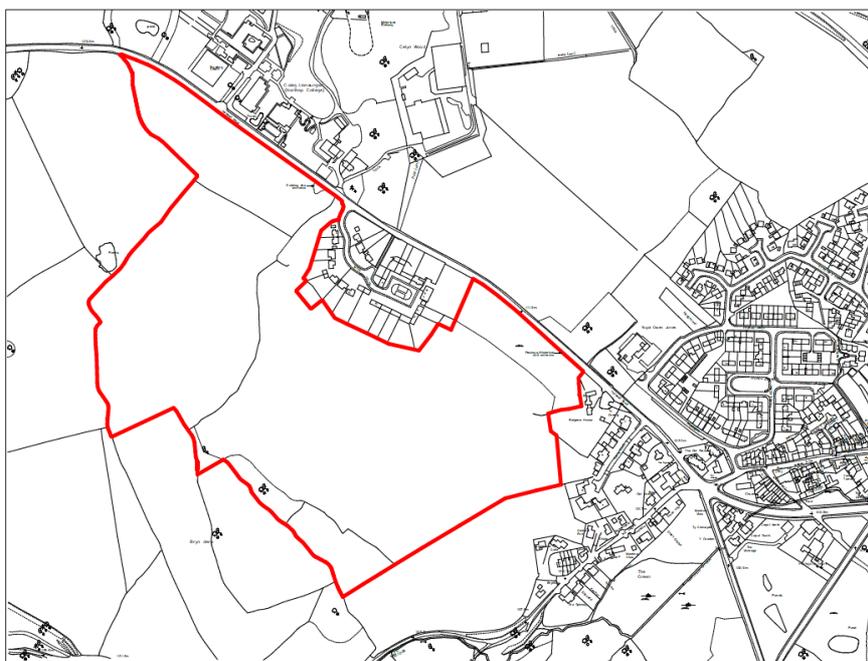
- It is also stated that preventing the coalescence of Northop with Coleg Cambria and the built up area of Maes Celyn is justified as there is continued pressure for development, illustrated by the candidate sites which have been put forward on land adjoining Northop and Maes Celyn. However, the presence of candidate sites cannot be used as justification for a Green Barrier. The tests in national policy are that the Green Barrier fulfils specific environmental criteria (i.e. used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area) and that normal planning and development management policies would not provide the necessary protection.
- Preventing urban encroachment into the wider rural area can be controlled via other development management policies, namely open countryside policy.
- Reference is made to the proposed new road (red route) which will link to the A55 at Northop. It is claimed that it would be inappropriate for significant development pressure, on the back of the red route, when it would sit adjacent to a settlement defined as a sustainable village, but which is small in size and historic in nature. Notwithstanding our objection to the proposed distribution of development to Northop (i.e. virtually no land for development is provided), this does not provide legitimate justification for the proposed Green Barrier. The proposed red route will extend east from the A55. Furthermore, there are no allocations proposed in Northop and the Green Barrier is tightly drawn, therefore restricting even the small-scale development suggested in LDP-EBD-BP1. Again, no justification is provided as to why the operation of open countryside policy would not suffice.
- LDP-EBD-BP1 also claims that the countryside setting for the historic village of Northop is important as it protects the setting of the conservation area and various listed buildings. However, the Conservation Area is centrally located within the village. Development to the west of the village would have no impact upon the setting of the Conservation Area, and indeed no such concerns are raised in the assessments undertaken by the Council on the candidate sites proposed in this location (i.e. NOR037 as assessed in LDP-EBD-

BP8). But in any event, there is no reason why heritage and conservation issues cannot be adequately controlled through the application of existing policy protecting heritage assets. Furthermore, no evidence is provided in relation to important views into and out of the area which should be protected. The test set out in PPW11 is not met.

2.9 The tests of PPW11 are not met. We therefore conclude that the proposed Flint Mountain-Northop Green Barrier is not soundly based and should be deleted.

#### Land to the south of Holywell Road / Coleg Cambria

2.10 Without prejudice to our view that the proposed Flint Mountain-Northop Green Barrier is not soundly based, we consider that our clients land to the south of Holywell Road / Coleg Cambria should be removed from it. This land is shown on the below plan.



**Figure 1:** Land adjacent to Maes Celyn, Holywell Road, Northop

2.11 The land does not lie directly between Northop and Flint Mountain. Having regard to the tests set out in PPW11, it does not:

- fulfil the purpose of Green Belts as set out at paragraph 3.67 of PPW11;
- prevent the coalescence of settlements;

- provide a buffer between the settlement edge and statutory designations; or,
- safeguard important views into and out of the area.

2.12 The tests of national policy are not met, and the proposed Green Barrier boundaries should be amended. It is not necessary to keep the land open in the longer term.

### 3. Conclusions

3.1 In relation to the proposed Flint Mountain-Northop Green Barrier, the plan fails the following soundness tests:

#### **Test 1: Does the plan fit?**

- The designation of the Green Barrier is inconsistent with national policy (PPW11). The relevant tests are not met.

#### **Test 2: Is the plan appropriate?**

- The Green Barrier is not supported by robust, proportionate and credible evidence.
- The rationale behind the Green Barrier cannot be demonstrated. The methodology that has been applied is not consistent with the criteria set out in PPW11.
- It has not been demonstrated why normal planning and development management policies would not provide the necessary protection.

3.2 We therefore conclude that the proposed Flint Mountain-Northop Green Barrier is not soundly based and should be deleted.

3.3 Without prejudice to our view that the proposed Flint Mountain-Northop Green Barrier is not soundly based as a whole, we consider that our clients land to the south of Holywell Road / Coleg Cambria should be removed from it.