

**WELSH GOVERNMENT**  
**Examination Hearing**  
**Statement**

**Flintshire County Council**  
**Local Development Plan**

**Matter 16**  
**Green Barriers**

**18 May 2021**

## **Matter 16 – Green Barriers**

### ***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?**

Planning Policy Wales (Edition 11) sections 3.64 – 3.78 (*excluding paras 3.66 and 3.72 which refer specifically to green belts only*) set out the national policy considerations in respect of green wedges.

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

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

Yes. The term green barrier is confusing and does not align with the terminology within PPW. Policy EN11 should be renamed ‘green wedges’ to ensure compliance with the designations status in national planning policy terms and ensure clarity to plan users.

The reasoned justification to policy EN11 (paras 12.40 – 12.42) is also unclear as the paragraphs refer to national policy on green belts and green wedges, conflating the two. Those not familiar with such planning designations may not realise that green barriers are in fact green wedges. It currently implies something different. There is currently no green belt designation in Flintshire. The Welsh Government considers that the policy and its reasoned justification could be made clearer on the purpose and explanation of the policy and its intent.

For information, Future Wales, National Development Framework (NDF) does identify a green belt in the Wrexham/Deeside area. However, this will be for a Strategic Development Plan (SDP) to identify. A green belt cannot be identified through a LDP, (PPW, paragraph 3.66).

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

This methodology is for the LPA to explain. We have two particular concerns that require clarification:

**1) HN8-1 Gypsy and Traveller Allocation at Magazine Lane for 8 permanent pitches is within Green Wedge EN11.11.** It is unclear how an allocation for residential development aligns with the purposes of a green wedge set out in PPW, in particular the criteria in paragraph 3.75. The WG design guide for Gypsy and Traveller Sites suggest that one pitch can accommodate around two caravans; one touring caravan and permanent amenity block which would result in permanent structures erected in the countryside. Unless the Council can fully justify its approach in relation to the overlap between HN8.1 and EN11.11 the Welsh Government considers that the green wedge boundary should be re-drawn to exclude allocation

HN8-1. This would be consistent with the Councils own approach which removed new allocation HN1.7 from the green wedge as part of the review process.

**2) Enterprise Zone designation (when spatially represented fully on the proposals map) overlaps with green wedge EN11.15.**

This matter was address at a previous session. No further comment from WG on this basis.

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

No additional comments.

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