



Representor Number 1149198

Flintshire Local Development Plan 2015-2030

Matter 16 (Green Barriers) Response on Behalf of Mrs EM Charlton Trust (April 2021)

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

Savills Response

Yes, the term "Green Barriers" is not defined in Planning Policy Wales 11 (PPW11). The term "Green Wedges" however, is defined in paragraph 3.68 as land which "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 Barriers should be renamed Green Wedges to maintain consistency between the LDP and the PPW11.

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

Savills Response

Savills consider that the methodology of the Green Barrier Assessment used to support Policy EN11 (Green Barriers) of the Flintshire Local Development Plan 2015 – 2030 is flawed as it does not take account of the significant impacts that the proposed developments featured in Policy PC10 (New Transport Schemes) will have on the Green Barrier. As a result, large areas of land, such as GEN4(4), have been retained as Green Barrier by the assessment despite being sustainably located on the edge of a settlement and being partially safeguarded for "New Transport Schemes".

In being supportive of Policy PC10, the Council have recognised that land needs be removed from the Green Barrier, yet no consideration is given in the Green Barrier Assessment to the impact that this will have on the "openness" of the land which surrounds it. An example of this is the safeguarding of the A494(T)/A55(T)/A548 Northop to Shotwick Interchange Improvement proposed 'Red Route' which cuts through the north western edge of the Mrs EM Charlton (Kelsterton Farm) site (Appendix 1).

In January 2021 Savills commissioned "Land Studio" to conduct a Landscape and Green Barrier Assessment (attached) of the Kelsterton Farm site to support this statement. The document makes reference to the proposed "Red Route" and its impact on the surrounding landscape and states the following in relation to the northern section of the site (Appendix 2):

"The proposed A55 Link Road will increase the urbanised nature of this area of the development site considerably and will have a significant detrimental impact on the Northop Mosaic landscape character area as it currently stands." Additionally, the report considers that "with the arrival of the A55 Link Road, the existing character of the site will become more urbanised and any associated roadside development will not significantly impact the landscape character and context following its construction."

This is a point we highlighted in our response to the Deposit Plan consultation in November 2019, where we stated that the construction of a new road, which will provide 4 lanes of highway infrastructure through the Green Barrier, will have a considerable impact on its openness and ability to perform as function Green Barrier land. Additionally, the layout of the proposed "Red

Route” is such that it maintains a distinct barrier between the towns of Connah’s Quay and Flint, meaning that the new road will form a new defensible boundary between the two settlements.

Whilst paragraph 3.55 of the PPW11 states that “Previously developed land, wherever possible, be used in preference to greenfield sites where it is suitable for development”, one of the Key Issues and Drivers identified in the LDP recognises that brownfield land across the Borough is “generally located in and around the River Dee and Dee Estuary, in areas at risk of flooding and / or of international nature conservation importance”.

As a result of this, the Green Barrier Assessment should be highlighting sustainable areas of land that can compensate for the lack of brownfield opportunities in the region. A failure to do so therefore would be contrary paragraph 3.44 of PPW11 which states 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.*”

Savills have undertaken an assessment of alternative sites (see attached) which shows the Kelsterton Farm site to have the fewest constraints with regards to flood risk, impact on the landscape and proximity to the urban settlement along the proposed “Red Route”. We consider that such an exercise demonstrates that the Mrs EM Charlton site should be considered and safeguarded as part of the evidence base review for the Green Barrier Assessment. We consider that a failure to actively seek out or support new sites to support the provision of roadside services is contrary to the advice provided in paragraph 3.44 of the PPW11. To be truly plan-led, and positively prepared, the need for new roadside services should not be left to chance via the planning application process as suggested by Flintshire CC during the Matter 5 hearing.

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

No Response


Appendix 1: Proposed Area of Safeguarding for Roadside Services

Proposed Site Plan:

Key:

-  Roadside Development Area
-  Residential Development Area
-  Proposed Tree Planting
-  Site Boundary

Proposed Link Road

-  Farmhouse and traditional farm buildings (with benefit of planning permission to convert to 5 dwellings – Application Ref 053212)



Appendix 2: Kelsterton Junction Proposals

