

Flintshire Local Development Plan Examination in Public Scheduled Hearing 18 May 2021: Matter 16

Green Barrier at Flint, Policy EN11 (13)

Objection by Huw Evans Planning on behalf of Messrs K & C Bevan

1.0 Reasons for the Objection

- 1.1 This objection is made on the basis that the policy is unsound as it is prejudicial to the next logical phase of development in the Tier 1 Main Settlement of Flint.

2.0 Policy

- 2.1 The site is not currently included within the green barrier and has been allocated for development in previous development plans and was part of the former Delyn Enterprise Zone. Given the formal consultation and adoption process that were followed this would indicate that, in principle, development would be acceptable subject to detailed planning consideration and land use requirements.
- 2.2 The Deposit LDP states that green barrier designations are drawn to ensure protection of the openness of key areas of land in strategic or key locations over the Plan period. It refers to the review carried out in the Green Barrier Background Paper and their purposes as set out in PPW. The review also had regard to whether each “existing green barrier has been the subject of existing or current development pressure”. The objective was to ensure that in each case a green barrier designation is necessary and justifiable over and above settlement boundary and open countryside policies and fulfils the purpose of green barriers in PPW which seeks to manage settlement form through the identification of green belts and local designations such as green barriers. The major distinction between the two is that green belts have a degree of permanence in that they should be protected for a longer period than the current development plan life span. Green barriers however should be reviewed as part of the development plan process.
- 2.3 In terms of this site the review considered that green barrier designation would; i) prevent coalescence between Flint and Bagillt, ii) manage urban form through controlled expansion, iii) assist in safeguarding the countryside from encroachment. In terms of development pressure it refers only to Flint generally and the one candidate site FLI008. There were no – one UDP omission or Alternative Sites. The review deleted some areas of the existing green barrier but added the land subject to this objection as shown in Appendix 3 of the review.

3.0 Evidence

- 3.1 This objection site was originally submitted as a candidate site for a mix of uses, primarily residential but including a retirement village and some employment. The site is in the same ownership as the Northop Road site which is allocated in the Plan and which is also the subject of a Position Statement put before the Examination. At the time of submitting the candidate site the owners were quite reasonably considering their options at the early stage of preparation of the Plan. Being local people, they were also cognisant of the development expansion of Flint through Croes Atti. In essence they agreed with the council's position and took the decision that the Northop Road site would be sufficient to meet the further housing need for LDP. Consequently no development assessments were carried out on the objection site but sensibly it left a 'marker' for potential development in the next plan beyond 2030. This relieves any concern over development pressure during the life of this plan. Flint will nonetheless require development to meet housing need in the future and even at this stage there would not appear to be a more sustainable and locationally appropriate site. It has excellent public transport links in having the only railway station in Flintshire linked to main line national rail network with good bus routes to Deeside, Holywell, Mold and Chester. It has well established housing and employment areas and a good retail sector providing a range of goods. It has primary and secondary schools, medical services and a leisure centre. There is good access to the open countryside and River Dee with the national and regional cycle and footpath routes pass through the area. There are no major constraints to development as evidenced by the site's employment allocation in the former Delyn and draft North Flintshire local plans.
- 3.2 In addition to its stated green barrier role one of the reasons that the authority considered that the site was not suitable for development is that it was not well related to the existing established residential areas and the town centre. Given the council's stated position on the 300 housing unit allocation at Warren Hall this simply lacks any credibility.
- 3.3 The council also challenges the future viability of the site but has no evidence to support that view. It refers to work carried out for the preparation of the UDP by the WDA who found that the development costs would be unduly prohibitive. However, the site was only being considered at that time for employment purposes. The same organisation, albeit under a different name, acknowledges that both the strategic sites at Northern Gateway and Warren Hall are not viable without significant publicly funded infrastructure investment with the inclusion of a substantial housing element. The residential element of both these projects, particularly the Northern Gateway, demonstrate that these are housing led and not employment led as they were originally envisaged. The viability of site will be assessed prior to submission for the next plan. It is noted that the Highway Authority has no objection in principle and that the site has development potential subject to a transport assessment.
- 3.4 Notwithstanding the fact that green barriers should be reviewed through the development plan process, the site's inclusion within a new green barrier inclusion where the Plan will have less than 8 years lifespan by the time of adoption sends a clear message that it will have more permanence. Community perception of green barriers, including elected members, is that they will remain after the plan period. This will make the council's task of finding the required additional land to satisfy future housing need more difficult despite the site being highly sustainable. It is good planning practice, and indeed it is incumbent on

responsible authorities, to look beyond the plan period for potential areas where that need can be best met. It would be very short-sighted not to do so.

- 3.5 Whilst this issue relates to green barriers as opposed Green Belts, regard should be had in this instance to paragraph 3.68 of PPW. This states that, *“When considering Green Belt designations a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this”*. This has traditionally been referred to a ‘white land’.

4.0 Conclusion

- 4.1 The Plan should adopt the principle of ‘white land’ and delete the proposed extension to the green barrier.

Huw Evans Planning

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