

# **Hearing Statement Flintshire Local Development Plan 2015-2030 Examination in Public – Matter 16**

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**CBRE on behalf of Jalstock 2 Ltd & Altside  
Developments Ltd**

**Representor ID: 1231128**

31<sup>st</sup> March 2021

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## Introduction

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- 1.1 CBRE Ltd ('CBRE') has been instructed by Jalstock 2 Ltd & Altside Developments Ltd to prepare and submit a Hearing Statement to the Flintshire Local Development Plan (LDP) 2015-2030 Examination in Public.
- 1.2 This Hearing Statement relates to Watersmeet (the 'site'), a strategically significant site situated on the border of England and Wales. The majority of the site is under the control of Jalstock 2 Ltd & Altside Developments Ltd, with some land at the north and east of the site in the ownership of Cheshire West and Chester (CWaC).
- 1.3 The site extends to approximately 168 hectares, with the majority (circa. 136 ha) within the administrative boundary of Flintshire Country Council (FCC) and the remainder (circa 32 ha) within the administrative area of CWaC.
- 1.4 This Hearing Statement clarifies Jalstock 2 Ltd & Altside Developments Ltd's position in relation to the Inspector's focussed Matters, Issues and Questions ("MIQs"), and identifies specific issues with the LDP which should be addressed before the plan is adopted.
- 1.5 It should be read alongside the representation and Watersmeet Development Statement submitted to the Flintshire Deposit LDP consultation (Representation ID ref. 383 and 755) which set out the opportunity which Watersmeet presents as a residential-led mixed used settlement with the potential to improve cross border connectivity by supporting the Chester Broughton Growth Corridor ('CBGC').
- 1.6 As set out in the Examination Guidance Notes, a separate statement for each hearing session topic has been formulated. This Hearing Statement responds to **Matter 16: Green Barriers**.

## Matter 16: Green Barriers

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

- 1.7 The FCC Background Paper: Green Barrier Review assessed the performance of each Green Barrier with the aim of ensuring that each Green Barrier designation is necessary and justifiable and fulfils the purpose of Green Barriers.
- 1.8 Each existing Green Barrier was assessed against the purposes of Green Barrier as defined in Planning Policy Wales (edition 10). FCC applied further considerations as set out at paragraph 4.4 of Background Paper 1 Green Barrier Review (with maps) (Sept 2020).
- 1.9 FCC were clear that it is not necessary for a tract of land to satisfy every single criterion and that a designation is not based on a ‘tally of ticks’.
- 1.10 The green barrier at Watersmeet is described as ‘Sealand – Cheshire Border (N River Dee) GEN4 (16)’ (GEN4(16)) and covers the area south of the England / Wales boundary and north of the River Dee, excluding development to the southwest of the Sealand Industrial Estate.
- 1.11 The Council state that Green Barrier GEN4(16) meets all the functions set out in the PPW. However, we consider that a distinction should be made between Watersmeet and the wider Green Barrier GEN4(16), for Watersmeet has characteristics which suggest it should be considered differently when assessed against the purposes of the Green Barrier.
- 1.12 Furthermore, FCC’s methodology for assessing the appropriateness of Green Barrier designations does not take into account the impact of any future development over the plan period on the performance of each Green Barrier and whether, following development, the Green Barrier designation would remain necessary and justifiable, as set out at Representation ID ref. 383 and 755.
- 1.13 To address the River Dee’s impediment of north-south movement between Flintshire and CWaC and the impact this is having on vehicular movements (further detail on cross-boundary issues are set out in our Hearing Statement 7), a new relief road linking Sealand Road and the A55 has long been seen as a potential solution.
- 1.14 CWaC and FCC are currently assessing the feasibility of delivering a relief road between Chester and Broughton to address accessibility, congestion, and air quality issues in Chester and surrounding areas on both sides of the England - Wales border.
- 1.15 We are of the view that FCC’s methodology of assessing the Green Barrier is not robust as it fails to take into account the transport strategies of neighbouring authorities and infrastructure development which if brought forward during the plan period could fundamentally change the character of Green Barrier GEN4(16) during the plan period.
- 1.16 Moreover, it is concerning that FCC may become overly reliant on its two strategic sites to deliver its additional employment growth and the number of homes the County needs, and reliant on sites which have been carried forward from the Unitary Development Plan which brings into question their deliverability.
- 1.17 For example, the Northern Gateway, Well Street, Buckley (LDP Policy HN1 Site 1), and Highmere Drive Connah’s Quay (LDP Policy HN1 Site 3) sites have long been earmarked for housing development which has not materialised. There is a risk that including these sites in the LDP as housing allocations may undermine Flintshire’s ability to meet its housing need should they remain undelivered.
- 1.18 As set out in our representations and Development Statement (Representation ID ref. 383 and 755), it is considered that the safeguarding and ultimately the future development of the

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Watersmeet site can ensure that the under-delivery on the County's identified strategic sites does not create a significant shortfall in delivery in Flintshire over the Plan Period.

- 1.19 The Watersmeet site is uniquely positioned to accommodate a new residential-led community. It is well connected to major employment hubs in Deeside and Chester and the wider region, bounded by urban influences which physically and visually provide important context to the character of the site, accessible by a range of public transport providing future residents with opportunities for sustainable travel, and a deliverable site of a scale where significant social benefits can be secured such as new and improved infrastructure.
- 1.20 For the reasons set out above, we consider that the Watersmeet should be safeguarded within the Plan for future residential-led development, and this should be reflected in its land use designation. This will ensure that in the event that identified sites do not come forward during the Plan Period, Watersmeet can support the long-term growth of the County, meeting a wide range of housing needs to offset any shortfall.
- 1.21 By acknowledging in the LDP and its Green Barrier Assessments the need to bring forward infrastructure to address boundary issues with CWaC, the land required for the future delivery of such infrastructure, and the potential for Watersmeet to act as a 'safety net' should an aspirational level of growth not be forthcoming, FCC would be in a position to robustly justify and defend its Green Barrier designations.