



on behalf of

Gower Homes, Castle Green Homes and Messrs Arrowsmith, Bartlett & Kitchen

Response to Green Barrier Evidence - Flintshire LDP 2015 - 2030

October 2021

1.0 GREEN BELT POLICY & MAPPING

1.1 The NDP Policy 22 states that:

“The Welsh Government requires the Strategic Development Plan to identify a green belt around Wrexham and Deeside to manage urban form and growth. The Strategic Development Plan must consider the relationship of the green belts with the green belt in Cheshire West and Chester. Local Development Plans and development management decisions should not permit major development in the areas shown for consideration for green belts, except in very exceptional circumstances, until the need for green belts and their boundaries has been established by an adopted Strategic Development Plan.”

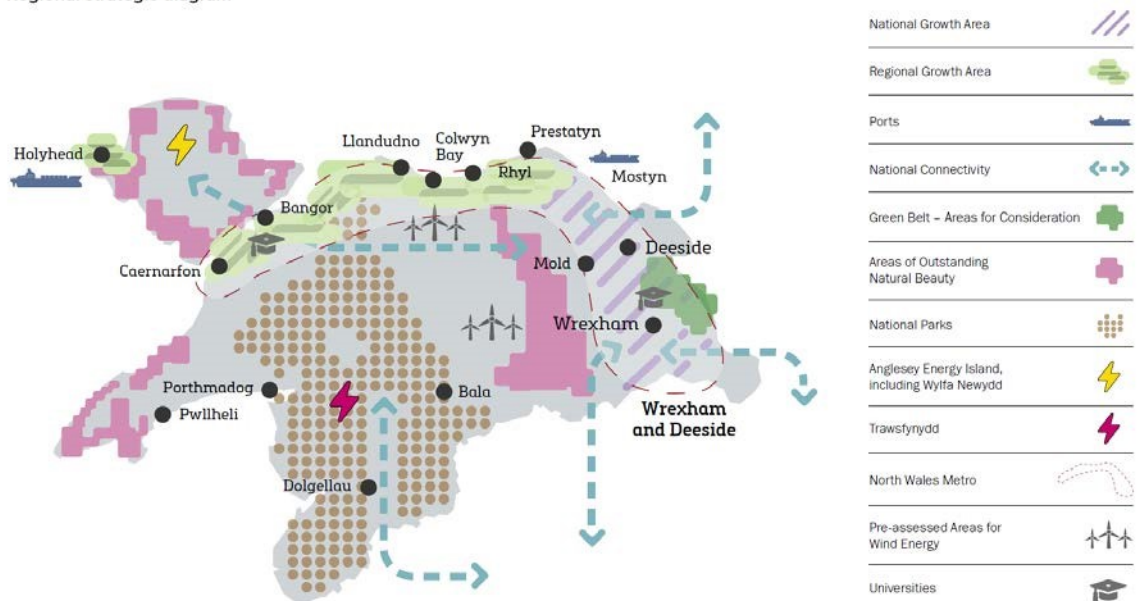
1.2 The emphasis in the policy is clear in that any new Green Belt should be located “around” Wrexham and Deeside and the indicative plan on page 111 of the NDP must therefore be interpreted as a tool to aid such a review.

1.3 Policy 22 in the NDF Future Wales document illustrates the area for consideration as shown below shaded green on its “Regional Strategic Diagram” on page 111 (replicated below).

1.4 One must assume that the boundaries shown by the “green shading” of this area solely reflects the “administrative” Welsh national boundaries of Flintshire and Wrexham and do not infringe into the neighbouring English authority area of Cheshire West and Chester; as can be seen from the plan extract of the map provided on page 116 of the NDF. For a start the NDF has no jurisdiction over the neighbouring English authority and moreover, the Green Belt boundary for CWaC is already known as the plan extract provided clearly illustrates.

1.5 The plan used in NDF (page 111) is “fat pen” in style, and this is exemplified by the AONB boundary marked upon the plan when one compares it to the more accurately plotted plan provided on page 119 of the NDF.

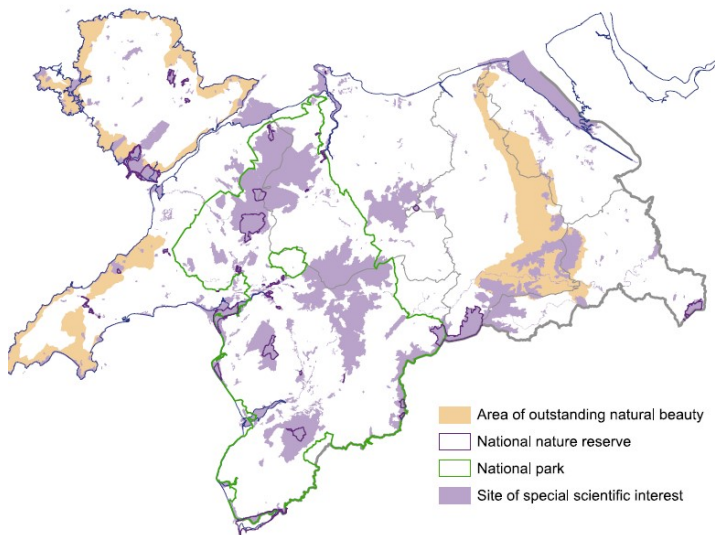
Regional strategic diagram



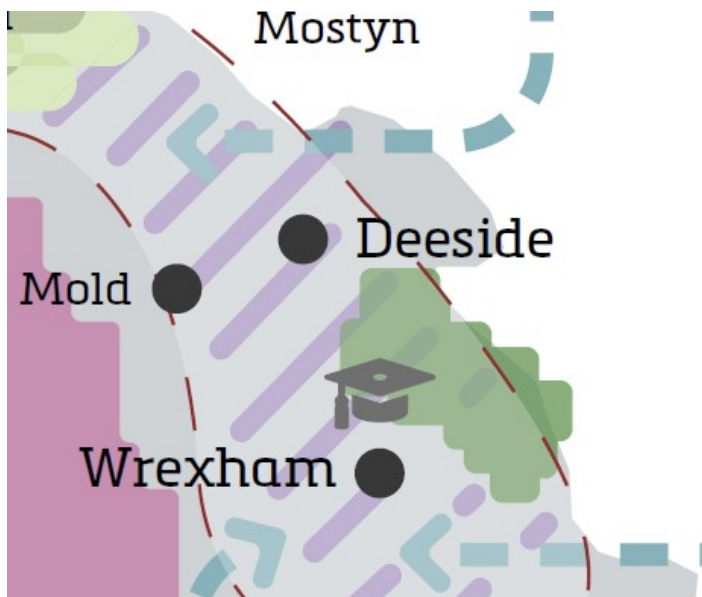
NDF page 111 plan



NDF page 116 plan

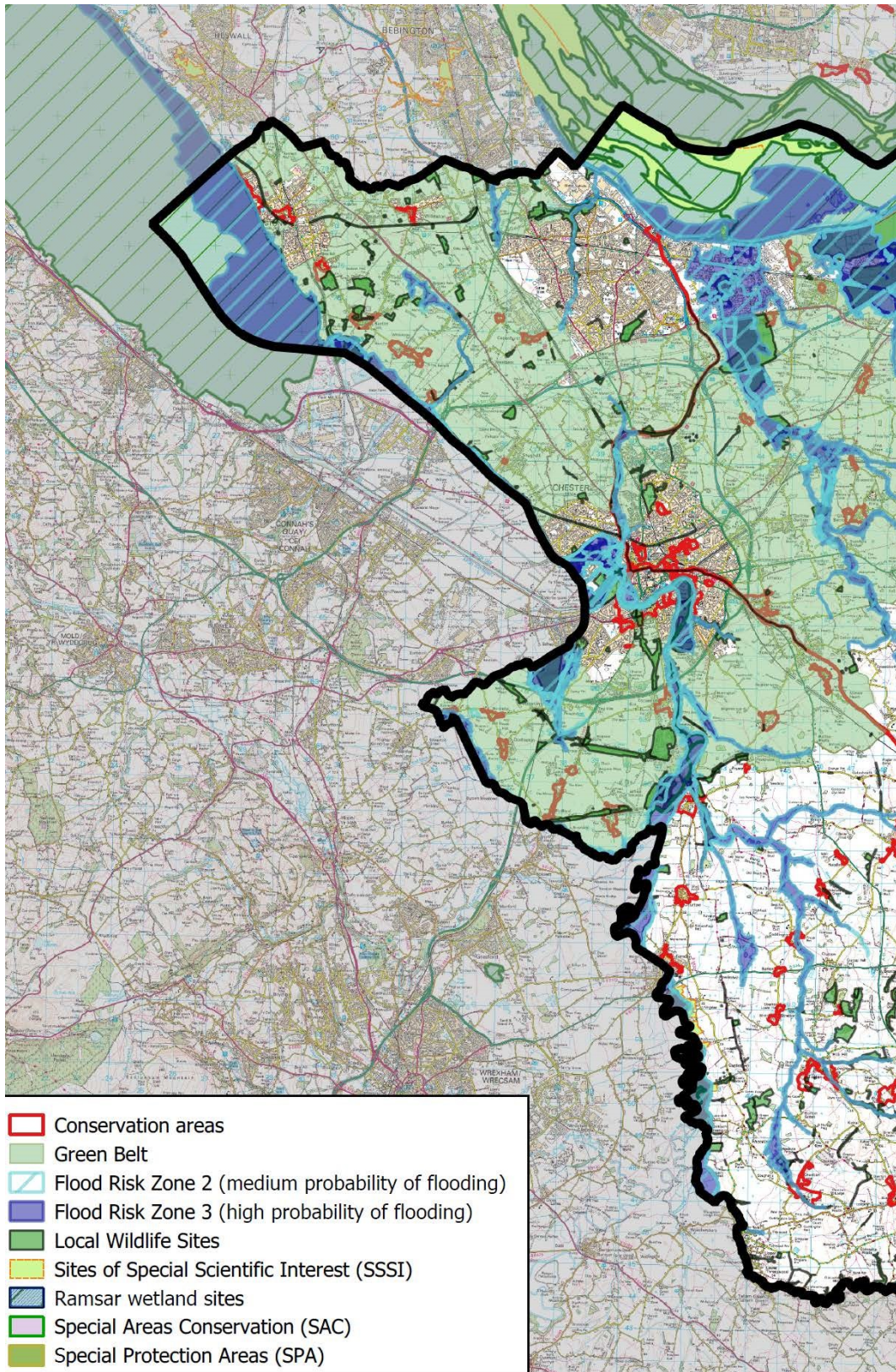


NDF page 119 plan



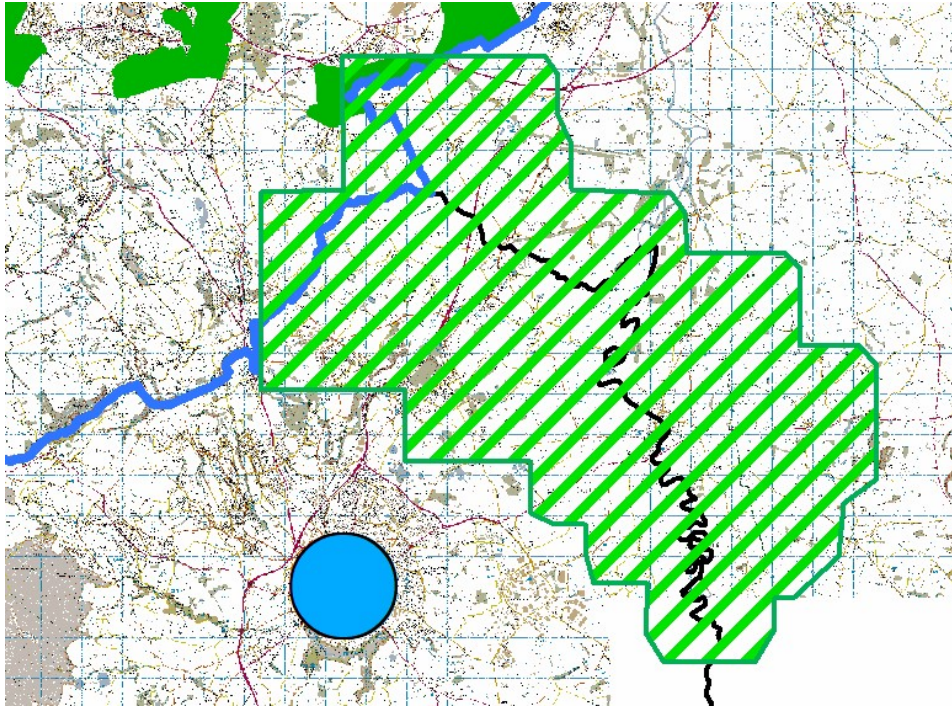
NDF page 111 plan (zoomed-in extract)

1.6 The following plan is an extract from the Cheshire West & Cheshire Council Local plan Proposals Map, which clearly illustrates the Green Belt that runs along the entire western boundary with Flintshire and down towards the boundary with Wrexham to Pulford.

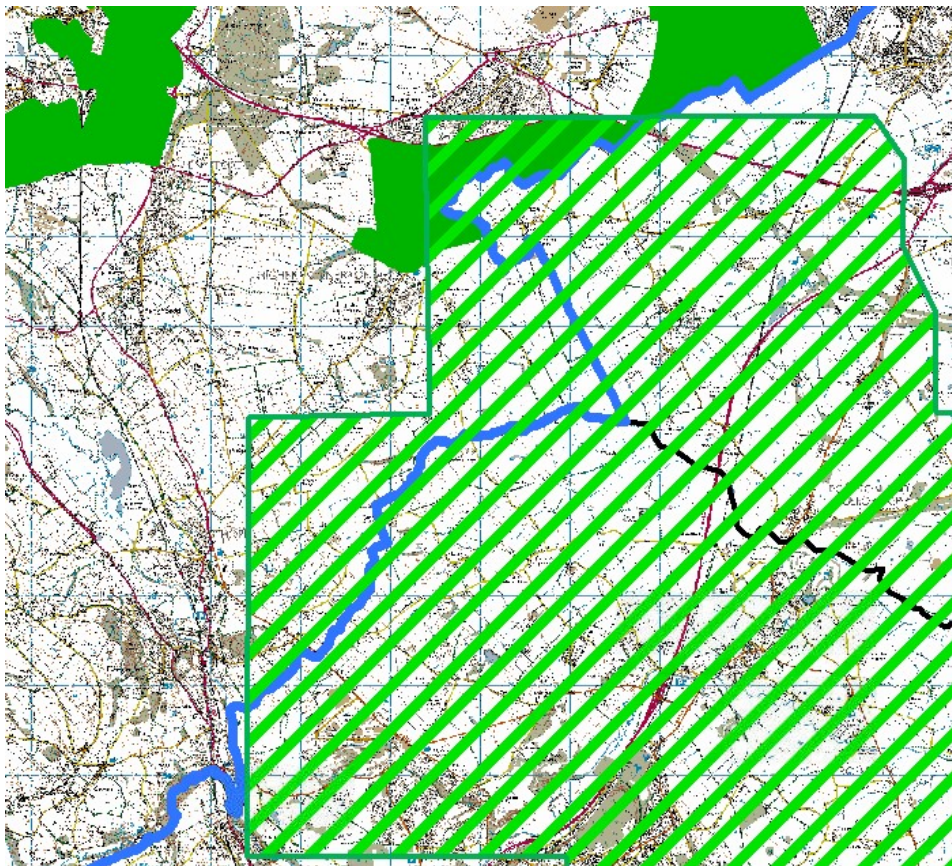


Extract of CWAC Local Plan Summary Map

1.7 FCC have attempted to reproduce the “shape” of the “potential Green Belt” as is illustrated by its plans in its **FCC022 Action Point AP3b.6** document (reproduced below).

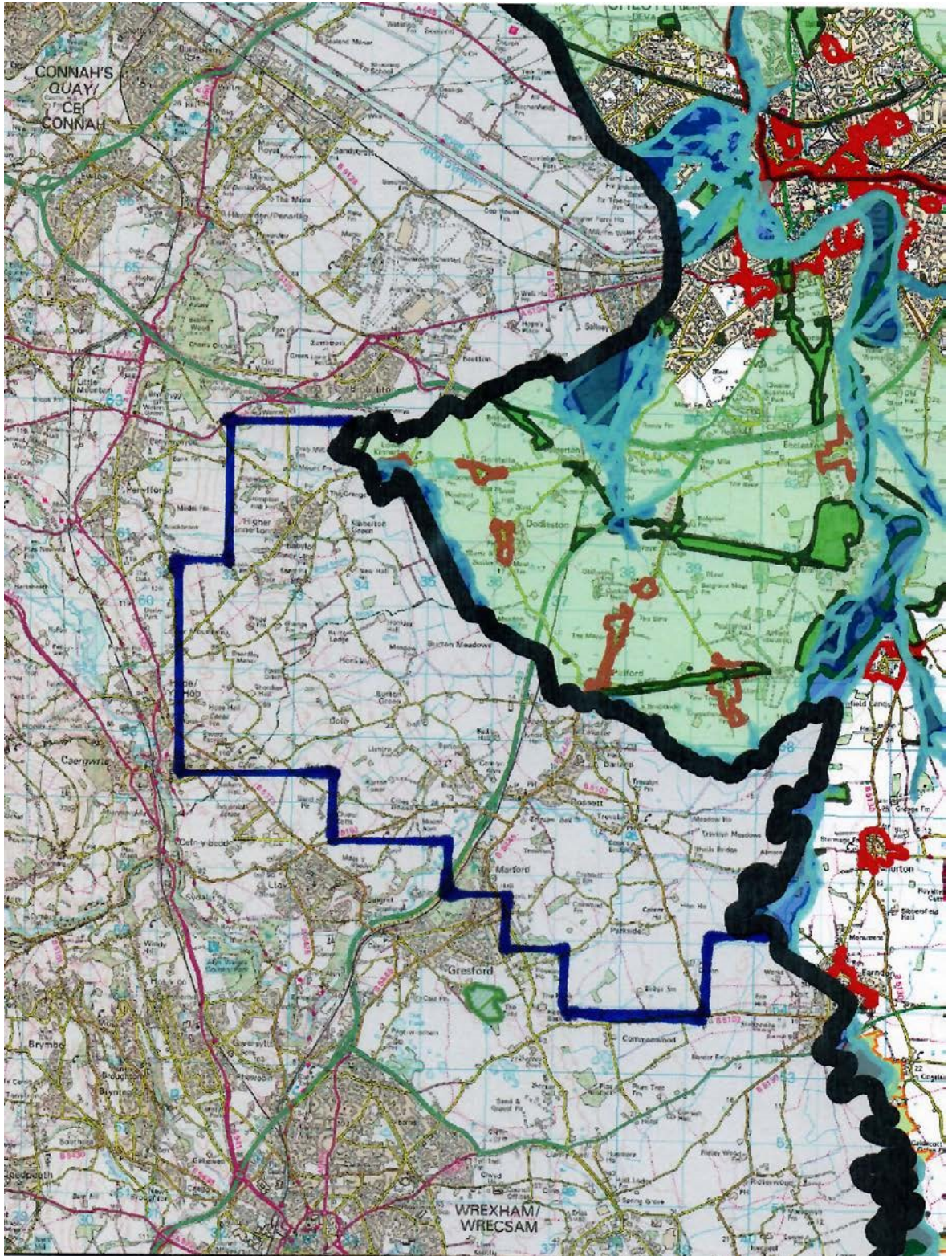


FCC Action Point AP3b.6 – map 1



FCC Action Point AP3b.6 – map 2

1.8 We have sought to correlate the NDP page 111 plan and transpose this onto the plan which shows the Cheshire West Green Belt and it is clear that not only have FCC incorrectly mapped the area of search but that the strategic site of Warren Hall (STR3B) should actually be included in the Green Belt area of search. This is considered to be a significant material consideration to the Examination, not just in relation to Matter 3 and Matter 16, but the entire plan.



J10 version of Policy 22 map