

# Hearing Statement Flintshire Local Development Plan 2015 -2030 Examination in Public <sup>2</sup>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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# 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 2022).
- 1.9 FCC were clear that it is not necessary for a tract of land to satisfy every single criterion and that a Green Barrier can be justified if it meets most of the criteria.
- 1.10 The Green Barrier GEN4(16) 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 The current 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 current Green Barrier GEN4(16) in 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 the current Green Barrier GEN4(16) 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 other sites have long been earmarked for housing development which has not materialised. There is a risk that including these sites in the Green Barrier GEN4(16) 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 CR X Q W \ · V L G H Q W L I L H G V 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 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 Q H would an aspirational level of growth not be forthcoming, FCC would be in a position to robustly justify and defend its Green Barrier designations.