



# Hearing Statement – Flintshire Local Development Plan (LDP) 2015-2030 examination

In relation to: Matter 16 – Green Barrier

for Mr Fell (Rep ID: 1232940)

Emery Planning project number: 9108

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Hearing : Matter 16 – Green Barrier  
Client : Mr Fell (Rep ID: 1232940)

Date : 29 April 2021  
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# Contents:

|                          |   |
|--------------------------|---|
| 1. Introduction          | 1 |
| 2. Response to Matter 16 | 1 |

## 1. Introduction

- 1.1 This hearing statement is prepared by Emery Planning on behalf of Mr Fell (Rep ID: 1232940) in relation to Matter 16 – Green Barrier. Emery Planning made representations on behalf of Mr Fell to the Deposit Plan consultation, and before that previous consultations on the Local Development Plan (LDP).
- 1.2 Our responses to the issues and questions on this matter are set out below.

## 2. Response to Matter 16

**Key Issue: Do the policies and proposals on this matter achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy? Are they based on robust and credible evidence?**

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

- 2.1 Mr Fell's representations address the settlement boundary for Buckley as identified on the proposals map, and specifically the property known as Newlands, Drury New Road, Drury. We consider that the property should be included within the settlement boundary for Drury. We have addressed this matter in detail under Matter 4.
- 2.2 The settlement boundary for Drury is also the boundary for the Green Barrier. The effect is to place a highly restrictive policy on previously developed land and domestic curtilages which are attached to, and form part of, the village of Drury. The Green Barrier boundary should therefore be amended in conjunction with our proposed modifications to the settlement boundary.
- 2.3 As we discussed under Matter 4, the Green Barrier Review has been erroneously used to justify the proposed settlement boundaries in this location. The Candidate Alternative Sites Topic Paper (LDP-EBD-BP8, site ref: DRU006) refers to the Green Barrier Review and claims that the Green Barrier “has been reviewed and found to be necessary in this location as it seeks to prevent the coalescence of the two settlements”. However, the Green Barrier review provides no specific mention of our client's site. The area assessed under GEN4 (17) of the Green Barrier Review merely provides a comment that “The land on either side of Drury New Road is prominent and has a feeling of openness, despite the proximity of the two settlements.” However, this cannot be

referring to Newlands and the adjacent properties to the north, as the land is quite obviously developed and is not open. Reliance upon the Green Barrier Review for assessing small-scale boundary changes is therefore misplaced.

2.4 As our client's site forms a logical part of the settlement as opposed to the wider countryside, both physically and as perceived on the ground, it does not fulfil any role in preventing the coalescence of two settlements, or indeed any other Green Barrier purpose.

2.5 We therefore consider that the Green Barrier boundary should be drawn to reflect our proposed amendments to the settlement boundary, as shown on the plan below. The red dashed line reflects our proposed settlement boundary. The Green Barrier would lie beyond that boundary. Drawing the boundaries in this way would properly reflect what is currently on the ground, noting the acceptance by Flintshire County Council at Matter 4 that the correct approach to the settlement boundaries is to clearly follow the existing pattern of development and physical features on the ground.



## Conclusions

2.6 In relation to the proposed settlement boundaries, and in particular the proposed settlement boundary for Drury, the plan fails the following soundness tests:

### **Test 2: Is the plan appropriate?**

- The settlement / Green Barrier boundaries are not supported by robust, proportionate and credible evidence.
- The rationale behind the settlement / Green Barrier boundaries cannot be demonstrated. No clear methodology is followed.
- The proposed settlement boundary for Drury (and resultant Green Barrier boundary) is not logical or reasonable having regard to actual circumstances on the ground.

2.7 A change to the proposed settlement and Green Barrier boundary is required at Drury. Newlands adjoins and forms part of Drury, and should therefore be included within the settlement boundary.