

## GREEN BARRIERS

1. I wish to challenge the methodology of using green barriers to prevent coalescence around Flintshire towns and settlements. PPW11 states that green barriers can be used to prevent the coalescence of large towns and cities from other settlements. I would contend Mold is not a large town, as its population is around 10,200. I do not regard this as a large enough population to be classified as a large town. Wrexham (pop 42,500), Colwyn Bay (pop 34,200), and Rhyl (pop 25,100) could possibly be considered as large towns. The definition of a large town in Wikipedia is one having a population of between 20,000 and 100,000. Therefore, the positioning of green barriers to prevent coalescence around Mold appears to be outside the PPW11 definition and should not be used. This appears to be the prime purpose given for the green barriers to the south and east of Mold ref EN11.9 and EN11.10.
2. The plan makes extensive use of green belts around Mold to prevent the coalescence of Mold with adjoining villages of Gwernymyndd and Mynydd Isa. In view of the above these should be reviewed. I believe that there could still be a clear barrier between Mold and adjacent villages of Mynydd Isa and Gwernymyndd with some amendment to the proposed area. The Mold bypass (A494) would appear to provide a clear barrier and demarcation to the edge of Mold between its junction with Ruthin Road and Chester Road.
3. PPW11 states that green barriers may be used to manage urban form through controlled expansion of urban areas. This would appear to be a better approach in respect of Mold, where consideration could be given to look at its urban form and shape. However, these principles should be equitably applied to all parts of the boundary of the Mold settlement. Part of the justification given for the Green Barriers around Mold is that there is land available elsewhere for development. This does not appear equitable. The green barriers appear to be allocated to prevent further development on the South and East edges of Mold, forcing future development to the West.
4. One of the purposes of a green barrier is to assist in safeguarding the countryside from encroachment. In undertaking the review of green barriers, I would have thought consideration should be given to minimising the loss of best & most versatile (BMV) agricultural land which is also required in PPW11. There is no evidence of this having been considered in determining green barriers.
5. Along Ruthin Road, Mold, considerable development has been permitted on the East side and therefore can see no reason why some development could not be permitted on site MOL002 to the West side of the road without affecting the demarcation of the town from the village of Gwernymydd.
6. In respect of the Woodlands Rd site the UDP inspector in allowing the green barrier during the review, indicated that at some time in the future the land may prove suitable for development. (Ref. page 17 of Background Paper 1: Green Barrier Review, September 2019).

7. The UDP Inspector, in considering the land between Pool house Lane and Gwernaffield Road determined that the site represented a significant incursion into open countryside.
  
8. It is part of the LDP process to review Green Barriers. The deletion of the areas in Mold Ref MOL002 land between Ruthin Road and Plas Anney and MOL056 Penybont Farm, Chester Road, from the green barriers EN11.9 and EN11.10 respectively, would manage urban form through controlled expansion of urban areas, assist in safeguarding the countryside from encroachment (particularly development on grade 2 agricultural land), provide protection to the setting of an urban area, and there would continue to be a demarcation between the town of Mold and the villages of Gwernymydd and Mynydd Isa.