on behalf of

The Pridding Farming Partnership

Response to Green Belt Policy 22 of Future Wales

November 2025

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WREXHAM : CURRENT STATUS

1.0 Green Wedge (previously Green Barrier) is the Welsh equivalent of Green Belt, albeit that it is not considered with the same degree of permanence as its English Green Belt cousin.

1.1 During the Wrexham LDP Examination the issue of Green Wedge Barrier (and Green Belt) was discussed and subject of hearing sessions.

1.2 The Council's evidence base was presented by way of their "Green Wedge Review" (October 2017) which sought to both remove and add areas of Green Wedge/Barrier in the new development plan (LDP2).

1.3 Indeed, new Green Barrier was identified around Gwersyllt.

1.4 The National Development Plan (NDP) Future Wales (FW) was published on 24 January 2021 and clearly the Council's evidence base and indeed the hearing sessions pre-dated this policy document.

1.5 The issue of Green Wedges was, however, raised and discussed during the LDP2 Hearing Sessions under Matter 4 "Location of Development" held in September 2019.

1.6 Despite FW's publication, the LDP Inspectors did not ask for any update or response to FW Policy 22 specifically from the Council as part of the Matters Arising Changes (MAC's) and moreover the Inspectors Report, when published in February 2023, did not recommend any changes to the LDP Policy SP7 on Green Wedges or seek any supplemental Green Belt deisgnation.

1.7 The Inspectors Report did, however, discuss Future Wales and stated (Para 2.17) that "FW forms part of the Council's statutory development plan and, with which, this plan needs to be in general conformity. The LDP is consistent with its main principles, particularly that, as recognised in Policy 20".

1.8 This suggests that FW was taken into account by the Inspectors.

FUTURE WALES : CORRECT APPROACH

1.9 In addition, FW Policy 22 states the following:

> **Policy 22 – Green Belts in the North** 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.

1.10 Our interpretation of this is that FW cannot be any clearer in that :

- *there is a plan to identify Green Belt around Wrexham and Deeside for the sole purpose of "managing urban form and growth"*
- *that it will be the role of the SDP to establish any Green Belt*
- *the Green Belt must consider that which is already in existence on the Cheshire West side*
- *in the meantime, LDP's and local development management decisions must not permit major development unless there are exceptional circumstances*

1.11 Our reading of this, is that even if land that might be subject of GB consideration is promoted (in the Wrexham or Flintshire area) then the very fact the Council do not have an up-to-date development plan is an exceptional circumstance itself; the fact they don't have an up-to-date housing trajectory is yet another exceptional circumstance.

1.12 Notwithstanding this, any consideration of land for GB must duly reflect the existing GB in Cheshire West and given that none exists south of Pulford on the Cheshire West side, it would make no rational sense to apply Green Belt down towards and including Holt since the corresponding land on the other side of the border (for instance Farndon) is not covered by a Green Belt designation on the English side.

1.13 Further, Wrexham's own Green Barrier (Wedge) Review sought to remove the "lighter" Green Wedge designation around Gresford so it would make no sense to re-instate it.

PPW12 : CORRECT APPROACH

1.14 In addition, one must also consider the policy guidance in PPW12 (February 2024) which discusses "Managing Settlement Form – Green Belts and Green Wedges" under Paras 3.64 to 3.78 and the following extracts are particularly pertinent:

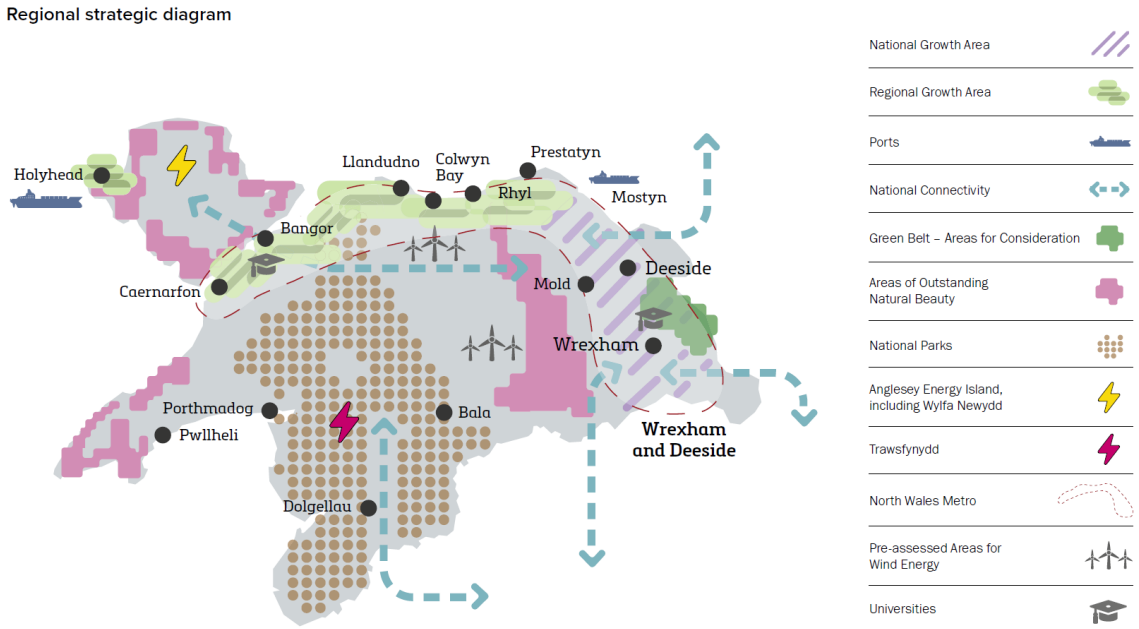
> 3.64
>
> Around towns and cities there may be a need to protect open land from development. This can be achieved through the identification of Green Belts and/or local designations, such as green wedges. Proposals for both Green Belts and green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. The essential difference between them is that land within a Green Belt should be protected for a longer period than the relevant current development plan period, whereas green wedge policies should be reviewed as part of the development plan review process.
>
> 3.65
>
> The main aim of Green Belts is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. 3.66 Due to their strategic nature Green Belts will have significance beyond a single local authority and they should only be proposed as part of either a Joint LDP, an SDP or Future Wales.
>
> 3.67
>
> The purpose of Green Belts is to:
>
> • prevent the coalescence of large towns and cities with other settlements;
>
> • manage urban form through controlled expansion of urban areas;
>
> • assist in safeguarding the countryside from encroachment;
>
> • protect the setting of an urban area; and
>
> • assist in urban regeneration by encouraging the recycling of derelict and other urban land.
>
> 3.68
>
> Green wedges are local designations which essentially have the same purpose as Green Belts. They may be used to provide a buffer between the settlement edge and statutory designations and safeguard important views into and out of the area. Green wedges should be proposed and be subject to review as part of the LDP process.
>
> 3.70
>
> Green Belt and green wedge boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term. The boundaries of Green Belts should be altered only in exceptional circumstances and with regard to their intended long-term permanence. The spatial form of Green Belts should be appropriate to the location and will not necessarily need to extend in a continuous band around an urban area.
>
> 3.72
>
> When considering Green Belt designations a sufficient range of development land which is suitably located in relation to the existing urban edge should be made available, having regard to the longer term need for development land, the effects of development pressures in areas beyond the Green Belt and the need to minimise demand for travel. This may require land to be safeguarded, and boundaries of proposed Green Belts must be carefully defined to achieve this.

1.15 There is, therefore, no policy support or indeed logic for introducing Green Belt in areas once covered by Green Barrier (Wedge) designations and nor is there any policy support or logic for inventing a new freestanding Green Belt that has no corresponding contiguous relationship with its neighbouring English Green Belt designation.

FUTURE WALES & FLINTSHIRE : MAPPING

1.16 The emphasis in the FW Policy 22 is clear in that any new Green Belt should be located "around" Wrexham and Deeside and the indicative plan provided on page 111 of FW (reproduced below) must therefore be interpreted as a tool to aid such a review.

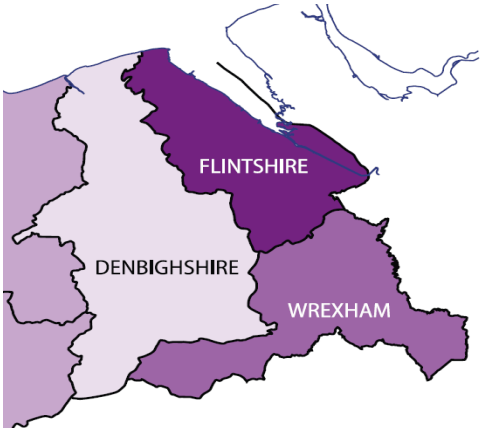
1.17 Policy 22 in FW illustrates the area for consideration as shown below shaded green on its "Regional Strategic Diagram" on page 111 (replicated below).



Future Wales : page 111 plan

1.18 This plan is so "crude" to be wholly inaccurate and should not be sued for "plotting" purposes. For instance, the AONB is totally inaccurate as are the routes of major highway connectivity (e.g. routes of the A55, M56, A470, A483/A5 and A483 – none of which are corrected plotted) so none of these features can be relied upon as being accurate. It is considered to be a "fat pen" illustrative plan and nothing more.

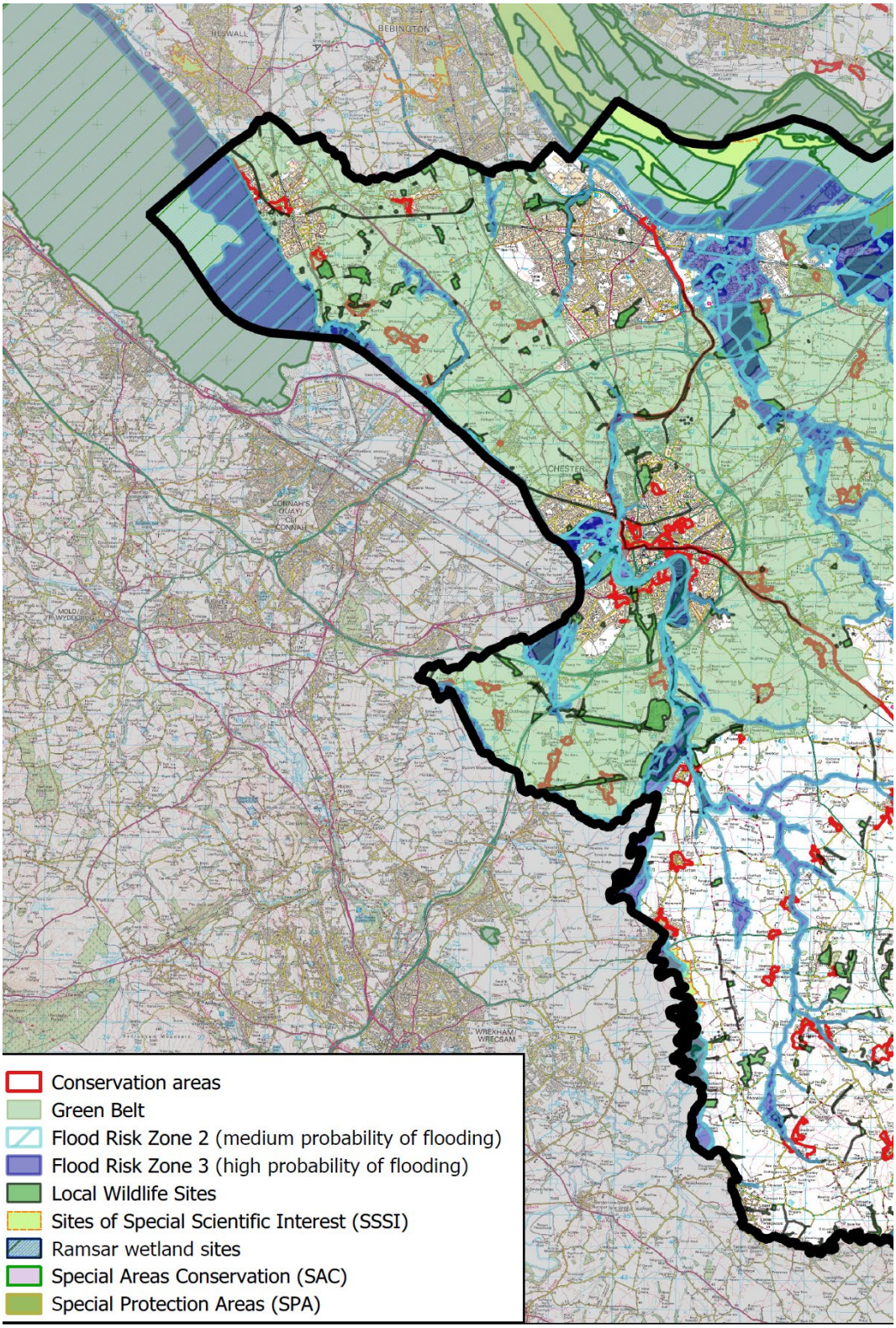
1.19 One must assume that the boundaries shown by the "grey shading" of solely reflect the "administrative" Welsh national boundaries and do not infringe into the neighbouring English authority areas of Cheshire West and Chester or Shropshire; as can be seen from the plan extract of the map provided on page 116 of the NDF (also replicated below).



Future Wales : page 116 plan

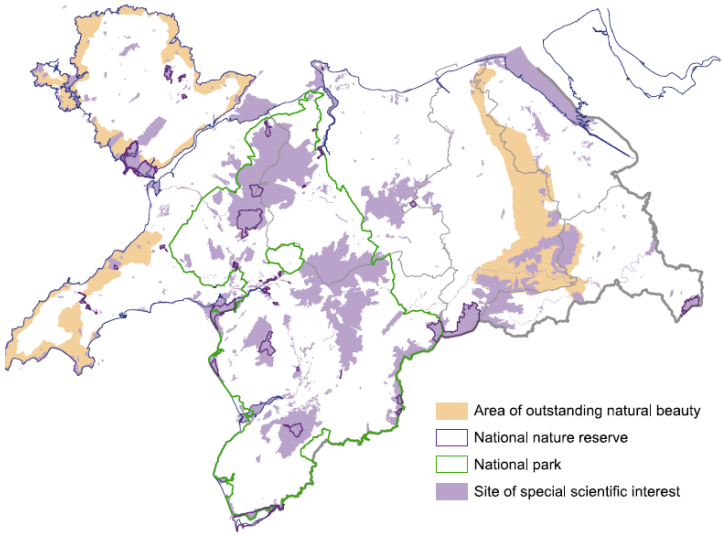
1.20 For a start, FW has no jurisdiction over the neighbouring English authority and moreover, the Green Belt boundary for Cheshire West is already known, as the plan extract (provided below) from the Cheshire West & Cheshire Council Local Plan Proposals Map clearly illustrates.

1.21 It shows the Green Belt that runs along the entire western boundary that lies between Cheshire West and Flintshire and down towards the boundary between Cheshire West and with Wrexham to Pulford, where it stops so that all settlements south (including Aldford, Churton and Farndon) are "outwith" of the Green Belt.



Extract of CWaAC Local Plan Summary Map

1.22 The plan used in FW (page 111) is, as we have remarked earlier, "fat pen" in style, and this is exemplified by the AONB boundary marked upon the plan when one compares it to the rather more accurately plotted plan provided on page 119 of FW. The two plans bear no resemblance to one another and as such the plan on page 111 is wholly misleading.



Future Wales : page 119 plan

1.23 The plan presented to the KSS2 (north) Public Inquiry during October 2025 is the same plan that was drafted by Flintshire County Council (FCC) and used by them in the LDP Examination held in October 2021 when this very issue was discussed in the hearing session (I know because I was party to these discussions and attended the applicable sessions).

1.24 FCC attempted to reproduce the "shape" of the "Policy 22 Green Belt" mapping in its **FCC022 Action Point AP3b.6** document by creating a map (provided below); however, it was created by FCC who used the wholly inaccurate FW page 111 plan … as a result if you use an incorrect baseplan you are already setting any plans produced to also be erroneous.

1.25 We pointed this out to the Inspector and submitted a short paper on this – it was not disputed.

1.26 Therefore, by trying to use the inaccurate and crude interpretation of the FW mapping any results of subsequent mapping will be inaccurate and crude themselves.

1.27 The fact is that neither the FW page 111 map nor the FCC mapping attempts reflect the wording under either FW Policy 22 or the guidance in PPW12 – it is, we would contend, the narrative of the policy text that one must follow not some crude plan that has been produced without any reference to either past Green Barrier Reviews, what exists on the Cheshire West boundary or what FW and PPW actually spell out as being needed.

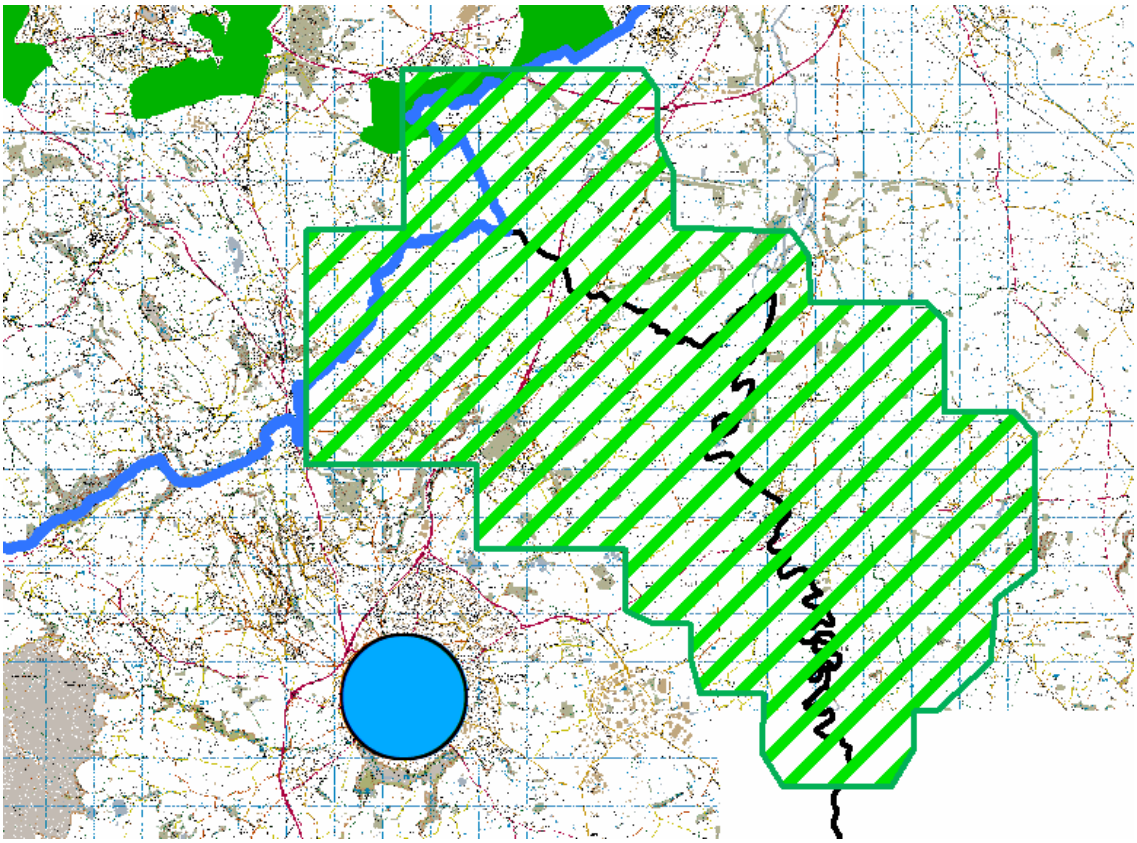
1.28 For a start if one did accept the FCC plan was correct – and the Flintshire LDP Inspectors did not – then it would suggest areas of Wrexham and Flintshire would be brought into Green Belt designation that would go well beyond the intended emphasis of Policy 22 and PPW12 - this would also fly in the face of the English Green Belt boundary and bear no relationship to it.

1.29 The intention of Policy 22 is to suggest that a study be undertaken to determine and assess land that may fit with the spirit of FW and PPW12, not to use some crude mapping that is unfit for purpose.

1.30 Secondly, if one did accept that the FW plan was correct and then applied it, again a different plan would emerge.

1.31 The fact is that both are incorrect and you are starting at the wrong point as you are basing an interpretation upon two flawed datasets. The correct approach is to follow what FW and PPW12 state, consider the Cheshire West boundary and undertake a study on this basis.

1.32 In doing that you would not, for a start, be looking to designate Green belt in Holt where none exist directly over the border.



FCC Action Point AP3b.6 – map 1

THE CORRECT POLICY APPROACH

1.33 The Welsh Government F.A.Q. v2 document poses the question ***"How should LPA's consider sites on and/or near the boundary of the area for consideration for green belts ?"*** and provides the following guidance:

"In advance of the adoption of an SDP, which will define the boundary of a green belt area, LPAs should use their judgement to determine whether a site should be treated as being in or out of the area for consideration. LPAs should set out their thinking and the process they have followed to make their decision. Examples of questions that can be used to assist decision makers:-

1. *Where is the site considered to lie on the regional strategic diagram?*

   OUR RESPONSE : the page 111 is inaccurate and cannot be used as a basis for decision making- it needs to be refined through the SDP process.

2. *Does the site naturally form part of the wider open area which would logically be covered by a green belt? Or is it distinctly separate from the wider open area?*

   OUR RESPONSE : the site is bound by defensible boundaries on all side (the A543 to the south, Wrexham Road B5102 to the north) and is not part of any wider open area but an established settlement (a Local Service Settlement Tier 3 in the LDP2 settlement hierarchy) where growth is anticipated – to consider surrounding this sort of settlement by Green belt would be counter intuitive for a settlement that is expected to deliver growth

3. *How does the site relate to the built form of existing settlements?*

   OUR RESPONSE : the site is bound by defensible boundaries on all sides (the A543 to the south, Wrexham Road B5102 to the north and development to its northern and eastern flanks.

4. *How does the site perform with regard to the purposes of the green belt as set out in PPW?"*

   OUR RESPONSE : The site will not lead to coalescence between Holta and Wrexham or indeed Holt and Farndon; the site will allow the existing urban form of Holt to extend in a managed and controlled manner that is entirely logical in rounding-off and filling-in an area of under-developed land within the defensible boundaries of Holt; the site will assist in safeguarding the open countryside beyond to the south from encroachment; the site will protect the setting of the Holt urban area; and whilst it will replace an existing agricultural contractors depot it does not involve brownfield land.

1.34 The guidance could not be any clearer in confirming that a sound and clear explanation should be provided in relation to sites being considered for allocation or designation.

1.35 The fact is that FW refers to the need for a strategic Green Belt between Wrexham and Chester and between Deeside and Chester, taking into account the English (Cheshire West & Chester) Green Belt, yet this has not been taken into consideration and it would be unjustified for Wrexham to think that land at Holt would meet any of the criteria listed above.

1.36 The purpose of a review is for the identification of the most appropriate land to be used for future development, through the development plan.

CONCLUSION

1.37 This paper has found the following:

1. The Wexham LDP was subject of a Green Wedge Review, which was discussed at hearing sessions and the Inspectors found it to be sound and they also took into account Future Wales
2. Future Wales recommends that SDP considers new Green Belt to manage urban form and growth
3. FW states clearly that it must consider Green Belt already in existence on the Cheshire West side
4. The SDP is the correct place for new Green Belt designation (if one is needed at all)
5. That is makes no policy sense or logic to identify Green belt in areas of Wales that do not border areas of Green Belt in England
6. PPW12 is also very clear as to the expectations of how Green Belt should be designated and what role it ought to perform
7. FW's page 111 mapping is not accurate and must not be sued to transpose features onto another map
8. The current Green Belt on the Cheshire West side means that the designation stops at Pulford
9. The LDP Examination FCC's interpretation of FW Policy 22 was flawed, unjustified and itself raises inconsistencies and it was not endorsed or accepted by the LDP Inspectors
10. WG has produced guidance for LPA's and in addressing this it is clear that Holt would not meet the tests posed in considering land suitable for Green Belt

1.38 Our submission points out a series of very obvious errors in the approach taken by Flintshire during the LDP examination – their mapping was not accepted.

1.39 We are of the opinion that neither the application site at Holt nor indeed Holt settlement itself is ever intended to be subject of Green Belt designation.

1.40 We reserve our right to make further comment should it be necessary, but would invite the Council to agree with our findings and reach the same conclusions we have.
