



**FLINTSHIRE LOCAL DEVELOPMENT PLAN 2015-2030 EXAMINATION**

**MATTER 10:  
IMPLEMENTING SUSTAINABLE DEVELOPMENT**

**STATEMENT IN RESPONSE TO INSPECTOR'S QUESTIONS**

**BY**

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## **MATTER 10: IMPLEMENTING SUSTAINABLE DEVELOPMENT**

### **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? ARE THE POLICIES AND REQUIREMENTS CLEAR, REASONABLE AND SUFFICIENT?**

**A. HAS THE SPECIAL CHARACTER OF MOLD BEEN ADEQUATELY CONSIDERED IN DRAWING UP THE SETTLEMENT HIERARCHY/BOUNDARIES?**

1.1 We have no comment on this question.

**B. IS IT CLEAR HOW PROPOSALS IN THE OPEN COUNTRYSIDE WILL BE TREATED, IN PARTICULAR THAT NEW BUILDING WILL BE GENERALLY STRICTLY CONTROLLED?**

1.2 The policies in relation to development beyond settlement boundaries are confusing as they appear in various different places within the Plan and contain contradictory policies/requirements.

1.3 In terms of housing for example, the general policy setting out the relationship of development of settlement boundaries is policy PC1. This indicates that specific forms of housing development will be allowed outside the settlement boundary where they are set out in policy HN4-A/B/C/D.

1.4 Policy HN4 then goes on to deal with housing in the countryside. It indicates that, outside defined settlement boundaries development will only be permitted where it is for 1 of 7 types of development. 3 of the types of development set out in policy HN4

- are therefore not consistent with policy PC1. In particular, these relate to agricultural/forestry dwellings or dwellings for other rural enterprises (criterion a), subdivision of existing dwellings (criterion c) and One Planet Development (criterion g).
- 1.5 It is important that the plan is “*coherent and consistent*” otherwise it fails soundness test 2.
  - 1.6 Anyone reading the Plan and looking at policy PC1 in relation to housing would go directly to policies HN4-A (replacement dwellings), HN4-B (conversion of rural buildings), HN4-C (infilling) and HN4-D (affordable housing exception sites) as that is where policy PC1 directs them. Unless they read policy HN4 separately they would believe that the types of development set out under (a), (c) and (g) were outside of the relevant policies in the Plan. Policy PC1 should therefore also reference policy HN4 itself (not just HN4A, B, C and D).
  - 1.7 In order to meet the test of soundness it is crucial that policy HN4 and policy PC1 are consistent.
  - 1.8 Additionally, paragraph 3.60 of PPW indicates that, as well as infilling, minor extensions to existing settlements may be acceptable particularly where they meet local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. Whilst policy HN4-D allows affordable housing exception sites under certain circumstances, no other circumstances where the Council may approve residential development which result in extensions to existing settlements are set out.
  - 1.9 For example, the Plans Monitoring Section indicates that “*if the housing land supply falls below 5 years, for a period of 2 consecutive years, then the Council will keep monitoring*” and undertake further investigation to see whether a partial review is required. Although the Council indicate that the Plan will be reviewed in 4 years,

evidence of past performance in relation to bringing forward Local Plans (and the previous UDP) would suggest that this would be subject to substantial slippage (we comment on this further in relation to Matter 20). Where the Plan falls below required housing delivery there should be a mechanism within the Plan to allow sustainable sites on the edge of existing settlements to come forward. The policies in relation to housing in the Open Countryside should therefore acknowledge that there may be circumstances later in the plan period if housing delivery is falling short of required numbers where sustainable sites on the edge of existing settlements which will not cause harm to the countryside beyond will be considered suitable for housing developments. We would therefore suggest an addition to the list of development that are acceptable in the Open Countryside in policy HN4 as follows:-

- It involves development on the edge of an identified sustainable settlement (Tier 1, Tier 2 or Tier 3) required to meet a shortfall in housing delivery identified against the targets set out in Section 13 of the Plan which will cause no harm to the wider open countryside.

**C. IS THE REQUIREMENT FOR ELECTRIC CHARGING POINTS IN NON-RESIDENTIAL DEVELOPMENT IN POLICY PC5 CONSISTENT WITH NATIONAL GUIDANCE?**

1.10 We have no comment on this question.