

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

Matter 11 – Employment Land and Sites, Retail Hierarchy

for Mrs Stott and Mrs Haworth (Rep ID: 1233028)

Emery Planning project number: 14-065

Project : 14-065
Hearing : Matter 11 – Employment
Land and Sites, Retail
Hierarchy
Client : Mrs Stott and Mrs
Haworth (Rep ID:
1233028)
Date : 23 April 2021
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1. Introduction

- 1.1 This hearing statement is prepared by Emery Planning on behalf of Mrs Stott and Mrs Haworth (Rep ID: 1233028) in relation to Matter 11 – Employment Land and Sites, Retail Hierarchy.

2. Response to Matter 11

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?

Policy PE3: Employment Development Outside Allocated Sites and Principal Employment Areas

- 2.1 The Inspector will recall that we have previously set under Matter 4 our concern that the plan does not provide any employment land requirement or site allocations for the Tier 3 Sustainable Settlements, contrary to the requirements of PPW and TAN6 identify a diverse range of sites suitable for future employment use in rural areas.
- 2.2 Part of the Council's response was Policy PE3 provides a criteria-based exception policy for new employment development. Notwithstanding our view that this should be in addition to site allocations (in accordance with paragraph 3.1.3 of TAN6), we have the following comments on the policy.
- 2.3 Firstly, part ii(b) requires that the development "*is specifically for a rural activity*". However, the policy is to permit new industrial, office and warehousing development. National planning policy is strongly supportive of the rural economy but does not say that it should be restricted to only 'rural activities'. This element of the policy should be deleted.
- 2.4 Secondly, part ii(c) the development is of an appropriate scale and well related to the form of the settlement and does not exacerbate ribbon development or result in a fragmented pattern of development. The part we take issue with is "*exacerbate ribbon development*". It will be extremely difficult to fulfil parts ii(c) and ii(d), which refers forming a logical site boundary, if infilling along a road (which could be interpreted as ribbon development) is restricted. The Council has

already expressed a view at these hearings that ribbon development is harmful per say, but that is unequivocally wrong as whether a form of development is in some way harmful (for example in terms of character and appearance) will depend entirely upon the specific circumstances of the site. In many instances what could be described as ‘ribbon’ development could also be described as ‘infill’ or ‘rounding off’. We therefore consider that the reference to ribbon development should be deleted.

- 2.5 Finally, for the reasons set out in our representations to the Deposit consultation and our various statements to this examination, the proposed Green Barrier around Northop, when combined with other existing constraints, means that the policy is unlikely to result in the development of any sites around Northop. Therefore, the policy does not negate the need to consider the need for allocations within the village, and also the restrictive nature of the proposed Green Barrier boundaries.