

Hearing Statement – Matter 17

Flintshire Local Development Plan

On behalf of Pochin Goodman (Northern
Gateway) Ltd (PGNGL)

April 2021



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Pochin Goodman (Northern Gateway) Ltd (PGNGL) in respect of:
- Matter 17: Renewable Energy
- I.2. PGNGL has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.3. PGNGL control the former Corus Garden City site, which forms part of the strategic Northern Gateway site. This scheme is an important part of the national, regional and local growth agenda and can positively contribute towards the economic and housing growth for the area.
- I.4. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with PGNGL comments upon the submission version of the Flintshire Local Development Plan, September 2019, as submitted in November 2019.
- I.5. As indicated in earlier communication, this is a written statement and PGNGL do not wish to attend Matter 17 of the Examination in Public.

2. Matter 17: Renewable Energy

Q17	<p>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?</p>
	<p>Where appropriate, have alternative strategies been considered, is the identification of any sites based on a robust and rational site selection process?</p>
	<p>Are the policies and requirements Clear, Reasonable and sufficient?</p>
g)	<p>Is EN12 consistent with national policy or more onerous?</p>

- 2.1. PGNGL **support** the aims and objectives of EN12. However, PGNGL consider that the policy is unnecessarily onerous. The wording ‘requires’ that development maximises the potential for renewable or low carbon energy technology to meet energy demands of the proposal. PGNGL consider that the wording should be amended to ‘encourage’ or ‘promote’, which would be more consistent with wording in PPW, and the wording within the Local Plan contained within policies STR4 and STR14.
- 2.2. PPW notes that low carbon electricity must become the main source of energy in Wales. PPW establishes an Energy Hierarchy for Planning, with reducing energy demand at the top of the hierarchy, followed by energy efficiency, then renewable energy generation, minimising carbon impact of other energy generation, and finally minimise extraction of carbon intensive energy materials. PPW seeks to ensure that Development Plan policies are supportive of renewable and low carbon energy development and should seek to maximise the potential of renewable energy by linking the development plan with other strategies. It does not ‘require’

that development maximises the potential for renewable or low carbon energy to meet the energy demands arising from the proposed development. Furthermore PPW is clear that 'Planning applications should not be refused on the basis of exceeding a renewable energy target'. EN12 should reflect PPW, the energy hierarchy, and should be amended to encourage or promote development that maximises the potential for renewable or low carbon energy.

- 2.3. The Plan in its present form is not effective or appropriate and is not consistent with national policy. It is considered that the Plan could fail to deliver sustainable development in accordance with the policies in PPW.
- 2.4. In these circumstances we do not consider that the Flintshire Local Development Plan, in its current form, to be sound.
- 2.5. However, we consider that with the suggested amendments to the policy to encourage rather than 'require' the Plan can be found sound.

Proposed Change

- 2.6. To overcome the objection and address soundness matters, the following changes are proposed:
 - Amendment to Policy EN12 to encourage or promote, rather than require development to maximise the potential for renewable or low carbon technology to meet energy demands.