

**Flintshire Local Development Plan 2015 – 2030
EXAMINATION IN PUBLIC**

**Hearing Session Matter 9
Wednesday 21st April 2021**

**Climate Change and Environmental
Protection**

STR14

Hearing Statement by Flintshire County Council

Flintshire Local Development Plan (2015 - 2030) Examination in Public

Flintshire County Council Statement: Matter 9: Climate Change and Environmental Protection

This statement has been prepared by Flintshire County Council (FCC) in response to the Inspectors' hearing questions:

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?

Response:

1. Policy STR14 covers a wide range of differing but often inter-connected elements of climate change and environmental protection. The policy seeks to mitigate the effects of climate change and ensure environmental protection through the application of sustainable development principles. This policy will contribute towards the achievement of the following three objectives within the LDP;

Objective 1. Ensure that housing development takes place in sustainable locations where sites are viable and deliverable and are supported by the necessary social, environmental and physical infrastructure

Objective 14. Minimise the causes and impacts of climate change and Pollution

Objective 19. Support the safeguarding and sustainable use of natural resources such as water and promote the development of brownfield land

2. The criteria of this policy supports the aspirations of the 'Productive and Enterprising Place' theme in PPW11 (Chapter 5) and contributes towards the achievement of the seven well-being goals set out within the Well-being of Future Generations Act (2015). The principles of sustainable development and creating places which are resilient to climate change underpin policy STR14 and will ensure that it achieves the three objectives above in a sustainable manner which is consistent with national policy. The key evidence bases supporting this policy are the Strategic Flood Consequences Assessment [LDP-EBD-EN1](#) which provides the evidence base to highlight the importance of the location of development in relation to flood risk and climate change in the county. Also the Renewable Energy Assessment [LDP-EBD-RE1](#) explains the importance of energy efficiency measures and the scope for renewable and low carbon energy as part of new development. The approach taken by policy STR14 is in line with the fundamental principle of trying to create resilient places.

Question a) Is the wording of Policy STR14 sufficiently strong, such that it will enable the policy to have a proper and positive influence on development proposals?

Council's Response:

a.1 Each criteria in policy STR14 is relevant to the aim of creating sustainable development and supports the aims of national policy as set out in paragraph 2.2 of PPW (Edition 11) which states :- "Sustainable Places are the goal of the land use planning system in Wales". The strength of wording of the criteria within policy STR14 are in line with the emphasis placed on each element in PPW and it would be inappropriate to make the emphasis of local policy more onerous or 'stronger' than is the case in PPW.

- Criteria i relates to locating new development in settlements which are accessible to a range of services and facilities in order to reduce car use and thereby reduce carbon emissions. This is wholly in line with the sustainable development principles throughout PPW11.
- Criteria ii supports the development of appropriate brownfield land as this will reduce the need for greenfield sites and this reflects guidance in para 3.55 PPW11.
- Criteria iii highlights the need for development to have regard to water resource management including supply, surface water run-off (SuDS) and waste water and links to more detail in Policy EN14 Flood Risk and EN15 Water Resources PPW11 clearly references water supply in para 3.61 and deals with broader Water and Flood Risk matters in section 6.6 of PPW.
- Criteria iv seeks to avoid development in flood risk areas, and ensures that development, which is proposed in areas of flood risk, considers carefully the consequences of flooding and risks elsewhere. It links with policy EN 14 Flood Risk and the approach is wholly in line with the approach in PPW11 and TAN15.
- Criteria v aims to encourage energy efficient development and links to policy EN12 which sets out the requirement for all larger developments to produce an Energy Assessment to determine the feasibility of incorporating low carbon or renewable energy generation as part of the scheme. The principles of energy efficiency measures and renewable energy in new development are now incorporated in Building Regulations. However, Para 3.7 of PPW11 states that new development should seek to maximise energy efficiency and section 5.7 of PPW11 clearly references the importance attached to renewable energy generation.
- Criteria vi seeks to ensure that new development has regard to a variety of potential sources of harm and clearly links with the Policies EN16, 17 and 18 which cover issues relating to development on or near landfill sites and sites which may be affected by contamination, unstable land as well as pollution and nuisance. The purpose of Policy STR14 is to ensure that all relevant aspects of a development scheme have been considered and this is line with guidance in PPW11.

- Criteria vii designing new development to be adaptable and resilient to climate change is an important theme in national policy. PPW stresses the need for good design throughout the planning process and states in paragraph 3.7 “Good design promotes environmental sustainability and contributes to the achievement of the well-being goals” and an integrated and flexible approach to design, including early decisions regarding location, density, layout, built form, the choice of materials, the adaptability of buildings and site treatment will be an appropriate way of contributing to resilient development.”
- a.2 As with all LDP policies, the plan must be read as a whole. Policy STR14 should be read alongside the detailed policies as set out in the Policy Context Table after each strategic policy. In this case Development Management policies EN12, EN13, EN14, EN15, EN16, EN17, and EN18 add the specific details on how the policy will be implemented, dependent on the use proposed. STR14 sets out the high level sustainability principles highlighting the need to mitigate the effects of climate change as far as a land use policy can. Not all of the criteria set out under policy STR14 will be applicable to all applications, it will depend on the type and location of development that is proposed. However, it is important to highlight these significant issues which are all material planning considerations to ensure that all developments have adequately considered them. Where a planning application must be accompanied by a Design and Access statement, this policy sets out the requirements for which issues should be included. The weight to be applied to each of the criteria will be considered during the application process where it will be clear which criteria are relevant to each planning application.