

Supplementary Planning Guidance Note

Extensions and Alterations to Dwellings

Adopted 15.10.2024

1. Purpose

- 1.1 The Council has set out in its Local Development Plan (LDP) an intention to prepare a series of Supplementary Planning Guidance Notes (SPG). The purpose of each SPG is to:
- assist the preparation of planning proposals and guide pre-application discussions,
 - guide officers in handling, and officers and councillors in deciding, planning applications,
 - assist Inspectors in the determination of appeals,
 - improve the quality of new development,
 - facilitate a consistent and transparent approach to decision making.

2. The LDP and the need for SPG

- 2.1 The Welsh Government Development Management Manual advises in para 9.1.2 that 'Applications for planning permission must be determined in accordance with the approved or adopted development plan for the area, unless material considerations indicate otherwise'. The Flintshire LDP was adopted on 24/01/23 and forms the basis for decision making alongside Future Wales: The National Plan. However, the LDP cannot provide all the detailed advice needed to guide development proposals. SPG's can support the LDP by providing more detailed guidance on topics and issues to help the interpretation and implementation of policies and proposals. The Development Plans Manual Ed. 3 advises that 'Supplementary Planning Guidance (SPG) can be taken into account as a material planning consideration provided it is derived from and is consistent with the adopted development plan and has itself been the subject of consultation, which will carry more weight'. The intention of SPG's is not to set out 'policy' as that is the role of the LDP, but to provide more detailed advice and guidance which expands on a particular policy or allocation in the LDP.

3. Status / Preparation Process

- 3.1 The Council indicated in its Delivery Agreement (DA) for the LDP that it intends to prepare SPG. The DA explained that the Council will consult on any draft SPG and, following consideration of representations, and any necessary amendments, seek formal adoption. This approach accords with Welsh Government advice in Development Plans Manual (Edition 3).
- 3.2 This SPG was consulted on for a 6-week period commencing on 01/12/23 and ending on 26/01/24. Representations and responses, together with any amendments to the draft document were considered by Cabinet at its meeting on 15/10/2024 who resolved to adopt this SPG. Consultation comments, responses and any amendments are set out in Appendix 2. This document should therefore be afforded considerable weight as a material planning consideration.

4. Introduction

- 4.1 This Supplementary Planning Guidance Note (SPG) provides guidance regarding house extensions and alterations. It highlights some general principles relating to house extensions whilst seeking to promote good design for such proposals. It supports the use of Local Development Plan (LDP) policy HN5 House Extensions and Alterations.
- 4.2 Extensions and improvements are a reasonable way of achieving more space and functionality within a dwelling to meet changing needs, but care must be taken to ensure that all additions respect the historic fabric and character of the building and its locality. Whether in the open countryside or in a built-up area, proposed extensions should respect their local surroundings in terms of form, scale, aspect, design and materials. This SPG is concerned with the external appearance of the dwelling, including its scale and mass. Although the planning system does not have the right to protect the views from householders' properties, it should prevent detrimental impact on the amenity of neighbouring properties and on the character of the property and its surroundings. In this sense, the planning system operates to reconcile the needs of individuals with the wider community interest.
- 4.3 This SPG focuses on extensions and alterations to houses which require planning permission. It is accepted that there may be smaller extensions, alterations or other works such as cladding or pebbledashing, which are permitted development and do not need planning permission. Careful consideration should be given to these works to ensure that they respect the appearance of the property and locality. The guidance in this SPG should be applied where relevant.
- 4.4 It is recommended that a suitably qualified professional is employed to prepare proposals for extending or altering a dwelling. Good design need not be more expensive; indeed, it can add value to the property and result in lower maintenance costs. Examples include designing in energy efficiency and designing to prevent (or reduce) crime. Whether or not planning permission is needed, this SPG should help to bring about high quality development which will enhance the property and its neighbourhood.
- 4.5 The Welsh Government publications "Planning: A Guide for Householders Version 3" offers useful advice. A PDF is available from their website <https://www.gov.wales/sites/default/files/publications/2020-05/planning-a-guide-for-householders.pdf>
Certain minor changes - called "permitted development rights" - may be made without the need for planning permission, and these are explained in the publication "Permitted development for householders Version 2".
- 4.6 Planning permission should only be applied for once the design of the scheme has been finalised. A duty planning officer (planningduty@flintshire.gov.uk) will be able to offer initial advice on your proposals before you make an application. Applicants are encouraged to seek advice as part of the Pre- Application Planning Advice service with the Planning department before making any planning applications.
The Pre-Application Planning Advice service will identify relevant policies, guidance and technical standards; confirm what information will be required for the planning application;

identify any issues and how these may be overcome and give an indication of the means and timescale for determining the application. For more detailed advice it will be necessary to submit a pre-application enquiry and detail can be found at <https://www.flintshire.gov.uk/en/Resident/Planning> Any changes sought after permission has been granted may require a fresh planning application or amended plans.

5. Policy

- 5.1 The Welsh Government now takes a firm view on design matters, as explained in Planning Policy Wales (PPW12 in para 3.9) and Technical Advice Note 12 Design (TAN12). PPW states ‘the special characteristics of an area should be central to the design of a development. The layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations. A clear rationale behind the design decisions made, based on site and context analysis, a strong vision, performance requirements and design principles, should be sought throughout the development process and expressed, when appropriate, in a design and access statement’.
- 5.2 TAN 12 Design states ‘Early consideration of design, well in advance of any planning application is essential to achieving good design. At the outset, appreciation of the site’s context, and the development of a vision and agreed design objectives must be established and remain central to the evolutionary process’ The Welsh Government see the design process as an important part of any development and recommend as stated that design is thought out early on in the process and that any design should take into account the character and appearance of the surrounding area. At the local level one of several relevant policies in the LDP is HN5 (House Extensions and Alterations) of the LDP (see Appendix 1).
- 5.3 As a general design approach to extending existing buildings, the supporting text to policy HN5 notes that “Extensions should be subsidiary in scale to the existing dwelling and should not unacceptably harm the amenity of residents or occupiers of adjoining developments. Particular care will be needed when considering proposals to extend a building that has already been previously extended in order to ensure the resultant dwelling is in keeping with the original dwelling, site and surroundings and which retains a legible design character.” Legibility is where it is possible to look at the final scheme and ‘read’ the original dwelling alongside the extension.
- 5.4 On a similar theme of adding to existing properties, policy HN6 (Annex Accommodation) provides guidance in relation to proposals for accommodation for dependent relatives (sometimes known as “granny flats”) (see Appendix 1). Account must also be taken of Policy STR4 Principles of Sustainable Development, Design and Placemaking, PC2 General Requirements for Development and PC3 Design (see Appendix 1) whereby STR4 states that high quality, well thought out and sustainable design which improves the environment and people’s health and well-being is essential. This can be achieved by ensuring that new developments incorporate the objectives of good design and sustainable development, and that the character of existing built development is conserved or enhanced. PC3 set

out a number of criteria which, when read together, will ensure a logical and robust checklist to ensuring that new development embraces the objectives of good design and is sustainable.

6. Neighbours

- 6.1 In the interests of good neighbour relations, it is advisable for any householder intending to extend their property to discuss their intentions with their neighbours who will be affected by the development. On all planning applications the Council will undertake consultations with neighbours whose living conditions may be affected by the proposal.
- 6.2 It is the responsibility of the householder, applicant or agent making the proposals to ensure that any extension, solid wall or other means of enclosure is constructed on land under the same ownership and to avoid encroachment of foundations or overhanging of guttering. Details of the Party Wall, etc. Act 1996 are available at the Planning Services office.

7. Additional special considerations

- 7.1 Whilst the same general principles apply across the County, special considerations apply to dwellings which are:
 - Listed buildings
 - In a conservation area
 - In the Clwydian Range and Dee Valley Area of Outstanding Natural Beauty (AONB)
 - In flood risk areas
- 7.2 Any alterations or extensions which affect the character or appearance of a listed building will require listed building consent as well as planning permission. Please note that this applies to the inside as well as the outside of listed buildings.
- 7.3 In conservation areas and the AONB permitted development rights are more restricted, which means that it is necessary to apply for planning permission for certain types of work which do not need an application in other areas; for instance, the volume limits for extensions are lower, and permission is required to clad the outside of the house. In a conservation area any extension to a dwelling would need to preserve or enhance the character and appearance of the conservation area and its setting. In the AONB an extension would need to conserve or enhance the natural beauty of the designated area and its setting. Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB. NRW have produced some online resources which support the character and qualities of the AONB.

These can be accessed at <https://naturalresources.wales/guidance-and-advice/> and <https://lucmaps.co.uk/NRWDarkSkies/>

- 7.4 Where an existing dwelling is located in a flood zone, flood resilience should be incorporated into the alteration/extension designs where possible to provide a betterment. This could include raising electricity sockets and use of flood resistant materials.
- 7.5 In all these sensitive areas, the Council will be looking for the most appropriate design response for the specific circumstances presented in each case. It is recommended that advice in these cases is sought at an early stage and as mentioned previously there is the pre-application service which can be used if more detailed advice is required.

8. Advice on extensions and alterations

- 8.1 The following advice on extensions looks firstly at general design principles and secondly particular forms of extensions, for example rear extensions.

Site Analysis and context

- 8.2 The local context comprises the characteristics and setting of an area in which a development is located. Understanding the site and its immediate and wider context is the basis for a meaningful and sustainable design response, and is the responsibility of all those involved in the design process. More advice can be found on site and context analysis here <https://www.gov.wales/sites/default/files/publications/2018-09/site-context-analysis-guide.pdf>

Design

- 8.3 Good design principles when considering extensions include:
- **Continuation** - where the extension continues the building line and roof of the original dwelling. This suits a relatively small extension. Windows, doors and materials should match the original. This would also be suitable on a smaller property, for example a terrace of shallow depth.
 - **Reflection** - by using the same form as the original but at a smaller scale or set back in terms of building line, or with a lower roofline. This is appropriate on larger properties with a deeper platform.
 - **Separation** - where the original house has special features or a distinctive character which it would be difficult to emulate by either of the two previous methods, the extension could be linked by a porch, hallway or gallery. This is difficult to achieve successfully and should be carried out by a qualified architect. In some cases where a house has a particular character an extension with a modern minimalist look, may compliment the original house rather than trying to emulate the original character.

- 8.4 The extension should not result in an overdevelopment of the residential curtilage. The SPG Space Around Dwellings sets out the Council's guidelines for garden areas, parking spaces, site boundaries, distances between properties with overlooking windows, and distances to plot boundaries from the building. Extensions should also have regard to existing landscape features such as mature trees where these should be retained (see SPG Trees and Development). Extensions should not result in the loss of existing parking spaces which would result in road safety or congestion problems as a result of overspill parking. Furthermore, extensions should not lead to the loss of large areas of garden which could then lead to future applications for garden extensions, particularly in rural settlements or in the open countryside. The extension should avoid impacts on living conditions either of the residents of the extended house or to residents of nearby houses. The extended dwelling should be proportionate to the size and characteristics of the plot in which it sits.
- 8.5 The focal point should be clear, and from there the other elements of the design should be placed, proportioned and detailed so as to allow the eye to "read" the whole design in an orderly way. These principles are explained better by illustrations than words. Fig. 1 shows these considerations in both good and bad terms.

Figure 1 Punctuation, balance and resolution

An unpunctuated monotonous facade compared with one containing variation and interest.



The restless, unsettling, jumbled form altered to a balanced composition which does not have to be symmetrical to work.

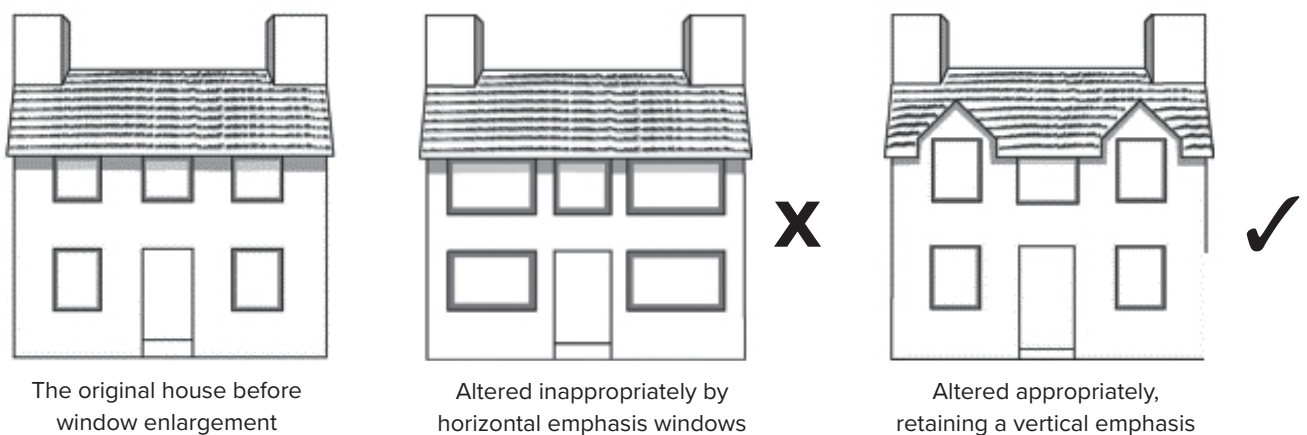


Both good examples introduce a focus whereas in the others the parts compete for attention

- When altering a house of traditional style, care should be taken of its scale and character. A simple symmetrical form is preferred rather than a design with busy details. The alteration of aspects such as doors, windows, ceiling heights etc could harm the character unless careful consideration is given to the design. It is recommended that such alterations are kept to a minimum.

- The proportion of solid (wall, roof) to void (windows, doors) should be carefully considered, as illustrated in Fig 2. In traditional buildings solid areas dominated voids, whereas in modern buildings the reverse is often the case. Where traditional and modern buildings adopt a vertical orientation of windows then this characteristic should be retained. Windows should always be set back deeply from the front face of walls and by a minimum of 80mm, this is also a traditional feature.

Figure 2 Proportions



- 8.6 These principles apply just as much to more modern houses as indicated by the example of a 1930's semi-detached in Fig. 3.

Figure 3 Good and bad ways of extending a typical 1930's semi-detached house



The left keeps the character of the original and its features such as tile hanging and brick detailing. The right introduces a flat-roofed extension, spoils the proportions, and loses original detailing.

- 8.7 The relationship of windows to wall space should reflect the traditional balance. Care must be taken in the positioning and design / treatment of windows overlooking adjoining properties and garden areas, so as not to unacceptably reduce neighbours privacy. Generally walls of extensions should not contain any windows at first floor level where that wall is close to the boundary, unless the window is of obscured glazing. The extension should respect the spacing between buildings as this is a component of the character of the street scene. The extension should regard any repetitive spacing between buildings and fit unobtrusively into the pattern of development rather than dominating its neighbours.
- 8.8 When an extension is reasonably prominent, pitched roofs are the best solution, but there may be less visible situations at the rear of properties in which a flat roof is acceptable. The pitched roof of the extension should not be higher than that of the existing dwelling, and its pitch, angles and materials should match those of the existing structure. A flat roofed extension must be no higher than the eaves of the house.
- 8.9 Details of ridges, eaves, gutters and downpipes should be shown on the drawings. In conservation areas and on listed buildings, materials used (e.g. cast iron) will be a significant consideration.
- 8.10 Boundary enclosures such as walls, railings and gates should be taken into account, with good examples being retained as much as possible. Where original walls have been removed, consideration should be given to their reinstatement in whole or part. Where new entrances are proposed, these should be in proportion to the existing walls and hedges. Ornate 'hacienda' style gateways with ornate sweeping brick walls and pillars should be avoided.

Materials

- 8.11 The external walls and the roof of the extension should normally be similar to those on the original building in terms of the type, texture and colour of materials used, as should the pointing of brickwork and stonework. Should the building have been altered inappropriately in the past, it may on occasions be better to seek to relate the extension to nearby buildings which have better retained the vernacular, that is, the indigenous local style.
- **Sustainability** - Local materials should be sourced wherever possible and the use of energy efficient materials and features.
 - **Contrast** - The use of contrasting materials can work well; for instance corrugated iron cladding has a traditional place within a countryside setting although there can be instances where contrast doesn't work well for instance glazing set in thick timber which could draw attention away from the character of the original building.

General Principles

8.12 In altering a dwelling, several principles should be kept in mind:

- Avoid over enlargement or drastic changes in character. (See Figure 5)
- Avoid inappropriate changes, such as pseudo foreign details intended for another climate and conditions. (See Fig. 4)
- Avoid unnecessary and inappropriate alteration of the buildings basic form and structure
- Avoid extensions and alterations which do not have regard to the existing site and surroundings in terms of other nearby dwellings and features such as trees, hedgerows and topography

These principles are now examined in greater detail in terms of scale and form.

Figure 4 Good and bad ways of extending a traditional house



A typical local rural house before extension.

The three examples all alter the house to give increased light to the front rooms, weather protection to the front door, and reroofing and extend it with a garage; two unsympathetically and suitably.



With pseudo-historic details, totally unauthentic



Modernised, yet neither truly old nor truly modern



Sympathetically done in relation to the building's original character

Scale and form

8.13 Any new extension should be subsidiary or subordinate in terms of overall floor area, size, height and proportion to that of the original dwelling and should sit comfortably alongside the existing house. Much will depend on the quality of the design of the proposed extension both in terms of the relationship of the extension to the existing dwelling, and the impact that the resulted extended property could have on its setting and surroundings. In terms of what constitutes 'subsidiary or subordinate', it is difficult to be precise, but up to half the original floor space could be deemed acceptable. Once a proposed extension exceeds the original floor space of the property by more than half its original area, then it will be particularly important to scrutinise the impact the proposed extension is likely to have against all the relevant considerations in the guidance provided in this SPG. The key principles that need to be adhered to are that:

- The aim should be to ensure that the extension harmonises with and complements the existing dwelling, rather than simply being added on to it. Fig. 5 illustrates the points. But it must also avoid over dominating smaller adjoining properties, in other words it should fit with its surroundings.
- The extension should ideally be centrally located on the gable, or set back slightly, to reduce its complexity and make it more traditional. Generally large windows on the gable should be avoided as they compete with the front elevation to be the focus of attention. The roof slope of the extension must be the same as that of the house. This means that the extension must be no deeper in plan than the original house. Otherwise the roof would be higher.
- The Council do not wish to specify a percentage figure for the increase in floorspace represented by an extension because this represents an 'artificial' method of assessing a proposal. However, it would be difficult to design an extension which came close to doubling (or more) the floorspace which appeared subordinate to or in harmony with the original house. This will be particularly important in the case of small rural properties with limited floorspace where proposals may come forward for large extensions which could dwarf the original.

8.14 There must be closer scrutiny where extensions are proposed on previously converted rural buildings; in most cases, conversion of rural buildings will have undergone an extension in the process, therefore extending further could harm the original character of the rural building. Separate guidance is contained in SPG Conversion of Rural Buildings.

Figure 5 Extending in scale



The original small cottage



Extended beyond recognition and totally unacceptable



Extension in scale

9. Particular forms of extensions

Front extensions

- 9.1 Normally extensions should not project forward of the existing building but in certain situations, where to do so would reflect an existing feature of the locality, they may be acceptable. For instance, where the existing building is set well back and the front extension reflects the design of the existing and does not cause detriment to the neighbouring dwellings it may be satisfactory to allow a sizeable front extension. However, opportunities for acceptable front extensions, with the exception of porches, are few and far between and it is not possible to provide specific advice or examples as each must be considered on its unique merits. The 45° guide, described under rear extensions, may be applicable.
- 9.2 It is sometimes possible to construct some porches without the need for planning permission. Whether they require planning permission or not, they should match the character and design of the existing property and should:
 - be small in size, simple in design and respectful of the original lines of the house;
 - incorporate matching materials and design features;
 - provide a pitched roof;
 - not exceed the sill height of the first floor windows.

- 9.3 Homeowners may sometimes seek to introduce more light and space by replacing 'flush' windows with bay, bow or box windows. Careful consideration needs to be given to such proposals on the principal elevation of a house where it is an alien feature within the locality. Such proposals which extend beyond a wall forming the principal elevation of a house will require planning permission.

Side extensions

- 9.4 Flat roofed extensions, which do not relate to the design of the existing building, are not generally acceptable. A side extension should not fill in the gap between residential properties so as to create the impression of a terrace in a line of detached or semi-detached houses, but setting back the extension by a metre or two could maintain a visual break. Generally the width of the extension should not exceed half the width of the existing frontage of the property, nor should it exceed half the width of the garden/plot between the property and the adjacent highway.

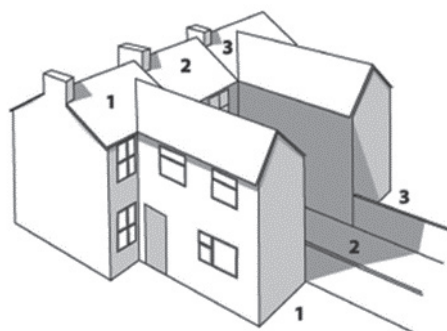
Rear extensions

- 9.5 As always, care should be taken to avoid adversely affecting the living standards of neighbours, as explained in LPG SPG Note. Space around Dwellings, Figure 6 shows examples of how not to do it.

Figure 6 Unacceptable rear extensions



Overlarge, insensitive, takes up too much of the garden and casts a shadow on the adjoining ground floor window



The middle house in this terrace is now badly overshadowed by the neighbours' overlarge extensions

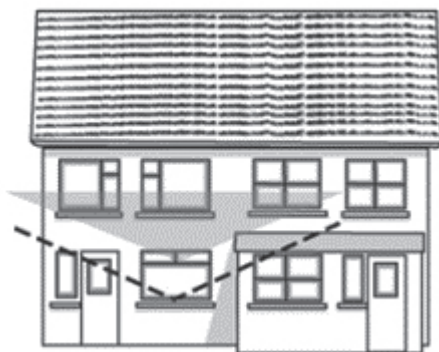
- 9.6 Generally, the Council will not permit rear extensions which are deeper than the width of the gable. The Council uses as a guide the 45° guide, explained in Figure 7. In summary, a 45° line is drawn from the midpoint of a sill of a window in a habitable room in an adjacent house. If the proposed extension would go beyond that line it would probably result in an unacceptable loss of light. The impact of the height of an extension can be assessed by drawing a line upwards at an angle of 25° and the extension should not be higher, as it would result in shadow and loss of light.

Figure 7 The 45° Guide

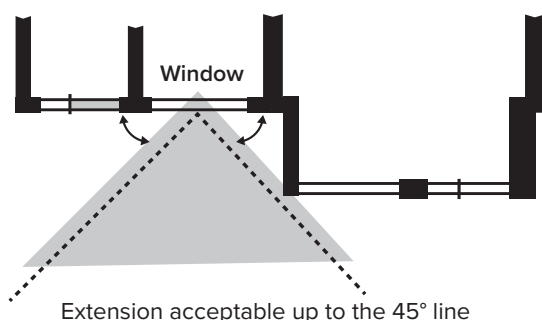
Example 1

Single storey rear extension
Semi-detached house

Rear View



Extension acceptable provided it is limited in depth as shown below

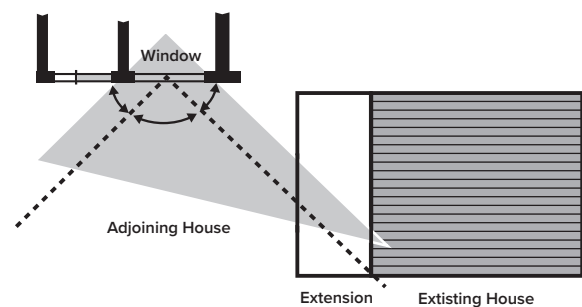


Extension acceptable up to the 45° line

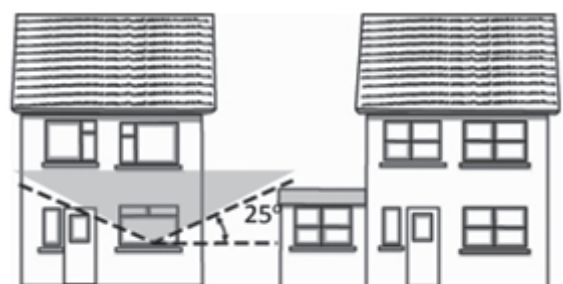
Example 2

Single and two storey side extension
Detached House

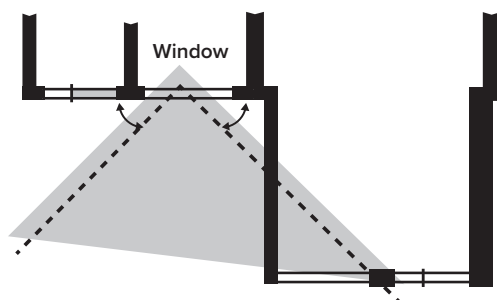
Plan View



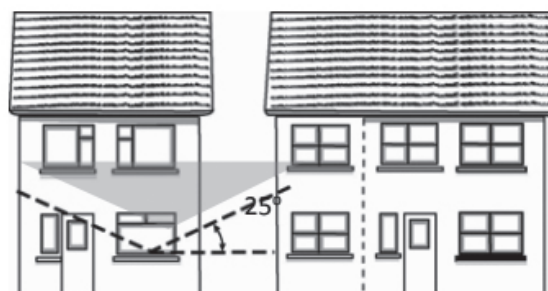
Although projecting slightly beyond the 45° line the extension is acceptable provided it is single storey as shown below



Single storey extension acceptable as below the 25° line



Extension unacceptable as it projects
Well beyond the 45° line



Two storey extension unacceptable
as it is above the 25° line

- 9.7 Two storey extensions should not normally be within 2 metres of a boundary that forms a party wall between terraced and semi-detached properties, and 1 metre of other properties. (Occasionally the only way properties can be extended is by building at the side up to the boundary, but this must be visually relieved by setting back the façade and/or lowering the ridge height.)
- 9.8 Roof alterations and dormer windows should be kept as small as possible so as to minimise the visual impact on the appearance of the property and the surrounding area, and to minimise the loss of privacy to neighbours. The following criteria should be met:
- dormer extensions should not normally be incorporated on front elevations;
 - dormer extensions should be as small as possible and in proportion to other features of the house. Where dormers would cover and dominate a large area of the roof they will normally be refused: Dormer windows should not occupy more than 40% of the area of the roof slope and must be recessed in from the sides by at least 750mm;
 - extensions must not project above the ridge line of the property;
 - dormer windows should follow the vertical lines of existing doors and windows;
 - where the use of roof space is desired, consideration should be given to the incorporation of sloping roof lights or traditionally styled dormer windows to create the sloping ceilings associated with attic rooms. Sloping roof lights are cheaper to install and are less intrusive than dormer windows, and can reduce the problems of overlooking.

Other Alterations to a dwelling

- 9.9 **Cladding / Pebbledashing** - In a conservation area, national park or AONB, it is necessary to apply for planning permission for cladding the outside of a house, with stone, artificial stone, pebbledash, render, timber, plastic or tiling. Outside of these areas, such works will not require an application for planning permission provided the materials are of a similar appearance to those used in the construction of the house. The external treatment of a house by such works can drastically alter its appearance and harm the character and appearance of the locality, and need to be considered carefully.
- 9.10 **External Flue, Chimney or Soil Stack** - these are normally considered to be permitted development provided:
- a. the installation, alteration or replacement of a chimney does not project by more than 1m from the highest part of the roof.
 - b. The property is not in a conservation area, national park or AONB
 - c. In the case of a listed building, the advice of the local planning authority is sought.
- 9.11 The aim in all cases is to ensure that the installation is done in a manner which works efficiently but is sympathetically sited so as to be as unobtrusive as possible.

10. Annexes and dependant relatives' accommodation

- 10.1 A residential annex is accommodation ancillary to the main dwelling within the residential curtilage and must not be used as a separate dwelling as set out in Policy HN6- Annex Accommodation. It is acknowledged that an extension of the house or conversion of an outbuilding may provide an opportunity to accommodate elderly or sick relatives, or older teenagers, giving them some degree of independence.
- 10.2 In open countryside locations both national guidance and policies PC1 and HN4 seek to strictly control new residential development in the form of a new dwelling. In this context policy HN6 does not allow new build annexes, preferring extension to a dwelling or the conversion of an outbuilding. Within settlement boundaries there may be scope for small scale new build but often annex proposals will be unable to have the necessary vehicular access, parking and garden area which would be necessary to operate as a separate residential unit. If, in an urban context, there was sufficient scope for a new dwelling, then a proposal could come forward as a small site 'windfall' proposal within the context of policy STR2. However, in open countryside locations, and urban locations where there are constraints on the plot and annex, then it will be necessary for any planning consent to incorporate a planning condition requiring that the annex remains incidental to the main house and that it is at no time to be subdivided from the main house or occupied as a self contained unit. These restrictions would apply to current and future owners and occupants.

10.3 There are a number of important considerations as set out below

- The annex should form part of the same ‘planning unit’ and it should not involve any separate garden area, vehicular access, or car parking area; the Council want to avoid the annex becoming a self contained dwelling which would result in the creation of two separate dwellings, and it will attach condition to prevent this occurring.
- The layout, design and physical relationship between the house and the proposed annex will be important considerations for the Council in deciding such planning applications; the annex should be reliant in part on the main dwelling for facilities.
- The size and scale of the accommodation should be considered as It is unlikely that a large annex would receive permission. As a guide, the scale should be such that the annex could be used as part of the main dwelling once the dependency need has ceased.
- Design should be carefully considered as some aspects such as the use of rooflights can alter the character and appearance of some buildings, especially those with historic character, and they can also cause light pollution.

Contacts

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Appendix 1

Local Development Plan Policies

HN5 House Extensions and Alterations

Extensions or alterations to existing dwellings will be permitted provided that the proposal:

- a. Is subsidiary in siting scale and form to the existing dwelling, and does not represent an overdevelopment of the site
- b. Respects the existing dwelling and surroundings in terms of design and materials;
- c. Will not have an unacceptable impact on the living conditions of occupiers of adjoining developments.

HN6 Annex Accommodation

Annex accommodation will only be permitted where it is:

- a. An extension to an existing dwelling; or
- b. A conversion of an existing building within the curtilage of an existing dwelling;

Provided that:

- i. Its usage is ancillary to the residential use of the existing dwelling and is reliant in part on the main dwelling for facilities;
- ii. It is limited in terms of size, scale and floor area to be reflective of the needs of the user;
- iii. It involves no separate garden area, vehicular access, or car parking area; and
- iv. It is in the same ownership as the main dwelling, with future occupancy controlled by means of a condition or legal agreement.

PC2: General Requirements for Development

All development should:

- a) harmonise with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape;
- b) not have a significant adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard, or the adverse effects of pollution;
- c) take account of personal and community safety and security in its design and layout;

- d) maximise sustainable travel choice by having safe and convenient access by foot, cycle, public transport and vehicles;
- e) not have an unacceptable effect on the highway network or highway safety as a result of problems arising from traffic generation, inadequate and poorly located parking spaces, servicing and manoeuvring;
- f) not result in or be susceptible to problems related to foul and surface water drainage, land stability, contamination, flooding, or pollution of light, air and water, either on or off site.

PC3: Design

All new development should:

- a. Be of a high quality, distinctive and inclusive design which respects and enhances the site and its surroundings in terms of its siting, layout, scale. Height, design, density, use of materials and landscaping, and creates a sense of place;
- b. Retain existing landscape and nature conservation features and incorporate opportunities to enhance biodiversity and ecological connectivity;
- c. Ensure that new materials are appropriate, durable and sympathetic to the character and context of the site;
- d. Protect and enhance the townscape, architectural, historic and cultural built environment;
- e. Incorporate suitable provision of space about dwellings, amenity space, landscaping and planting;
- f. Create attractive, accessible and safe healthy places with natural surveillance, visibility and sensitive lighting;
- g. Incorporate Sustainable Urban Drainage Schemes to bring about multiple benefits as an integral part of the development
- h. Protect the living conditions of nearby occupiers from any harmful effects of new development including overlooking, harm to outlook, increased activity/disturbance/noise.

PC4: Sustainability and Resilience of New Development

Development should:

- a) be sustainably located and accessible to non - private car means of travel, so as to reduce carbon emissions;
- b) be designed so as to be resilient and adaptable to the effects of climate change;
- c) incorporate planting, landscaping and design features within a Sustainable Management of Natural Resources (SMNR) approach which mitigate the effects of climate change such as increased rainfall events and high temperatures;
- d) make efficient use of resources through sustainable construction techniques and materials, including layout, siting and orientation to maximise solar gain, water conservation and waste reduction; and
- e) incorporate renewable energy technologies and carbon sinks where appropriate.

STR4 Principles of Sustainable Development, Design and placemaking

To promote and create new sustainable places, all development will be designed to a high standard in line with the sustainable placemaking design principles and should achieve local distinctiveness, be inclusive and accessible, and mitigate and adapt to climate change.

To achieve this, all development should:

- i. Be designed to be adaptable, safe and accessible, to respond to climate change, and for housing, adapt to changing needs over time;
- ii. Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;
- iii. Be accessible and connected, allowing ease of movement;
- iv. Make the best use of land, materials and resources;
- v. Contribute to the well-being of communities, including safeguarding amenity, the public realm, provision of open space and recreation, landscaping and parking provision of open space and recreation, landscaping and parking provision in residential contexts;
- vi. Incorporate new, and connect to existing green infrastructure, promoting biodiversity
- vii. Incorporate where possible on-site energy efficiency and renewable energy generation
- viii. Ensure there is capacity and availability of infrastructure to serve new development;
- ix. Manage water and waste sustainably;
- x. x. Ensure that it supports and sustains the long term well being of the Welsh language

Appendix 2

Comments and Responses to updated SPG - Extensions and Alterations

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Buckley Town Council	Could it be further clarified to state physical appearance of the building must be done in a sympathetic way that doesn't detract from the original look of the property.	Clarification on design instructions in order to ensure that any extension/alteration is sympathetic to original building.	Noted Para 4.2 of the SPG sets the scene by emphasising that 'care must be taken to ensure all additions respect the character of the building and its locality'. The SPG provides guidance on a range of considerations such as siting, form, scale, design and materials to ensure that any extension/alteration should harmonise and complement the existing dwelling. Policy HN5 provides the policy guidance on house extensions and alterations and should be read alongside policies PC2, 3 and 4. The SPG seeks to expand on this guidance.	None
Clwyd Powys Archaeological Trust (CPAT)	We always encourage pre- application consultation with the Planning Archaeologists at the regional Welsh Archaeological Trust	To add reference to encouraging developers to seek Pre Application Planning Advice from the Welsh Archaeological Trust	Part Accepted. A general note of advice encouraging all applicants to apply for Pre- Application Planning Advice would	Add after the 2nd sentence in paragraph 4.6 Applicants are encouraged to seek advice as part of the Pre- Application

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	from the applicant or their architect where the fabric or character of an historic property may be impacted. Where an impact is identified and cannot be minimised or reversed then some form of archaeological mitigation by e.g. an archaeological survey, excavation, watching brief or any combination of these may be required as a condition in accordance with TAN 24 (May 2017) and Planning Policy Wales (Feb 2021). In certain cases where an impact cannot be avoided, and the development would result in significant structural loss of historic fabric and the historic character of a building we may also object to proposals.	before submitting a planning application.	be more appropriate. The LDP is to be read as a whole, consequently all relevant policies will be considered as part of the planning application process and there are policies in the LDP which deal with the historic environment.	Planning Advice service with the Planning department before making any planning applications. The Pre-Application Planning Advice service will identify relevant policies, guidance and technical standards; confirm what information will be required for the planning application; identify any issues and how these may be overcome and give an indication of the means and timescale for determining the application'.
Clwyd Powys Archaeological Trust (CPAT)	Extensions and annexes can be particularly damaging to sub-surface archaeology where they occur within the	4.2 include the wording... 'respect the historic fabric and character of the building'	Accepted	Add 'historic fabric and' after 'respect' in the first sentence of paragraph 4.2 so that it reads: 'Extensions and

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	medieval historic core of a town or village or the building is within or adjacent to a recorded archaeological site.			improvements are a reasonable way of achieving more space and functionality within a dwelling to meet changing needs, but care must be taken to ensure all additions respect the historic fabric and character of the building and its locality'.
Clwyd Powys Archaeological Trust (CPAT)	Pre-application consultation with the Planning Archaeologists at the regional Welsh Archaeological Trust or, if the building is listed, the Built Heritage Conservation Officer, may be useful if the building is known to retain some historic fabric or historic character so that the heritage implications of the proposals can be discussed and mitigation agreed.	Add pre application discussion in para 5.2	Not accepted A previous comment of pre application discussions has been partly accepted, resulting in an above.	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
Clwyd Powys Archaeological Trust (CPAT)		In HN5 add: <i>Does not have an unacceptable adverse impact on the historic fabric and character of a building.</i>	Not accepted. Changes to policy wording in the LDP can only be made at when a review of the plan is carried out.	None
Clwyd Powys Archaeological Trust (CPAT)		In HN6 add: <i>Provided that...v. Does not have an unacceptable adverse impact on the historic fabric, character and setting of the existing building or impact any related sub-surface archaeology.</i>	Not accepted. Changes to policy wording in the LDP can only be made at when a review of the plan is carried out.	None
Clwyd Powys Archaeological Trust (CPAT)	PC3 in d. mentions the “historic and cultural built environment” so this is OK.	None	Noted	None
Holywell Town Council	Car parking provision should be considered as part of any approved extensions to dwellings, where the number of occupants are increased.	Consideration to be given to car parking provision as part of any extension proposal.	Partly accepted The Parking Standards SPG sets out what the relevant parking standards are for different sizes of dwellings. The Extensions and Alterations SPG does	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
NRW	<p>NRW does not normally comment on householder applications within flood risk zones (see our 'Consultation topic checklist'). However, we advise that you consider including reference to betterment and building above culverts.</p> <p>We recommend that consideration or reference to protected species should also be included in the 'New Housing in the Open Countryside' and 'Extensions and Alterations to Dwellings' draft SPG's.</p>	<p>71: 'Additional special considerations':</p> <ul style="list-style-type: none"> • "Where an existing dwelling is located in a flood zone, flood resilience should be incorporated into the alteration/extension designs where possible to provide a betterment. This could include raising electricity sockets and use of flood resistant materials." • "Any works over or to a culverted main river are likely to require a Flood Risk Activity Permit (FRAP) from NRW under the Environmental Permitting Regulations (EPR) 2016. Proposals 	<p>Partly accepted.</p> <p>Proposals for the extension or alteration of a dwelling in areas of flood risk would need to be judged against policy EN14 of the LDP</p> <p>Consider it appropriate to incorporate the essence of the first bullet point in 71.</p> <p>Consider the second bullet point is too detailed for this SPG to go into</p>	<p>Add to para 7.1 an additional bullet point 'in flood risk areas' and add a new paragraph with the following wording:</p> <p><u>Where an existing dwelling is located in a flood zone, flood resilience should be incorporated into the alteration/extension designs where possible to provide a betterment.</u></p> <p><u>This could include raising electricity sockets and use of flood resistant mater</u></p>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
		to build over existing culverts are likely to be opposed because of health and safety considerations, increased maintenance costs, and because this may preclude options to restore the watercourse in the future.”		
NRW	We recommend that consideration or reference to protected species should also be included in the ‘New Housing in the Open Countryside’ and ‘Extensions and Alterations to Dwellings’ draft SPG’s.	<p>We also advise reference to European protected species derogation criteria within the draft SPG’s, including:</p> <ul style="list-style-type: none"> - Requirement to demonstrate the proposal preserves public health or public safety or is imperative for reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment; and - There is no satisfactory alternative. 	<p>Not accepted.</p> <p>The Council has an existing SPG relating to Nature Conservation and Development and a more specialised SPG relating to Great Crested Newt Mitigation Requirements. These will be updated and reviewed and consultation undertaken on them prior to adoption.</p> <p>The aim of this SPG is to provide guidance and highlight planning policy principles relating to house extensions and promote good design.</p>	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
			Policies in the LDP and the suite of SPGs, when finalised, should be read together.	
NRW		Suggested wording to be added within the SPG: "For further information on the special qualities and design considerations relevant to the Clwydian Range and Dee Valley AONB we advise including cross references to the Clwydian Range and Dee Valley AONB SPG. New development should be designed to avoid or reduce light pollution and the Dark Skies SPG provides detailed practical guidance on achieving this.	Partly accepted. Suggest slightly amended wording	At the end of para 7.3 remove the text as follows: There are separate SPGs relating to the AONB which provide guidance on the design and lighting for those proposing new development. and replace with 'Regard should be had to the AONB SPG which sets out the special qualities, issues and design considerations relevant to the AONB and the Dark Skies SPG which provides clear advice in relation to lighting in the AONB.'
NRW	Paragraph 7.3. We advise ensuring the same information outlined above in relation to Paragraph	In relation to proposals for new housing within the AONB or its setting, we advise highlighting that these proposals	Not accepted. Policy HN5 and this SPG is concerned with extensions and alterations of existing	None

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	6.13 of the New Housing in the Open Countryside SPG is also incorporated into this SPG.	should typically be informed and supported by landscape and visual appraisals prepared by suitably qualified and experienced landscape professionals. We also advise stating that an early understanding of the potential landscape and visual impacts of a development can improve integration and ensure adverse effects are reduced and minimised or avoided altogether. Harm can often be avoided by selecting an appropriate site at the outset.	<p>dwellings and is supported by a suite of other policies in particular PC2 and PC3. Also, Policy EN4 relates to landscape character and policy EN5 relates to the AONB. The emphasis of policy and the SPG is that the extension or alteration is subsidiary in siting, scale and form and that it should harmonise or enhance the surrounding landscape. Given that there are also two SPGs relating specifically to the AONB, it is not considered that the level of detail being suggested here is appropriate for inclusion in this SPG.</p>	
NRW	It would be helpful to add a reference in the SPGs to other evidence on landscape, adding that in addition to the existing SPGs on the AONB, further supporting information	Add reference to further supporting information in relation to the character of the AONB, information should include LANDMAP and NRW online resource on Tranquillity and Place	Accepted	At the end of para 7.3 add the words :- <i>'NRW have produced some online resources which support the character and qualities of the AONB. These can be accessed at</i>

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	on the character and qualities of the AONB and its setting can be found in LANDMAP and the NRW online resources on Tranquillity and Place (Tranquillity and Place (arcgis.com)), and Dark Skies (Wales and Dark Skies (arcgis.com)).	and Dark Skies, these can be found at arcgis.com		https://naturalresources.wales and https://lucmaps.co.uk/NRWDarkSkies/
Penyffordd Community Council	Welcomes the consultation but has nothing further to add in regards to the draft SPGs.	None	Noted	None
Officer Led Changes		Para 5.1	Update reference to PPW 12	In para 5.1 add '12' after PPW and in second sentence after 'PPW' add 'in para 3.9'
Planning Strategy Group	In considering representations and responses, Planning Strategy Group on 14/03/24 agreed to additional text within section 4 Introduction regarding other changes to property which do not require planning		New para in section 4	Add new para after 4.2 with the following wording: 'This SPG focuses on extensions and alterations to houses which require planning permission. It is accepted that there may be smaller extensions, alterations

Representor	Summary of Comments	Change Sought	Response	Recommended Changes
	permission but which may harm the character and appearance of property and area.			or other works such as cladding or pebbledashing, which are permitted development and do not need planning permission. Careful consideration should be given to these works to ensure that they respect the character and appearance of the property and locality. The guidance in this SPG should be applied where relevant'.

