

Andrew Farrow
Chief Officer (Planning and Environment)
Flintshire County Council
County Hall
Mold
Flintshire
CH7 6NF

Date : 29 July 2022

Dear Mr Farrow ,

Flintshire Local Development Plan 2015 ±2030 : Inspectors Matters Arising
Changes

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The proposed MAC does not recognise that the policy needs to be capable of being met but does not recognise that there are different types of development. The emerging policy took a proportionate and pragmatic approach to delivering development, recognising that the criteria may not be applicable to every project. The modification to the policy is no longer practical or reasonable.



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Talacre-Gwespyr-Ffynnongroyw Green Barrier (as it was called in the Deposit Plan). As part of LDP
preparation, Flintshire Council has undertaken a process to review the green barrier designations, which
PPW requires it to do.

In reviewing the designations, the Council has concluded that the Gronant-Talacre-Gwespyr-Ffynnongroyw
Green Barrier meets only one of the five purposes of a green belt i.e. to assist in safeguarding the countryside
from encroachment. It is recognised that this does not necessarily mean that such a designation should not
be retained in principle and further could not be re<0052> Q V <004C>u Ge<0048005500440057>.99-3.9<004C>u 0 S. It is



all nearby sensitive receptors, including holiday accommodation, which should be protected from any adverse impacts associated with resource recovery activities and minerals extraction, such as noise, odour and visual impacts. Failing to protect amenity risks adverse impacts upon operators if they cannot attract new and repeat visitors. This would have direct and indirect consequences for the local economy, including the retention of jobs.



_____ (Proposed changes underlined and strikethrough).

considers that the proposed amendment would align Policy PE13 with national policy (PPW) . Specifically, paragraph 6.4.18 which relates to Special Protection Areas, Special Areas of Conservation and Ramsar Sites and states,

The proposed amendments to draft Policy PE13 would mean that this element of the Plan would be aligned with national policy, thereby satisfying the tests of soundness.

Policy EN13 (Renewable and Low Carbon Energy Development) (refs. MAC 098 and MAC 099)

recognises the importance of ensuring that renewable and low carbon energy generation can be developed in a way that does not cause unacceptable loss of amenity and accessibility to the area as stated in part ii of draft Policy EN13 should not be considered. However, _____

The amenity of any nearby sensitive receptors, including holiday accommodation, should be protected from any adverse impacts associated with renewable or low carbon energy activities, such as visual, noise and odour impacts. Failing to protect amenity risks operators not being able to attract new and repeat visitors to the local area with direct and indirect consequences for the local economy, including retaining jobs.

The following amendment to draft Policy EN13:

- i the siting, design, layout, type of installation and materials used do not have a significant adverse effect on the character and features of the proposed location;

_____ (proposed amendment underlined).

considers that the proposed amendment would align Policy EN13 with national policy (PPW) which states



certain types of development to its holiday parks and hotels, the ability of the Company to continue to attract new and repeat visitors will result in stagnating facilities which will be a harmful outcome for the Company. This would, in turn, have wider detrimental effects on the local economy (e.g. reduced employment and local spending). It is vital therefore for the LDP to have a positive planning framework to facilitate the delivery of this investment and the delivery of the Plan objectives.

supports the addition of Policy PE15 as it provides clarity for future development proposals for telecommunications infrastructure within the Borough. However, consider section (iii) needs to include other neighbouring uses in addition to the natural heritage, historic environment, or the amenity of neighbouring residents.

The following amendment is proposed:

_____ (Proposed amendments underlined and with strikethrough).

_____ considers that the proposed amendment would align Policy PE15 with national policy (PPW) which states