

Denbighshire County Council,
Local Development Plan
2006 – 2016

Draft – Annual Monitoring Report 2015

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Strategic Planning and Housing
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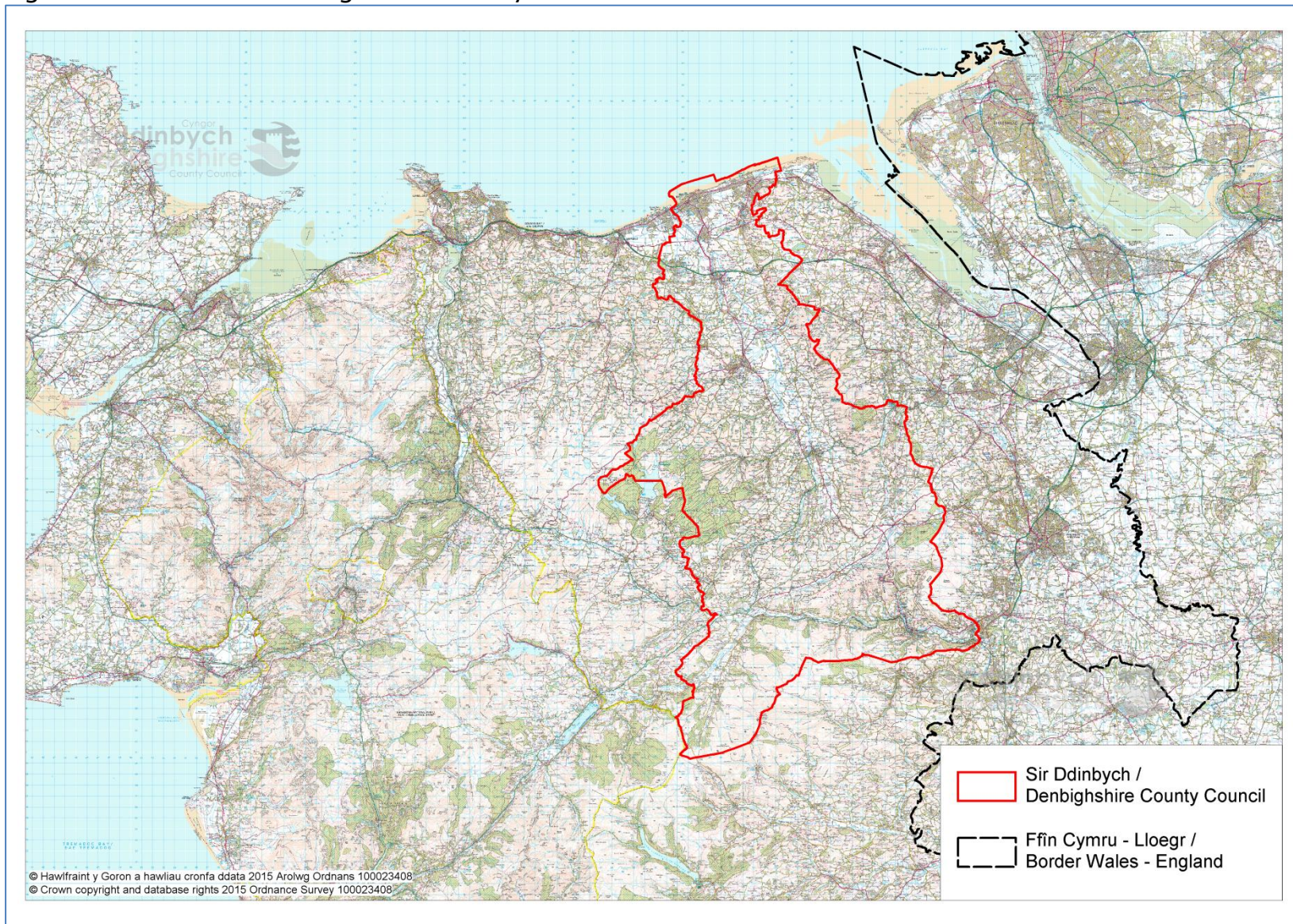
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Figure 1: Location of Denbighshire County Council in North Wales



1. Executive Summary

- 1.1 This is the first annual monitoring report (AMR) prepared by Denbighshire County Council. The document reviews the relevance and success of the LDP, and looks at the extent to which the LDP Strategy and local policies are being delivered and achieved.
- 1.2 There have been several changes made to national policy, technical advice notes and other sector guidance documents since Plan adoption. Chapter 5 discusses in detail those changes that have implications for Denbighshire LDP policies; notably Technical Advice Note (TAN) 1: Joint Housing Land Availability, TAN 20: Planning and the Welsh Language, and planning changes to Waste and Minerals.
- 1.3 Detailed local policy monitoring identified two local policy areas which do not operate as expected at the time of Plan adoption and, therefore, may require further attention: BSC 1 – Growth Strategy for Denbighshire (esp. 5-year housing land supply), and BSC 10 – Gypsy and Traveller Sites. Details for all local policies and, where required, proposed actions to address the shortfall, are set out in Appendix 1.
- 1.4 Whilst housing delivery, i.e. granted planning permission and completions, is in line with the LDP Growth Strategy, spatial distribution and settlement classification (see Chapter 6), there is an identified need to increase the amount of homes build every year. The Council do not wish to review the LDP Growth Strategy on the mere quantitative lack of houses, and outlines various actions to support prospective developers to address the challenges.
- 1.5 Local policy BSC 10 is highlighted because the Council was committed to instigate the search for a suitable site, i.e. identified and planning permission granted within 18 months of receipt of the North West Wales LHMA, should it identify a specific need. The Gypsy & Traveller Accommodation Needs Assessment (GTANA) element of the Local Housing Market Assessment (LHMA) was received in May 2013 and ratified by the Council on 3th December 2013. The Council is currently undertaking an updated GTANA with Conwy CBC. This is now a statutory requirement (Housing Act 2014). Should a need to be identified, the Council will be obliged to address that need.
- 1.6 The Sustainability Appraisal (SA) - monitoring as part of the AMR is conducted in a similar way like the local policy monitoring. No SA Objective has been identified that requires further considerations or immediate actions. The assessment of individual SA Objectives, including commentary, can be found in Appendix 2. Due to the nature of individual indicators and trigger levels, the Council has only limited powers to steer change but will consider measures that positively contribute towards meeting the SA Objectives.

- 1.7 Denbighshire County Council do not wish to review the Plan on the basis of not meeting the 5-year housing land supply as a result of the first LDP annual monitoring report. The Plan was found to meet the tests of soundness at the end of the examination process including demonstrating that sufficient supply of land for residential development is available in the County.
- 1.8 The Council should complete at least 2 formal AMRs before the Plan is reviewed in order to demonstrate specific trends and patterns emerging. It is essential to have the evidence to justify the need to change or amend the Plan.

2. Introduction

- 2.1 Denbighshire County Council Local Development Plan 2006 – 2021 (LDP) was adopted on 4th June 2013. It provides a clear vision on how new development can address the challenges faced by the County and where, when and how much new development can take place up to 2021.
- 2.2 Under the obligations of section 76 of the Planning and Compulsory Purchase Act 2004, as amended, and section 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, the Council is duty bound to produce an annual monitoring report for submission to Welsh Government (WG) by 31st October each year and publication on its website.
- 2.3 This is the first annual monitoring report (AMR) prepared by Denbighshire County Council. Although policy performance is assessed and based on the period 1st April 2014 to 31st March 2015, the document includes reference to changes in legislation and local circumstances that have influenced decision-making since Plan adoption in June 2013.

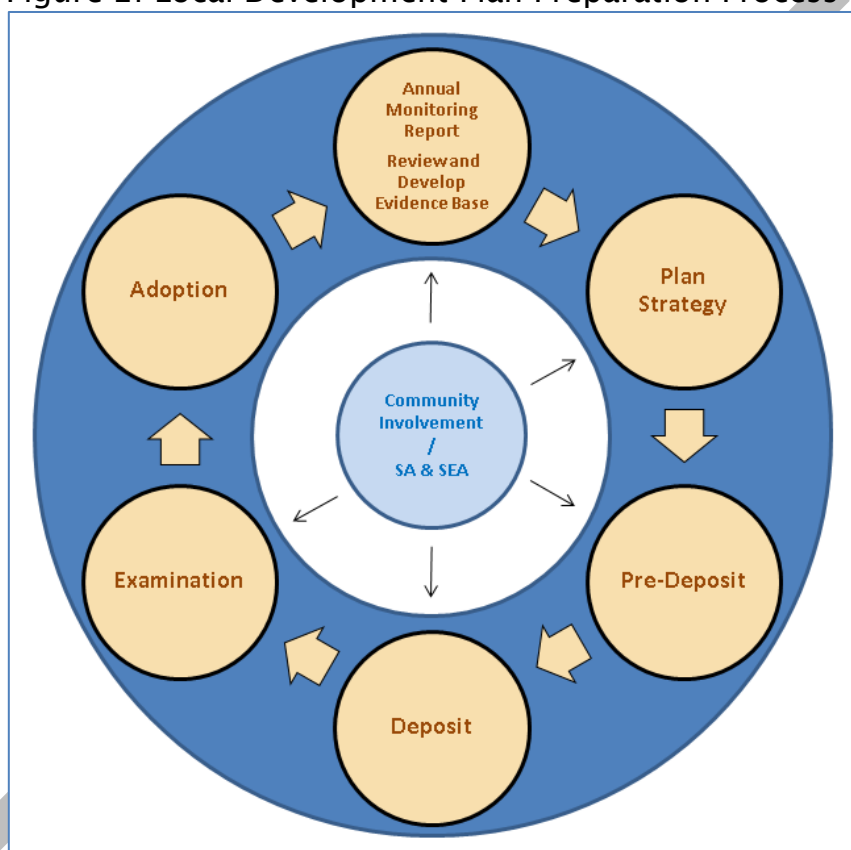
3. Background

- 3.1 Monitoring represents an essential feedback loop within the cyclical process of policy-making. It should identify the key challenges, opportunities and possible ways forward for revising and adjusting local policies. The process is a tool for reviewing the relevance and success of the LDP and identifying any changes necessary. It also provides feedback on the extent to which the LDP Strategy and policies are being delivered and achieved.
- 3.2 Local planning authorities may wish to make amendments to their LDP and supplementary planning guidance documents as a result of the monitoring exercise. A major Plan review must be undertaken after 4 years of adoption and should consider elements of the sustainability appraisal and, consequently, the soundness of the Plan. Details on the

LDP Review process can be found in the document: 'Local Development Plan: Manual', Chapter 9.6. Welsh Government will publish further guidance in Autumn 2015.

3.3 The LDP contains a detailed monitoring framework in Chapter 7, which is part of the adopted LDP and sets out performance targets for the LDP Objectives and various local policies. Individual indicators are linked to trigger points that when met may result in a review of the relevant local policy.

3.4 Figure 2: Local Development Plan Preparation Process Diagram



Adapted from Welsh Government, Local Development Plans Wales (2005), Figure 1

3.5 Local Development Plans Wales 2005 (see paragraph 4.43) contains further guidance on the assessments that should be included in AMRs:

- whether the basic strategy remains sound (if not, a full plan review may be needed);
- what impact the policies are having globally, nationally, regionally and locally;
- whether the policies need changing to reflect changes in national policy;
- whether policies and related targets in LDPs have been met or progress is being made towards meeting them, including publication of relevant supplementary planning guidance (SPG);
- where progress has not been made, the reasons for this and what knock on effects it may have;

- what aspects, if any, of the LDP need adjusting or replacing because they are not working as intended or are not achieving the objectives of the strategy and/or sustainable development objectives; and
 - if policies or proposals need changing, what suggested actions are required to achieve this.
- 3.6 Plan monitoring and Plan review are two closely linked processes but must remain separate. Whilst monitoring comprises of data collection and assessment, i.e. the AMR presents facts, a Plan review builds on those facts, which turn into evidence that may influence political decision-making. Since this is the first AMR produced by Denbighshire County Council, it is difficult to demonstrate any trends that justify consideration for a Plan review.
4. Denbighshire socio-economic situation
- 4.1 The purpose of this chapter is to provide an overview of the socio-economic situation in the County. It does not merely set a statistical background for the Sustainability Appraisal but also paints the picture of the environment in which the local policies are applied to new developments.
- 4.2 **Population & Demographics:** The most recently available (2013 based) population and household estimates place Denbighshire's population at 94,510 and number of households at 41,043. The 2011 Census illustrated that 21% of Denbighshire's residents were 65 and over; this is above the national average of 18.4% and is illustrative of an ageing population within the County. Population projections suggest that this percentage will increase to 24.7% by 2021 putting further strain on services provided to residents who are 65 and over.
- 4.3 **Welsh Language:** According to the annual population survey estimates published by Statistics Wales, an estimated 38.7% of residents over the age of 3 could speak Welsh at the year ending December 2013. This figure is 2.1% higher than the same figure for Conwy, but markedly less than for Gwynedd or the Isle of Anglesey, the two most westerly North Wales authorities. The percentage of residents over the age of 3 who could speak Welsh at the year ending December 2006 was 35.8%, which means an increase of almost 3% between measures taken in 2006 and 2013; Denbighshire is the only North Wales local authority to witness an increase. Electoral wards in Rhyl and Prestatyn have low percentages of Welsh speaking residents, with more rural wards in the middle and towards the south of Denbighshire exhibiting a higher percentage of Welsh speakers.
- 4.4 **Employment & Economy:** At the most recent count (February 2015), there were 1,488 people in Denbighshire who were claiming job seekers allowance. This is a rate of 2.6% and uses the number of

people between 16-64 years-old as the denominator. According to the ONS Annual Survey of Hours and Earnings, the median weekly earnings for a full-time Denbighshire resident is £417 approximately; this is significantly below the median earnings recorded for Conwy, which is £516. In 2013, there were 3,195 active businesses in Denbighshire; this is an increase from 3,155 in 2006. However, the intervening period witnessed an increase until 2008, a year which witnessed a peak of 3,320. Since then, the number of businesses decreased down to a low of 3,115 in 2012 before recovering to 3,195 in 2013. The Gross Value Added for Denbighshire in 2012 (the most recent year that data is available for) was £13,555, which is an increase of £1,725 from 2006.

4.5 **Housing & Homelessness:** Denbighshire County Council has met the Welsh Quality Housing Standard and is one of the first local authorities in the whole of Wales that has achieved this. The Welsh Housing Quality Standard does not just apply to Council owned properties but applies to all social housing stock and therefore housing associations. Wales & West have already completed the Standard, whilst North Wales Housing, Grwp Cynefin and Clwyd Alyn are working towards compliance. During the 2013/14 financial year, there were 150 households that were accepted as homeless in Denbighshire. In spite of the economic situation, the number of households accepted as homeless has decreased by 160 households from 2006/07.

4.6 **Deprivation:** According to the Welsh Index of Multiple Deprivation, 14% of Denbighshire's lower layer super output areas (LSOAs) are in top decile of most deprived LSOAs in Wales. In short, this means that 8 of Denbighshire's 58 LSOAs are amongst the most deprived. Most of the deprivation is fuelled by the social and economic issues in the North of the County, and, in particular, in Rhyl. Rhyl West LSOAs and Rhyl South West LSOAs are deprived areas, with Rhyl West 2 being the second most deprived in all of Wales. In comparison, other North Wales local authorities have much lower percentages of LSOAs in the top decile. The Isle of Anglesey and Flintshire have only 2% of their LSOAs in the top decile, Gwynedd has 4% in the top decile and Wrexham and Conwy both have 6% in the top decile. In comparison to the region, it is clear that Denbighshire has stark deprivation issues in certain parts of the County.

5. Changes to National Policy and Technical Advice Notes

5.1 The Planning Inspectors who conducted the examination into the Denbighshire Local Development Plan concluded that the Plan met the tests of soundness and, hence, was compliant with national policy and guidance on the day of adoption.

5.2 There have been made several changes to national policy, technical advice notes and other sector guidance documents since Plan

adoption. These are listed in table 1. This chapter discusses in detail those changes that have implications for Denbighshire LDP policies and require further consideration regarding potential policy review.

5.3 Table 1: New legislation and guidance documents since June 2013

Document	Date
Planning Policy Wales (6. Edition)	February 2014
Planning Policy Wales (7. Edition)	July 2014
Technical Advice Note 1: Joint Housing Land Availability Studies	January 2015
Technical Advice Note 12: Design	July 2014
Technical Advice Note 20: Planning and the Welsh Language	October 2013
Technical Advice Note 21: Waste	February 2014
Technical Advice Note 23: Planning for Economic Development	February 2013
Technical Advice Note 22: Sustainable Buildings (deleted)	July 2014
The Town and Country Planning (General Permitted Development) (Amendment) (Wales) Order 2013	September 2013
The Town and Country (General Permitted Development) (Amendment) Order 2014	November 2014
The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2014	September 2014/ November 2014 (amendment no.2)

5.4 *Technical Advice Note 1: Joint Housing Land Availability*

5.41 Welsh Government published a revised version of TAN 1 in January 2015. The guidance document sets out the principals of conducting the Joint Housing Land Availability Study (JHLA) and, hence, the determination of the 5-year housing land supply in the County. If the local planning authority (LPA) has an adopted LDP, the 'residual' method is the only one to be used for calculating housing land supply instead of 'past building' rates. The disadvantage of the dictated method is that it can indicate land shortages, which do not exist in practice.

5.42 Maintaining a 5-year supply of housing land is a principal measure of performance for an adopted Local Development Plan. The 2015 JHLAS has been completed and the Statement of Common Ground agreed with the members of the study group. The report has not been published yet but indicates a housing land supply of 2.1 years. Since the Plan was adopted in 2013, the 2015 Joint Housing Land Availability Study (JHLAS) includes land allocated for residential use in the LDP. That means that actually more land was available for residential development. Table 2 illustrates the differences that

individual calculation methods have on the 5 year housing land supply figure. Previously local planning authorities have been able to use an average of past completion rates to derive housing land supply.

5.43 Table 2: Impact of chosen method on 5-year housing land supply

Method used for calculating housing land supply	Result
Based on 10 year past completions	8.75 years
Based on 5 year past completions	9.97 years
Based on residual method	2.10 years

Source: Denbighshire County Council (2015)

5.44 The residual method focusses on the remaining number of houses to be delivered in the remaining Plan period, whereas the past completions/ built method reflects to a greater extent what has actually been delivered on the ground by the construction industry in the County. Comparing both methods identifies a significant problem in Denbighshire. There is sufficient land available for residential development but delivery is dependent on developers. The industry has not taken up the land available, due to viability concerns, to deliver as many houses per year as required by the Plan.

5.45 Planning Policy Wales (July 2014), paragraph 9.2.3, stresses the need for a local planning authority to demonstrate that a 5-year housing land supply is genuinely available in the County. The Denbighshire JHLA 2015 indicates a supply of 2.1 which is a lower figure than the 5 years stipulated by PPW. Technical Advice Note (TAN) 1 'Joint Housing Land Availability Studies', paragraphs 2.4 and 3.4, advises (but does not compel) local planning authorities to consider a Plan review should the supply figure not be met.

5.46 Denbighshire does not wish to review the Plan on the basis of not meeting the 5-year housing land supply as a result of the first LDP annual monitoring report. The Plan was found to meet the tests of soundness at the end of the examination process including demonstrating that sufficient supply of land for residential development is available in the County.

5.47 The local planning authority should complete at least 2 formal AMRs before the Plan is reviewed in order to demonstrate specific trends and patterns emerging. It is essential to have the evidence to justify the need to change or amend the document. The LDP is not due for a full review until 2017, and by that date a new set of household projections will have been produced, which may well be very different to previous projections.

5.5 *Welsh Language and Culture*

5.51 Sites allocated in the Denbighshire LDP for specific land uses were screened with regard to potentially adverse effects on the Welsh

language as part of the Sustainability Appraisal. LDP policy RD 5 'The Welsh Language and the social and cultural fabric of communities' lays out thresholds and criteria when the local planning authority expects a Community Linguistic Statement or Community and Linguistic Impact Assessment to be submitted with a planning application.

5.52 In October 2013, Welsh Government revised Technical Advice Note (TAN) 20: Planning and the Welsh Language. Further advice on the consideration of the Welsh language as part of the Local Development Plan making process was published in a Practice Guidance in June 2014. TAN 20, paragraph 4.1.2, clarifies that planning applications should not be accompanied by Welsh language impact assessments to avoid duplication with the site selection process as part of the Sustainability Appraisal during Plan production.

5.53 There is a potential conflict between LDP policy RD5 and TAN 20. However, the local policy does not narrowly focus on Welsh language requirements but broadens the assessment to include culture, character and balance of local communities. These matters are not dealt with by the Technical Advice Note. The document further clarifies, in TAN 20 paragraph 3.11.3, that local planning authorities with an local plan adopted prior to October 2013, have to achieve TAN compliance at the 4-year review stage, if supported by evidence. Therefore, Denbighshire will need to review its position with regard to RD 5 at the next Plan review stage.

5.6 *Minerals*

5.61 The LDP was produced using the Regional Technical Statement for Aggregates published in 2009, which recommended that no rock resource allocation was required at the time of publication. The Council was advised to provide for 1 Million tonnes (Mt) Sand and Gravel to cover at least a 12 year period. In response to this requirement, the LDP identified a 'Preferred Area for Sand and Gravel', designated under local policy PSE 17, within which applications for the extraction of up to 1Mt of Sand and Gravel will be permitted, taking into account the level of need identified by the Regional Aggregate Working Party apportionment figures.

5.62 The North Wales Aggregates Working Party has undertaken a review of the Regional Technical Statement; culminating in the publication of the 1st Review of the document in August 2014. As a result, Denbighshire is advised that new allocations totalling 2.2 Mt for Sand and Gravel and 0.8 Mt for crushed rock should be identified over a 25 year period until 2036. These recommendations are based upon the need for an LDP to meet needs over the entire Plan period plus 10 years for crushed rocks and plus 7 years for Sand and Gravel in line with Minerals Technical Advice Note 1: Aggregates, paragraphs 31 and

32. Consideration therefore needs to be given to what the level of requirement would be over the Plan period and 10 / 7 years beyond.
- 5.63 The annual requirement for crushed rock is based upon an annualised apportionment of 0.89 million tonnes per year. This equates to a requirement for 8.9 Mt over a 10 year period (2011 – 2021) and to a requirement for 17.8 Mt over a 20 year period (2011 – 2031); and is well below the 22.07 Mt landbank available as at December 2010). The annual requirement for sand and gravel is based upon an annualised apportionment of 0.1 Mt per year. This equates to a requirement for 1 Mt over a 10 year period (2011 – 2021) and to a requirement for 1.7 Mt over a 17 year period (2011 – 2028), which is greater than the 1Mt provision made in the LDP for Sand and Gravel.
- 5.64 LDP policy PSE17 is considered to be sufficiently flexible to enable the increase in requirement for Sand and Gravel to be met. In October 2014, Planning Committee agreed a Position Statement to demonstrate Denbighshire’s commitment to contributing towards demand for minerals. The existing landbank for crushed rock is considered to be sufficient.
- 5.7 *Waste*
- 5.71 The LDP was written in the context of the North Wales Regional Waste Plan 1st Review (NWRWP) (April 2009). Local policy VOE 7 monitoring indicator and trigger levels were established using the requirements contained within the NWRWP. Subsequently, Welsh Government published a new Chapter 12 on Waste in Planning Policy Wales (2014) and a revised Technical Advice Note 21 (February 2014) which removed the requirement to produce Regional Waste Plans (RWP) and the need for local Plans to have regard to the pertinent RWP.
- 5.72 In order to deliver the Waste Strategy ‘Towards Zero Waste’ (2010), Welsh Government also published a number of Sector Plans, including the Collections, Infrastructure and Markets Sector Plan (CIMSP) in July 2012. The CIMSP has effectively superseded the RWP in terms of assessing need, and Planning Policy Wales requires local Plans to demonstrate how the CIMSP has been taken into account during document production.
- 5.73 Capacity calculations contained within the NWRWP are out of date and have been superseded by national policy. Therefore, the monitoring indicator and trigger level defined in the local Plan are of limited relevance. Should the Council consider reviewing local policies in the future, the requirements as set out in TAN 21 should be used to formulate monitoring indicators and trigger levels. Local Development Plans have to ascertain whether:
- a) Support for any local authority procurement programmes is necessary;

- b) Any agreement contained within the Regional Waste Monitoring Report needs to be addressed by way of a site allocation; and
 - c) Whether any opportunities exist to derive benefits from facilitating co-location and the development of heat networks.
- 5.74 a) Is support for any local authority procurement programme necessary? During development of the LDP consideration was given to any spatial requirements of the local authority procurement programmes, namely the North East Wales Hub Food Waste Project, a collaboration between Denbighshire, Flintshire and Conwy to procure food waste treatment and the North Wales Residual Waste Treatment Partnership Project, a collaboration between Denbighshire, Flintshire, Conwy, Gwynedd and Anglesey to procure residual waste treatment. An allocation was included in the Denbighshire Local Development Plan near Rhualt, at the Waen, which has been taken forward and developed as part of the North East Wales Hub Food Waste Project. No spatial requirements were identified within Denbighshire for the North Wales Residual Waste Partnership Project. This matter should be kept under review, particularly as supporting infrastructure requirements may change.
- 5.75 b) Does any agreement contained within the Regional Waste Monitoring Report need to be addressed by way of a site allocation? As identified above, no Regional Waste Monitoring (RWM) Report had been published at the time of writing this report. Consideration has therefore been given as to whether any action is considered likely to be required within Denbighshire in advance of the publication of the RWM report. As identified above, the 5 year trigger for action has not yet been reached with respect to landfill and therefore no action is considered necessary. However, this matter should be kept under review.
- 5.76 c) Do any opportunities exist to derive benefits from facilitating co-location and the development of heat networks? As identified above, the North Wales Residual Waste Partnership project has not identified any spatial requirement for Denbighshire and is currently looking to locate a facility on the Deeside Industrial Estate, a location which also offers potential opportunities for the development of heat networks. Any facility would therefore need to be delivered by the market. There is a fine balance to be met between having sufficient capacity to manage residual waste arisings and having an overprovision, which the Collections, Infrastructure and Market Sector Plan cautions against. Proposals for such facilities should therefore be rigorously tested to ensure that they would meet a required need and not result in overprovision of recovery.
- 5.77 Although national policy and guidance has changed with respect to waste, LDP policy VOE 7 is considered sufficiently flexible to enable waste infrastructure to be delivered. This matter should be kept under

review to ensure that any emerging requirements can be met through the LDP. TAN 21 includes a regional requirement for monitoring which will monitor progress and level of need with respect to recovery and disposal and where necessary identify where additional provision needs to be made. In the event that additional provision is identified as necessary in Denbighshire the waste policies would need to be reviewed to ensure that an appropriate allocation can be identified. It is not considered necessary to identify a monitoring target or trigger level within the monitoring for the LDP to address this, as a review of policy would be prompted by the significant contextual change demonstrated by the Waste Planning Monitoring Report.

- 5.78 Policy VOE 8 includes a test that proposals outside development boundaries will be supported where they meet an unmet need identified in the Regional Waste Plan. Since the requirement to produce and have regard to the Regional Waste Plans have been removed from national policy and guidance, the strict application of this test could result in the approval of proposals that are contrary to national policy and/or guidance. In reality, however, when making decisions regarding proposals for waste management the Local Authority would be obliged to consider whether any material considerations would support a different decision being taken. The changes to national policy and guidance would be considered significant in this respect. For example, in the event that the CIMSP or any regionally produced Waste Planning Monitoring Report identify an un-met need for waste infrastructure, it would be appropriate for these to apply to Policy VOE8 instead of the Regional Waste Plan. It is, however, recommended that this policy is amended during the review of the LDP to enable this inconsistency to be addressed.

6. LDP Growth Strategy

- 6.1 One of the key issues the Denbighshire Local Development Plan needs to address is the need for housing in general and affordable housing. The broad spatial distribution of growth was established at the Pre-Deposit stage with growth being mostly concentrated in the north of the County with more limited growth to meet local needs in all other areas.
- 6.2 The settlement strategy for the County is outlined in local policy BSC 1 – Growth Strategy for Denbighshire. There is a single Key Strategic Site selected in the County – Bodelwyddan. Lower growth areas have been identified at Rhyl, Prestatyn, St Asaph, Denbigh, Ruthin and Corwen. These are all established centres with a range of services to meet regional or local needs. Rhyl and Prestatyn are the main centres within the County but are heavily constrained by issues such as flood risk; topography; environmental designations and infrastructure capacity. These constraints have resulted in levels of growth for these areas being lower than those previously experienced.

6.3 A number of villages have been identified and development boundaries drawn, where appropriate sites allocated for housing, community facilities and recreational open space have also been identified on the proposals maps. There have been a number of hamlets identified to allow for affordable housing growth to meet purely local needs in very rural areas. Housing development in hamlets will be limited to a quota set for each settlement, located within the areas of search defined on the Proposals Maps and tied to local needs.

6.4 Outside of villages and hamlets, other rural areas have been classified as open countryside where development opportunities will be strictly controlled in line with national policy. A limited contribution to housing needs will be made through the conversion of redundant rural buildings and infill development.

6.5 Tables 3, 4 and 5 sets out the number of dwellings granted planning permission and houses completed during the monitoring period 2014/15 in accordance with their position in the LDP Growth Strategy.

6.6 Table 3: Granted permissions for dwellings in line with LDP Growth Strategy (2014/15)

LDP Growth Strategy	Number of houses
Key Strategic Site Bodelwyddan	(1715)*
Lower Growth Towns	165
Villages	9
Hamlets	nil
Open Countryside	16
Total	190

* - Outline permission was granted in January 2015; subject to a Section 106 agreement. Terms of S106 agreement are currently being drafted.

6.7 Table 4: Housing completions in line with LDP Growth Strategy (2014/15)

LDP Growth Strategy	Number of houses
Key Strategic Site Bodelwyddan	n/a
Lower Growth Towns	134
Villages	20
Hamlets	3
Open Countryside	29
Total	186

6.8 As can be seen from tables 3 and 4, the performance of the LDP Growth Strategy merely lacks in the quantitative number of houses to be built in line with LDP policy BSC 1 and its monitoring target but not in their spatial distribution and settlement classification. The Council's Strategic Planning & Housing and Development Management teams are working on the production of supplementary planning guidance

notes, site development briefs, housing site prospectus, and the provision of high quality planning advice to make Denbighshire an attractive County for house builders to invest.

6.9 Table 5: Spatial distribution of house completions in 2014/15

Location	Number of houses
North of the County	133
Central area	25
South of the County	28
<i>Total</i>	186

6.10 The total number of houses completed shown in tables 4 and 5, i.e. 186, differs by 10 houses from the figure recorded against BSC 1 in the Denbighshire Joint Housing Land Availability and Appendix X. This is due to 186 is the gross figure for completions, whilst 176 is the net figure, including 10 dwellings lost due to conversion or replacement dwellings.

6.11 As indicated by tables 3, 4 and 5, houses granted planning permission and house completions during the monitoring period were in line with the LDP Growth Strategy and the spatial distribution of houses in the County.

6.12 Whilst planning significantly contributes towards the delivery of affordable housing (see LDP policies BSC 4, BSC 8 and BSC 9), Denbighshire County Council places great emphasise on exploring additional and alternative ways of providing affordable housing for people in need.

6.13 The Council is taking a number of actions to increase affordable housing provision in the County:

- Currently investigating innovative housing funding and delivery mechanisms for affordable housing and good practice at other local authorities, such as joint venture schemes, private investment, establishing a housing delivery company, innovative actions to bring empty homes back into use and address eyesore sites. This also includes identifying a wider range of development partners to assist in increasing the supply of affordable housing.
- Asset review underway to establish best use and potential to develop/ redevelop Council-owned land. A cross-departmental group has been established to promote and facilitate the redevelopment of several Council-owned sites.
- Work has also commenced on promoting other potential development sites and formalising pre-planning application discussions with developers.

- Work has commenced on a standard approach to S106 agreements, with the aim of simplifying and speeding up the planning process, whilst ensuring that it meets mortgage providers' requirements.
- Work is underway in conjunction with Grwp Cynefin (i.e. registered Social Landlord) to review and simplify the affordable housing application process and register, alongside developing a marketing strategy. Re-launch and promotion of the register will be carried out following this process.

7. Gypsy & Traveller Site

- 7.1 An understanding of Gypsy and Traveller accommodation issues is essential to make properly planned provision and avoid the problems associated with ad hoc or unauthorised encampments. A comprehensive accommodation assessment and strategy to meet the need which is identified will greatly strengthen the ability of local authorities to respond swiftly and firmly to inappropriate unauthorised developments and encampments and help to avoid future unauthorised camping and development.
- 7.2 The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under the Housing (Wales) Act 2014.
- 7.3 All local authorities are required to undertake a new assessment by 26th February 2016 and every 5 years thereafter. Denbighshire County Council will be conducting a joint Gypsy and Traveller accommodation needs assessment with Conwy County Borough Council in 2015/2016 to meet the Welsh Government deadline. Having completed the required assessment, if a need has been identified, the Council will be required to address that need in line with local policy BSC 10.

8. Sustainability Appraisal Framework

- 8.1 The SA Framework was developed using the review of plans and programmes, baseline data and key sustainability issues and opportunities. The framework comprises a series of SA Objectives which are aspirational goals that Denbighshire should strive to work towards through the preparation and implementation of the LDP.
- 8.2 The SA Framework is used to test the sustainability performance of the LDP and highlighting its strengths and weaknesses. Monitoring is a fundamental activity that will enable Denbighshire County Council to assess:
- the implementation of the LDP objectives and targets;

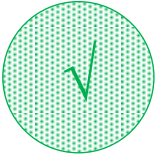

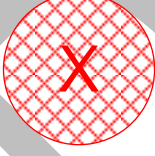
- the performance of mitigation measures;
- the undesirable sustainability effects; and
- whether sustainability predictions were accurate.

8.3 The performance of each of the Local Development Plan polices has been assessed using the SA Framework and are reported in the SA Report (2011) and Appendices. Results from this SA Objectives monitoring exercise will be used to adjust local policies if required as part of the Plan review in the future. Appendix 2 contains a detailed SA Objectives monitoring table.

9. Local Policy Monitoring

9.1 Information and data are drawn from multiple sources: Joint Housing Land Availability Study, planning applications received by the Council and survey work undertaken by other departments and services in the Council. The assessment of individual local policies, including commentary, can be found in Appendix 1.

9.2 To visually aid monitoring, the following symbols are used to highlight local policy performance:

	<p>Local policy performs satisfactorily, i.e. policy target has been met, is ongoing or exceeds expectations.</p>
	<p>Policy target has not been met yet but the Council expect to meet the target over the next 12 months or the monitoring period is too short to assess performance in line with policy indicator and defined trigger level.</p>
	<p>Local policy does not operate as expected, i.e. policy targets aren't met. The Council has to identify reasons for failure and make use of appropriate measures to improve performance.</p>

9.3 There are policy indicators and trigger levels, for example, LDP Objective 8, that contain the phrase 'except where justified in line with policy' or wording to a similar extent. They were included in reference to the requirement that Planning Policy Wales (PPW) and LDPs have to be applied in their entirety during the decision-making process. Other material considerations may occasionally override individual policy criteria without threatening the effectiveness and deliverability of the Plan.

9.4 Table 6 summarises local policies which are not operating as expected at the time of Plan adoption and, therefore, may require further attention.

9.5 Table 6: LDP policies not performing as expected

LDP Policies	Comments
BSC 1 – Growth Strategy for Denbighshire (i.e. Maintain 5 year housing land supply)	see Chapter 6
BSC 10 – Gypsy & Traveller Sites	see Chapter 7

9.6 The Sustainability Appraisal (SA) - monitoring as part of the AMR is conducted in a similar way like the local policy monitoring. Symbols were used to visually aid monitoring and comments are provided in relation to every SA Objective. The assessment of individual SA Objectives, including commentary, can be found in Appendix 2.

9.7 The SA monitoring looks holistically at societal, environmental and economic trends in Denbighshire. Some SA indicators are not directly influenced by LDP policy performance. It is difficult to provide detailed comments on actions that could improve the SA Objective. Furthermore, due to the nature of individual indicators and trigger levels, the Council has only limited powers to steer change but will consider measures the positively contribute towards meeting SA Objectives.

9.8 Some fields in the SA monitoring table are marked 'Data not captured'. This refers to the fact that information is generally not available or no longer recorded. Previously available data may have been collected by the voluntary sector or public bodies but have ceased due to reduced resources.