

Denbighshire County Council
Local Development Plan
2006 – 2021

Annual Monitoring Report 2015

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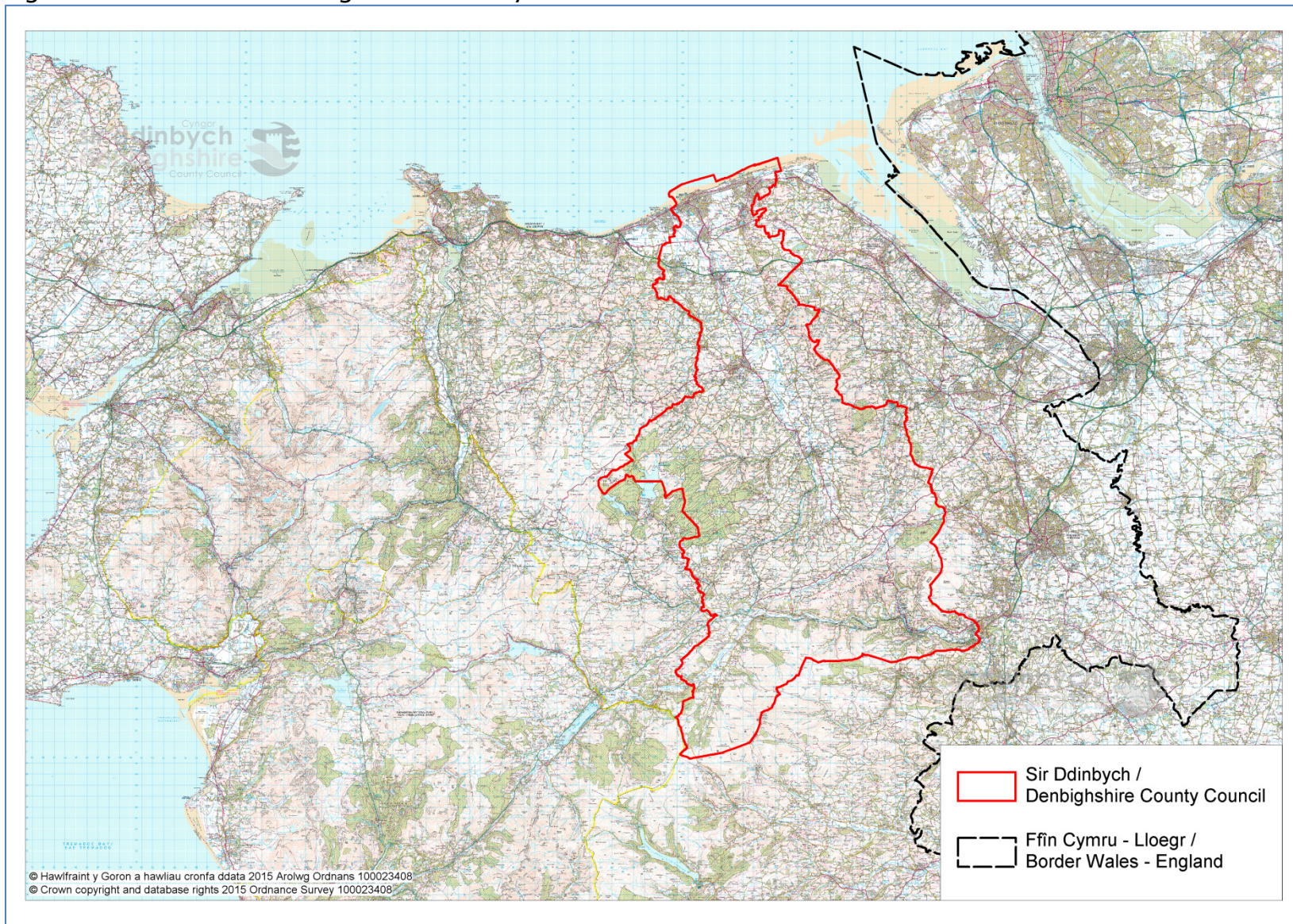
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Figure 1: Location of Denbighshire County Council in North Wales



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.

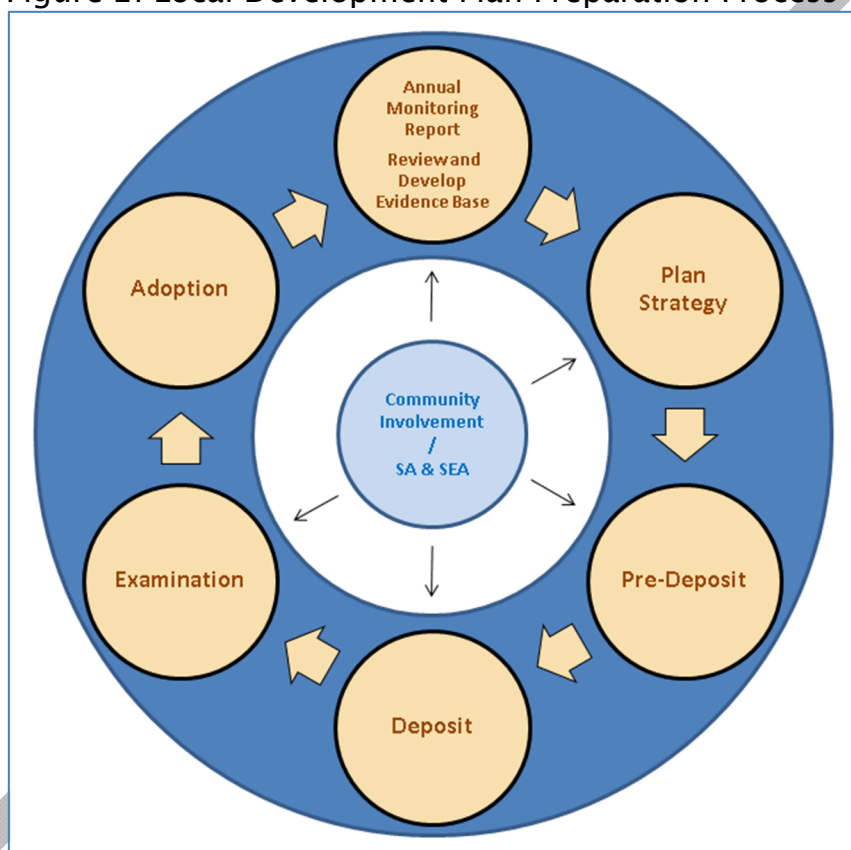
3. Background

- 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 – Edition 2', Chapter 10 Review and Revision.

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 been published and 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 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 for developers, land agents and the public to make Denbighshire an attractive County for house builders to invest.

5.48 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 a 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 Rhuallt, 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 been 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 Bodewyddan	(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 Bodewyddan	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.

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.

6.20 *Well-being of Future Generations (Wales) Act 2015*

6.21 The Well-being of Future Generations (Wales) Act 2015 received Royal Assent on 29.04.2015, and is about improving the social, economic, environmental and cultural well-being of Wales. It places a duty on Welsh local authorities to contribute towards achieving the seven 'well-being goals' set out in line with defined sustainable development principles.

6.22 As a member of the local Public Service Board (PSB), the Council will develop in cooperation with its partners a number of 'well-being objectives' for the County. Once these objectives have been set, the planning department will have regard to them when making planning-decisions. Should a reference to the local development plan be identified in any of these new objectives, future LDP AMR documents will report progress, and may contain recommendations for actions, to ensure alliance with other corporate strategies and plans.

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.

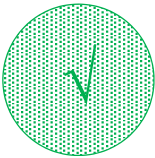
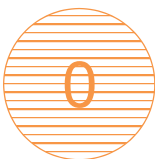
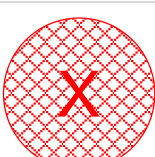
8.3 The performance of each of the Local Development Plan policies has been assessed using the SA Framework and are reported in the SA Report (2011) and Appendices. Results from this SA Objectives monitoring exercise will be used to adjust local policies if required as part of the Plan review in the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

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

	Local policy performs satisfactorily, i.e. policy target has been met, is ongoing or exceeds expectations.
	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.
	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.

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 5.4
BSC 10 – Gypsy & Traveller Sites	see Chapter 7


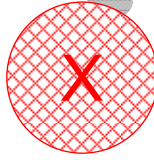
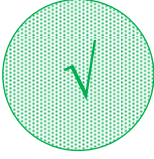
9.6 The Sustainability Appraisal (SA) - monitoring as part of the AMR is conducted in a similar way like the local policy monitoring. Symbols were used to visually aid monitoring and comments are provided in relation to every SA Objective. The assessment of individual SA Objectives, including commentary,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


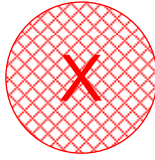
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
LDP Objective 1: Population and Community					
BSC 1 - Growth Strategy for Denbighshire	Meet the housing needs of the County	The number of new houses granted planning permission; the number of new homes completed annually	In the case of both indicators: Less than 500 per year for 3 consecutive years in Phase 2 and less than 750 per year for 3 consecutive years in Phase 3		<p><i>LDP housing development - Phase 2 (2011/12 – 2015/16), Phase 3 (2016/17 – 2020/21);</i></p> <p>Number of houses granted planning permission (2014/2015); excluding outline permission: 190;</p> <p>Number of new dwellings completed (2014/2015): 176;</p> <p>Both indicators are significantly lower than the anticipated 500. Denbighshire County Council housing land supply figure (2014/ 2015): 2.1 years;</p> <p>The Council is committed to supporting house builders by providing additional planning guidance, and pre-application advice. More efforts have to be made to increase the amount of residential development brought forward in the County but there is no requirement to review the LDP Growth Strategy.</p>
	Maintain 5 year housing land supply	---	Less than 5 years housing land supply		
BSC 2 – Brownfield Development Priority	Increase the number of brownfield sites coming forward for development	The amount of new development granted planning permission on brownfield sites	Decrease below 60% for housing and employment (excluding Bodelwyddan KSS)		<p>% of dwellings granted planning permission on brownfield land: 68%;</p> <p>% of employment granted planning permission on brownfield land: 100%;</p> <p>Policy review is not required</p>


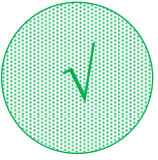
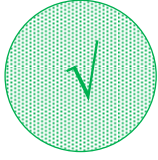
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
BSC 4 – Affordable Housing; BSC 8 – Rural Exception Sites; BSC 9 – Local Connections Affordable Housing within Small Groups	Increase the number of new affordable dwellings built in the County.	Number of affordable dwellings permitted per annum; Number of affordable dwellings completed per annum	In the case of both indicators: Less than 165 affordable dwellings permitted per year for 3 consecutive years in Phase 2 and less than 225 per year for 3 consecutive years in Phase 3		Number of affordable dwellings granted planning permission (2014/2015): 70 ; Number of new affordable dwellings completed (2014/2015): 36 ; The total number of affordable housing delivered in 2014/15 was 74. This figure is higher than the 36 dwellings completed through the planning system because it also includes, for example, reuse of empty properties. More efforts have to be made to increase the amount of affordable housing delivered in the County but there is no requirement to review the LDP Growth Strategy.
BSC 10 – Gypsy & Traveller Sites	Meeting the needs of gypsies and travellers	---	Where a need for permanent and/or transit sites is identified for Denbighshire in the North West Wales Local Housing Market Assessment (LHMA). The Council will work in partnership with neighbouring authorities to instigate a site search. A suitable site will be 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. Policy review may be required in 12 months time, should the Council fail to address any identified need in the updated GTANA.

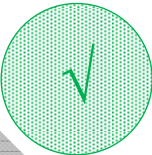
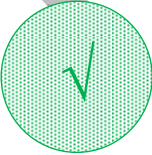
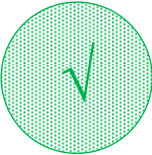

Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
LDP Objectives 2 & 3: Economy and Jobs					
PSE 2 – Land for Employment Uses	An average of 4 hectares of employment land taken up per annum	The amount of new employment land, in hectares, granted planning permission	Less than 3 hectares per year for 3 consecutive years		There has been no planning applications granted permission for development on new employment land (see LDP document, p.42) for the last two years. However, 7.95ha of employment land were delivered on (existing) brownfield land. Outline planning permission, subject to Section 106 agreement was granted for 26ha at Bodelwyddan Key Strategic site. Delivering 26ha will amount to 43.7% of all additional employment land made available in the LDP. Policy review is not required
PSE 1 – North Wales Coast Strategic Regeneration Area; PSE 3 – Protection of Employment Land and Buildings	Protect employment land from non-employment uses	The amount of employment land, in hectares, lost to non-employment uses	More than 5% lost in conflict with Policy PSE 3 in comparison to the amount of employment land available, in hectares, in the year of LDP adoption		The amount of employment land in the year of LDP adoption (2013/2014): 342.36ha. The amount of employment land in the year (2014/2015): 339.75ha, which equates to a reduction in 0.77%. Policy review is not required
PSE 5 – Rural Economy	Help to sustain the rural economy	Unemployment levels	Increase in unemployment levels in rural areas 5% above 2011 levels		There has been a fall in unemployment (i.e. people applying for jobseeker's allowance) throughout all electoral wards in Denbighshire from 3.5% in 2013 to 2.2% in 2015. Policy review is not required

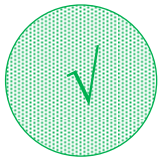
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

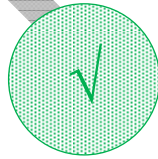
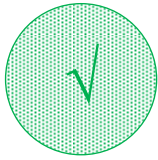
LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
LDP Objective 4: Retail					
PSE 6 – Retail Economy; PSE 9 – Out of Centre Retail Development	Direct new retail development to existing town centres	Amount of unallocated new major retail, office and leisure floor space permitted outside town centres	1 new major retail, office and leisure development permitted outside town centres contrary to LDP policy		No planning permission was granted for schemes outside town centres contrary to LDP policy in 2014/15. Policy review is not required
PSE 7 – Proposals for New Retail Development	Meet the quantitative need for non-food retailing in the county	The provision of new non-food retail floor space in Rhyl, Prestatyn and Denbigh	No projects delivered by 2015.		Planning permission was granted for construction of a terrace of 4 no. new retail (non-food) units adjacent to Prestatyn Retail Park (Planning permission ref: 43/2014/0905). Policy review is not required
PSE 8 – Development within Town Centres	Maintain the balance of retail and non-retail uses within town centres	Number of shops lost due to a change of use	5% increase in non-retail uses in a town centre for 3 consecutive years		There is no town centre in Denbighshire where an 5% increase in non-retail uses was recorded between November 2013 and November 2014. The total number of convenience, comparison and other outlets within all town centres has risen by 1.8%. Policy review is not required
PSE 6 – Retail Economy; PSE 8 – Development within Town Centres; PSE 9 - Out of Centre Retail Development	Maintain and enhance the vitality and viability of town centres	Number of vacant retail units within town centres	Vacancy rate of 15% or above for 3 consecutive years		There is no town centre within Denbighshire where a vacancy rate of 15% or above has been observed for the last two years; with the exception of Rhyl (November 2014: 17.2%). Policy review may be considered if the number of town centres with a vacancy rate above 15% has increased over the next 12 months.

Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
PSE 10 – Local Shops and Services	Protect local shops and services	Number of local shops or services lost due to a change of use	Loss of any local shop or service contrary to policy		No planning permission was granted that would have resulted in the loss of a local shop or service contrary to LDP policy in 2014/15. Policy review is not required

LDP Objectives 5 & 6: Transport

ASA 1 – New Transport Infrastructure	Provision is made for safe access by all users, including cyclists, pedestrians to public services, retail and community facilities	Number of developments that incorporate recommendations made in accompanying transport assessment and non-motorised user audits	One development failing to incorporate the recommendations made in accompanying transport assessment and non-motorised user audits		The Council approved 18 planning applications which were supported by a transport assessment in line with policy requirements. Policy amendment is not required
ASA 2 – Provision of Sustainable Transport Facilities	Use of planning conditions/ S106 agreements to secure the improvement of or contributions to the improvement of public transport, walking or cycling infrastructure likely to be caused by new developments	Number of new developments improving or making contributions towards the improvement of public transport, walking or cycling infrastructure through planning conditions/ S106 agreements	No new developments making necessary contributions towards the improvement of public transport, walking or cycling infrastructure through planning conditions/ S106 agreements after four years		The Council negotiated a sum of £25,000 contributions towards improvements to cycle and pedestrian linkages in Rhyl. Policy review is not required
ASA 3 – Parking Standards	Application of maximum parking standards to new development proposals in line with relevant Supplementary Planning Guidance	Number of new developments exceeding maximum parking standards set out in relevant Supplementary Planning Guidance	One new development failing to comply with maximum parking standards		All new developments comply with maximum parking standards. There has been no planning application that was proposing more spaces than required by the adopted SPG 'Parking Requirements in New

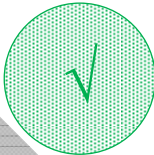
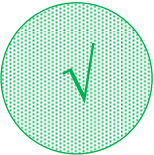
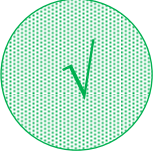
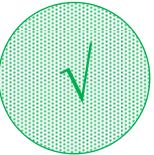
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
					Developments'. 5 Planning applications were refused on the basis of insufficient parking space provision. Policy review is not required
BSC 5 – Key Strategic Site - Bodelwyddan	Provision of new road infrastructure/ improvements to existing road network between A55 Junction 26 and Bodelwyddan (Sarn Road)	Length of new road infrastructure/ improvement works to existing network between A55 Junction 26 and Bodelwyddan (Sarn Road)	No new road infrastructure / no improvement works to existing network between A55 Junction 26 and Bodelwyddan (Sarn Road) before the occupation of the first dwelling on the KSS	Has not been monitored yet	Outline permission was granted in January 2015; subject to a Section 106 agreement. Terms and conditions of the S106 agreement are currently being drafted. Policy performance is linked to general principles of BSC 5.
	Improvement of public transport / increased bus service links between Bodelwyddan KSS and key settlements in negotiation with service providers	Frequency of bus services linking Bodelwyddan KSS and key settlements per hour	No increase in frequency of bus services linking Bodelwyddan KSS and key settlements in accordance with the timetable agreed by developers and service operators	Has not been monitored yet	
	Provision of new cycle and pedestrian routes/facilities as part of the Bodelwyddan KSS to provide connectivity between residential and employment / community facility areas	Number/ length of new cycle and pedestrian routes/facilities as part of the Bodelwyddan KSS	No cycle and pedestrian routes/ facilities before the occupation of the first dwelling on the KSS	Has not been monitored yet	

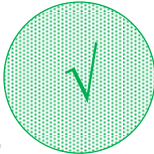
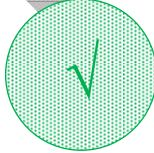
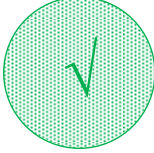

Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
LDP Objective 7: Welsh Language					
RD 5 – The Welsh Language and the Social and Cultural Fabric of Communities	No significant harm to the Welsh character or language balance of the community	Results of Community Linguistic Statements or Assessments submitted	Any development permitted where the Community Linguistic Statement or Assessment concludes Welsh character or language would be harmed where such harm is not outweighed by other considerations		The Council granted planning permission for two developments, where the planning application was accompanied by a Community Linguistic Statements as required by local policy. None of the submitted statements concluded that the development will harm the Welsh language.
	An increase in Welsh or bilingual signage and Welsh place names	Use of Welsh or bilingual signage and the use of Welsh place names in new development	Any development where new streets or places are created not including Welsh names or bilingual signage		The 'Planning and the Welsh Language' SPG was adopted in March 2014.
	Prepare and adopt Supplementary Planning Guidance regarding the Welsh language	Preparation and adoption of SPG	Adoption of SPG within 12 months of the adoption of the LDP		The Council registered new street names in Welsh only = 1, English only = 0, and Bilingual = 3. Policy review is not required
LDP Objective 8: Public Open Space					
BSC 11 – Recreation and Open Space	Ensure new developments make an adequate contribution to public open space provision	Number of units granted where the open space requirements are met	1 planning permission granted where the open space requirements are not met, except where justified in line with policy		There were 12 approved planning applications that allowed for development land either entirely or partially designated under policy BSC11. These applications were justified in line with policy, and included improvement


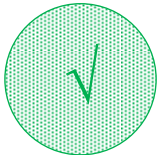
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
	Protect allocated open space from development	Amount of allocated open space lost to development	1 planning permission granted for development on open space, except where justified in line with policy		works to facilities located on play and open space. Policy review is not required
LDP Objective 9: Minerals					
PSE 15 – Safeguarding Minerals	Safeguard high quality resources of minerals, including limestone, sand and gravel, Denbigh gritstones, igneous and volcanic deposits from development that would result in permanent loss or hinder extraction	Area of mineral lost to development	Loss of identified mineral except where justified in line with the policy		Only planning applications which have been justified in line with the policy have been approved, 4 in total during the monitoring period. Policy review is not required
PSE 16 – Mineral Buffer Zone	Maintain a buffer between sensitive development and quarries	Number of planning permissions granted for sensitive development in buffer zones	One or more planning permission granted for sensitive development within a buffer zone		No planning permission has been granted within Mineral Buffer Zones during the monitoring period. Policy review is not required
PSE 17 – Future Mineral Extraction	Contribute to the regional demand for aggregates	Tonnes of sand & gravel extraction permitted. Maintain a 10 year landbank of hard rock	No extraction permitted by 2017. Landbank falls below 10 years		No planning permissions for sand and gravel extraction have been received to date. Reserves in excess of 20 million tonnes remained at the end of 2013. The landbank for hard rock was 36 years, based upon a 10 years sales average. Policy review is not proposed


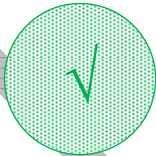
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

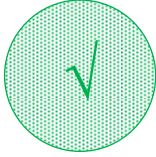
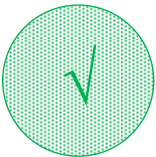
LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
					at this time in the Plan period but it must be kept under observation over the next 12 months. (see paragraphs 5.6 in main document)
LDP Objective 10: Waste					
VOE 7 – Locations for Waste Management	Denbighshire will contribute towards the regional need for waste management capacity	The percentage of waste management capacity permitted as a percentage of the total capacity required, as identified in the North Wales Regional Waste Plan 1st Review	Less than 50% capacity permitted by 2015, either within or outside of the County delivered in partnership with other north Wales local authorities, as proportion of capacity required by Denbighshire		Planning permission was secured for the construction of a 200 kilotons per annum Energy from Waste facility in Flintshire which will manage residual waste arising from across North Wales, including Denbighshire. Policy review is not proposed at this time in the Plan period but it must be kept under observation over the next 12 months. (see paragraphs 5.7 in main document)
LDP Objective 11: Energy					
VOE 10 – Renewable Energy Technologies	Progress towards the TAN 8 target for onshore wind energy	The capacity of renewable energy developments (MW) (installed or permitted but not yet operational) inside the Strategic Search Area by type per annum (in collaboration with CCBC)	Not achieving the target set out in TAN 8, National Energy Policy or PPW by 2015		Total operational and consented capacity at 31/03/2015 = 189.45MW (TAN8 target: 140MW); Policy review is not required

Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

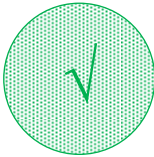


LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
	Prepare and adopt Supplementary Planning Guidance regarding renewable energy	Preparation and adoption of SPG	Supplementary Planning Guidance not adopted by 2013		Supplementary planning guidance note (SPG) on renewable energy has been drafted, and adoption is anticipated for Winter 2015/16. Policy review is not required
VOE 9 – On-shore Wind Energy	Increase the capacity of renewable energy developments in the County	Number and type of renewable and low carbon energy schemes permitted per annum	Less than 1 development per year over 3 consecutive years		There were 18 approved planning applications in the period 1st April 2014 to 31st March 2015. The total amount of kw approved was 10,326 over the last three years. Policy review is not required

LDP Objective 12: Infrastructure

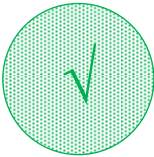

BSC 3 – Securing Infrastructure Contributions from Development	Secure contributions towards infrastructure to meet the additional social, economic, physical and/or environmental infrastructure requirements arising from development	Number of planning obligations secured	Failure to secure contributions where necessary		The Council signed 9 Section 106 agreements covering the provision of affordable housing, open space, and the installation of flood mitigation measures. Policy review is not required
BSC 12 – Community Facilities	Prevent the loss of community services or facilities	Number of services or facilities lost through change of use	Loss of any community facility unless justified in line with policy		There were 3 approved planning applications seeking a change of use but all of them were justified in line with policy or prevailing material consideration. Policy review is not required

Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

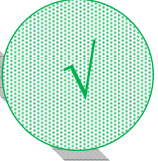

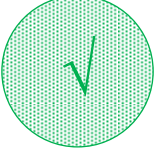

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
VOE 6 – Water Management	To ensure new development does not increase risk of flooding	% of new developments with Sustainable Drainage Systems (SuDS) incorporated, or similar solution, where suitable	Failure to secure any or any successful challenges to the requirement, where suitable		There was 1 development granted approval in Llangollen where SuDS were suitable and have been secured by planning condition.
	To ensure major development proposals make efficient use of water resources and without detriment to the environment	Number of major development proposals developed in accordance with by a Water Conservation Statement	Failure to secure any or any successful challenges to the requirement, where suitable		The Council hasn't received a major planning application accompanied by a water conservation statement during the monitoring period. Supplementary Planning Guidance on water management is scheduled for adoption in Spring 2016.
	Prepare and adopt Supplementary Planning Guidance regarding water management	Preparation and adoption of SPG	Guidance not adopted by 2015		Policy review is not required

LDP Objective 13: Mixed Use Development

BSC 5 – Key Strategic Site – Bodelwyddan	Prepare and adopt Supplementary Planning Guidance regarding the Key Strategic Site	---	Supplementary Planning Guidance not adopted by the end of 2013		Site Development Brief 'Bodelwyddan Key Strategic Site' was adopted in July 2014. The outline planning application was received in December 2013 and was granted permission, subject to a Section 106 agreement, in January 2015. Terms and conditions of the S106 agreement are currently being drafted. Policy review is not proposed at this time in the Plan period but it must be
	Deliver the Key Strategic Site	Planning permission granted for 1715 dwellings, 26 hectares of employment land and associated facilities	Planning permission not granted by the end of 2013		

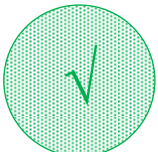
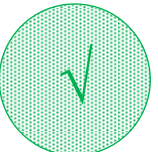
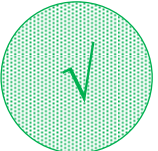
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
		and infrastructure			kept under observation over the next 12 months.
LDP Objective 14: Design					
RD 1 – Sustainable Development and Good Standard Design	Respect site and surroundings and ensure sustainable land take	Average density of residential development permitted	Average density of residential development permitted falling below 35 dwellings per hectare unless justified by policy		The Council approved planning applications for a total number of 190 dwellings. Deviations from the 35 dwellings per hectare density requirement were justified where additional highways arrangements or landscape constraints prevented the achievement. Supplementary Planning Guidance is scheduled for adoption in Spring 2016. Policy review is not required
	Produce supplementary planning guidance regarding design	---	Supplementary planning guidance not produced by the end of 2013		
BSC 1 – Growth Strategy for Denbighshire	Create mixed and balanced communities	The provision of a range of house sizes, types and tenure to reflect local need	No developments completed with a range of house sizes, types and tenure to reflect local need		A number of housing developments have been completed, or are still under construction, which have delivered a range of house types and sizes to reflect local need. These include Parc St Francis in Prestatyn, Castlefields in Rhuddlan, and Maes Glyndwr in Cynwyd. All of these schemes delivered affordable housing in addition to market dwellings. Policy review is not required
BSC 7 – Houses In Multiple Occupation & Self-contained Flats	Prevent the creation of Houses in Multiple Occupation	Number of HMOs granted planning permission	1 or more HMOs granted planning permission		The Council did not approve any planning applications for the creation of a HMO. Policy review is not required

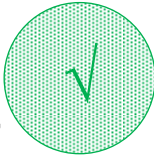
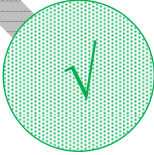
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

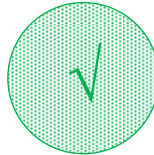
LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
VOE 1 – Key Areas of Importance	Direct inappropriate development away from the flood plain	Amount of development permitted in C1 and C2 flood plain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	1 or more granted planning permission		The local planning authority dealt with 62 planning applications that sought permission for development located either wholly within or more than 10% of the area in C1 flood plain. All of them met TAN15 tests where relevant. 42 planning applications have been approved for development located either wholly within or more than 10% of the area in C2 flood plain; for example: erection of overhead lines or the construction of a manege and associated lighting. There has been no residential development granted planning permission within C2 flood plain, i.e. no proposal met the TAN 15 tests. Policy review is not required
LDP Objective 15: Tourism					
PSE 1 – North Wales Coast Strategic Regeneration Area	Contribute towards the visitor economy	Number of tourism facilities lost through change of use	Loss of any tourism facility except where justified in line with policy		The Council approved 10 planning applications for developments contributing to the visitor economy in the County. Proposals included a hotel, improvement to facilities on existing caravans and the installation of new cabins. Policy review is not required
	Contribute towards the visitor economy	Number of planning permissions granted and completed in accordance with policies PSE1 criteria iii), PSE 11, PSE 12 and PSE 14	No planning permissions granted over 3 years in accordance with the named policies		

Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
VOE 3 – Pontcysyllte Aqueduct and Canal World Heritage Site	To protect the designation of the World Heritage Site, its Outstanding Universal Value and setting	Prepare joint SPG	Joint SPG not adopted by the end of 2013		The Joint SPG was adopted with Wrexham and Shropshire (England) in June 2012, and revised in August 2013. Policy review is not required
	To protect and enhance the World Heritage Site Buffer Zone character.	Prepare joint SPG	Joint SPG not adopted by the end of 2013		

LDP Objective 16: Areas of Protection

VOE 5 – Conservation of Natural Resources	Protect statutory designated sites of nature conservation from adverse effects caused by new development	Number of developments that have an adverse effect on statutory designated sites of nature conservation	No development proposal granted planning permission that would have an adverse effect on statutory designated sites of nature conservation and unless accepted by Natural Resources Wales as being necessary for management of the designated site		There has been no approved planning application that would adversely affect statutory designated of nature conservation. Natural Resources Wales and the County Ecology and Biodiversity Officer are both consulted on proposals that are likely to have an effect on ecological features. Policy review is not required
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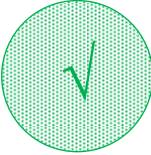

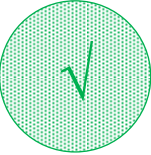
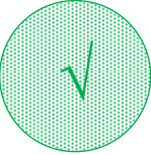
Appendix 1 – Local Policy Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

LDP Policy	Policy Target	Indicator	Trigger Level	Performance	Comments
National policy objectives					
Policy Target	Indicator	Trigger Level	Performance	Comments	
Delivering new housing on allocated sites	Number of planning permissions granted on allocated sites, as a % of total development permitted (hectares and units)	---	---	---	Number of planning permissions granted on allocated sites, as a % of total development permitted – in hectares: 27.45 % ; in units: 60.5%
Maintaining the vitality and viability of town centres	Amount of major retail, office and leisure development (sqm) permitted in town centres expressed as a percentage of all major development permitted	---	---	---	Amount of major retail, office and leisure development (sqm) permitted in town centres expressed as a percentage of all major development in town centres: 43.3%
Amount of residential development meeting the Code for Sustainable Homes Level 3 and obtaining 6 credits under Ene 1 – Dwelling Emissions Rate	All new housing developments to meet this National requirement	One new development not meeting national requirements	N/A	N/A	Policy Target and Indicator are no longer covered by planning legislation. Planning Policy Wales (Edition 7), Section 4.12, has been revised to delete the national development management policy on sustainable building standards. These changes have been made in light of amendments to Part L of Building Regulations on energy efficiency coming into force. No further actions required, proposed for deletion.
Amount of non-residential development over 1,000m ² on a site over 1ha meeting BREEAM 'very good' standard and achieving mandatory credits for Excellent under issue Ene 7 – Reduction of CO ₂ Emissions	All new non-residential developments to meet this national requirement	One new development not meeting national requirements	N/A		


Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

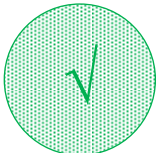



Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
SA Objective 1: Ensure the housing needs of the community are met				
The LDP includes a number of policies promoting new housing which should positively contribute to housing needs	No. of affordable homes delivered per annum and the % of eligible residential planning permissions where affordable housing has been negotiated	To follow guidance on provision of affordable housing in the interim North East Wales Housing Market Assessment		<p><u>Affordable homes</u> – delivery rates have varied annually, with 573 delivered during the Plan period so far. The interim North East Wales Housing Market Assessment was updated by the Update of Need, Demand and Affordability in Denbighshire undertaken by Glyndwr University in 2010. This informed LDP policy requirements. Following LDP adoption all residential development sites have met the policy requirements for affordable provision unless justified in line with Policy BSC 4 & SPG Affordable Housing.</p> <p><u>Empty properties</u> – the Council undertakes a variety of actions aiming to bring empty properties back into use. As at April 2015, 1.63% of the County’s housing stock had been vacant for more than 6 months.</p> <p><u>Waiting list</u> – the housing waiting list has been subject to a number of reviews since 2009 and this has led to a reduction in the overall numbers.</p> <p><u>Housing quality</u> – As at Sept 2014 96% of the Council’s housing stock had met WHQS. The remaining properties could not be accessed and will be upgraded when they are vacated.</p> <p><u>Property prices</u> – Property prices have fallen in the County as a result of the economic downturn, and recovery has been slow with prices still below the average price in 2009.</p>
	% of vacant housing	100%		
	Households on the Housing register	Year on year reduction in the number of households on the housing register		
	% of unfit housing against the Welsh Housing Quality Standard	To reduce the percentage of unfit homes		

Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	Average property price compared against average earnings	To reduce the ratio of property price and earnings; Source: www.landreg.gov.uk / Wealth of the Nation, 2004		However, average incomes have also fallen and the ratio of income to house price has risen slightly from 4.67 (2009) to 4.97 (2014).

SA Objective 2: Promote community health and well-being



Promote community health and well-being	Life expectancy	To maintain/increase life expectancy; Source: www.statistics.gov.uk		Life expectancy for men and women has been maintained over the period 2010 – 2013; Health Impact Assessment was used in the production of the Key Strategic Site Bodelwyddan, Site Development Brief which was a material consideration in the determination of the outline planning application for the site, however they aren't a statutory requirement in the planning process; Access to services in rural areas remains an issue but Denbighshire is not an authority highlighted as have one of the highest proportions of wards in the worse 10% (Welsh Index of Multiple Deprivation 2014).
	No. of planning applications incorporating Health Impact Assessment (HIA)	100% for major developments		
	Community Satisfaction / perceptions surveys – Housing Estate Surveys	To decrease % of people who describe their health as poor	Data not captured	
	Indices of deprivation	To decrease % of population living in most deprived areas		
	Proportion of households not living within 400m of their nearest natural green space	0% Source: NRW (CCW) Accessible Green space standards		
	Proportion of households within reasonable	Increase		

Appendix 2 – SA Objectives Monitoring Table

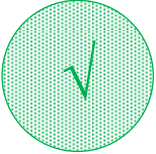
Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	walking distance of key health services			

SA Objective 3: Promote safer neighbourhoods and contribute to a reduction in the fear of crime

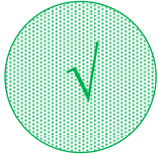
Promote community health and well-being; the LDP has reference to safety and crime in policies that consider design	Overall crime rates by type	To reduce crime rates year on year		The average crime rate per 1000 inhabitants in Denbighshire has been significantly fallen since 2006/2007. Whilst the crime rates for violence against people have been fallen, the crime rates for burglary have slightly increased over the same period of time.
	Average crime rate in Denbighshire per 1000 inhabitants	To reduce the number of crimes committed per 1000 inhabitants		

SA Objective 4: Enhance existing and promote the development of high quality recreation, leisure and open space and provide opportunities for people to experience and respect the value of the natural environment




Policies in the LDP seek to protect open space and so the effect are predicted to be positive	Accessibility / availability of community facilities	To increase % of residents using authority and/or private sports and leisure facilities at least once a week	Data not captured	Leisure centre usage – comparison data will be available for the 2015/15 AMR; Loggerheads and Moel Famau country parks continue to attract large numbers of visitors 180k and 160 per annum respectively. DCC continues to expand its programme of countryside volunteering and organised events and walks to increase participation. Project to improve access to Horseshoe Falls, Llangollen completed; all residential development sites have met the policy requirements for open space provision unless justified in line with Policy BSC 11.
	Number of residential permissions granted where the open space requirements are met	100%		
	Hectares of accessible countryside and local green space	To increase (use the Green Space Toolkit)	Data not captured	

Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

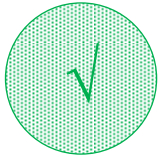
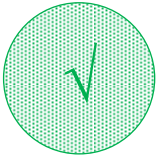

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	Number and % residents using parks, open spaces and nature reserves annually	Increase numbers year on year		

SA Objective 5: Improve accessibility to education, employment, health, homes and community services for all sectors of the community through modes of transport other than the private car

It will be important to monitor the accessibility of the opportunities	Accessibility /availability of community facilities (schools, health and social facilities, nurseries, further education establishments, community halls, churches, libraries, residential homes for the elderly, cemeteries, open space, sports facilities, supported accommodation, theatres and cinemas)	Distances from residents properties to community facilities as listed in the indicator to comply with the Welsh Index of Multiple Deprivation		Using the access to services deprivation statistics as a guide, Denbighshire's access to services is worse than Conwy's, and significant worse than the more urbanised authorities of Wrexham and Flintshire. However, Denbighshire's access to services is significantly better than Anglesey and Gwynedd, with their more remote locale's a negative in this instance; WIMD 2014 data for 'village, hamlet and isolated dwellings' show that the rural residential population of Wales experiences a significantly higher travel time to access key services than more urbanised areas. Data for maintain and improve the proportion of residential population within walking distance of key services can only be found at the national level and for the most recent update to the 2014 WIMD data undertaken in March 2015. It is therefore difficult to identify a trend for this indicator; from the period of 2009-2014, car millage/use has decreased, as has bus/coach, pedal cycle, motorcycle, and HGV use. Only light goods vehicle use has seen an increase in use;
	% of rural residential population within walking distance of key services	Maintain and improve the proportion		
	Travel to work data/modal split	Reduce the distance of travel to work and reduce the % of people who travel by means of private car. Increase % of people travelling by sustainable modes of transport		



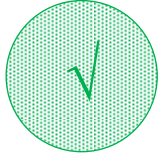
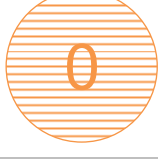
Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
		(walking/cycling/public transport)		General trend from 2009 – 2013 is a reduction in reducing traffic growth rates. This time period includes fluctuations of traffic growth and decline; Over the period 2004 – 2012, bus availability (households whose nearest bus stop is within 13 minutes walking and has a service at least once an hour) has risen from 88% to 89% in Wales. The Great Britain average is 91%.
	Traffic volumes	To reduce traffic growth rates		
	Proportion of new developments (housing/ economic/ retail) located within reasonable walking distance of public transport, cycle ways and footpaths	To monitor of new developments within reasonable walking distance	Data not available	
	Frequency/reliability of public transport	Ensure frequency is maintained and improved		
	Length of bus network	Ensure frequency is maintained and improved		
	No. of settlements served by bus/rail	Ensure frequency is maintained and improved	Data not captured	
	% of residential developments making relevant infrastructure contributions	Record the amount provided and the method of spend	Data not captured	


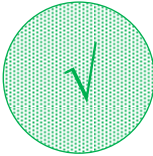
Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
SA Objective 6: Protect and enhance the Welsh language and Culture, including the County's heritage assets				
LDP Policy RD 4 as well as the LDP objective to retain young people in the County through the provision of affordable housing	Proportion of Welsh speakers in the County and their distribution	Maintain and improve the proportion		Figures from the Census 2011 have shown a decline in the number of Welsh speakers in Denbighshire from 26.7% to 24.6% since 2001. Similarly, the number of people with Welsh language skills has decreased from 36% to 35.4. However, Welsh Government's annual survey estimates figures (see StatsWales, 'Annual Population Survey estimates of persons aged 3 and over who say they can speak Welsh by local authority and measure') indicate that the % of persons aged 3 who say they can speak Welsh in Denbighshire has risen from 35.8% to 38.7% over the period 2006 to 2013.
	Proportion of people with skills in the Welsh Language	Maintain and improve the proportion		
	Welsh medium schools and pre- schools as a proportion of all schools	Maintain and improve the proportion		Primary school Welsh language capacity projected to be maintained in Denbigh, Prestatyn, Rhyl and Ruthin catchment areas. Capacity projected to increase in Dee Valley (127 in 2015 - 135 in 2018) and St Asaph (51 in 2015 - 69 in 2018) catchments.
	Bi-lingual published material	Maintain and improve the proportion		
	% quality of Schedule Ancient Monuments, Historic Parks and Gardens, Conservation Areas, Historic Landscapes	No reduction in quality	Data not captured	Welsh Language Standards have been issued for the County Council from the Welsh Language Commissioner. They will be implemented upon Council's formal approval. This will ensure a standard practice is achieved across the Council's work.
	Number of listed buildings on the 'Buildings at Risk Register'	Reduction	Data not captured	There are very few SAMs in Denbighshire

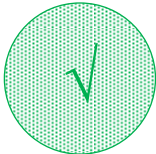
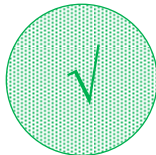
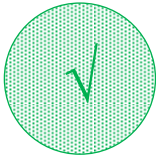
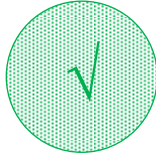
Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	% of Schedule Ancient Monuments subject to positive actions undertaken by DCC as a result of plan proposals	Increase	Data not captured	<p>compared to listed buildings and I can be reasonably sure that they have not suffered any deterioration. The register in this area was drafted by Cadw in 1995 and there has been no follow up survey by Cadw since so there is no objective information to go on. Historic landscapes are vast areas which are impossible to monitor.</p> <p>There are no figures available since then on buildings that have been removed from the at risk category and no figures of buildings that might have been added. The last building at risk survey was carried in 2011. Cadw are in the process of carrying out a building at risk survey for the whole of Wales but Denbighshire has not been done yet. Demolition and redevelopment in Conservation Areas may positively contribute towards the built environment. Therefore, keeping the number 'low' is not necessarily an aspiring target.</p> <p>All Conservation Areas in Denbighshire benefit from a character appraisal. The Council is in the process of carrying out a review of individual ones.</p>
	% of demolition in Conservation Areas	Low number in demolition		
	% of Conservation Areas with an up- to-date character appraisal	50% up to date		
	Number of Conservation Areas adversely affected by plan proposals	0	Data not captured	


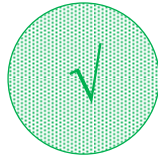
Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021



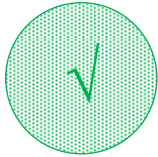
Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
SA Objective 7: Support County economic development and regeneration, including the provision of opportunities for rural diversification				
New employment land will be permitted in the County and it will be important to monitor the land take. In addition the SRA will be developing regeneration schemes which will have an impact on the levels of deprivation in the north of the County. The number and type of rural diversification will be monitored for trends and impacts.	Gross Value Added per capita	To increase GVA per capita		The Gross Value Added per capita has been increased year by year from £11,830 (2006) to £13,555 (2012).
	Gross Value Added per worker	To increase GVA per worker		Gross Value Added per worker / GVA per hour worked increased from £18.4 (2006) to £20.9 (2012).
	Proportion of economic activity by sector	To increase the number of sectors, especially rural trends	Data not captured	Number of VAT registered enterprises/ number of active enterprises has slightly increased from 3155 (2006) to 3195 (2013).
	% changes in the number of VAT registered enterprises	To increase the overall number of VAT registered enterprises		There has been a fall in unemployment (i.e. people applying for jobseeker's allowance) throughout all electoral wards in Denbighshire from 3.5% in 2013 to 2.2% in 2015.
	Employment / unemployment rates	Reduction in unemployment rate		There has also been a small increase (+0.3%) in the number of people claiming unemployment benefit in Denbighshire between January 2006 and January 2015. 7.95ha of employment land were delivered on (existing) brownfield land. Outline planning permission, subject to Section 106 agreement was granted for 26ha at Bodelwyddan Key Strategic site. Delivering 26ha will amount to 43.7% of all additional employment land made available in the LDP.

Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

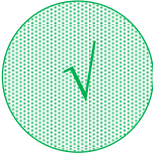

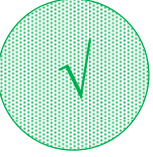

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	Unemployment claimant count with proportion of residents of working age population	To decrease the proportion of people claiming unemployment benefit		
	Take up of allocated employment land	To increase the take up of employment land		

SA Objective 8: Maintain and enhance the vitality and viability of town and rural centres


The LDP protects the retail core of town centres from inappropriate change of use and so a positive effect should be monitored	Vacancy rates in town centres	To decrease the amount of vacant floorspace		In terms of vacant town centre floorspace, performance was mixed for the 8 town centres in Denbighshire in the period of 2009 – 2015. Corwen, Denbigh, Rhuddlan have reduced vacancy rates over this period, Ruthin has remained the same, whilst Llangollen, St.Asaph, Prestatyn and Rhyl have witnessed an increase in vacancy rates. Approximately 62 % of residents are satisfied with their nearest town centre whilst roughly 35% are dissatisfied. As the 2013 Denbighshire Residents Survey is the first Council initiative to include this question, it is not possible to measure performance in this target until the next 2015 Residents Survey has been completed.
	Quality of town centres (perception surveys)	Maintain and improve the quality		
	% changes in total number of VAT registered enterprises in town and rural centres	Increase in the number of VAT registered businesses		
	% change in total number of shops, pubs and post offices in rural centres	To resist the loss of village shops, pubs and post offices in rural areas where appropriate	Data not captured	

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
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SA Objective 9: Make the best use of previously developed land and existing buildings in locations served by sustainable transport modes



The new development promoted through the LDP could lead to the remediation of brownfield land	% of dwellings built on previously developed land	% of new dwellings to be built on previously developed land same comment as below		The percentage of dwellings built on previously developed land has declined from 73% (12/13), 70% (13/14) and 68% (14/15), this is in line with the target of reducing the amount of derelict land in the County. Development densities of 30 dph have been encouraged and implemented wherever appropriate in respect of the surrounding character of the area. Limited amount of development being delivered currently and no commencements to date on LDP allocated sites to measure impact of density requirement in policy RD1. NB: RD 1 policy requirement is 35dph.
	Number of developments meeting densities of between 30-50 dph and higher % in town centres and areas with high public transport accessibility	All developments aim for a density of 30 dwelling per hectare		
	Amount of derelict land	Reduce year on year		
	No of empty properties	Reduce year on year		

SA Objective 10: Safeguard soil quality and function and maintain long term productivity of agricultural land

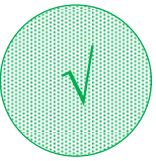
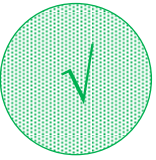
The new development promoted through the LDP will lead to the removal of soil from the land	Total area of contaminated land	To reduce the area of contamination year on year		There has not been development on land allocated in the LDP that necessitate remediation work. Where development has yet to commence, this will be controlled through the use of conditions attached to the planning
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Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

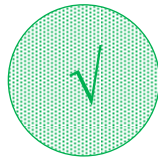
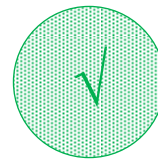
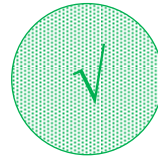
Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	Total area remediated as part of new development	To remediate all areas of contamination to a satisfactory standard when required by new development		permission. There has also been no change to areas of contaminated land and soil management.
	Soil management methodology	Positive mitigation of and reuse/replacement of soil		

SA Objective 11: Protect and enhance all international, national and locally designated nature conservation sites, protected species and geo-diversity sites and avoid their damage or fragmentation. Protect, enhance and create appropriate wildlife habitats in urban and rural areas thus enhancing biodiversity

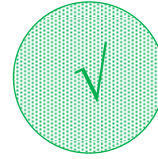
There are policies in the LDP to protect the biodiversity in the County and so the effects are predicted to be positive. However, information should be collected in relation to condition and enhancement of the sites to monitor the effectiveness of the LDP policies	Area and condition of statutory nature conservation sites. Area and condition of non-statutory nature conservation sites	85% of SSSI features in favourable condition by 2013. No adverse effects on SAC's/SPA's		Nature Conservation and biodiversity enhancement measures are a principal consideration in determining planning applications. There has been no approved planning application that would adversely affect statutory designated of nature conservation. Natural Resources Wales and the County Ecology and Biodiversity Officer are both consulted on proposals that are likely to have an effect on ecological features.
	% of designated sites improved by the LA	To improve condition of all designated sites	Data not captured	
	Number of proposals/policies resulting in the loss or damage to designated sites	No loss or damage to designated sites at all levels		The Denbighshire Biodiversity Partnership reports actions derived from the Denbighshire Local Biodiversity Action Plan to the Biodiversity Action Reporting System. There are 75 listed on

Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

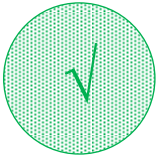
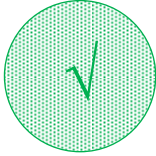
Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	Achievement of the Biodiversity Action Plan targets	Annual Local Biodiversity Action Plan reports		BARS website. There has been no decrease in the number of Regionally Important Geological and Geomorphological Sites (RIGS).
	No. of Regionally Important Geological and Geomorphological Sites (RIGS)	No decrease in number		
	Area of land actively managed for nature conservation	Increase in the area of land managed under Environmental Stewardship Schemes e.g. Tir Gofal	Data not captured	
	Number of development schemes which include design in ecological features	Increase proportion of ecological design in new developments	Data not captured	
	Maintenance regimes in place for new habitats on new developments	100%		

SA Objective 12: Preserve and enhance landscape character across the County, particularly the AONB

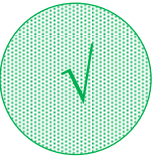
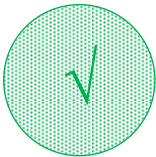
The LDP seeks to protect the local landscape. It will be important to monitor whether new developments positively	% of county designated for landscape	No decrease		Extension to the AONB supported and achieved. SPG for World Heritage Site adopted. No changes in LANDMAP evaluation.
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Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

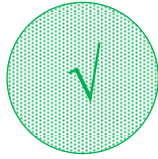
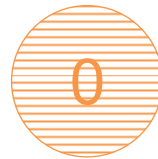
Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
contribute to the design quality of settlements	% of county designated as high or outstanding landscape quality (LANDMAP studies)	No decrease		
	Changes in the LANDMAP evaluation and extent of that change as a result of development	No changes		

SA Objective 13: Protect and improve the water quantity and quality of inland and coastal waters

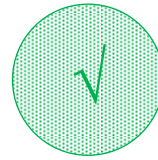
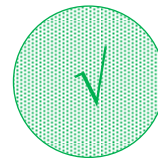
The LDP seeks to protect the quality of surface and groundwater resources. The availability of water resource falls within the remit of Dŵr Cymru which is responsible for managing water supply and demand across Wales, although it is recognised that this will be affected by the levels of growth within each settlement. Indicators have been proposed to monitor water quality and the potential effects of new development. The LDP also promotes	% of watercourse classified as good biological and chemical quality	91% of rivers length in the UK should be of good quality by 2010. DCC will work towards achieving this target. Source: NRW		In 2014, 40.6 per cent of Welsh waters achieved good or better ecological status, an increase compared with 31.2 per cent in 2009. Sea water of the North Wales Coast has been described as compliant with Bathing Water Directive, Prestatyn Beach was awarded a 'Blue Flag'
	Compliance with Bathing Water Directive, European Blue Flag and UK Seaside awards	100% compliance		
	Groundwater quality	To maintain groundwater quality	Data not captured	There are no records of incidents of major and significant water pollution due to new developments. Per capita consumption of water by year for Wales from 150 litres (2006) to 149 litres (2011) per person per day
	Distribution of aquifers and their vulnerabilities	To maintain groundwater quality	Data not captured	

Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
sustainable design and construction and so it will be beneficial to monitor water use in the LDP, although this is also affected by individual actions.	Number of incidents of major and significant water pollution due to new developments	0%		
	Surface water and groundwater abstractions (licensed and private)	---	Data not captured	
	% of planning permissions with water saving devices/ grey water recycling required as part of conditions	To reduce overall water consumption in new developments	Data not captured	
	Estimated household water consumption (litres per head per day)	Long term decrease		

SA Objective 14: Minimise the vulnerability to flooding and ensure new development does not increase flood risk

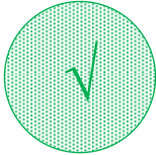
There are a number of policies to direct new development away from areas of floodrisk and so effects should be positive. The extent to which the need for permeable surfaces and the use of SuDS is promoted in new development	% of planning applications with SuDS required as part of conditions	All new development proposals to show that sustainable drainage has been considered and implemented if appropriate; Source: NRW		Environment Agency, Countryside Council Wales and Forestry Commission merged in 2013 to form Natural Resources Wales, an organisation that advises on flood considerations. Conditions attached to planning permissions were used to secure the implementation of SuDs into the development where applicants proposed them. Denbighshire County Council did not granted planning permission for vulnerable development against advice received from Natural Resources Wales.
	No. of new vulnerable development granted planning permission in C1 and/or C2 floodplain area contrary to advice from the Environment	0%		

Appendix 2 – SA Objectives Monitoring Table

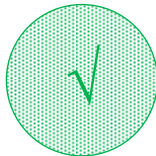
Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	Agency Natural Resources Wales			

SA Objective 15: Protect and improve air quality

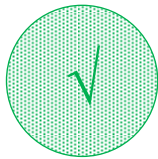
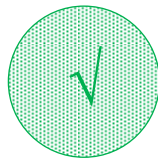
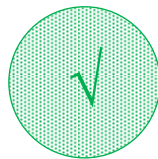
It is not predicted that the LDP will result in adverse effects on air quality. However, some contextual monitoring could be undertaken to support other monitoring	Levels of main pollutants	To meet National Air Quality Standards		An Air Quality Management Zone has not been established in the County of Denbighshire yet.
	No. of days when air pollution is moderate or high for NO2, SO2, O3, CO or PM10	---	Data not captured	

SA Objective 16: Contribute to a reduction in greenhouse gas emissions (especially CO2) by increasing energy conservation and efficiency in development and support increased provision and use of renewable energy

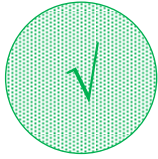

Monitor the success of the MIPPS 01/2009 requirement for new development	Annual greenhouse gas emissions by sector	To reduce CO2 emissions by 20% by 2010 and by 60% by 2050 from a 1990 baseline figure (national target) Source: UK Climate Change Programme 2000		Both Wales and Denbighshire have shown a continuing decline in greenhouse gas emissions. Denbighshire's CO2 emissions in 2012 were 581 Kt, which is a decrease from 637 Kt in 2008. CO2 emissions for Wales were 46.6 Mt in 2010, which is a 15% reduction from 1990. For all of Wales, greenhouse gas emissions have reduced in each sector, from a total of 35.9 Mt in 2006 to 31.8 Mt in 2010. The requirements set out in national planning policy for developments to meet Code for Sustainable Homes and BREEAM standards
	No. of Code for Sustainable Homes assessments accompanying new developments	100% of new dwellings to meet Code Level 3 Standards from 2010. 100% of new commercial buildings to meet BREEAM Very Good Standard	Data not captured	

Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

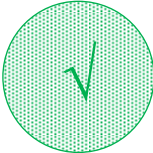
Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	% of energy produced in the County generated from renewable sources	10% renewable energy target by 2010 (national target) and 60% by 2050 Source: UK Climate Change Programme		has been removed and integrated with Building Regulations requirements. Developments meeting these standards (or equivalents) are therefore no longer recorded.
	No. of buildings incorporating renewable energy production (solar panels, wind turbines, photovoltaics, ground-source heat)	Increase number year on year		Data is not available at county level for renewable energy production. However, the all-Wales percentage has increased each year from 2005. In 2013, 10.1% of energy generated in Wales was from renewable sources and this has steadily increased from 3.5% in 2005.
	Construction projects incorporating on-site recycling	All major development projects to incorporate on-site recycling		No major developments have taken place since LDP adoption, which would require on-site recycling.

SA Objective 17: Protect mineral resources from development that would preclude extraction

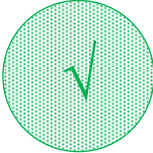
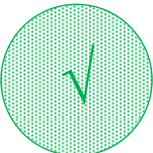
There is a need to consider the mineral deposit which may be found underneath a development proposal	Amount of mineral reserves	To sustainably manage existing reserves		Reuse of aggregates in construction was approximately 50% in North Wales according to the 2012 Construction and Demolition Survey undertaken by Natural Resources Wales. However, less than 1% of aggregate wastes were actually disposed of by landfill in North Wales, with the vast majority of aggregate wastes being recovered for beneficial use, including backfilling. Although this indicator is not being complied with, in light of the above the objective is still being met. No mineral reserves were sterilised by non-mineral
	Reuse of aggregates in construction	100%		

Appendix 2 – SA Objectives Monitoring Table

Denbighshire County Council Local Development Plan 2006 - 2021

Effect to be monitored	Indicator	Target/ Data Source	Performance	Comments
	Number of planning applications approved resulting in the sterilisation of mineral reserves	0%		development.

SA Objective 18: Encourage waste reduction, reuse, recycling and recovery and regional self-sufficiency

New development in the County will need to consider how it can minimise the impact on the environment. Policies VOE 7 & 8 permits new local waste management sites / facilities and so those numbers should be monitored	Household, construction and demolition and industrial waste production (tonnage)	Reduction in waste to at least 10% of 1998 figure by 2010 By 2020 waste arising per person should be less than 300 kg per annum; Source: Municipal Waste Management Strategy for Denbighshire County Council, February 2005		The target for 2009/10 was met across Wales (Source: Municipal Sector Plan). Recycling rates in Denbighshire in 2009/10 was 52.5%, well in excess of the WG target of 40%. Further targets have been identified for subsequent years all of which Denbighshire has exceeded to date.
	% of household, construction and demolition and industrial waste recycled	By 2009/10 achieve at least 40% recycling/composting, with a minimum of 15% composting and 15% recycling Source: Municipal Waste Management Strategy for Denbighshire County Council, February 2005		

Appendix 2 - WG TAN 1 Response

CONSULTATION RESPONSE FORM

Draft Technical Advice Note 1 – Joint Housing Land Availability Studies

We want to know your views on proposed changes to Technical Advice Note 1, *Joint Housing Land Availability Studies*, which supports the Welsh Government's policy on housing land supply.

Please submit your comments by **10th October 2014**

If you have any queries on this consultation, please email: planconsultations-f@wales.gsi.gov.uk or telephone: 029 2082 3290

Data Protection

Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about. It may also be seen by other Welsh Government staff to help them plan future consultations.

The Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. This helps to show that the consultation was carried out properly. If you do not want your name or address published, please tick the box below. We will then blank them out.

Names or addresses we blank out might still get published later, though we do not think this would happen very often. The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 allow the public to ask to see information held by many public bodies, including the Welsh Government. This includes information which has not been published. However, the law also allows us to withhold information in some circumstances. If anyone asks to see information we have withheld, we will have to decide whether to release it or not. If someone has asked for their name and address not to be published, that is an important fact we would take into account. However, there might sometimes be important reasons why we would have to reveal someone's name and address, even though they have asked for them not to be published. We would get in touch with the person and ask their views before we finally decided to reveal the information.

Confidentiality

Responses to consultations may be made public on the internet or in a report.

If you do not want your name and address to be shown on any documents we produce please indicate here

If you do not want your response to be shown in any document we produce please indicate here

CONSULTATION RESPONSE FORM

Draft Technical Advice Note 1, Joint Housing Land Availability Studies (Consultation)

Date 18 July - 10 October 2014

Name	Lara Griffiths	
Organisation	Denbighshire County Council	
Address	Caledfryn Smithfield Road Denbigh LL16 3RJ	
E-mail address	Lara.griffiths@denbighshire.gov.uk	
Telephone	01824 706913	
Type <i>(please select one from the following)</i>	Business	<input type="checkbox"/>
	Local Planning Authority	<input checked="" type="checkbox"/>
	Government Agency / Other Public Sector	<input type="checkbox"/>
	Professional Body / Interest Group	<input type="checkbox"/>
	Voluntary sector (community groups, volunteers, self-help groups, co-operatives, enterprises, religious, not for profit organisations)	<input type="checkbox"/>
	Other (other groups not listed above)	<input type="checkbox"/>

Q1	<u>Purpose / Context</u> (sections 2 and 3)	X
	Do you agree that the Joint Housing Land Availability Study (JHLAS) and Local Development Plan Annual Monitoring Report (AMR) processes should be more closely aligned?	
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Q1	<u>Further Comments</u>	
	<p>The JHLAS clearly informs the AMR and provides data for a number of the key indicators within it. There are however concerns relating to formally linking the two processes and the potential impact this may have in terms of trigger points for a LDP review. The first AMR can be due relatively shortly following adoption of an LDP and before many newly allocated sites have had sufficient time to progress through the planning process. As landowners/developers have no confirmation that their site is to be included in an LDP until the Inspector's report is received then they are unlikely to have spent time and money preparing detailed plans prior to adoption of the Plan. The time required to prepare plans and necessary supporting information, submit and secure a full planning consent and commence construction is unlikely to happen on many newly allocated LDP housing sites prior to submission of the first AMR. This also supposes that the landowner/developer considers that the housing market is sufficiently attractive for them to consider bringing the site forward on adoption, which in the current economic climate is unlikely. The likely outcome of this is, that the majority of LPAs will find themselves triggering the need for an LDP review within 2 years of adoption in the current climate. This is borne out by comparison of the 2013 JHLAs across Wales where only 1 LPA, with an adopted LDP, had a housing land supply in excess of 5 years using the residual method.</p>	

Q2	<u>Study preparation</u> (section 4.1)	X
	To enable the most up-to-date JHLAS to feed into the AMR it is proposed to shorten the timetable for its preparation to six months.	
	Do you agree that it is feasible to prepare a JHLAS in this revised	

timeframe?	
Agree	
Neither Agree nor Disagree	
Disagree	

Q2	Further Comments
<p>Completion of the JHLA within 6 months may be desirable but difficult to achieve in reality for many LPAs. Staff reductions and budgetary constraints are likely to impact on the resources available to carry out such studies. For areas such as Denbighshire, which has a large rural hinterland the actual site survey work is extremely time consuming. The authority has also experienced delays to the agreed timetable caused by study group members requesting extensions to agreed consultation periods due to limited resource issues which is understandable but can delay publication dates. Even assuming that the Council can carry out the survey work and prepare the statement of common ground within the suggested timeframe, the Planning Inspectorate would also have to deal with a significant number of studies at the same time. This would be outside of the control of the council but may impact on publication date of the final study and input in to the AMR.</p>	

Q3	<u>Sites for inclusion (section 4.3)</u>	X
<p>Do you agree that sites subject to section 106 agreements should be included in the 5 year housing land supply (subject to their removal if the agreement remains unsigned after 1 year)?</p>		
Agree		
Neither Agree nor Disagree		
Disagree		

Q3	Further Comments
Yes they should be included. Should be some flexibility to retain for more	

than 1 year if it can be demonstrated that progress is being made.

Q4	<u>Site categorisation (section 4.4)</u>	X
<p>Greater delineation has been introduced into the site categorisation to give more precise information about why a site has not been included in the 5 year housing land supply. The former 2* category (sites affected by low market demand) has been removed as a result.</p> <p>Do you agree that these changes will assist in the understanding of a local planning authority's housing land supply?</p>		
Agree		
Neither Agree nor Disagree		
Disagree		

Q4	Further Comments	
<p>The Council would support the removal of the 2* classification and hasn't used this category for a number of years.</p> <p>Category 4 would appear in equitable as there is little Councils can do to force developers to bring forward sites if they feel they are unviable or would prefer to wait for healthier market conditions. This may encourage land banking particularly if it is known that the council will be forced to release additional land if the JHLA reports a land supply of less than 5 years which is not in fact an accurate picture of what is available.</p>		

Q5	<u>Calculating housing land supply (section 5)</u>	X
<p>It is proposed that only local planning authorities with an adopted LDP (or an adopted Unitary Development Plan that is still within the plan period) will be able to undertake a JHLAS calculation (using the residual methodology) and thus be able to demonstrate that they have a 5 year housing land supply.</p> <p>Do you agree with this approach, which is aimed at incentivising the preparation and adoption of LDPs?</p>		
Agree		
Neither Agree nor Disagree		
Disagree		

Q5 Further Comments

Denbighshire recognises the value and importance of having an adopted LDP and agrees that all authorities should be encouraged to progress their Plans. If an authority does not have an adopted and in date development plan though it is hard to see what incentive there would be for carrying out the JHLA if there is no opportunity to demonstrate a housing land supply. This is particularly relevant given the resource constraints local authorities are currently operating under.

Q6	<u>Calculating housing land supply (section 5)</u>	X
	It is proposed that the residual methodology based on an adopted LDP or UDP will be the only methodology allowed for calculating housing land supply. Do you agree with this approach?	
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Q6 Further Comments

Denbighshire does not agree the proposed approach. The residual method can lead to extreme annual requirements during periods of low economic activity and also where growth levels in adopted LDPs are based on Household projections that have since been shown to be inaccurate. The difficulties of using the residual method are at least recognised in the existing TAN 1 (2006) which states (para. 7.5.2) *'In some circumstances that calculation has indicated land shortages or surpluses which do not exist in practice. In such cases, a comparison of available land with past building rates can provide a measure of the adequacy of land supply that is more relevant to the achievement of the general objectives of the development plan'*.

The residual method of calculation works best when actual build rates have broadly been as anticipated in the development plan. However if there has been significant deviation between actual build rates and those contained in the LDP (which are primarily based on WG projections) this distorts the residual calculation and can produce unrealistic and, having regard to market conditions, unachievable results. The Minister acknowledged, in his letter of 10th April 2014 to LPA's, that recent completions have been lower than anticipated in previous WG projections and this is an obvious reflection of recent past economic conditions resulting from the global economic crisis.

For Denbighshire the household figures are much lower than those published in the 2006 and 2008 based household projections. The differences are significant and suggest a much lower growth rate than that planned for in the

LDP which was adopted prior to the new figures being produced by Welsh Government. Whilst it is accepted that the latest projections are based on a period of economic decline, for Denbighshire they are significantly lower than previous projections (approx. 50% lower) or the LDP requirement. Housing completions remain the lowest recorded since 1996, with only 159 completions over the last year. The average annual completion rate over the plan period so far has been 211, significantly lower than the rate required to achieve the LDP target of 7500. This suggests that despite the availability of developable land allocated for housing, the market is unlikely to deliver the levels of house-building required to meet the predicted household growth.

The adopted Denbighshire LDP contains an annual housing requirement of 500 dwellings per annum over the 15 year Plan period. Actual completions since the start of the Plan period (2006) have averaged only 211 dwellings per annum. As a result, in Denbighshire, based on the residual method there is now a requirement to achieve a completion rate of 796 dwellings per annum to meet the LDP requirement. This rate is more than **double** that achieved since 2006 and compares to an average completion rate over the LDP plan period of 211 dwellings per annum. While the LDP Inspector has ensured that the Council has sufficient land allocated to meet its LDP requirement, both the capacity of the housebuilding industry in the area and the market demand in the area, to now meet this residual completion rate of 796 dwellings per annum must be questioned. For example Denbighshire has not achieved a completion rate as high as 400 dwellings per annum in any single year during its existence. It is now expected to achieve nearly double this **on average every year** during the remaining Plan period which is clearly unachievable. To achieve a 5 year supply it has to have sufficient land available and agreed by the study group as likely to be developed within the next five years, to accommodate an annual completion rate of 796 dwellings per annum, which is unrealistic. The Denbighshire situation is of course not unique and it is likely that a significant number of other LPA's will struggle to achieve an agreed 5 year supply, even though the land supply as a whole is sufficient to accommodate their LDP requirement and a built in contingency.

The subsequent release of more land, either via an appeal scenario, or via a review of the LDP is likely to do little to help achieve a 5 year supply, given the marketing and housebuilding capacity constraints referred to previously. Furthermore, this likely increase in applications and appeals on unallocated land will serve to; harm planning and its reputation as a tool for public interest & sustainable development; remove certainty and transparency for developers and the community (key concerns noted in the Positive Planning agenda) and; undermine the influence of an LDP which has gone through the relevant consultation and Examination in Public procedures. Finally, it is paramount that housing supply analysis understands that although important, land supply is not the single variable that prevents the 5 year housing supply being met (for eg. access to finance for developers is a key barrier identified during discussions with developers) in a multifaceted housing market.

The proposed use of the residual methodology only is likely to lead to a market led approach to planning which runs in direct contradiction to the Welsh Government's stated aims of having a plan led approach. The

production of a development plan is extremely resource intensive and many authorities may question the value in producing one if the net result is an apparent shortage of housing land through the JHLA based on the proposed methodology. This is particularly true of authorities whose LDPs are based on the 2008 based household estimates which have subsequently been demonstrated to be highly inaccurate

Q7	<u>Housing supply figure (section 6)</u>	X
	Where an LPA has an undersupply of housing land (i.e. less than 5 years) it is proposed that the action to be taken would no longer be set out in the JHLAS report, but would be addressed in the AMR in order to link it directly with LDP monitoring. Do you agree with this approach?	
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Q7	Further Comments	
	The JHLAS should still include commentary however if the JHLAS process is to be aligned more closely with AMR then this would be the more logical place for such measures to be included. Given that the land supply situation can change rapidly the reference to possible Plan review based on the result of one JHLAS seems excessive and as previously stated is likely to put most LPAs into a Plan review less than 2 years from adoption	

Q8	<u>JHLAS process (section 7.3)</u>	X
	Do you agree that where the inclusion of sites is disputed by members of the Study Group, a Study Group meeting <i>must</i> be held?	
	Agree	
	Neither Agree nor Disagree	
	Disagree	

Q8	Further Comments	
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It is reasonable to allow provision for a study group meeting if required, but to make one compulsory may lead to delays in the publication of studies. The resources available to study group members are limited and it is considered unlikely that a difference stance on particular sites will be taken at a meeting.

Q9

Any other comments

We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

The Planning Bill sets out what characterises a ‘good’ planning authority. Included within this is having an adopted development plan and a 5 year housing land supply. For those authorities whose LDPs are based on the 2008 based Welsh Government projections; which have subsequently been proved to be highly inflated; these 2 indicators are almost mutually exclusive. In reality it will lead to a situation where authorities that have committed the resources and effort to adopt an LDP are then being unfairly penalised due to the methodology used in calculating the 5 year housing land supply.

How to respond

Please submit your comments by **10th October 2014** in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to : planconsultations-f@wales.gsi.gov.uk [Please include ‘TAN1 Consultation WG22580’ in the subject line]</p>	<p>Please complete the consultation form and send it to: TAN 1 Consultation Planning Policy Branch Planning Division Welsh Government Cathays Park, Cardiff CF10 3NQ</p>

Additional information

If you have any queries about this consultation, please

Email: planconsultations-f@wales.gsi.gov.uk

Telephone: Paul Robinson on 029 2082 3290 or Nick Lloyd on 029 2082 6802



CYNGOR
Sir Ddinbych
Denbighshire
COUNTY COUNCIL

*AWAHT ROSEMARY
FYM WJG*

Appendix 3 - Letters to Chief Planners

Rosemary Thomas
Chief Planner/ Deputy Director
Department for Environment and Sustainable Development
Welsh Government
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Eich cyf/Your ref

Ein cyf/Our ref

Dyddiad/Date

15 October 2012

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graham.boase@denbighshire.gov.uk

Dear Rosemary

Denbighshire Joint Housing Land Availability Study 2012 Revised Guidance and Methodology

I am writing to express my frustration and disappointment with the manner in which the publication of guidance on the preparation of Joint Housing Land Availability Studies (JHLAs) has been conducted. On 14th September 2012, Welsh Government issued a revised guidance note on the preparation of JHLAS. The revised guidance advises that a 10 year average completion rate be used when calculating the housing land supply to reflect the low build rates in the past 5 years.

The 2011 Denbighshire JHLA study was referred to the Planning Inspectorate as the Home Builders Federation (HBF) had challenged the methodology and stated that the Local Development Plan proposed growth rates should be taken into account. The Inspector concluded that as the Local Development Plan had yet to be found 'sound' that it was not appropriate to consider this information and that the 5 year supply should be calculated on the basis of the past 5 year completion rate.

The 2012 study was prepared on this basis and consultation on the site schedules and draft Statement of Common Ground (SoCG) was held between 29th June and 23rd July 2012 in line with the agreed timetable. An extension to the deadline was afforded to the HBF at their request. No comment was made on the land supply calculation methodology in this response. The site schedules and draft SoCG were amended following comments and re-circulated for consultation with the study group from 9th August to 31st August 2012 again in line with the agreed timetable. Comments from HBF were received on the 31st August stating that following discussions between the HBF and Welsh Government that Welsh Government had offered to extend the time period in the methodology to 10 years. This was the first indication Denbighshire had received that the methodology in terms of the timeframe may be changing.

Denbighshire officers contacted Welsh Government Planning Division (north) on 3rd September 2012 seeking confirmation/clarification on this matter. On 4th September 2012 a response was received from Welsh Government Cardiff reiterating that the completions timeframe could be altered as set out in TAN 1 if all study group members agreed, and if not it would be a matter for an Inspector to determine. On 14th September 2012 a revised guidance note was issued by Welsh Government on JHLA studies stating that the 10 year time frame for past average completions would be a more appropriate timeframe to use currently.

JHLAS's are prepared to an agreed time table which Denbighshire has adhered to throughout the process. To introduce new guidance which would mean reworking the calculations and re-consulting on the draft SoCG with only 10 working days to the deadline for final submission of SoCG is considered completely unreasonable.

The HBF appears to have unilaterally negotiated with Welsh Government a revision to the agreed method of calculating the housing land supply. Denbighshire County Council considers it wholly unacceptable that a change to the methodology to suit one particular party be introduced at such a late stage in the process and without any consultation with other members of the study group.

TAN 1 (7.5.5) does allow for different time periods to be used but only where **all** members of the study group agree. There has been **no** consultation with Denbighshire County Council (or any other North Wales Local Planning Authorities) as part of the relevant study group at any stage although it appears there have been extensive negotiations between HBF and Welsh Government.

In conclusion, I wish to record my disappointment with the process that has been followed in respect of the unilateral discussions that have led to a change in methodology without reference to the wider study group. I also question the timing of the release of the new guidance so late in the process of preparation of the 2012 studies. I would welcome your response on these matters.

Yours sincerely

Graham H Boase
Pennaeth Gwasanaethau Cynllunio, Adfywio a Rheoleiddio
Head of Planning, Regeneration & Regulatory Services

cc Mark Newey (WG)
Robert Newton (WG)

Gwasanaethau Cynllunio, Adfywio a Rheoleiddio Caledfryn, Ffordd y Ffair, Dinbych, Sir Ddinbych, LL16 3RJ
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Adran yr Amgylchedd a Datblygu Cynaliadwy
Department for Environment and Sustainable Development



Llywodraeth Cymru
Welsh Government

Mr Graham H Boase,
Head of Planning, Regeneration &
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Eich cyf : Your ref
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Dyddiad : Date: 31 October 2012

Dear Graham,

Thank you for your letter of 11 October about the revised Guidance Note on the JHLAS process that we issued on 14 September.

As 2011 was the first year of the revised JHLAS process we reviewed its operation by carrying out a 'lessons learnt' exercise, taking account of issues that arose during the process, including those raised by local planning authorities and by the Home Builders Federation (HBF). As a result of this exercise we amended the Guidance Note to provide further guidance on specific aspects of the process. As I mentioned in my letter accompanying the revised Guidance Note, we have not made any changes to the JHLAS process. The further guidance was provided to assist with the existing process and as such, consultation was not considered to be necessary.

One of the issues that was evident from the 2011 Studies was that low housing delivery rates over the last five years had resulted, in some cases, in relatively high land supply figures in comparison with previous figures calculated using the residual method. This issue was also raised by the HBF. In order to address this issue we included in the revised Guidance Note our view that when using the past building rates methodology it would currently be more appropriate to use a period of 10 years immediately preceding the base date of the study. As TAN 1 allows for a longer (or shorter) period to be used where all members of the Study Group agree, we did not consider that this guidance point represented a change in methodology requiring consultation. As in previous years, this is a matter for the Study Group to consider and if agreement can not be reached, it should be included in the SoCG as a disputed matter for a Planning Inspector to consider.

The HBF have expressed a number of concerns to us about the use of the past building rates methodology set out in TAN 1 and have proposed alternative methodologies, including

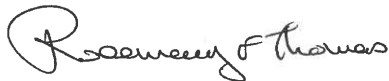


the use of household projections. However, we consider that the critical factor is for planning authorities to have up-to-date adopted plans in place to enable the residual method to be used to calculate housing land supply. We anticipate that progress on this front will mean that the number of LPAs using the past building rates methodology will diminish over the coming 12 months.

Regarding the timing of the revised Guidance Note, I recognise that this may have been difficult for some of those LPAs that are at an advanced stage of the process, such as Denbighshire. However, we were aware that the HBF were already raising concerns with LPAs about the effect on the land supply of continuing to use a 5 year period for past building rates and therefore considered it necessary to clarify our view on this matter. In addition, at the point when the revised Guidance Note was issued the majority of LPAs had either not issued their site schedules for consultation or not issued their draft SoCG. I appreciate the efforts that you have made to incorporate the revised guidance into your SoCG, given that you were at a more advanced stage of the process.

I hope this clarifies the issues you raised in your letter.

Yours sincerely



ROSEMARY THOMAS
Chief Planner/Deputy Director
Department for Environment and Sustainable Development

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Dyddiad / Date 19 May 2015

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Mr Neil Hemmington
Chief Planner
Planning Directorate
Department for Natural Resources
Cathays Park
Cardiff CF10 3NQ

Dear Mr. Hemmington

TAN 1

I am writing to express my concerns and frustration with the position Denbighshire County Council finds itself in, in relation to the revised TAN 1- Joint Housing Land Availability Studies (2015) and resultant housing land supply figures. I'm sure other authorities have the same concerns and frustrations.

Denbighshire was one of the leading authorities in progressing its LDP to adoption and recognizes the value and importance of having an adopted LDP. The Draft Planning Bill sets out what characterizes a 'good' planning authority. Included within this is having an adopted development plan, and a 5 year housing land supply. For Denbighshire, whose LDP is based on the 2008 Welsh Government projections; these 2 requirements are basically mutually exclusive given the introduction of "the residual method" as the sole methodology for determining housing land supply. This has led to a situation where Denbighshire having committed the resources and effort to prepare and adopt an LDP is now unfairly penalised due to the methodology used in calculating the 5 year housing land supply.

For Denbighshire, recent household projections (2011 based) are much lower, around 50% lower, than those published in the 2006 and 2008 based projections. The differences are highly significant and suggest a much lower growth rate than that planned for in the Denbighshire LDP which was adopted prior to the new figures being produced by Welsh Government. Whilst it is accepted that the latest projections are based on a period of economic decline, for Denbighshire they are significantly lower than previous projections that informed the LDP requirement.

The residual method of calculating housing land supply can lead to extreme annual requirements during periods of low economic activity and also where growth levels in adopted LDPs are based on Household projections that have since been shown to be inaccurate. The difficulties of using the residual method were at least recognized in the previous TAN 1 (2006) which stated (para. 7.5.2) '*In some circumstances that calculation has indicated land shortages or surpluses which do*

not exist in practice. In such cases, a comparison of available land with past building rates can provide a measure of the adequacy of land supply that is more relevant to the achievement of the general objectives of the development plan'.

The residual method of calculation works best when actual build rates have broadly been as anticipated in the development plan. However if there is significant deviation between actual build rates and those contained in the LDP this distorts the residual calculation and produces unrealistic and, having regard to market conditions, unachievable results. The Minister acknowledged, in his letter of 10th April 2014 to LPA's, that recent completions have been lower than anticipated in previous WG projections and this is an obvious reflection of recent past economic conditions resulting from the global economic crisis.

In 2014, under the previous TAN 1, Denbighshire, using the residual method had a housing land supply of 1.8 years. It was useful in the 2014 study to provide a comparison with past building rates which indicated the performance of the building industry locally. This showed a housing land supply in excess of 5 years based on either the past 5 or 10 year completion averages.

This year, the preliminary work on the 2015 Joint Housing Land Availability Study is indicating that again, using the residual method only, that the housing land supply within Denbighshire will be below 5 years despite us having a recently adopted LDP with a significant number of deliverable sites allocated for housing. This is in contrast to the comparison with past build rates which would show a housing land supply of around 10 years which is far more realistic given the status of our LDP. This gap between the figures produced using the residual methodology and the past completions will continue to grow as the residual requirement increases as year on year the build rates required by the LDP are not met. This is not an accurate reflection of the land supply in the County, but more an indication that the housing market is depressed and house building rates are low. Denbighshire is being very proactive in looking at bringing forward sites in its control, preparing development briefs for a range of sites and being flexible in negotiations on sites. All of these efforts though will not be enough to bring the housing land supply above 5 years under the residual method of calculation.

The adopted Denbighshire LDP contains an annual housing requirement of 500 dwellings per annum over the 15 year Plan period. Actual completions since the start of the Plan period (2006) have averaged only 189 dwellings per annum. As a result, in Denbighshire, based on the residual method there is now a requirement to achieve a completion rate of 898 dwellings per annum to meet the LDP requirement. This rate is more than **four times** that achieved since 2006. While the LDP Inspector ensured that the Council has sufficient land allocated to meet its LDP requirement, both the capacity of the house building industry and the market demand in the area, to meet this residual completion rate of 898 dwellings per annum is totally unrealistic, even during a boom period for house building.

The subsequent release of more land, either via an appeal scenario or via a review of the LDP is likely to do little to help achieve a 5 year supply, given the market and house building capacity constraints referred to previously. Furthermore, this likely increase in applications and appeals on unallocated land will serve to harm the plan led planning system promoted by WAG and its reputation as a tool for

public interest & sustainable development; remove certainty and transparency for developers and the community (key concerns noted in the Positive Planning agenda) and, undermine the influence of an LDP which has gone through the relevant consultation and Examination in Public procedures.

The Denbighshire situation is of course not unique and it is likely that a significant number of other LPA's will struggle to achieve an agreed 5 year supply, even though the land supply as a whole is sufficient to accommodate their LDP requirement and a built in contingency. This would appear to fly in the face of Welsh Government's stated desire to have a plan led system and in my opinion will undermine the planning function.

I request WG as a matter of urgency review these issues and the contents of TAN1 before it is too late and the plan led system in Wales as promoted by WG becomes an irrelevancy.

I look forward to your considered response.

Yours sincerely

Graham H Boase
Head of Planning & Public Protection

Hugh Evans, Leader
David Smith, Lead Member for Public Realm
Rebecca Maxwell, Corporate Director: Economic and Community Ambition
Paul Mead, Development Manager
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Adran Cyfoeth Naturiol
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Our ref: A11075064

Mr Graham Boase
Head of Planning and Public Protection
Denbighshire County Council
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18 June 2015

Dear Mr Boase,

Thank you for your letter dated 19 May about the revised TAN 1 and Denbighshire's housing land supply position.

The Minister for Natural Resources has been clear that housing land supply needs to be soundly based on meeting the housing requirements identified in a local planning authority's development plan. This was a key principle underlying the recent review of TAN 1, as emphasised in my letter of 19 January, and reflects the position that has been set out in *Planning Policy Wales* (PPW) since its advent in 2002. The past build rates methodology, being based on the past performance of the house-building industry rather than the housing provision established in development plans, did not provide a measure of delivery against a plan's housing need-based targets. The past build rates methodology was used largely by authorities without an adopted development plan and with the improving picture regarding plan adoption, was no longer considered to be an appropriate means of calculating housing land supply as it is a reflection on the past performance of the house-building industry rather than being based on future planned change in an area. However, I recognise that economic conditions and their affect on the performance of the house-building industry, can form part of the reason for an authority failing to achieve a five-year housing land supply and this may therefore be cited as such in an Annual Monitoring Report (AMR).

Regarding the Welsh Government's household projections, as set out in PPW these are a starting point for assessing housing requirements and this has been the situation since 2002. Local authorities should consider the appropriateness of the



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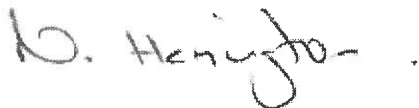
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projections for their area, based upon all sources of local evidence and taking account of the full range of economic and other proposals in their development plan. The housing provision established in an LDP should therefore not only take account of the household projections and locally identified housing requirements, but also be supportive of the authority's overall strategy and growth aspirations as expressed in the LDP. The Minister's letter of 10 April 2014 to which you refer, emphasised this point.

You also refer to the low housing completion rates in Denbighshire and the resultant effect on your housing trajectory and on achieving your LDP housing delivery target. These are issues that you will need to address in your AMR, taking account of economic conditions. The proactive work that you mention you are undertaking to bring forward sites, along with a flexible approach to negotiations with developers, should assist in this process. This approach should also help to reduce the number of applications on unallocated sites, which nevertheless would still need to comply with LDP and national policies and should therefore only be allowed if sustainable.

In summary, the change to the sole use of the residual methodology is intended to reinforce the link between housing land supply and the housing requirements of an area as expressed by local planning authorities in their LDPs. The arguments that you put forward regarding the implications of this change were fully considered as part of the recent review, including by the Technical Advisory Group in advance of the public consultation. We therefore currently have no plans for a further review of TAN 1, but as for all planning policy and guidance, will continue to keep the situation under review.

Yours sincerely,



Neil Hemington

Chief Planner
Planning Directorate
Department for Natural Resources