

## APPENDIX 1

Draft Site Development Brief:

Residential development

- Brookhouse sites,

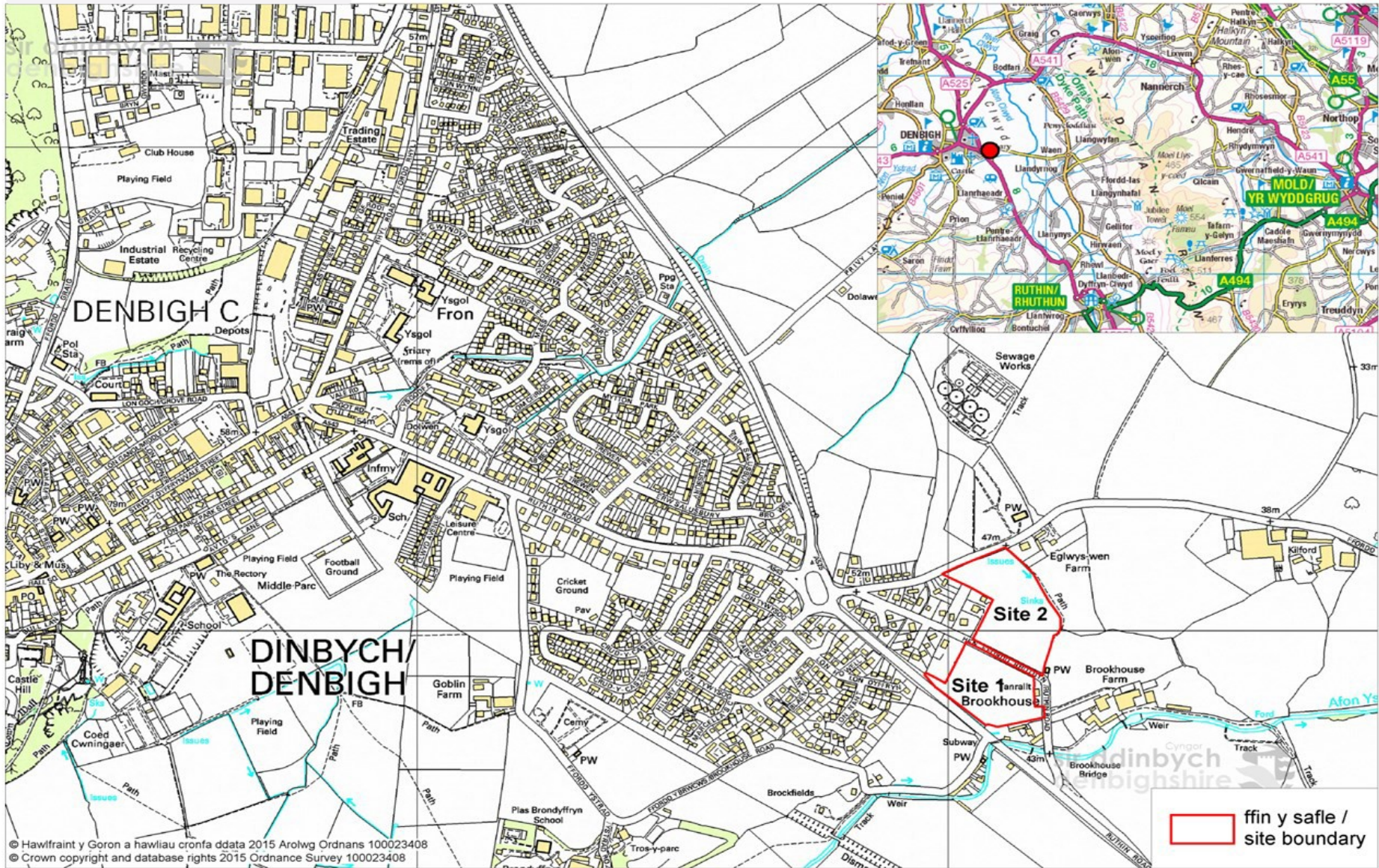
Denbigh

Main Document



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## 1. Introduction

1.1 This site development brief is one of a series of Supplementary Planning Guidance (SPG) notes amplifying Denbighshire Local Development Plan 2006 – 2021 (LDP). SPGs are based on policies or individual site allocations and aim to guide the process, design and quality of new development. These notes are intended to offer detailed guidance to assist the public, Members of the Council, developers and Officers in discussions prior to the submission of and, subsequently, in the determination of planning applications.

## 2. Document Status and Stages in Preparation

2.1 This site development brief was formally ~~approved for public consultation~~ adopted by Denbighshire County Council's Planning Committee on ~~July 15th 2015~~ 16<sup>th</sup> March 2016.

2.2 The Council's SPG documents are not part of the adopted local development plan. The Welsh Government has confirmed that following public consultation and subsequent Local Planning Authority (LPA) approval, SPGs can be treated as a material planning consideration. Following approval, LPAs, Planning Inspectors and the Welsh Government can consider the document when determining planning applications and appeals.

2.3 This document has been prepared in accordance with Planning Policy Wales (Edition 7), Welsh Government guidance documents and advice received from statutory bodies and Welsh Water.

## 3. Site Location and Description

3.1 Denbigh is a market town located centrally in the administrative boundary of Denbighshire. It is located about 7km to the south of the A55 trunk road, a principle transport corridor in North Wales. It is linked by a ~~dual carriageway section of~~ the A525 which provides access to Ruthin, roughly 10km to the south and St Asaph to the north (see Figure 1). According to the 2011 census, there are approximately 8000 people living in Denbigh. The town is a lower growth town in the Denbighshire LDP settlement hierarchy for the purpose of allocating housing over the lifetime of the Plan. Following the LDP examination in public process and subsequent Council adoption of the LDP.

3.2 For ease of reference, figure 1 labels 'Land between old and new Ruthin Road' as site 1, and 'Land off Eglwys Wen' as site 2. This is how the sites will be referred to throughout the document. Sites 1 & 2 are located to the south east boundary of Denbigh, and are bounded by Whitchurch Road to the north and the A525 to the south. Old Ruthin Road intersects both sites centrally. Site 1 is relatively flat. Site 2 gently slopes down from west to east. Both sites currently consist of agricultural grazing land bounded by hedgerow.

3.3 Further north of the sites is a grade I listed building St Marcella Church. This listed building includes associated grade II listed Lychgate & churchyard walls and the Chest Tomb of Twm O'r Nant. South east of the sites are Brookhouse Mill and Brookhouse Farm, which is a grade II listed building. Directly to the south of the site are the Brookhouse Cottages. Both allocated housing sites total an area of approximately 5 hectares.

3.4 Old Ruthin Road provides access to the Brookhouse Mill, Brookhouse Farm, a Chapel and a number of houses on Karen Court and Llys Catrin. There are frequent bus services near the site on Whitchurch Road and Old Ruthin Road. These nearby bus services offer access to Wrexham, Llangollen, Corwen, Ruthin, and Llangwyfan



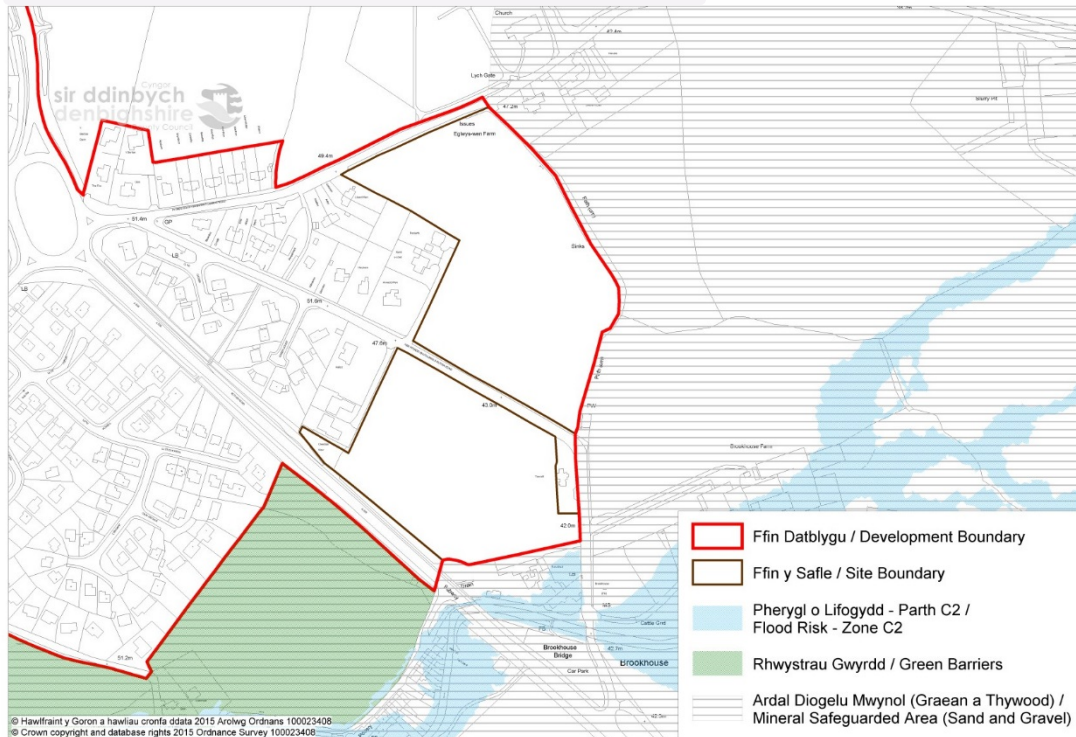
Photo 1: View from St Marcella Church across both sites towards the A525 Brookhouse Chapel towards St Marcella's Church

3.5 Both sites occupy a visibly prominent location when entering the town from the south east. The site is particularly visible from the A525, Whitchurch Road, and Old Ruthin Road.

#### 4. Planning Policies

4.1 Figure 2 (on the following page) shows local designations which would be applicable when determining planning applications for the site. The LDP Proposals Map for Denbigh and the LDP Key Map provide an overview of land designations relevant to the wider area.

Figure 2: Local designations relevant to development on site .



- 4.2 Planning Policy Wales, paragraph 2.1.2, states that planning applications have to be determined in accordance with the adopted development plan unless material considerations indicate otherwise. Denbighshire's LDP was adopted in June 2013, and contains local policies applicable to development proposals at the sites.
- 4.3 Planning Policy Wales states that material considerations must be planning matters; that is, they must be relevant to the regulation of the development and use of land in the public interest. It also states that material considerations must be fairly and reasonably related to the development concerned. For example, material considerations could include physical infrastructure capacity (e.g. in the public drainage or water systems), noise or disturbance resulting from use, highways capacity, biodiversity, flood risk, previous appeal decisions, and research work carried out to support planning proposals. Section 5 of this document will further detail material considerations specific to the sites. These material considerations are based primarily on policy RD1.
- 4.4 LDP Policy RD 1 – Development Boundary. Sites 1 & 2 are located within the development boundary of Denbigh and are allocated for housing as outlined in policy BSC 1. The number of units proposed on the site should be justified in accordance with policy RD 1 if it falls below the 35 dwellings per hectare density indicated in the policy. This document details local circumstances relevant to the sites and would warrant a lesser density.

4.5 Development proposals should raise design standards and enhance the environment through landscape improvements. Policy RD 1 outlines general design criteria that development proposals in development boundaries should adhere to. Applicants should consider the following design matters (that are by no means exhaustive): built height, scale, density of development, massing, site layout, impacts on the wider rights of way network, waste disposal/recycling arrangements, elevation of buildings, Sustainable Drainage Systems (SuDS), green landscape features and built material sympathetic to the surrounding area. *Technical Advice Note 12: Design* outlines that good design goes beyond being visual attractive. Good design involves access, character, community safety, environmental sustainability, and movement. Development proposals will be required to apply these objectives of good design. Further design principles are outlined in section 6 of this document.

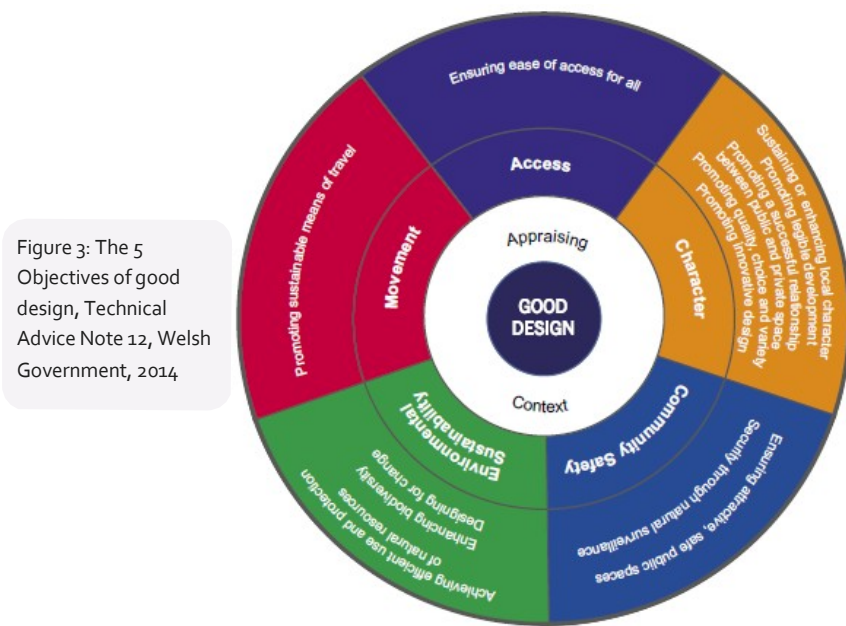


Figure 3: The 5 Objectives of good design, Technical Advice Note 12, Welsh Government, 2014

4.6 LDP Policy BSC 1 – Growth Strategy for Denbighshire. Both sites are allocated for residential development in the adopted Denbighshire Local Development Plan 2006 – 2021 (LDP), and labelled 'BSC 1' on the LDP Proposals Map for Denbigh. LDP Policy BSC 1 also sets out the requirement to provide a range of house types, sizes and tenure to reflect the local need and demand. The Local Housing Market Assessment provides further details on individual areas in the County.

4.6 7 LDP Policy BSC3 Securing Infrastructure Contributions from Development. This policy states that development will be expected to contribute to the provision of infrastructure to meet the additional social, economic, physical and/or environmental infrastructure requirements arising from the development. The policy lists 5 priorities, and notes that the priorities will vary depending on the nature and location of development. Improving the quality of school buildings and performance in education is a key corporate priority outlined in Denbighshire's Corporate Plan. Alongside affordable housing, sustainable transport facilities, and open space, contributions to education provision will be sought. Education requirements are further discussed in section 5.27 of this document.

- 4.7 <sup>8</sup> LDP Policy BSC 4 Affordable Housing. This policy states that all developments of 3 or more residential units are expected to provide a **minimum** of 10% affordable housing. This should be delivered on site for developments of 10 or more residential units.  ~~, or by financial contribution on developments of less than 10 residential units. In the interests of creating and maintaining sustainable mixed communities, proposals for 100% affordable housing sites will only be considered on sites of 10 units or less.~~ **The policy requirement of a minimum 10% contribution will be subject to annual monitoring of sales prices and could be increased to a minimum of 30% when prices rise.**
- 4.8 <sup>9</sup> **Current evidence** indicates ~~The Housing Strategy Officers indicate~~ that a demand for 2 bedroom affordable houses exists in the area. ~~They note that the~~ Tenure type could include rented through a Registered Social Landlord, intermediate rented, and shared equity. Affordable housing would have to be designed in line with space requirements in Residential Space Standards SPG (2013), and Design Quality Requirements (Welsh Government, 2005). Further guidance on this topic is also contained in the Council's Affordable Housing SPG (2014).
- 4.9 <sup>10</sup> LDP Policy BSC 11 Recreation and open space. This policy seeks to ensure that the county minimum standard of 2.4 hectares per 1,000 people is applied to development proposals. Development proposals for both sites should ~~preferably~~ provide open space on site. Per dwelling, this equates to 48 sqm outdoor sport, and 24 sqm children's equipped playspace & informal space. ~~Situations where commuted sums provision will be acceptable are outlined in the policy. Where there is no identified shortfall of open space in the local area, the Council will, where appropriate, expect developers to make a financial contribution. This contribution would be a commuted sum to mitigate the impact of increased usage on existing open space and equipment in the area. On larger sites, such as sites 1 & 2, the Council expect the majority of open space to be provided on site.~~

Figure 4: Fields in Trust 'benchmark' standards, applied in policy BSC 11.

Type of Open Space	Standard
Outdoor Sport including Playing Pitches	1.6 Hectares/1,000 Population
Children's Equipped Playspace	0.25 Hectares/1,000 Population
Children's Informal Space	0.55 Hectares/1,000 Population
Overall	2.4 Hectares/1,000 Population



- 4.11 Policy RD 5 - The Welsh Language and the social and cultural fabric of communities. This policy requires all planning applications to take into account the needs and interests of the Welsh Language. The policy contains development thresholds which set out the need for planning applications to be accompanied by additional information. Both sites exceed the 20 residential units threshold. As a result, a "Community and Linguistic Impact Assessment" is required to accompany the planning application. Further guidance on this topic is contained in the Council's Planning and the Welsh Language SPG (2014).
- 4.12 Policy VOE 1 – Key areas of importance. Alongside policy RD 1 criteria iii), this policy requires proposals to respect and where possible enhance built heritage sites and historic landscapes for their characteristics and local distinctiveness. Both sites are located in the Vale of Clwyd Historic Landscape. Site 2 is located close to a listed building. Planning Policy Wales section 6.5.9 highlights the objective of preserving or enhancing a listed building and its setting. Welsh Government Circular 61/96 Planning and the Historic Environment: Historic Buildings and Conservation Areas paragraph 11 provides additional guidance on development affecting the setting of a listed building.
- 4.13 Policy VOE5 - Conservation of natural resources. The purpose of this policy is to protect and enhance the natural environment. Development proposals that might have an impact on protected habitats and species will be required to be supported by an ecological survey / biodiversity statement. Compensation, mitigation or avoidance measures may be required to offset any adverse effects on protected environmental features caused by the development. In such cases, the measures should be in advance of any potential impact.
- 4.14 Policy VOE6 – Water management. The proposal will be required to incorporate water conservation and measures to eliminate or reduce surface water run-off from the site, where practicable. Major development proposals (greater than 1,000 sqm floorspace or 10 dwellings) should be accompanied by a Water Conservation Statement. Support for the SuDS approach to managing surface water is set out in paragraph 8.2 of Technical Advice Note 15 'Development and Flood Risk'. Paragraph 8.2 notes that "SuDS can perform an important role in managing run-off from a site and should be implemented, wherever they will be effective, in all new development proposals, irrespective of the zone in which they are located." In addition, Approved Document Part H of the Building Regulations 2000 establishes that when feasible, the first option for surface water disposal should be the use of SuDS.
- 4.14 Policy ASA 2 – Provision of sustainable transport facilities. Development proposals can result in a need to bring forward improvements to public transport, walking or cycling infrastructure. In such cases, this policy requires proposals to incorporate or contribute to the cost of their provision. This could include; capacity improvements or connection to the cycle network; provision of walking and cycling links with public transport facilities; improvement of public transport services.

4.15 Policy ASA3 - Parking Standards. This policy seeks to ensure that appropriate parking spaces for cars and bicycles are provided as part of development proposals. The surrounding area in terms of access & availability of public transport, population density, parking space availability, and whether alternative forms of transport are proposed, will be taken into account. Parking requirements are further discussed in section 5.6.

## 5. Site appraisal and requirements.

5.1 This section describes known constraints at the sites that any planning application would have to give consideration to and overcome. The below considerations are outlined in alphabetical order.

### 5.2 Access and parking.

Any development proposal will require a Transport Assessment (TA) as per policy RD1 criteria vii), and as both housing allocations together could exceed 100 houses (PPW section 8.7.2). In addition, the Council consider the locality to be sensitive to additional highway pressure which also triggers the TA requirement in PPW. The TA should outline how the development proposal would mitigate transport impact through design and planning conditions or obligations. Figure 5 (below) outlines the typical content of a TA.

5.3 A TA would be required should planning applications be submitted separately for the 2 sites. In such a case, the TA should take account of the adjacent site and not prevent its delivery. This would involve assessing the combined impact of both sites when complete (at a range of housing densities) on the local highway network. PPW section 8.7.2, and Annex D of *Technical Advice Note 18: Transport* provide further guidance on TAs. Non-vehicular (pedestrian & cycling) requirements are outlined in section 5.6 of this brief.

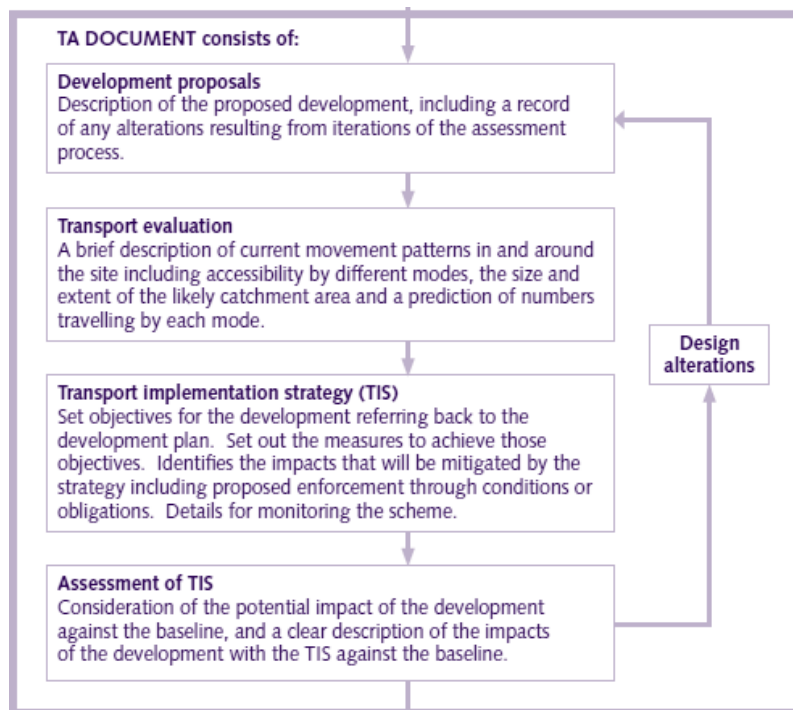


Figure 5: TA document typical content, taken from Technical Advice Note 18, Welsh Government, 2007

5.4 The satellite image of the site (following page) shows known transport pressure points (red annotations). It also shows the approximate location of the most suitable vehicular access (orange circle) to the sites. These annotations are outlined further on the following page.

Figure 6: Aerial View (2009) of highway constraints.



5.5 In addition to any considerations highlighted during discussions with the Highway Authority, the TA should take account of the following noted community concerns:

#### 1. Myddleton Park Roundabout.

The capacity of the roundabout at peak traffic times to accommodate extra traffic generated by the sites. This assessment should assess the type of traffic using the roundabout. This includes large lorries and the speed of cars travelling through the roundabout because of the relatively direct route of the A525. Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).

#### 2. Old Ruthin Road and Whitchurch Road junction.

The adequacy of visibility for vehicles exiting and entering Old Ruthin Road and the impact increased traffic would have on this junction. Currently, vehicles approaching this junction from Old Ruthin Road are not visible to road users on Whitchurch Road.

### 3. Old Ruthin Road (brow of slope).

Ensure access and highway arrangements take account of the topography of Old Ruthin Road which slopes downwards west to east. In combination with on road parked vehicles, this creates a blind spot for road users on the brow of the hill. ~~Highway safety at this corner is exacerbated during heavy rainfall when flooding occurs.~~ Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.

### 4. Approximate location of access for both sites.

Following discussions with the Highway Authority, it is anticipated that vehicular access would be achieved at Old Ruthin Road for both sites. This road has a speed limit of 30mph.

### 5. Whitchurch Road/ St Marcella's Church.

The TA should assess whether the development proposal would add any additional strain to this area. This should include taking into account traffic and parking need from the Church on days of worship, weddings and funerals etc. The TA should assess the suitability of achieving access off Whitchurch Road if this point of access is proposed.

### 6. Old Ruthin Road (corner).

Because Old Ruthin Road is narrow, larger vehicles and buses tend to accommodate both lanes of the road in order to navigate the corner opposite Brookhouse Chapel (annotation number 6). Highway & pedestrian safety at this corner is exacerbated further during heavy rainfall when flooding occurs. Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2. The TA should assess these points and provide design solutions as necessary.

### 7. Old Ruthin Road and New Ruthin Road junction.

The capacity of this junction and the potential to relocate the 30 mph speed limit sign to the south of this area should be considered in the TA. The relocation of the 30mph sign should ~~consider~~ incorporate provision of street lighting to mark the change in speed and so as to not require a legal Order to be made. ~~The weight capacity of Brookhouse Bridge should also be considered.~~

5.6 *Parking requirements.*

Denbighshire's Parking Requirements in New Developments SPG divides the County into 2 parking zones (based on urban and rural areas) to set standards. The site is located in parking zone 1 (an urban area and allocated settlement in the LDP). Therefore the parking requirements outlined in section 6.13 of the SPG apply. Other relevant sections from the SPG include: section 7 which outlines access requirements for disabled people, section 8 cycle parking standards, section 9 on motorcycle parking standards and section 10 on landscaping.

5.7 *Accessibility.*

Pedestrian access from the sites to the centre of Denbigh is currently unsatisfactory. The roundabout, the A525 and Old Ruthin Road do not offer an inviting, pleasant or positive perception on walking safely to Denbigh centre. This presents a barrier for new residents to be connected to Denbigh for important community, employment opportunities, education and retail services. It is likely this barrier will increase car dependency.

5.8 Figure 4 below shows existing pavements and public right of ways in the area (in green) and the location of nearby bus stops (in red). These bus services provide access to Wrexham, Llangollen, Corwen, Ruthin, and Llangwyfan.

Figure 7: Surrounding pavements & public right of way.

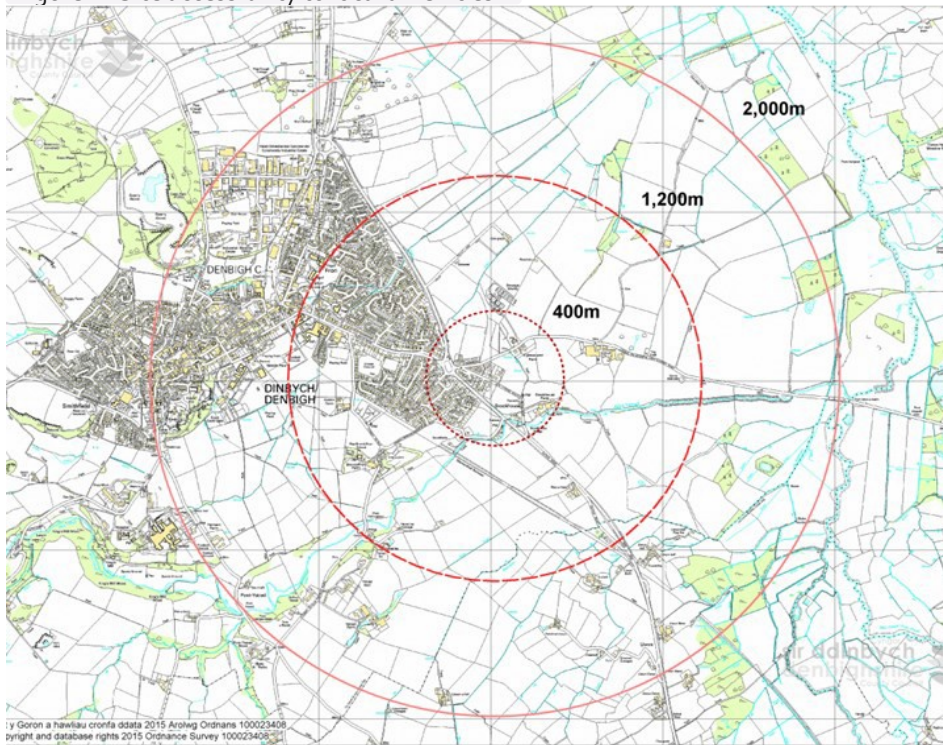


5.9 The proposed site layout should fit in with and enhance existing walking routes (see figure 4). The site layout should encourage walking and make it easier and preferable to get around the area by foot. Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of additional pavement to the sides 2.0 metre wide footways on either side of Old Ruthin Road that abuts shall be

provided along the frontages of both sites ~~should be included in any proposal. To make walking and cycling to Denbigh centre easier~~ As detailed in paragraph 5.5, enhancements to the roundabout area ~~should~~ shall be considered. Figure 5 on the previous page shows the distance of the two sites from Denbigh centre.

- 5.10 A number of local amenities (see figure 8 on the following page) are within 1.6km of the site (high school, convenience store, primary school, Denbigh Infirmary, supermarket, play area, swimming pool). Denbigh High Street, and an additional supermarket are located within 2km of the sites. These amenities could be within walkable distances outlined in Manual for Streets 0.8km – 2km (MfS 2007, section 4.41) should improvements noted in section 5.9 be made.
- 5.11 The development both within the site and immediate area should be designed to become a walkable neighbourhood. This will help reduce the need to use the car for short journeys, benefit local business and create health and wellbeing benefits for the wider community. The World Health Organisation recently created a Health Economic Assessment Tool (HEAT – see <http://heatwalkingcycling.org/> for more info). This tool outlines the economic benefit from walking and cycling.


Figure 8 : Site accessibility to local amenities.



5.12 The growing trend of realising the environmental role in shaping human health is recognised in Health Impact Assessments. This assessment considers all the wider determinants of health and wellbeing. The Wales Health Impact Assessment Support Unit offer Guidance on Health Impact Assessments ('HIA: A Practical Guide'. –available on the following link [www.whiasu.wales.nhs.uk](http://www.whiasu.wales.nhs.uk)). Providing a HIA is not a statutory requirement. However, any proposal is encouraged to recognise the benefits of designing a development that contributes to human health.

5.13 Principles from Manual for Streets 2007 (MfS) should be implemented into the design of the development proposal. This involves giving design priority to pedestrians as per the below table taken from MfS:

Table 3.2: User hierarchy

<p><b>Consider first</b></p>  <p><b>Consider last</b></p>	Pedestrians
	Cyclists
	Public transport users
	Specialist service vehicles (e.g. emergency services, waste, etc.)
	Other motor traffic

5.14 The above approach is endorsed in PPW section 8.1.34, alongside the need to promote walking, cycling and improve access to public transport, local shops and facilities (PPW section 8.1.4 TAN 18 section 3.6).



5.15 *Access for all.*

In line with policy RD1, the development proposal should ensure safe and convenient access for disabled people, pedestrians and cyclists. National planning policy outlines that access should consider all people who may be affected by the development. This includes all age groups across society and people with sensory impairments and learning difficulties. Technical Advice Note 12: Design (2014) page 18 and section 5.3 provides further guidance on inclusive access. Section 7 of the Council's Parking in New Developments SPG (2014) outlines accessibility requirements for disabled people.

5.16 Archaeology.

The Council's Archaeologist has no evidence of archaeology at the site within the Historic Environment Record. However, the Council's Archaeologist notes that in an area close to Kilford Farm there was evidence of Mesolithic, bronze-age, and early medieval activity. There are also records of an armed engagement in the area in 1645. Therefore, it cannot be fully ruled out that there has not been any archaeological activity in the area. A pre-determination evaluation would be needed as a first step to assess the archaeology present on the site. Any application should be accompanied by a desk based assessment and if necessary, geophysical surveying.

5.17 Biodiversity.

The Council's Biodiversity Officer has no record of protected species or habitats on site 1 and 2, but notes that this does not preclude their presence with it being likely that bats and nesting birds are present in hedgerows and trees. In addition, site 1 has a record of hedgehog which is a section 42 species under the Natural Environment and Rural Communities Act 2006. It is likely hedgehogs will be present at site 2 also. A detailed survey would be required to accompany any planning application (s) for the sites. The Biodiversity Officer advises that wildlife corridor(s) are incorporated into the development and suggests the location outlined in figure 6 (following page). Wildlife corridor(s) will be required to be incorporated into the development in line with advice from the Biodiversity Officer and the suggested location is outlined in figure 6. Alternatively located wildlife corridors that provide the same function will also be considered.

5.18 The ecological surveys should comprise an Extended Phase 1 survey and a bat survey. The surveys should involve assessing activity on site trees and be undertaken early to inform the site layout and design requirements. Timing of any surveys should be discussed and agreed with the Council's Biodiversity officer prior to any survey work starting. Results of the surveys along with avoidance, mitigation and compensation measures (as appropriate) should be submitted with any planning application. Any development proposal should seek to ensure sensitive ecological features are retained, e.g. hedgerows, mature trees.

5.19 Where impacts on bats are considered likely, then those trees should be subject to emergence surveys at an appropriate time of year. Should bats be found to be using the trees as roosting sites then NRW would expect the proposal to deliver appropriate mitigation and/or compensation schemes, along with Reasonable Avoidance Measures, to ensure the favourable conservation status of the species is maintained. If bats are found, an NRW licence to permit works that will affect bats and bat roosts will be required.

Figure 9 : Suggested location for wildlife corridor.



5.20 It is expected that the wildlife corridor would provide a route through the site for wildlife, including hedgehogs and bats. The wildlife corridor would require planting of native species hedgerow (of local provenance). Newly planted hedgerow should be protected, as should existing hedgerow along with improvement measures. A 3-5m buffer is suggested between the base of proposed hedgerow and residential curtilages and the wildlife corridor should not be lit. Long term management of the wildlife corridor should be considered early on in the development process.

5.21 Boundaries.

The south eastern boundary of the site along Ruthin Road (A525) offers important public views onto the site. Therefore, the residential design, layout and landscaping should reflect this. Because of topography, garden spaces next to this boundary require a good level of privacy. In the interests of visual amenity, native hedgerow planting (and its subsequent management) should be included as an alternative to wooden panel fencing to screen the site and gardens along this boundary.

5.22 Old Ruthin Road divides site 1 and 2. Consideration should be given to orientating principal elevations with defensible space parallel to Old Ruthin Road. This will visually link the site to the surrounding area and avoid both sites becoming separate and inward facing.

5.23 Site 2 fronts onto Whitchurch Road. The churchyard walls across the road from site 2 are grade II listed. The walls are identified as having group value with grade 1 listed Marcella Church in the listed building schedule description. Development should respect and enhance the setting of the listed building and the church yard walls. The use of trees and vegetation along the site boundary to visually reduce the impact of the proposal should be considered. Subsequent management of trees and vegetation should be included as part of any proposal. A public right of way next to the site can be accessed from Whitchurch Road. The suggested wildlife corridor to the north east boundary will also assist in reducing views of the site from the open countryside.

5.24 Built Heritage and surrounding character.

*Nearby listed buildings.*

As noted, north of site 2 is a grade I listed building St Marcella Church and grade II associated churchyard walls. The Council's Conservation Officer raised no objections to the principle of residential development at the site subject to views of the Church being retained. A visual corridor is therefore required to safeguard the view of the Church from Old Ruthin Road and New Ruthin Road. This requirement should be reflected in the design and layout of the site and could also be the wildlife corridor. To the east of the site is Brookhouse Farm a grade II listed building which could be a design influence for the proposal.<sup>9</sup>

5.25 *Nearby buildings with notable design influences.*

The houses to the north west of the site are more modern and are unlikely to be a design influence for the scheme. Slate roofs, external construction materials and design sympathetic to the Brookhouse Mill, Cottages, Brookhouse Farm (listed building) and Marcella Church provides the design context. The housing density and building heights of the development should be in keeping with the surrounding area which are typically 2 storey detached and semi detached properties. Site 2 is inclined requiring a topography sensitive design. These design requirements are considered particular important owing to the high visibility of the sites. Paragraph 8.18 of the Council's SPG on Extensions to Dwellings and page 15-16 of the Householder Development Design Guide SPG contains separation distances for household extension planning applications. These standards are considered a useful tool for guiding the design details of any planning proposal.

5.26 Community safety.

Any proposal should create attractive and safe public spaces and movement routes. This includes pedestrian and cyclist routes and maximising natural surveillance over public spaces. Where appropriate, Secure by Design measures should be adopted. Active frontages to all streets should be designed into the scheme. This approach will avoid blank elevations and blank walls (including on junctions and rear alleyways) deadening the street scene and creating a perception of an unsafe space. The diagrams on the following page illustrate these principles.

5.27 Open space should be afforded natural surveillance by orientating and ensuring it is overlooked by proposed dwellings. Development should ensure that it is orientated and overlooks open spaces and public right of ways to ensure natural surveillance. Corner plot developments should be orientated and overlook the highway and public realm from both elevations. This approach avoids blank wall elevations facing onto the public realm which offers no natural surveillance and can attract vandalism.

5.28 Contamination.

Based on desk based records, the Council are unaware of any land contamination relating to historic land uses at the sites.

5.29 Education.

Development of the sites would create extra demand on nearby education facilities. Nearby primary schools include Ysgol Twm or Nant, Ysgol Frongoch, Ysgol y Parc whilst nearby secondary schools include Denbigh High (Welsh 2<sup>nd</sup> language), Ysgol Bryn Hyfryd (Ruthin) and Ysgol Glan Clwyd (St Asaph). Other nearby schools include St. Brigids, Ysgol Plas Brondyffryn and Ysgol Tan y Fron.

5.30 The Council's Education Section has confirmed that primary school capacity is high limited in both Welsh and English medium education in Denbigh. Therefore, a developer contribution to increase capacity in Denbigh primary schools and move away from mobile classrooms would be required. Further guidance on the calculations of these contributions is set out in appendix 1.

5.31 Flooding.

Afon Ystrad runs to the south of the site and is surrounded in its immediate area by a designated flood zone C2. The site is not located in a flood risk area as defined by Technical Advice Note 15 Development and Flood Risk (TAN 15) and associated maps (see figure 2).

5.32 However, flooding at the nearby Brookhouse Cottages and properties that surround Afon Ystrad (all located in a flood zone C2 as defined by TAN 15) has recently occurred. In addition, flooding is known to occur at Old Ruthin Road including the corner adjacent Brookhouse Chapel. To reduce risk, the proposal would be required to minimise water runoff in order to maintain or reduce pre-development rates as per policy VOE 6 Water Management. The use of SuDS should be considered alongside other design solutions. Details of adoption and management for the proposed SuDS should also be submitted to ensure that the scheme/systems remain effective for the lifetime of the development.

5.33 Landscape, trees and hedges and open space.

The existing hedgerow abutting the A525 and on both sides of Old Ruthin Road should be retained and enhanced with additional planting and trees. **Should any highway works necessitate the removal of hedgerow, these must be replaced.** This would reduce the visual impact of the site from this vantage point. Additional planting in this area would also create a natural acoustic barrier to assist in reducing the noise of vehicles on the A525. An established hedgerow abuts Whitchurch Road and makes up the eastern boundary of the site. These noted features play an important role in visually screening the sites and as habitats for local wildlife.

5.34 Policy BSC11 Recreation and open space. Situations when commuted sums provision will only be acceptable are outlined in the policy. It is expected that any development proposal should provide open space on site. Open space provided should be accessible to all and well linked to existing public right of ways. The required wildlife corridor could perform multiple functions such as: ensuring key views are retained to St Marcella's Church, an area of natural drainage (SUDS), and screening the sites from eastern views. The developer should ensure maintenance arrangements are in place for recreation and open space provided, alongside the wildlife corridor, SUD and trees & hedgerows/landscaping.



A good example of a 'natural playground'. This form of recreation space provides more play value than traditional provision, and encourages children to engage with nature. This type of recreation & open space provision is encouraged to form part of any proposal.

5.35 Utilities.

*Electric pylons.*

Electric pylons cross the site and it is advised that the National Grid are contacted prior to the submission of any planning application.

5.36 Dwr Cymru/Welsh Water have confirmed the following in relation to the sites:

- Water Supply : no issues.
- Sewerage/foul drainage : ~~no issues~~ Off site sewers required. A surface water sewer runs along the southern boundary of the site and protection measures/easements would be required.
- Wastewater treatment : no issues.

Subject to Denbigh’s Waste Water Treatment Works performing at current levels, Welsh Water note that LDP housing allocations at Denbigh could be accommodated. It is also noted that off-site sewers would be required to connect to the sewerage network. Figure 7 outlines the water and sewerage network in the area. NRW note that the site is located over a principal aquifer, and therefore mains connection to the foul sewer network is preferable. Welsh Water has confirmed no issues in relation to connecting to the foul sewer network.

Figure 10 : Local water and sewerage network.



5.37 Welsh language.

The number of Welsh speakers in the Lower Denbigh electoral ward is approximately 40% and the number of people with Welsh skills is 58% (Census 2011) . ‘A Community and Linguistic Impact Assessment’ will be required to accompany a planning application. As a minimum, development proposals should seek to use locally relevant Welsh names for streets and the development as a whole.

5.38 Construction

The Council will require a 'Construction Plan' to be submitted with any planning applications, covering issues such as hours of work on site, construction access routes, delivery of materials, noise, dust and disturbance during construction and phasing of development.



## 6 Design objectives.

In context of the site description and requirements outlined previously, this section states the design objectives that any proposal would also have to meet. The 6 design objectives are:

**1.** A development that prioritises walking, cycling and public transport over private vehicular. This will be achieved by creating attractive and safe routes that links proposed open spaces, wildlife corridor, existing public right of ways and bus stops. Also, contributions to non-vehicular access improvements to the adjoining area and Denbigh centre will assist this objective.

**2.** Access, housing density and site layout will be designed in context of the surrounding area. This should take account of highway network capacity, the opposite housing allocation, local character, built heritage, and the objective to prioritise design around non-vehicular movement.

**3.** The design will take account of the sites edge of town visual prominence and existing built heritage. This will be achieved by a context aware use of design and external construction materials. The site layout & building orientation will respect the setting of St. Marcellus Church & views from surrounding roads. High quality landscaping will ensure a seamless transition from countryside to built form.

**4.** A design that enhances human health and existing biodiversity. This will be achieved by providing a wildlife corridor, green public spaces, walking routes and new natural habitats throughout the site. The proposal should also minimise surface water run-off to reduce flooding risk from Afon Ystrad.

**5.** A development that ensures satisfactory infrastructure is in place to handle water, sewerage, waste collection, and education provision.

**6.** A Welsh branded scheme with affordable housing to help the community and Welsh language to grow in the area.

## 7 Further considerations.

### *Consultation.*

At the time of writing, the Welsh Planning System does not have a statutory requirement to undertake pre-application with key consultees and the local community. However, any applicant is strongly encouraged to engage the surrounding local community, ward members and the town council. Key consultees outlined in section 8 should also be engaged prior to submitting any planning application. Any local comments provided in this pre-application process should be taken into account when designing the scheme.

### 7.1 *Environment Impact Assessment (EIA).*

Applicants are advised to establish whether their planning proposal falls under the regulations of the Town and Country Planning (Environment Impact Assessment) (England and Wales) Regulations 1999, and, therefore, could be classed as 'EIA development'. The purpose of an EIA is to establish whether development is likely to cause significant effects on the environment and what type of mitigation measures may be required to reduce them.

7.2 All proposals that are of a description mentioned in Schedule 1 of the regulations have to be subject to an EIA, whereas proposals that are of a description mentioned in Schedule 2 of the regulations do not necessarily have to be subject to an EIA depending on the outcome of the EIA screening exercise. Further information on the process can be found in Welsh Office Circular 11/99 ('Environmental Impact Assessment (EIA)') or obtained from the Planning / 'Development Management' section.

### 7.3 *Validation requirements.*

The Town and Country Planning (Development Management Procedure) (Wales) Order 2012 and WG Circular 002/2012: 'Guidance for Local Planning Authorities on the use of the standard application form ('1app') and validation of applications' set the context for planning application validation requirements in Wales.

7.4 In light of the legislative context and policy requirements outlined in the LDP, the documents outlined in the box to the right will be required to accompany any planning application. It is also suggested a construction plan is submitted as part of any application.

#### **Validation requirements (accompanying documents).**

- Design and Access Statement,
- Transport Assessment,
- Biodiversity Survey and Report,
- Tree Survey,
- Welsh Language Community Linguistic Impact Assessment,
- Water Conservation Statement,
- ~~Consultation report (optional)~~

## **8. Contacts**

- 8.1 Denbighshire County Council  
Planning and Public Protection  
Development Management  
Caledfryn  
Smithfield Road  
Denbigh  
LL16 3RJ  
Tel.: 01824 706727  
Email: [planning@denbighshire.gov.uk](mailto:planning@denbighshire.gov.uk)
- 8.2 Denbighshire County Council  
Planning and Public Protection  
Strategic Planning and Housing  
Caledfryn  
Smithfield Road  
Denbigh  
LL16 3RJ  
Tel.: 01824 706727  
Email: [ldp@denbighshire.gov.uk](mailto:ldp@denbighshire.gov.uk)
- 8.3 Denbighshire County Council  
Highways & Environmental Services  
Highways and Transportation  
Department  
Caledfryn  
Smithfield Road  
Denbigh  
LL16 3RJ  
Tel: 01824 706882  
Email: [highways@denbighshire.gov.uk](mailto:highways@denbighshire.gov.uk)



## Appendix 1

### 1. Guidance on Contributions to Education

#### Educational Planning in Denbighshire

1.1 Denbighshire County Council, like every other Local Authority in Wales, is currently reviewing its schools as part of our commitment to modernise education and to ensure our schools provide the best possible learning environments. In accordance with Welsh Government requirements, Denbighshire are required to provide the right number of places, of the right type in the right location.

1.2 Due to the geographical nature of Denbighshire there are some areas, predominantly in the South of the County, which have significant surplus places and in other areas, predominantly in the North, which are facing significant capacity issues, this includes Ysgol Twm or Nant, Ysgol Frongoch, and Ysgol y Parc in Denbigh. Denbighshire County Council's Admissions Policy grants parental preference where there are sufficient places available. In some instances 'empty places' in a school do not equate to there being capacity in the school due to these places being restricted to certain year groups.

1.3 Contributions may be used for the following;

- The provision of new classrooms to accommodate an increase in pupil places within existing schools;
- Replacement and/or improvement of existing school facilities to adequately facilitate an increase in pupil places;
- Provision of land for a new school where required and related to the scale of the development;
- Provision of additional facilities (i.e. playing fields) necessitated by an increase in pupil numbers.

### 2. Criteria

The requirement for developer contributions will be based on the following criteria:

- i) ~~Developments which comprise of 5 or more houses or, where not absolute, a site area of 0.2 hectares or more.~~
- ii) ~~Denbighshire County Council will seek contributions in cases where the identified schools have less than 5% surplus places having taken into account the proposed development. Contributions should only be sought in respect of the number of pupils which would take surplus places below 5%, rather than the total number expected from the development. The contributions would be held by Denbighshire to fund works at the affected schools.~~

- i) Contributions will be sought from proposed development which comprise of 5 or more dwellings, or a site area of 0.2 hectares or more, that have the potential to increase demand on local schools. This will be for primary and secondary provision where a capacity issue has been highlighted by Education Services, Denbighshire County Council. It should be noted that empty places does not necessarily equate to there being sufficient capacity at that school. Investment may be need to bring it up to the required standard to make it suitable for the pupils generated from the proposed development.
- ii) Only those schools affected by the development will receive the benefit of the financial contribution. Where a number of developments are being proposed within close proximity which as a whole will necessitate a need for additional facilities, Denbighshire may combine contributions as necessary to negate the cumulative effect.
- iii) Contributions received by Denbighshire will be held in interest bearing accounts with a unique finance code which is to be used only for the purpose specified in the obligation. If this contribution is not spent within an agreed timescale the contribution will be reimbursed with interest.
- iv) For planning contributions the pupil capacity will be calculated net of any capacity that has been achieved through using mobile accommodation.

### 3. Exceptions.

3.1 The exceptions to the provision of school places will be the following type of residential development from which planning authorities will not seek contributions:-

- Housing specifically designed for occupation by elderly persons (ie restricted by planning condition or agreement to occupation by those over aged 55 years or more).
- 1 bed dwellings or 1 bed apartments or flats.

4. Calculation of Contributions

4.1 Contributions towards additional or improved school facilities will be based on the following factors:

**1. The number of qualifying dwelling units in the development** The policy will apply to developments with 5 or more dwelling units or over 0.2 hectares.

**2. The number of school age children likely to be generated by each residential unit.** This is based on the data gathered by local authorities to estimate likely pupils arising from developments. This would generate a figure of 0.24 as the primary school formula multiplier and 0.174 as the secondary school formula multiplier. This will be reviewed by the local authority.

**3. Cost Guidelines.** Denbighshire has suggested a sum of £16,000 per pupil place for a primary school and a sum of £15,000 per pupil for a secondary school. These costs are based on a 420 primary school development and a 1500 secondary school development average cost/m<sup>2</sup> data sourced from the Building Cost Information Service and are current as 4Q 2013.

## Worked Examples

### Primary School Pupils

For example if school capacity was 240, ~~5% would be 12 pupils so that the trigger for contributions would be 228.~~

And if actual Number of Pupils 230:

Development of 140 houses  $140 \times 0.24 = 33.6$  pupils (round up to 34)

$$230 + 34 = 264$$

$$264 - 230 = 34$$

We only ask for contributions for 34 pupils.  $34 \times \text{£}16,000 = \text{£}544,000$

### Secondary School.

For example if School capacity was 1480, ~~5% would be 74 pupils so that the trigger for contributions would be 1406.~~

And if actual Number of Pupils 1395

Development of 140 houses  $140 \times 0.174 = 24.36$  pupils (round down to 24)

$$1395 + 24 = 1419$$

$$1419 - 1406 = 13$$

We only ask for contributions for 13 pupils.  $13 \times \text{£}15,000 = \text{£}195,000$



# **DRAFT SITE DEVELOPMENT BRIEF: Brookhouse sites, Denbigh**

## **CONSULTATION REPORT MARCH 2015**

### **1. CONSULTATION UNDERTAKEN**

1.1 Consultation on the draft Site Development Brief: Brookhouse sites, Denbigh, ran for over 12 weeks from 3<sup>rd</sup> August to 30<sup>th</sup> October 2015. This was a public consultation and was open for anyone to respond. The consultation included the following:

- Letters / emails were sent to contacts on the LDP database; public bodies; statutory consultees; local, regional and national organisations with an interest in the LDP; plus agents /developers, registered social landlords, statutory consultees (eg NRW, WG), relevant landowners and others with an interest in the site.
- All County Councillors notified
- All Denbighshire City, Town & Community Councils notified, together with neighbouring Counties, Town & Community Councils
- Town & Community Councils received copies of the consultation documents and response forms
- Council libraries and One-Stop-Shops also received hard copies of the consultation documents and response forms
- 2 drop-in events were held in Denbigh library (Saturday 5<sup>th</sup> September 9.30am – 12.30pm and Saturday 3<sup>rd</sup> October 9.30am – 12.30pm), one in Brookhouse Mill (Thursday 24<sup>th</sup> September 12pm – 7pm) and one in HWB Dinbych (Thursday 20<sup>th</sup> August 12pm – 7pm). Drop-ins were attended by officers from planning policy and housing strategy. Attendees had the opportunity to put comments on maps of the site.
- Approximately 2,000 leaflets advertising the consultation and drop-in events were delivered to properties in the neighbouring areas (including, but not limited to, all properties in the Brookhouse area and Myddleton Park, Crud y Castell, Erw Salusbury, Trewen/Parc Alafowlia, Llys Gwydyr and Colomendy estates)
- The draft Site Development Brief was published on the Council's website, with electronic versions of the response form available to download
- A press release was issued before and, for a second time, during the consultation period.

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- 1.2 A total of 59 written responses were received, largely from local residents and 167 comments were placed on the maps at the drop- in sessions. Representations included comments from Denbigh Town Council, Home Builders Federation, Clwyd-Powys Archaeological Trust, Dwr Cymru Welsh Water, Sustrans Cymru, Campaign for the Protection of Rural Wales and Cadw. All comments received have been logged, acknowledged and scanned. They are available to view from the Strategic Planning & Housing Team in Caledfryn. The key issues raised are summarised in Section 2 below and summaries of each comment received together with individual responses are set out in the table attached as Appendix 1.

## 2. SUMMARY OF KEY ISSUES RAISED

### PRINCIPLE OF DEVELOPMENT

#### **Key issues**

Main concerns raised related to the need for the proposed level of housing development in Denbigh and the suitability of the Brookhouse sites, and surrounding area, to accommodate this growth.

- 2.1 A large proportion of the responses objected to the principle of housing development both in Denbigh generally and/or, more specifically, on the allocated sites.
- 2.2 The general level of housing growth in Denbigh was not part of this consultation but had previously been determined through the LDP preparation process, previous public consultation, LDP examination and eventual adoption of the development plan by Denbighshire County Council.
- 2.3 The principle of the allocation of the sites for housing was also not part of the consultation on the site development brief and this was made clear in all the consultation material and press releases as well as by officers at the drop in sessions. The site was consulted upon as part of the LDP preparation process and is an allocated housing site in an adopted development plan. The site development brief provides a level of detail as to constraints on the site; any contributions that will be required from the developer such as for education; affordable housing and open space and design considerations.
- 2.4 Responses were also received querying the need for greenfield sites to be allocated for housing ahead of vacant brownfield sites, for example the former North Wales Hospital, Station Yard and Middle Lane sites. However, account has already been taken of the potential housing contribution from brownfield sites in determining growth levels and allocations through the LDP preparation process. As the Brookhouse

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sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.

### FLOOD RISK

#### **Key issues**

Main concerns raised related to potential increase in flood risk to existing, and new, properties, which may occur from increased surface water run-off as a result of the loss of greenfield sites.

- 2.5 A number of responses expressed concerns regarding the potential for increased risk of flooding due to the loss of greenfield sites and referenced previous flooding issues in the local area. It is recognised that there is an area of flood risk (as defined by Welsh Government's Development Advice Maps and shown in figure 2 of the Site Development Brief) to the south of the sites, associated with the Afon Ystrad. However, the allocated sites do not fall within this area of flood risk.
- 2.6 Flooding is also known to occur at Old Ruthin Road and concerns were raised that the introduction of built development in this area would increase the levels of surface water run-off and exacerbate the risk of flooding. Paragraph 5.32 of the Site Development Brief addresses the issues of flood risk and requires that any proposed development at least maintain, or improve, pre-development run-off rates.

### HIGHWAY ISSUES

#### **Key issues**

Main concerns relate to the capacity and suitability of the existing highway network to accommodate increased traffic. Safety of vehicles and pedestrians is also raised as a concern due the characteristics of existing roads.

- 2.7 The principle of development in this location has been established through the Local Development Plan and included consideration of highways capacity and access issues. Newly generated traffic on Old Ruthin Road would be expected to be in the order of an extra 95 vehicles per hour (3 extra vehicles every 2 minutes) during the morning peak hour (0800-0900). This is still very low in comparison with the level of traffic on the A525 in this location and is unlikely to have a significant impact upon road safety. Old Ruthin Road has sufficient capacity to accommodate the newly generated traffic from both sites. Nonetheless, the Transport Assessment will be expected to consider the impact of the development upon road capacity and safety.

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- 2.8 The Site Development Brief requires any potential developer to carry out a Transport Assessment as part of any development proposal for the sites. The development brief highlights the areas of particular concern raised by local residents which should be addressed as part of any Transport Assessment. Several responses highlighted the corner on Old Ruthin Road by Brookhouse Chapel as a particular concern, and the Transport Assessment requirements have been amended to include the need for swept path analysis of this location and consideration of off-setting the footway to allow for localised widening. Most peak times at the Chapel (i.e. Sunday mornings and weekday funerals) would not coincide with peak times for traffic generated by the new development. However, provision should be made for some additional parking for the Chapel in the southeast corner of Site 2 and the development brief has been amended accordingly. The development brief has also been amended to include pedestrian safety improvements at Myddleton Park roundabout, possible on-street parking restrictions on Old Ruthin Road and the provision of 2 metre wide footways on either side of Old Ruthin Road.
- 2.9 Concerns were also received regarding the impact of construction traffic and the suitability of the bridge adjoining Brookhouse Mill for increased traffic. Developers would be required to provide a Construction Management Plan which would include construction access routes, and the development brief has been amended accordingly. The bridge is in sound condition structurally and is rated at 40 tonnes. Furthermore, increasing the number of vehicles travelling over the bridge will not have a material impact upon the strength of the bridge.
- 2.10 Despite the change in gradient and the slight bend part way along Old Ruthin Road, forward visibility still complies with the minimum standard set in Table A of Welsh Government's Technical Advice Note 18 'Transport'. The 30 mph limit on Whitchurch Road is due to be extended by approximately 150 metres towards Llandyrnog which should further reduce the speed of traffic. Paragraph 5.5 of the development brief also makes provision for the existing 30 mph speed limit to be extended further towards the A525. The capacity and safety of the Old Ruthin Road/A525 junction and Myddleton Park roundabout will be considered as part of the Transport Assessment. Paragraph 5.9 of the development brief includes provisions to improve pedestrian facilities, including the provision of additional footways and it highlights the need to improve provision for pedestrians to improve access to the town centre. This will include consideration of ways to improve pedestrian facilities at the Myddleton Park roundabout. Road Safety Audits (which are an independent assessment of road safety) are carried out for all developments which necessitate improvements.

## INFRASTRUCTURE CAPACITY

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### **Key issues**

Concern was expressed about the capacity of local primary schools, primary health care facilities and sewerage systems to accommodate the proposed levels of growth.

- 2.11 The development brief acknowledges that there is limited capacity for both English and Welsh medium education in Denbigh, and requires any developer to make a financial contribution towards education provision. Appendix 1 of the development brief sets out the formula for calculating the amount of contribution required.
- 2.12 The Council is unable to directly influence health care provision in the area but is in regular liaison with Betsi Cadwalader University Health Board and local GP practices who are fully aware of all allocated housing sites in the area and the potential impact in terms of increases in patient numbers and distribution of patients.
- 2.13 Dwr Cymru Welsh Water have confirmed that there is sufficient capacity within the sewerage and wastewater treatment systems to accommodate development of the Brookhouse sites.

## CHARACTER & WELSH LANGUAGE

### **Key issues**

Concerns were raised regarding the impact of new development on the rural character and historic setting of Brookhouse, and use of the Welsh language in the local area.

- 2.14 Several responses identified Brookhouse as a separate hamlet, distinct from Denbigh and characterised by its rural setting, high quality historic and natural environment and high levels of Welsh speaking. Concerns were also expressed on the density of any proposed development.
- 2.15 The Brookhouse area has been considered as part of the town of Denbigh throughout the LDP preparation process and is within the Denbigh development boundary, as set out in the adopted LDP. The development brief recognises the local context, with regards to house types, density and edge-of-settlement location, and that a lower density could be justified through the submission of a planning application (para. 4.4). The LDP was subject to Sustainability Appraisal throughout its preparation, which included assessment of issues around language and culture arising from housing growth. The Council has also adopted Supplementary Planning Guidance on Planning & the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37). The development brief requires any

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development to take account of local character and provides guidance in relation to the surrounding built heritage, archaeology and character (para. 5.24). This is further reflected in the design objectives for the site.

### LANDSCAPE & BIODIVERSITY

#### **Key issues**

Concerns were raised regarding the potential loss of wildlife and habitats on the sites, and the impact on local views.

- 2.16 The development brief provides guidance on issues around biodiversity on the sites (para. 5.17), including the requirement for ecological surveys, mitigation/compensation measures, the retention of existing hedgerows and the need for a wildlife corridor within any development proposal. This requirement for, and suggested location of, a wildlife corridor has been informed through consultation with the Council's Biodiversity Officer and is considered the most appropriate due to the species and habitats on the sites. The wildlife corridor will also function as a visual corridor to safeguard the views towards St Marcella's Church (para. 5.24). The quality of the surrounding landscape is acknowledged and the development brief includes requirements and design objectives which address this (para. 5.24, 5.33 and page 21).

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### Analysis of comments received during the consultation on the Draft Site Development Brief: 'Brookhouse' sites

59 responses were received, by email and post, from individuals and organisations during the consultation period. A number of late responses were received and these have been included in the responses summary table. From the 59 responses:

- 42 or 71% objected to the principle of development on the site
- 36 or 61% raised concerns about highways issues/impacts
- 15 or 25% raised concerns about flood risk
- 23 or 39% raised concerns about local infrastructure capacity (schools, education, sewerage etc.).

Comments were also received on concerns over landscape impact, loss of greenfield sites, impact on public amenity, impact on the historic environment/character, loss of biodiversity, lack of employment opportunities and impact on the Welsh language.

Officers were aware of an online petition against development on the sites, with approximately 400 supporters, but this was not submitted by any individual/organisation at any time during or after the consultation period and therefore has not been counted in the number of responses.

The table below sets out the comments that were made on the maps at the drop-in sessions:

ISSUE	NO. OF TIMES COMMENT MADE
<b>Site allocation</b>	
Brownfield should be built on first before green field sites (e.g NW Hospital, Kwik Save, Middle Lane and Empty Buildings on Vale Street and Chapel Street)	28
The top area of Denbigh needs regeneration, there are field there already allocated in the LDP which have not received any objections – develop these sites first.	1
Site is in the Area of Outstanding Natural Beauty and is an important part of Denbigh.	1
Has Denbighshire not met its quota with housing in Bodelwyddan and other areas?	1
The land is green fields and grade 3.	1
These fields should be kept as grade 2 vale grazing land	1
This area is green belt land	2
Changes have already been made in HM Stanley to what was planned, no doubt this will happen here and everything will not be adhered to.	1

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Brookhouse is an idyllic rural hamlet is situated on greenfield/belt and goes against the Rural Development Plan, where its aims are to 'Care for the Environment'. The construction of this site will damage the environment and the countryside.	1
There should be no development at all	1
No no no no. No more ruining our town.	1
<b>TOTAL</b>	<b>39</b>
<b>Local services</b>	
The site will impact on Doctors, Education (school spaces) and the environment including sewerage, water and electric.	3
There are no GPs, Dentists or District Nurses to take on all of the new residents.	4
Bus routes / access to town?	1
Developer will contribute to schools – we do not see how this can be achieved	1
There are no social services to support the people	1
A pumping station will be required to pump the sewerage uphill.	1
Local services will not be able to cope	1
Who pays for schools? Initial payment and for additional pupils in the future	2
There is no employment for new residents	1
Twm o'r Nant school cannot cope with the number of extra pupils	2
<b>TOTAL</b>	<b>17</b>
<b>Highways</b>	
Transport and highways surrounding the site are not suitable	4
The increase in traffic could cause problems with the access onto the main Denbigh to Ruthin road	3
The existing road floods on the corner and down the road near to the access to the sites.	1
Serious traffic issues along Ruthin Road	4
The Section 106 agreement should provide parking and turning for the Chapel and Whitchurch	
The Old Ruthin Road could not cope with the proposed traffic volumes	3
The top of the hill on the Old Ruthin Road is a blind spot for cars and the footpaths are narrow	6
The bend in the road by the Brookhouse Chapel was dangerous when this road was the main route – hence the bypass. The increase in traffic would likely reinstate that danger.	1
The old Ruthin Road is too dangerous for access to a housing estate	2



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The corner at the Brookhouse Chapel on the Old Ruthin Road is dangerous for large vehicles and Chapel Cars	3
There is a blind spot in the road near to Drws – y – Coed, Ffordd Eglwyswen	1
The existing access to the site on Ffordd Eglwyswen is perfectly acceptable (people don't usually park this high up from the Church) and has good visibility.	1
Can roads and pavements cope with the amount of extra vehicles?	3
The Ruthin road was built due to the number of accidents on the Old Ruthin Road, why with increased housing is it now safe?	4
The roads around the site are bottlenecks	1
Parking on the road is a problem most days especially when the Brookhouse carpark overflows onto the road	1
Parking is an issue on the Road when there is a funeral at Eglwys Wen Fawr.	1
Provision of chapel parking – s106 obligation	1
Creamy Lorries have issues on these roads.	1
There are few suitable pavements on the roads around the site.	1
Cars drive on the opposite side of the road on the Old Ruthin Road when the road is flooded.	1
The road is very dangerous on the brow of the hill, buses use both lanes (Old Ruthin Road), lack of visibility, pedestrian safety	1
The old Ruthin Road is a dangerous road and junction.	1
How will the bridge cope with all the lorries bringing building supplies to the site? So if they build 174 houses it will mean 1300 car journeys every day!	1
Pull-in for buses? (Old Ruthin Road)	1
Roads already dangerous at both ends and on brow (Old Ruthin Road)	1
Not being able to get into school in the mornings	1
<b>TOTAL</b>	<b>49</b>
<b>Housing</b>	
No more housing in Denbigh	3
More houses will reduce the existing house prices in Denbigh.	1
Smaller houses and bungalows needed for single people	1
The 10% affordable housing must be insisted on as there is a proven need.	1
Affordable Housing should be minimised and moved to central Denbigh	1
There are currently 127 houses for sale in Denbigh	2

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Empty homes should be filled first	1
Over 100 empty houses in Denbigh use them	1
This development will not generate affordable housing!	1
No houses. Too many in Denbigh already for sale.	1
There should be provision for older people: bungalows, older people's homes on site and older people's transport arrangements.	1
<b>TOTAL</b>	<b>14</b>
<b>Design and density</b>	
The density should be kept low and in keeping with the local houses. There should also be height restrictions on these houses	2
The density should be lowered by using larger houses	2
Can adequate open space be incorporated if the density is too high?	1
Density – reflective of existing housing	1
The density is too high	10
<b>TOTAL</b>	<b>16</b>
<b>Open space/ landscaping</b>	
Need for adequate recreational space on site	1
A recreation site for older people is needed.	1
Will there be park land and open space for children and young adults?	1
A play area for children is required – is there an allocation for this?	1
The area of land alongside Hafod and Clwydian view should not be built on and left as a buffer to the site	1
The site should be kept as green as a possible.	1
Landscaping for amenity of existing neighbours	1
<b>TOTAL</b>	<b>7</b>
<b>Wildlife</b>	
How will the crested newts and bats on the site be treated, will this stop the development proceeding?	1
The green corridor needs to be preserved	2
The wildlife corridor should reach to the Whitchurch Road	1
<b>TOTAL</b>	<b>4</b>
<b>Footpaths</b>	
The footpath alongside the site should be protected for local walkers.	1
The footpath from the Chapel to the Whitchurch Road (adjacent to the wildlife corridor) should be upgraded to a cycleway (which already goes by the Brookhouse Pub).	1
Re-align footpath and incorporate nature corridor	1
<b>TOTAL</b>	<b>3</b>
<b>Flooding</b>	

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There needs to be plenty of grass and ponds on site to absorb the water that at present is absorbed by the field. The slope would increase the speed of the water heading towards Ystrad, increasing flooding problems for those already living by the river.	1
<b>TOTAL</b>	<b>1</b>
<b>Welsh Language</b>	
Has a Welsh language assessment been carried out?	3
This proposal will definitely have a detrimental impact on the Welsh language and the culture of Denbigh	3
Yr Iaith Gymraeg	1
The immediate area is very strong Welsh Speaking community. Has a Welsh language assessment been carried out specifically for Brookhouse/Denbigh	1
Welsh language	1
Concerns about: BSC4 affordable housing, RD5 Welsh language. Still oppose the development	2
<b>TOTAL</b>	<b>11</b>
<b>Impact on the church &amp; chapel</b>	
Development should reflect the listed status of church (Grade A) and the Chapel	1
People need to get to Whitchurch and the Church graves – will this be affected?	1
Drws – y – Coed is spelt incorrectly on the map.	1
This site will affect the Chapel, the setting of the Chapel should be protected	1
Protect Eglwyswen church	1
Parking provision for church ( <a href="#">St Marcella</a> ) – s106 obligation. Landscaping?	1
<b>TOTAL</b>	<b>6</b>

Denbighshire County Council

Draft Site Development Brief Brookhouse,  
Denbigh: Consultation Report :

Summaries of representations received & Council's responses

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
751	Mark Harris, Home Builders Federation (HBF)	<p>Considers that it would have been more appropriate to prepare an SDPG on s106 contribution including education, POS, etc rather than deal with this in each site development brief.</p> <p>Satisfied with the design information included and the identification of areas of highway concern. Considers that the need to assess the Myddleton Park roundabout seems excessive and should have been assessed when allocating the site.</p>	<p>The site development brief refers to a specific site allocation contained in the Plan and provides details on several LDP Policies, including infrastructure contributions. This is in line with the guidance contained in LDP Manual 2, section 7.3 on 'Supplementary Planning Guidance'.</p> <p>The development of both sites would increase the amount of traffic using Myddleton Park Roundabout. The local community have raised concern regarding the impact of increased traffic on the roundabout.</p>	No changes proposed
4575	Mrs Christine Morris	<p>Object to any housing development on these sites. Brownfield sites should be developed first.</p> <p>Any new housing should reflect density of the surrounding area and include several open areas and play space. Bungalows would be a suitable house type.</p>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The development brief makes reference for any proposal to be in keeping with housing density in the surrounding area (section 5.25).</p> <p>The development brief outlines the Council's requirements for open space in paragraph 4.9.</p>	<p>No changes proposed</p> <p>Add additional paragraph 4.6 as follows: <b>LDP Policy BSC 1 – Growth Strategy for Denbighshire</b>. Both sites are allocated for residential development in the adopted Denbighshire Local Development Plan</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<p>Concerned regarding access to the sites owing to the narrowness of the road. Considers that the volume of traffic would be equally dangerous to all walkers and cyclists who use this route for recreational facilities.</p>	<p>The development brief highlights such highway issues (pages 10 -14) that the developer will have to overcome.</p> <p>LDP policy BSC 1 requires that new housing developments provide a range of house types and sizes to meet the current and future needs of the local community. The development brief will be amended to clarify the Council's requirements for a mix of dwelling types and sizes to be provided on these sites.</p> <p>In accordance with design guidance such as the <i>Manual for Streets</i>, the existing road width is adequate for the likely level of traffic once the sites are fully developed, including the low numbers of heavy goods vehicles that would be expected. Improvements to footways are identified as a requirement within Section 5.9 of the Brief.</p> <p>Most of Old Ruthin Road is subject to a 30 mph limit. The 30 mph limit and low traffic flows mean this is a suitable location for on-road cycling.</p>	<p>2006 – 2021 (LDP), and labelled 'BSC 1' on the LDP Proposals Map for Denbigh.</p> <p>LDP Policy BSC 1 also sets out the requirement to provide a range of house types, sizes and tenure to reflect the local need and demand. The Local Housing Market Assessment provides further details on individual areas in the County.</p> <p>Amend paragraph 5.9 as follows: Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites.</p>
3236	Mark Walters, Clwyd-Powys Archaeological Trust	<p>Possible, though unrecorded, evidence of:</p> <ul style="list-style-type: none"> <li>- post/medieval dwellings along Whitchurch Road frontage</li> <li>- post/late medieval ridge &amp; furrow field system</li> <li>- other features in south west corner.</li> </ul>	<p>Comments noted. The development brief requires any application to be accompanied by a desk-based assessment and, if necessary, geophysical surveying (page 15). The development brief will be amended to</p>	<p>Amend paragraph 5.16 as follows: Therefore it cannot be fully ruled out that there has not been any archaeological activity in the area. A pre-</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		Advise that a pre-determination evaluation be completed prior to any development.	clarify that a pre-determination evaluation will be required.	determination evaluation would be needed as a first step to assess the archaeology present on the site. Any application should be accompanied by a desk based assessment and if necessary, geophysical surveying.
2908	Mr Gwilym Hartley Williams	<p>Object to development on the site:</p> <ul style="list-style-type: none"> <li>- No need for housing due to North Wales Hospital site</li> <li>- Character would be destroyed</li> <li>- Brownfield sites should be developed.</li> </ul>	<p>The development brief requires any development to take account of local character and is reflected in the design objectives for the site (page 21).</p> <p>Account has already been taken of the potential housing contribution from brownfield sites through the Local Development Plan process. The Brookhouse sites have been allocated for housing and the Council cannot restrict their delivery ahead of brownfield sites.</p>	No changes proposed
2860	Kim Cooke	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Availability of brownfield sites</li> <li>- Lack of need for housing</li> <li>- Traffic impacts and safety</li> <li>- Insufficient infrastructure and services.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation.</p> <p>Levels of housing need and demand, were discussed through the LDP examination, with the resultant allocations being made to meet these needs. Account has already been taken of the potential housing contribution from brownfield sites. The Brookhouse sites have been allocated for housing and the</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>Council cannot restrict their delivery ahead of brownfield sites.</p> <p>Infrastructure requirements are highlighted in the development brief in order to ensure developers are aware of potential costs before submitting any planning application.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p> <p>The Transport Assessment should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p> <p>Consideration should also be given to the provision of parking for the Chapel in the south east corner of Site 2.</p>	<p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>
3141	Dewi Griffiths, Dwr Cymru Welsh Water	<p>Recommend the following amendment to paragraph 5.36:</p> <p>“- sewerage/foul drainage – off site sewers required.</p> <p>A surface water sewer runs along the southern boundary of the site and protection measures/easements would be required.”</p>	Comments noted.	<p>Amend paragraph 5.36 (page 20) as follows: Dwr Cymru Welsh Water have confirmed the following in relation to the sites:</p> <ul style="list-style-type: none"> <li>- Water Supply : no issues</li> </ul>



Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
				<ul style="list-style-type: none"> <li>- Sewerage/foul drainage : off site sewers required. A surface water sewer runs along the southern boundary of the site and protection measures/easements would be required.</li> </ul>
4576	Mrs Janice Jones	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Unsuitable location</li> <li>- Problematic access</li> <li>- Loss of rural area – other sites should be developed first</li> <li>- Lack of education and health service capacity.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Levels of housing need and demand, were discussed through the LDP examination, with the resultant allocations being made to meet these needs. Account has already been taken of the potential housing contribution from brownfield sites. The Brookhouse sites have been allocated for housing and the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>In accordance with design guidance such as the <i>Manual for Streets</i>, the existing road width is adequate for the likely level of traffic once the sites are fully developed, including the low numbers of heavy goods vehicles that would be expected.</p> <p>As detailed in the development brief, a Transport Assessment (TA) will be required for the site which will identify how much of the newly generated traffic will be likely to use Whitchurch Road. This proportion is likely to be low. The junction of Old Ruthin</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>Road/Whitchurch Road will need to be assessed as part of the TA.</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The development brief highlights that a contribution towards education provision will be required in connection with this development site (para. 5.29).</p>	
993	Dr John C. Madoc-Jones	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Unnecessary</li> <li>- Brownfield sites should be developed first</li> <li>- Insufficient medical and social services capacity</li> </ul> <p>Development should include:</p> <ul style="list-style-type: none"> <li>- Mix of house types, similar to nearby developments</li> <li>- Play ground</li> <li>- Trees</li> <li>- Cycle and footpath links to surrounding area</li> <li>- Bus service.</li> </ul> <p>Disappointed with lack of action by County/Town &amp; Community Councillors in rejecting Welsh Government plans.</p>	<p>LDP policy BSC 1 requires that new housing developments provide a range of house types and sizes to meet the current and future needs of the local community. The development brief will be amended to clarify the Council's requirements for a mix of dwelling types and sizes to be provided on these sites.</p> <p>The development brief states that existing hedgerows and trees should be retained and enhanced (para. 5.33), open space should be provided on site (para. 5.34) and that cycle/footpaths should be incorporated to allow access to the wider area (page 21).</p> <p>Existing bus services presently run along Old Ruthin Road such as the X50 and the 14A. Further residential development in this</p>	<p>Add additional paragraph 4.6 as follows: <b>LDP Policy BSC 1 – Growth Strategy for Denbighshire</b>. Both sites are allocated for residential development in the adopted Denbighshire Local Development Plan 2006 – 2021 (LDP), and labelled 'BSC 1' on the LDP Proposals Map for Denbigh.</p> <p>LDP Policy BSC 1 also sets out the requirement to provide a range of house types, sizes and tenure to reflect the local need and demand. The Local Housing Market Assessment</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>location should strengthen use of these services.</p> <p>Levels of housing need and demand, were discussed through the LDP examination, with the resultant allocations being made to meet these needs. Account has already been taken of the potential housing contribution from brownfield sites. The Brookhouse sites have been allocated for housing development and the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The LDP was adopted by the Council in 2013 and a review will commence by 2017.</p>	<p>provides further details on individual areas in the County.</p>
4578	Fiona Gale, County Archaeologist, Denbighshire County Council	No comment to make at this stage.	Comment noted.	No changes proposed
2861	Mrs Edna Williams	<p>Objects to development on the sites:</p> <ul style="list-style-type: none"> <li>- Housing should be provided on North Wales Hospital and Middle Lane sites</li> <li>- Loss of attractive area for walking</li> <li>- Increased traffic on Old Ruthin Road</li> <li>- Bats</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from</p>	<p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<ul style="list-style-type: none"> <li>- Parking problems from church and chapel.</li> </ul>	<p>brownfield sites through the Local Development Plan process, including the former North Wales Hospital.</p> <p>Newly generated traffic on Old Ruthin Road would be expected to be in the order of an extra 95 vehicles per hour (3 extra vehicles every 2 minutes) during the morning peak hour. This is still very low in comparison with the level of traffic on the A525 in this location.</p> <p>Most peak times at the Chapel at church (i.e. Sunday mornings and weekday funerals) would not coincide with peak times for traffic generated by the new development. Nonetheless, consideration should be given to providing some additional parking for the Chapel in the southeast corner of Site 2.</p> <p>The development brief outlines the developer requirements in relation to bats or any other protected species/habitat (para. 5.17)</p>	<p>include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>
4579	Mr Ronald Blundell	<p>Object to housing development in Denbigh:</p> <ul style="list-style-type: none"> <li>- Lack of doctors and schools</li> <li>- Traffic congestion.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation.</p>	<p>No changes proposed</p>
2903	Nigel Morris	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Loss of green barrier</li> <li>- Brownfield and town centre sites should be developed first.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from</p>	<p>No changes proposed</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>brownfield sites, including the former North Wales Hospital.</p> <p>The Brookhouse sites have been allocated for housing and the Council cannot restrict their delivery ahead of brownfield sites.</p>	
4577	Mr Nigel Thomas	<p>A mix of 2/3/4 bedroom properties and bungalows should be provided.</p> <p>Support the inclusion of a wildlife zone.</p> <p>Play facilities are needed.</p> <p>Errors in the description and location of the town.</p> <p>The document addresses all the main issues about the site.</p>	<p>LDP policy BSC 1 requires that new housing developments provide a range of house types and sizes to meet the current and future needs of the local community. The development brief will be amended to clarify the Council's requirements for a mix of dwelling types and sizes to be provided on these sites.</p> <p>The development brief outlines the Council's requirements for open space in paragraph 4.9. Open space will be required to be provided as part of any development.</p> <p>Comments noted. Factual errors are noted and will be addressed.</p>	<p>Add additional paragraph 4.6 as follows: <b>LDP Policy BSC 1 – Growth Strategy for Denbighshire</b>. Both sites are allocated for residential development in the adopted Denbighshire Local Development Plan 2006 – 2021 (LDP), and labelled 'BSC 1' on the LDP Proposals Map for Denbigh.</p> <p>LDP Policy BSC 1 also sets out the requirement to provide a range of house types, sizes and tenure to reflect the local need and demand. The Local Housing Market Assessment provides further details on individual areas in the County.</p> <p>Amend paragraph 3.1 as follows: Denbigh is a market town located centrally in the</p>

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		<p>Suggest design features to help minimise loss of habitat.</p> <p>Separate entrance off Whitchurch Road and change to speed limit boundary are required.</p>	<p>Mitigation/compensation measures will be identified as part of the ecological surveys required for any planning application.</p> <p>Old Ruthin Road has ample capacity to accommodate the newly generated traffic from both sites. (Estimated 95 vehicles during morning peak of 0800-0900.)</p>	<p>north of the administrative boundary of Denbighshire. ....It is linked by a <del>dual carriageway</del> section of the A525 which provides access to Ruthin, roughly 10km to the south and St Asaph to the north.</p>
3564	Mrs Anne Roberts	Oes angen tai yn Brwcws o gwbl? Mae 'na dir arall ar gael ar gyfer y tai yma? e.e. yr hen ysbyty.	Mae'r safleoedd wedi'u dyrannu ar gyfer tai yn y Cynllun Datblygu Lleol, felly mae'r egwyddor o ddatblygu yn y lleoliad hwn wedi'i sefydlu ac mae tu allan i gylch gwaith yr ymgynghoriad hwn. Mae'r cyfraniad tai posibl o safleoedd tir llwyd eisoes wedi'i ystyried, gan gynnwys hen Ysbyty Gogledd Cymru. Gan fod safleoedd Brwcws wedi'u dyrannu ar gyfer tai, ni all y Cyngor gyfyngu eu cyflwyno o flaen safleoedd tir llwyd.	Dim newidiadau yn cael ei gynnis

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3117	Medwyn Williams, Denbigh Town Council	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Safety</li> <li>- Flooding</li> <li>- Historical setting</li> <li>- Need for housing</li> <li>- Availability of brownfield sites</li> <li>- Pressure on existing public services.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation.</p> <p>Levels of housing need and demand, were discussed through the LDP examination, with the resultant allocations being made to meet these needs. Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing development, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The allocated sites are not within an identified flood zone – the development brief addresses issues of nearby flood risk (para. 5.32).</p> <p>The development brief provides guidance in relation to the surrounding built heritage and character (para. 5.24).</p>	No changes proposed
1088	Cllr Colin Hughes	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Loss of green fields</li> <li>- Surface water run-off and consequences for flooding</li> <li>- Surrounding roads and bridge unsuitable/unsafe for increased traffic</li> <li>- Lack of contribution to the economy and town centre</li> <li>- Impact on the setting of the church.</li> </ul>	<p>The development brief provides guidance in relation to flood risk and surface water run-off (para. 5.31).</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road. The bend is approx. 120 degree and is within the 30 mph limit. The Transport Assessment should include swept path analysis of this bend and consider whether the footway on</p>	Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		Developers need to be made aware of requirements and cost implications.	<p>the outside of the bend could be offset to allow some localised widening. Consideration should also be given to the provision of parking for the Chapel in the south east corner of Site 2.</p> <p>The bridge is in sound condition structurally and is rated at 40 tonnes. Furthermore, increasing the number of vehicles travelling over the bridge will not have a material impact upon the strength of the bridge.</p> <p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>The development brief provides guidance for developers in relation to the surrounding built heritage, archaeology and character.</p> <p>The development brief will ensure that potential developers are aware of site constraints and development requirements prior to the submission of any planning application. Once adopted, it will be used by the Council in the determination of such applications.</p>	allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.
4581	Jo Hall	What about Bodelwyddan? Much, much more happening here.	The Council adopted a Site Development Brief for the Bodelwyddan Key Strategic Site in July 2014.	No changes proposed
2894 (18)	Hywel Watkin	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Surrounding roads are unsuitable/unsafe due to poor visibility, bends, width, bridge and on-street parking</li> </ul>	The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been	Amend paragraph 5.5, point 3 Old Ruthin Road: In combination with on road parked vehicles, this



Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<ul style="list-style-type: none"> <li>- Pedestrian and cyclist safety</li> <li>- Loss of popular walking route</li> <li>- Loss of rural setting</li> <li>- Flood risk from surface water run-off</li> <li>- Impact on Welsh language</li> <li>- Safety of pumping station</li> <li>- Impact on historic landscape</li> <li>- Biodiversity impacts</li> <li>- Lack of health and education infrastructure.</li> </ul> <p>Open space and play areas should be provided.</p> <p>Density should reflect the surrounding area.</p> <p>The sites should be removed from the LDP.</p>	<p>established and is outside the remit of this consultation.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p> <p>The bend is approx. 120 degree and is within the 30 mph limit. The Transport Assessment should include swept path analysis of this bend and consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p> <p>Consideration should also be given to the provision of parking for the Chapel in the south east corner of Site 2.</p> <p>The bridge is in sound condition structurally and is rated at 40 tonnes. Furthermore, increasing the number of vehicles travelling over the bridge will not have a material impact upon the strength of the bridge.</p> <p>The allocated sites are not within an identified flood zone – the development brief addresses issues of nearby flood risk (para. 5.32) and requires surface water run-off rates to be maintained or reduced (para.5.31).</p> <p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to</p>	<p>creates a blind spot for road users on the brow of the hill. Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales)</p>

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			<p>developers in relation to LDP policy RD5 (para. 5.37).</p> <p>Any requirement for a pumping station will depend upon the design of the drainage system, which will form part of any detailed planning application submission. The eventual design must be in accordance with approved document H1 of the Building Regulations.</p> <p>The development brief requires the site design and layout to fit in with, and enhance, existing walking routes (para. 5.9).</p> <p>The development brief provides guidance for developers in relation to the surrounding built heritage, archaeology and character.</p> <p>The development brief recognises the local context and that a lower density could be justified through the submission of a planning application (para. 4.4).</p> <p>Any amendments to the LDP, including changes to site allocations, can only be addressed through a formal review, which will commence before the end of 2017.</p>	<p>Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5.1, enhancements to the roundabout area shall be considered.</p>
4588 (19)	Mr Robert Owen	Rwy'n gwrthwynebu i'r datblygiad hwn yn gyfan gwbl. Fel un a anwyd, a fagwyd ac a gyflogir yn Ninbych, nid wyf yn teimlo bod angen y tai hyn.	Mae'r safleoedd wedi'u dyrannu ar gyfer tai yn y Cynllun Datblygu Lleol, felly mae'r egwyddor o ddatblygu yn y lleoliad hwn wedi cael ei sefydlu ac mae y tu allan i gylch gwaith yr ymgynghoriad hwn.	Dim newidiadau yn cael ei gynnig

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		<p>Nid oes unrhyw waith i'w gynnig i'r darpar breswylwyr.</p> <p>Mae'r datblygiad yn siŵr o fod yn niweidiol i ardal hardd.</p> <p>Mae'n debygol y bydd pobl di-Gymraeg yn symud i'r ardal, gan gyfrannu dim at ein hiaith neu ddiwylliant ac mae hyn yn siŵr o fod o niwed i'r sefyllfa fregus gyfredol.</p>	<p>Roedd y CDLI yn destun Gwerthusiad Cynaliadwyedd, gan gynnwys materion yn ymwneud ag iaith a diwylliant. Mae'r Cyngor hefyd wedi mabwysiadu Canllawiau Cynllunio Atodol ar Gynllunio a'r Iaith Gymraeg, ac mae'r briff datblygu yn rhoi arweiniad i ddatblygwyr mewn perthynas â pholisi CDLI RD5 (para. 5.37).</p>	
4589 (20)	Mr Trefor Owen	<p>The site is a greenfield area that should be kept. Dim datblygiad o gwbl. Gwarthus fod y Cyngor yn cysidro adeiladu ar dir gwyrdd mewn lle mor beryg.</p>	<p>Mae'r safleoedd wedi'u dyrannu ar gyfer tai yn y Cynllun Datblygu Lleol, felly mae'r egwyddor o ddatblygu yn y lleoliad hwn wedi'i sefydlu ac mae tu allan i gylch gwaith yr ymgynghoriad hwn.</p>	<p>Dim newidiadau yn cael ei gynnig</p>
4590 (21)	Mr Kevin Ringer	<p>Object to any housing on the site due to:</p> <ul style="list-style-type: none"> <li>- Sufficient housing to meet local needs</li> <li>- Loss of open space</li> <li>- Busy roads and lack of parking</li> <li>- Lack of employment opportunities</li> <li>- Insufficient health infrastructure capacity</li> <li>- Unknown how much education contribution will be.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>Newly generated traffic on Old Ruthin Road would be expected to be in the order of an extra 95 vehicles per hour (3 extra vehicles every 2 minutes) during the morning peak hour. This is still very low in comparison with the level of traffic on the A525 in this location. Old Ruthin Road has ample capacity to accommodate the newly generated traffic from both sites Most peak times at the Chapel at church (i.e. Sunday mornings and weekday funerals) would not coincide with</p>	<p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>peak times for traffic generated by the new development. Nonetheless, consideration should be given to providing some additional parking for the Chapel in the southeast corner of Site 2.</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The development brief requires a financial contribution from the developer towards improving the capacity of local schools, where this is required (para. 5.29), and the calculation is included in Appendix 1.</p>	
4556 (22)	Ellie Jane Roxburgh	<p>Object to development on the site due to:</p> <ul style="list-style-type: none"> <li>- Loss of attractive view from my property</li> <li>- Increased accidents from increased traffic</li> <li>- Other sites available which don't impact on wildlife.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p> <p>Additional traffic generated by both developments during the busiest hour (0800-0900) is estimated to be 95 vehicles and is unlikely to have a significant impact upon road safety. Nonetheless, the Transport Assessment will be expected to</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			consider the impact of the development upon road capacity and safety The development brief provides guidance in relation to biodiversity on the sites (para. 5.17).	
4591 (23)	Mr Philip Hughes	As our fields are below the proposed development I would like to know what plans will be in place to deal with run off rain water?	The development brief provides guidance in relation to flooding and surface water run-off (para. 5.31).	No changes proposed
4592 (24)	Jacqueline Jones	Support the development of housing on the site, in meeting local needs.  Affordable housing, particularly 2/3 bedroom properties, is lacking in the area.  Request a green area and park included in the site.	The development brief requires a minimum of 10% affordable housing to be provided on the sites (para. 4.7).  The development brief requires that open space be provided on-site (para. 5.33).	No changes proposed
4582 (25)	David R. Smith	Query the need for this size of development. Brownfield sites should be developed first.  Concerns regarding: <ul style="list-style-type: none"> <li>- Impact on local services</li> <li>- Increased traffic</li> <li>- Loss of green and safe environment for walking.</li> </ul>	The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Levels of housing need and demand, were discussed through the LDP examination, with the resultant allocations being made to meet these needs. Account has already been taken of the potential housing contribution from brownfield sites. The Brookhouse sites have been allocated for housing development and the Council cannot restrict their delivery ahead of brownfield sites.	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road. Additional traffic generated by both developments during the busiest hour (0800-0900) is estimated to 95 vehicles and is unlikely to have a significant impact upon road safety. Nonetheless, the Transport Assessment will be expected to consider the impact of the development upon road capacity and safety.	
3156 (26)	Glyn Evans, Sustrans Cymru	Support the inclusion of reference to active travel and sustainable transport requirements in the development brief.  Reference should be included to the Active Travel (Wales) Act, including ATA Design Guidance.  Whilst it is good to see documents such as Manual for Streets referred to, reference to the Active Travel (Wales) Act should also be made including the ATA Design Guidance which will highlight to future developers what is required.	Comments noted. The Development brief will be amended to include reference to the Active Travel (Wales) Act Design Guidelines.	Amend paragraph 5.9: The proposed site layout should fit in with and enhance existing walking routes. The site layout should encourage walking and make it easier and preferable to get around the area by foot. Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of additional pavement .....
4607 (28)	Eiddwen Watkin	Object to development of the sites: - Surrounding roads are unsuitable/unsafe due to poor visibility, bends, width, bridge and on-street parking	Typically vehicle trip rates for residential developments in locations such as this (i.e. high car ownership and on the edge of an urban area) are in the region of 0.55 per	Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<ul style="list-style-type: none"> <li>- Pedestrian and cyclist safety</li> <li>- Loss of popular walking route</li> <li>- Loss of rural setting</li> <li>- Flood risk from surface water run-off</li> <li>- Impact on Welsh language</li> <li>- Safety of pumping station</li> <li>- Impact on historic landscape</li> <li>- Biodiversity impacts</li> <li>- Lack of health and education infrastructure.</li> </ul> <p>Open space and play areas should be provided.</p> <p>Density should reflect the surrounding area.</p> <p>The sites should be removed from the LDP.</p> <p>Photos of traffic problems x 7 attached.</p>	<p>dwelling during the morning peak hour. This would equate to approximately 95 trips during the morning peak between 0800 and 0900. As a rule of thumb the flow during the morning peak hour is 10% of the daily flow. In other words a total daily flow in the region of 950 vehicles would be expected. More exact forecasts for trip generation and distribution will be provided as part of a Transport Assessment.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road. However, damage to the grass verge on the inside of the bend by the Chapel does demonstrate some overrunning. The TA should include swept path analysis of this bend and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Flows would be much lower on a Sunday morning or at the times of day when a funeral would be likely to be held. Nonetheless, consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2. Despite the change in gradient and the slight bend part way along Old Ruthin Road, forward visibility still complies with the minimum standard set in Table A of TAN 18. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Rd/Whitchurch</p>	<p>increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3 Old Ruthin Road: In combination with on road parked vehicles, this creates a blind spot for road users on the brow of the hill. Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of</p>

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			<p>Road junction. Nonetheless, the Transport Assessment will assess the junction for capacity and safety, including how much traffic generated by the development would be expected to use Whitchurch Road. The 30 mph limit on Whitchurch Road is due to be extended by approximately 150 metres towards Llandyrnog which should further reduce the speed of traffic (as it will have been travelling in a lower limit for longer by the time it reaches the Old Ruthin Road junction). Section 5.5 of the Brief also makes provision for the existing 30 mph speed limit to be extended further towards the A525. The capacity and safety of the Old Ruthin Road/A525 junction and Myddleton Park roundabout will be considered as part of the Transport Assessment. Improvements to pedestrian facilities will also need to be considered. Developers would also be required to provide a Construction Traffic Management Plan. Road Safety Audits (which are an independent assessment of road safety) are carried out for all developments which necessitate improvements.</p> <p>The bridge is in sound condition structurally and is rated at 40 tonnes. Furthermore, increasing the number of vehicles travelling over the bridge will not have a material impact upon the strength of the bridge. Section 5.9 of the Development Brief includes provisions to improve pedestrian</p>	<p>the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.5, point 7: The relocation of the 30mph sign should <del>consider</del> incorporate the provision of street lighting to mark the change in speed and so as to not require a legal Order to be made.</p> <p>Amend paragraph 5.9: Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>



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			<p>facilities, including the provision of additional footways.</p> <p>The additional traffic generated is estimated to be 95 vehicles during the morning peak (0800-0900). This equates to 3 additional vehicles every 2 minutes which still represents a relatively low flow of traffic. Increases in traffic flows outside of peak hours will be proportionately less.</p> <p>Even with the additional traffic, traffic flows will still be low and this fact, combined with low numbers of heavy goods vehicles and the 30 mph speed limit in place mean that this route will be suitable for on-carriageway cycling and will not require a separate, dedicated cycle path.</p> <p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>The development brief requires open space to be provided as part of any future development (para. 5.33) and provides guidance for developers in relation to design and layout.</p> <p>The development brief requires development to at least maintain, if not minimise, the risk of flooding from surface water run-off (para. 5.32).</p>	

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			<p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p> <p>Any requirement for a pumping station will depend upon the design of the drainage system, which will form part of any detailed planning application submission. The eventual design must be in accordance with approved document H1 of the Building Regulations.</p> <p>The development brief provides guidance for developers in relation to the surrounding built heritage, archaeology and character.</p> <p>The development brief recognises the local context and that a lower density could be justified through the submission of a planning application (para. 4.4).</p> <p>A review of the LDP will commence before the end of 2017. Any amendments to the LDP, including changes to site allocations, can only be addressed through a formal review, which will commence before the end of 2017.</p>	

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
	Residents of Llys Clwyd, Denbigh	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Environmental impact</li> <li>- Increased traffic and safety concerns</li> <li>- Other areas more suitable for development.</li> </ul> <p>Council should commission an independent environmental and safety study for the development.</p>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Levels of housing need and demand, were discussed through the LDP examination, with the resultant allocations being made to meet these needs.</p> <p>The additional traffic generated by both developments is estimated to be 95 vehicles during the morning peak (0800 to 0900). This equates to an additional 3 vehicles every 2 minutes. This is still very low in comparison with the level of traffic on the A525 in this location.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road. Road Safety Audits (which are an independent assessment of road safety) are carried out for all developments which necessitate improvements</p>	No changes proposed
(30)4616	Jill & Raymond Tunley	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Ecological impact</li> <li>- Increase in vehicular traffic and safety concerns</li> <li>- Capacity of sewerage system.</li> </ul> <p>Development must carefully consider traffic and water run-off/sewerage issues.</p>	<p>The development brief provides guidance on issues around biodiversity on the sites (para. 5.17), including the requirement for ecological surveys, avoidance/mitigation measures and the need for a wildlife corridor.</p> <p>The development brief requires the site design and layout to fit in with, and enhance, existing walking routes (para. 5.9).</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<p>Green links should be retained, with wide wildlife corridors.</p> <p>Public footpath should remain unaffected.</p>	<p>Development must maintain, or improve, current surface water run-off rates (para. 5.32).</p> <p>The additional traffic generated by both developments is estimated to be 95 vehicles during the morning peak (0800 to 0900). This equates to an additional 3 vehicles every 2 minutes. This is still very low in comparison with the level of traffic on the A525 in this location.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road. Road Safety Audits (which are an independent assessment of road safety) are carried out for all developments which necessitate improvements</p> <p>Dwr Cymru Welsh Water have confirmed that there is sufficient capacity within the sewerage and wastewater treatment systems to accommodate development of the Brookhouse sites.</p>	
(31) 73	Dr James Davies MP	<p>Publication of a development brief, which should incorporate strict requirements for development, is welcomed.</p> <p>Review of the LDP at the first opportunity is to be encouraged, with the intention of removing the site allocations.</p>	<p>Comments noted.</p> <p>Any amendments to the LDP, including changes to site allocations, can only be addressed through a formal review, which will commence before the end of 2017.</p> <p>The additional traffic generated by both developments is estimated to be 95 vehicles</p>	<p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<p>Issues raised by residents, and requiring close attention in the development brief, include:</p> <ul style="list-style-type: none"> <li>- Roads – safety and construction arrangements</li> <li>- Pedestrians – narrow pavements and distance from town</li> <li>- Nature of local community – hamlet, low density and Welsh language impacts</li> <li>- Environment – loss of farmland, landscape impact, biodiversity impact and flooding</li> <li>- Play – Play area/open space needed.</li> <li>- Viability – Impact on enabling housing proposal at North Wales Hospital.</li> <li>- Impact on local services – lack of capacity, particularly in schools, and sewerage systems.</li> </ul>	<p>during the morning peak (0800 to 0900). This equates to an additional 3 vehicles every 2 minutes. This is still very low in comparison with the level of traffic on the A525 in this location and is unlikely to have an impact on road safety. Nonetheless, the Transport Assessment will be expected to consider road safety and capacity issues. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road. During the same period there was one recorded injury accident on the A525 near to the Old Ruthin Road junction caused by a motorist failing to observe a cyclist when turning left. Despite the change in gradient and the slight bend part way along Old Ruthin Road, forward visibility still complies with the minimum standard set in Table A of TAN 18</p> <p>Road Safety Audits (which are an independent assessment of road safety) are carried out for all developments which necessitate improvements. Developers will also be required to provide a Construction Traffic Management Plan. Section 5.9 of the Development Brief includes provisions to improve pedestrian facilities, including the provision of additional footways and it highlights the need to improve provision for pedestrians to improve access to the town centre. This will include consideration of ways to improve pedestrian facilities at the Myddleton Park roundabout.</p>	<p>sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6: The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening of the carriageway. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.5, point 7: The relocation of the 30mph sign should <del>consider</del> incorporate the provision of street lighting to mark the change in speed and so as to not require a legal Order to be made.</p>

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			<p>A construction plan will be required in conjunction with any planning application which sets out hours of operation, routes for construction vehicles etc. The development brief will be amended to include reference to this.</p> <p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>The Brookhouse area falls within the Denbigh development boundary set out in the adopted LDP.</p> <p>The development brief recognises the local context and that a lower density could be justified through the submission of a planning application (para. 4.4).</p> <p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p> <p>The development brief provides guidance on issues around biodiversity on the sites (para.</p>	<p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5.1, enhancements to the roundabout area shall be considered.</p> <p>Add new paragraph 5.38: The Council will require a 'Construction Plan' to be submitted with any planning applications, covering issues such as hours of work on site, construction access routes, delivery of materials, noise, dust and disturbance during construction and phasing of development.</p>

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			<p>5.17), including the requirement for ecological surveys, avoidance/mitigation measures and the need for a wildlife corridor.</p> <p>The development brief requires open space to be provided as part of any future development (para. 5.33) and provides guidance for developers in relation to design and layout.</p> <p>As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of other sites, including the former North Wales Hospital.</p> <p>The development brief requires a financial contribution from the developer towards improving the capacity of local schools, where this is required (para. 5.29).</p> <p>Dwr Cymru Welsh Water have confirmed that there is sufficient capacity within the sewerage and wastewater treatment systems to accommodate development of the Brookhouse sites. Any requirement for a pumping station will depend upon the design of the drainage system, which will form part of any detailed planning application submission.</p>	
(32) 4617	Alison Smith	Object to development on any greenfield site due to lack of need.	The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is	None

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		<p>Object to development on these sites:</p> <ul style="list-style-type: none"> <li>- Proposed number of dwellings is too high</li> <li>- Increased traffic and accidents</li> <li>- Lack of capacity in health/social/education services</li> <li>- Brownfield sites in the town should be developed first</li> <li>- Landscape impact</li> <li>- Loss of grazing land.</li> </ul>	<p>outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites, including the former North Wales Hospital. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The development brief highlights that a contribution towards education provision will be required in connection with this development site (para. 5.29).</p> <p>The surrounding built heritage and landscape is acknowledged and the development brief includes requirements and design objectives which address this (para. 5.24, 5.33 and page 21).</p> <p>The additional traffic generated by both developments is estimated to be 95 vehicles during the morning peak (0800 to 0900). This equates to an additional 3 vehicles every 2 minutes. This is still very low in comparison with the level of traffic on the A525 in this location and is unlikely to have</p>	



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			<p>an impact on road safety. Nonetheless, the Transport Assessment will be expected to consider road safety and capacity issues. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p>	
(33) 3568	Richard Cattell	<p>Sites should be removed from the LDP at the review stage.</p> <p>Development would be better focussed on brownfield sites and upper Denbigh.</p> <p>Development must address:</p> <ul style="list-style-type: none"> <li>- Access difficulties</li> <li>- Limited visibility for traffic</li> <li>- Sharp bend/blind corner.</li> </ul> <p>Highways improvement costs must be met by the developer.</p> <p>Housing density should reflect adjoining areas, the number of houses proposed should be reduced and no three storey properties allowed in order to retain the character of the surrounding area. Bungalows should be included in the development.</p>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The Transport Assessment (TA) will need to take account of both the capacity and the safety of the junctions at either end of Old Ruthin Road. This will include measurement of visibility which impacts on both capacity and safety. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Road/Whitchurch Road junction. During the same period there was one recorded injury accident on the A525 near to the Old Ruthin Road junction caused by a motorist failing to observe a cyclist when turning left. Despite the change in gradient and the slight bend part way along Old Ruthin Road,</p>	<p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>

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			<p>forward visibility still complies with the minimum standard set in Table A of TAN 18</p> <p>There have been no recorded injury accidents along Old Ruthin Road during the period stated above. However, damage to the grass verge on the inside of the bend does demonstrate some overrunning. TA should include swept path analysis of this bend and consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p> <p>The likely traffic flows on Old Ruthin Road, even with the development, and 30 mph speed restriction mean that it is suitable for on-carriageway cycling and thus won't require a dedicated cycle path.</p> <p>Site constraints, including highway capacity issues, are highlighted in the development brief in order to ensure developers are aware of potential costs before submitting any planning application.</p> <p>The development brief provides guidance on matters of design and layout. Design objectives 2 and 3 (page 21) require the density and design to reflect the surrounding area and the edge-of-settlement location.</p> <p>LDP policy BSC 1 requires a mixture of house types and sizes to be provided to meet the needs and demands of local communities.</p>	<p>Add additional paragraph 4.6 as follows: <b>LDP Policy BSC 1 – Growth Strategy for Denbighshire</b>. Both sites are allocated for residential development in the adopted Denbighshire Local Development Plan 2006 – 2021 (LDP), and labelled 'BSC 1' on the LDP Proposals Map for Denbigh.</p> <p>LDP Policy BSC 1 also sets out the requirement to provide a range of house types, sizes and tenure to reflect the local need and demand. The Local Housing Market Assessment provides further details on individual areas in the County.</p>

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(34) 3567	Rhian Cattell	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Loss of highest quality agricultural land</li> <li>- Availability of brownfield sites for development</li> <li>- Flood risk</li> <li>- Highways constraints and parking</li> <li>- Lack of employment</li> <li>- Pedestrian safety</li> <li>- Distance from town centre</li> <li>- Impact on green barrier and historic landscape</li> <li>- Harm to the hamlet of Brookhouse</li> <li>- Felling of oak trees.</li> </ul> <p>Development brief should address:</p> <ul style="list-style-type: none"> <li>- Welsh language impact</li> <li>- Landscape impact</li> <li>- Reduced number of houses</li> <li>- Highways safety.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The sites are not located within an identified flood plain and the development brief sets out requirements in regard to surface water run-off (para. 5.31). Development must maintain, or improve, current surface water run-off rates (para. 5.32).</p> <p>The Transport Assessment (TA) will need to take account of both the capacity and the safety of the junctions at either end of Old Ruthin Road. This will include measurement of visibility which impacts on both capacity and safety. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Road/Whitchurch Road junction. During the same period there was one recorded injury accident on the A525 near to the Old Ruthin Road junction caused by a motorist failing to observe a cyclist when turning left. Despite the change in gradient and the slight bend part way along Old Ruthin Road,</p>	<p>Amend paragraph 5.9: Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5.1, enhancements to the roundabout area shall be considered.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>

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			<p>forward visibility still complies with the minimum standard set in Table A of TAN 18</p> <p>There have been no recorded injury accidents along Old Ruthin Road during the period stated above. However, damage to the grass verge on the inside of the bend does demonstrate some overrunning. The TA should include swept path analysis of this bend and consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p> <p>Consideration should also be given to whether a small area of parking could be provided in the southeast corner of Site 2.</p> <p>Paragraph 5.9 of the Development Brief sets out the Council's requirements for improvements to pedestrian access.</p> <p>The surrounding built heritage and landscape is acknowledged and the development brief includes requirements and design objectives which address this (para. 5.24, 5.33 and page 21).</p> <p>The Brookhouse area falls within the Denbigh development boundary set out in the adopted LDP.</p> <p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the</p>	

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p> <p>The development brief recognises the local context and that a lower density could be justified through the submission of a planning application (para. 4.4).</p>	
(35) 3561	Drs Phil and Meinir Michael	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Loss of green land</li> <li>- Impact on redevelopment of North Wales Hospital</li> <li>- Loss of character and walking route</li> <li>- Ribbon development</li> <li>- Highways constraints and safety</li> <li>- Distance from amenities</li> <li>- Flooding</li> <li>- Encourages car use</li> <li>- Impact on historical area.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>It is estimated that 95 additional vehicles would be expected to use Old Ruthin Road during the morning peak hour (0800-0900) once both sites are fully developed. This equates to approximately 3 extra vehicles every 2 minutes which in addition to the existing traffic would still represent a low traffic flow.</p> <p>The width of Old Ruthin Road is suitable for the level of traffic flow and low number of heavy goods vehicles that would be expected.</p> <p>The Transport Assessment should include swept path analysis of this bend and</p>	<p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking</p>

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			<p>consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p> <p>Despite the change in gradient and the slight bend part way along Old Ruthin Road, forward visibility still complies with the minimum standard set in Table A of TAN 18</p> <p>Existing problems with surface water drainage should be investigated by Highways and Environmental Services irrespective of any proposed development.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Road/Whitchurch Road junction.</p> <p>Nonetheless, the Transport Assessment will assess the junction for capacity and safety.</p> <p>Section 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve access to the Town Centre.</p> <p>The development brief provides guidance for developers in relation to the surrounding built heritage, archaeology and character.</p>	<p>for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>
(36) 3561	Drs Phil and Meinir Michael	The development brief should include an additional wildlife thoroughfare at the northern or north western border of the fields along the top hedgerows.	The suggested location of the wildlife corridor has been informed through consultation with the Council's Biodiversity Officer. The development brief sets out requirements in respect of ecological surveys, mitigation/compensation measures and the retention of existing hedgerows.	No changes proposed

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(37) 4618	Mrs M. K. Higginson, Voel Coaches Ltd	Concern over substantially increased traffic levels and resultant safety issues for road users. Request a traffic assessment be carried out before proposal goes any further.	The Development Brief requires a Transport Assessment to be carried out prior to any development taking place. Paragraphs 5.2 – 5.5 set out the Council's requirements.	No changes proposed
(38) 4619	Kate Meredith-Jones & Chris Roberts	Object to development on the sites: <ul style="list-style-type: none"> <li>- Lack of highways capacity</li> <li>- Pedestrian safety</li> <li>- Insufficient parking for church and chapel</li> <li>- Impact on Welsh language.</li> </ul>	<p>The Development Brief requires a Transport Assessment to be carried out prior to any development taking place. Paragraphs 5.2 – 5.5 set out the Council's requirements. The TA should include swept path analysis of this bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Road/Whitchurch Road junction.</p> <p>Nonetheless, the Transport Assessment will assess the junction for capacity and safety. Consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2.</p> <p>Section 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve access to the Town Centre.</p> <p>Further to the pedestrian safety concerns that would be addressed under Section 5.9 of the Development Brief, the capacity of the Myddleton Park roundabout would be assessed as part of the Transport Assessment (TA) using the industry software, ARCADY.</p>	<p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis</p>

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			<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation.</p> <p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p>	<p>of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.9: Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>
(39) 4620	Mr C Roberts	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Lack of highways capacity</li> <li>- Pedestrian safety</li> <li>- Insufficient parking for church and chapel</li> <li>- Impact on Welsh language.</li> </ul>	<p>The Development Brief requires a Transport Assessment to be carried out prior to any development taking place. Paragraphs 5.2 – 5.5 set out the Council's requirements. The TA should include swept path analysis of this bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Road/Whitchurch Road junction.</p>	<p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used</p>



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			<p>Nonetheless, the Transport Assessment will assess the junction for capacity and safety. Consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2.</p> <p>Section 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve access to the Town Centre. Further to the pedestrian safety concerns that would be addressed under Section 5.9 of the Development Brief, the capacity of the Myddleton Park roundabout would be assessed as part of the Transport Assessment (TA) using the industry software, ARCADY.</p> <p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation.</p> <p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p>	<p>regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.9: Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>
(40) 2912	Rev G. Graham Floyd & S.	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Loss of green space</li> <li>- Impact on development of brownfield sites</li> </ul>	The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is	Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also

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	Elizabeth M. Floyd	<ul style="list-style-type: none"> <li>- Increased traffic and safety issues</li> <li>- Lack of school capacity.</li> </ul>	<p>outside the remit of this consultation. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The development brief requires a financial contribution from the developer towards improving the capacity of local schools, where this is required (para. 5.29).</p> <p>The width of Old Ruthin Road is suitable for the level of traffic flow and low number of heavy goods vehicles that would be expected. The Development Brief requires a Transport Assessment to be carried out prior to any development taking place. Paragraphs 5.2 – 5.5 set out the Council's requirements. The TA should include swept path analysis of this bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Despite the change in gradient and the slight bend part way along Old Ruthin Road, forward visibility still complies with the minimum standards set in Table A of TAN18.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Road/Whitchurch Road junction.</p> <p>Nonetheless, the Transport Assessment will assess the junction for capacity and safety.</p>	<p>be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking</p>

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			<p>Consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2.</p> <p>Section 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve access to the Town Centre.</p> <p>Further to the pedestrian safety concerns that would be addressed under Section 5.9 of the Development Brief, the capacity of the Myddleton Park roundabout would be assessed as part of the Transport Assessment (TA) using the industry software, ARCADY.</p>	<p>for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.9: Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>
(41) 4620	Rachel Pates-Jones	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Lack of benefit to Denbigh</li> <li>- Previous housing developments and resultant pressure on schools/services</li> <li>- Few employment opportunities</li> <li>- Impact on St Marcella's Church</li> <li>- North Wales Hospital site should be developed first.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The development brief requires the inclusion of a visual corridor to safeguard the views toward St Marcella's Church (para. 5.24). Design objectives 2 and 3 also require the development to be sensitive to the surrounding built heritage (page 21).</p>	No changes proposed
(42) 4621	Linda Kaye	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Loss of green fields/amenity</li> <li>- Highways capacity and safety concerns</li> </ul>	The sites have been allocated for housing in the LDP, therefore the principle of	Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also

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		<ul style="list-style-type: none"> <li>- Flooding</li> <li>- Infrastructure.</li> </ul>	<p>development has been established and is outside the remit of this consultation.</p> <p>In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p> <p>It is estimated that 95 additional vehicles would be expected to use Old Ruthin Road during the morning peak hour (0800-0900) once both sites are fully developed. This equates to approximately 3 extra vehicles every 2 minutes which in addition to the existing traffic would still represent a low traffic flow.</p> <p>Section 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve access to the Town Centre, including the Myddleton Park roundabout. Despite the change in gradient and the slight bend part way along Old Ruthin Road, forward visibility still complies with the minimum standard set in Table A of TAN 18. Please note that parking restrictions could be considered if on-street parking was considered to create a particular hazard, however, it should also be recognised that on-street parking can also have a traffic calming effect and so this would need to be considered in detail before any changes are made. However, consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2.</p>	<p>be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>

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			<p>The sites are not located within an identified flood plain and the development brief sets out requirements in regard to surface water run-off (para. 5.31).</p> <p>Site constraints and infrastructure requirements are highlighted in the development brief in order to ensure developers are aware of the development requirements before submitting any planning application.</p>	<p>Amend paragraph 5.9: Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>
(43) 4622	Goronwy Owen, Pure Residential and Commercial Ltd.	<p>Welcome the publication of the draft Site Development Brief.</p> <p>Disagree with the use of the County open space standard based on the Field's in Trust benchmark standards. Feel that they are too high and will impact negatively on the design and layout of any scheme on the site.</p> <p>The requirement for a wildlife corridor will reduce the developable area and the proposed location makes little sense. Long-term maintenance should not be necessary. The requirement for a wildlife corridor should be removed from the development brief.</p> <p>Disagree with introduction of financial contribution to education provision. Feel it should be subject to</p>	<p>Comments noted.</p> <p>Open space standards for the County were consulted upon as part of the LDP preparation process and validated at the LDP Examination in Public prior to adoption in the LDP. Open space standards are not part of the consultation on this site development brief.</p> <p>The requirement for, and suggested location of, the wildlife corridor has been informed through consultation with the Council's Biodiversity Officer and is considered the most appropriate due to the species and habitats on the sites. Details of maintenance arrangements are considered necessary to ensure the wildlife corridor continues to function as such into the future.</p> <p>The site development brief refers to a specific site allocation contained in the Plan</p>	No changes proposed

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		<p>separate SPG. No evidence of capacity issues at local school has been presented. Also no information on funding available from Welsh Government and 21st Century Schools programmes. Feel the required contribution is excessive and would compromise viability of developing the site.</p> <p>Archaeology – concern that site investigations should have been carried out at LDP site selection stage. The cost of investigations should not be transferred to the developer.</p> <p>Affordable housing – welcome confirmation of 10%, feel higher levels would impact negatively on viability.</p> <p>Sustainable transport facilities – matters that could potentially prevent development of the site should have been investigated by the Council at LDP allocation stage. Highway capacity and deliverability of transport solutions for the site should not be left for developers to prove for the scheme. Council does not have adopted guidance on highway adoption and should provide confirmation that it will adopt highway schemes that comply with Manual for Streets. Uncertainty will impact on viability.</p>	<p>and provides details on several LDP Policies, including infrastructure contributions. This is in line with the guidance contained in LDP Manual 2, section 7.3 on 'Supplementary Planning Guidance'. The level of education contribution required will be determined at the planning application stage when the number of dwellings proposed is known. By providing the calculation for education and other financial contributions up front in a site development brief potential developers can factor this into their site viability exercise prior to bidding for the site.</p> <p>Site constraints, and development requirements, are highlighted in the development brief in order to ensure developers are aware of potential costs before submitting any planning application.</p> <p>Comment noted.</p> <p>Individual schemes are discussed with developers on a scheme by scheme basis. Highways will provide advice free of charge at an early stage to ensure that the road will be designed and specified to a standard that will be suitable for adoption.</p>	

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		<p>Flooding – Council should implement an adoption regime for SuDS to support its use within new development schemes.</p> <p>Brief does not provide sufficient level of information or clarity necessary to fully assess viability and deliverability of the site. Does not show how conflicting LDP policy requirements will be balanced to deliver viable and attractive residential developments.</p>	<p>Comment noted.</p> <p>Site development briefs provide an enhanced level of information and detail over other development sites that do not benefit from having site development briefs prepared. Developers generally have to do all of the necessary background work to assess if a site is viable and make a commercial decision whether to progress a planning application for a site, without the benefit of a brief that provides much of the needed information to inform that decision.</p>	
(44) 3555	G. Williams	<p>Object to the development of the sites:</p> <ul style="list-style-type: none"> <li>- Lack of highways capacity</li> <li>- Safety concerns for vehicles and pedestrians due to existing road/pavements</li> <li>- Flooding from surface water run-off</li> <li>- Bats and badgers on site</li> <li>- Sewage capacity</li> <li>- School and healthcare capacity</li> <li>- Loss of walking area</li> <li>- Loss of Brookhouse hamlet</li> <li>- Impact on Welsh language.</li> </ul>	<p>The busiest period during the day is expected to be the morning peak hour (0800-0900). It is estimated that an additional 95 vehicles would use Old Ruthin Road during this period, once both sites are fully developed. This equates to an additional 3 vehicles every 2 minutes which when added to the existing traffic flows, still represents a low flow of traffic.</p> <p>Section 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve access to the Town Centre, including the Myddleton Park roundabout. TA should include swept path analysis of this bend and consider whether the footway on the outside of the bend could be offset to allow some localised widening.</p>	<p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane</p>

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			<p>Consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2.</p> <p>The development brief requires surface water run-off rates to be maintained or reduced (para.5.31).</p> <p>Ecological surveys (including bats) and mitigation/avoidance measures will be required alongside any planning application (para. 5.17).</p> <p>Dwr Cymru Welsh Water have confirmed there is sufficient capacity to accommodate the proposed housing developments (para. 5.36).</p> <p>Financial contributions towards increasing the capacity of local schools will be required as part of any development (para. 5.29).</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>Any development will have to fit in with, and enhance, existing walking routes (para. 5.9).</p> <p>The LDP was subject to Sustainability Appraisal, including issues around language</p>	<p>where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both</p>



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			<p>and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p>	<p>sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>
(45) 2861	Edna Williams	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Empty homes should be brought into use</li> <li>- Several sites in local area in development/with planning permission or planned for development</li> <li>- Lack of infrastructure, particularly schools, health/social care and highways</li> <li>- Loss of greenfield in an area of outstanding natural beauty, and walking route</li> <li>- Lack of support by local community</li> <li>- Flooding</li> <li>- Pedestrian safety.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites in the local area. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>Financial contributions towards increasing the capacity of local schools will be required as part of any development (para. 5.29).</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to be 95 vehicles during the busiest hour which would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an</p>	<p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5,</p>

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			<p>issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network.</p> <p>Paragraph 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve links to the town centre, including the Myddleton Park roundabout.</p> <p>The sites are not located within an identified flood plain and the development brief sets out requirements in regard to surface water run-off (para. 5.31)</p>	<p>enhancements to the roundabout area shall be considered.</p>
(46) 4623	Geraldine Jones	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Proposed density and number of homes is out of keeping with the surrounding area</li> <li>- Impact on the historic environment</li> <li>- Loss of recreation/walking route</li> <li>- Impact on Welsh language.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation.</p> <p>The development brief recognises the local context and that a lower density could be justified through the submission of a planning application (para. 4.4).</p> <p>The surrounding built heritage and landscape is acknowledged and the development brief includes requirements and design objectives which address this (para. 5.24, 5.33 and page 21).</p>	<p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network.</p>

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			<p>Open space will be provided on site and any development will have to fit in with, and enhance, existing walking routes (para. 5.9).</p> <p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37). The use of Welsh street names are identified as a <b>minimum</b> requirement.</p>	
(47) 4624	Carole Roxburgh	<p>Objection to any development on the two sites.</p> <p>Following comments/objections made:</p> <ul style="list-style-type: none"> <li>- Unacceptable landscape harm as set out in policy VOE 2</li> <li>- Lack of evidence of housing need in Denbigh</li> <li>- Availability of brownfield sites in Denbigh – no justification for development of greenfield sites</li> <li>- Loss of the Brookhouse hamlet and countryside</li> <li>- Increase in carbon emissions from increased housing</li> <li>- Does not address the principles of 'good design' as set out in TAN 12 and lacks a collaborative approach to design</li> <li>- Lack of consideration of local history and possible archaeological findings</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>Para 4.5 of the development brief refers to the principles of good design set out in TAN 12 and states that development proposals must demonstrate how these are applied.</p> <p>Cadw, Clwyd-Powys Archaeological Trust and the County Archaeologist have informed the requirements of the development brief. The development brief requires any</p>	<p>Amend paragraph 5.17:  <del>....The Biodiversity Officer advises that wildlife corridor(s) are incorporated into the development and suggests the location outlined in figure 6.</del> Wildlife corridor(s) will be required to be incorporated into the development in line with advice from the Biodiversity Officer and the suggested location is outlined in figure 6...</p> <p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by</p>

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		<ul style="list-style-type: none"> <li>- Existing roads are unable to accommodate increased housing due to on-street parking from church/chapel, lack of pavements, sharp bends, blind spots, volume/type of existing traffic and strength of the bridge by Brookhouse Mill</li> <li>- Lack of infrastructure (health, education and utilities) to accommodate development</li> <li>- Need for connection to the main sewer</li> <li>- Lack of mitigation measures/financial contribution towards Welsh language impacts</li> <li>- Need for SuDS to be required and submission of a water conservation statement</li> <li>- Detailed biodiversity assessments and a wildlife corridor are required</li> </ul> <p>The development brief needs to request additional assessments and contributions from any developer in regards to safety, roads, infrastructure, flooding, biodiversity, health &amp; well-being, Welsh language, greenfield land, the merging of Brookhouse with Denbigh and history.</p> <p>(Several photos attached to demonstrate highways issues)</p>	<p>application to be accompanied by a desk-based archaeological assessment and, if necessary, geophysical surveying (para. 5.16).</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to be 95 vehicles during the busiest hour which would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p> <p>Despite the change in gradient and the slight bend part way along Old Ruthin Road, forward visibility still complies with the minimum standard set in Table A of TAN 18. However, damage to the grass verge on the inside of the bend does demonstrate some overrunning. TA should include swept path analysis of this bend and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Flows would be much lower on a Sunday morning or at the times of day when a funeral would be likely to be held. Nonetheless, consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2</p>	<p>increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road: Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>

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			<p>The bridge is in sound condition structurally and is rated at 40 tonnes. Furthermore, increasing the number of vehicles travelling over the bridge will not have a material impact upon the strength of the bridge.</p> <p>Paragraph 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve links to the town centre, including the Myddleton Park roundabout.</p> <p>Site constraints and infrastructure requirements are highlighted in the development brief in order to ensure developers are aware of the development requirements before submitting any planning application.</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The development brief requires a financial contribution from the developer towards improving the capacity of local schools, where this is required (para. 5.29).</p> <p>Dwr Cymru Welsh Water have confirmed that there is sufficient capacity within the sewerage and wastewater treatment</p>	<p>Amend paragraph 5.5, point 7: The relocation of the 30mph sign should <del>consider</del> incorporate the provision of street lighting to mark the change in speed and so as to not require a legal Order to be made.</p> <p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>systems to accommodate development of the Brookhouse sites (para. 5.36). Any foul drainage system must be designed in accordance with part H1 of the Building Regulations.</p> <p>Any requirement for financial contributions or mitigation measures towards impacts on the Welsh language will be dependent upon the outcome of the Community &amp; Linguistic Impact Assessment required as part of any eventual planning application.</p> <p>Para. 4.13 of the development brief requires that a water conservation statement be submitted for proposals of 10 or more dwellings. The requirement for SuDS as the first option for surface water disposal is required by building regulations and reflected in the development brief.</p> <p>Paragraphs 5.17-5.20 include requirements for ecological surveys and assessments. The relevant paragraphs will be amended to provide clarity on the requirement for a wildlife corridor.</p> <p>The development brief sets out the assessments needed to accompany any planning application on these sites, as identified by national and local planning policies. Specific developer contributions will be dependent upon the outcome of these assessments.</p>	

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
(48) 4625	N. Roxburgh	<p>Objection to any development on the two sites.</p> <p>Following comments/objections made:</p> <ul style="list-style-type: none"> <li>- Unacceptable landscape harm as set out in policy VOE 2</li> <li>- Design objectives cannot be delivered without the required assessments</li> <li>- Sites not feasible due to highways capacity</li> <li>- Density needs to be less than 35dph to reflect surrounding area</li> <li>- Doesn't meet the principles of 'good design' as set out in TAN 12</li> <li>- Lack of health and education infrastructure capacity, and assessments to ensure the correct contributions are secured.</li> </ul>	<p>The sites are not located within an AONB/AOB. The development brief sets out the design objectives considered particular to the Brookhouse sites. The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to be 95 vehicles during the busiest hour which would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p> <p>The development brief recognises the local context and that a lower density could be justified through the submission of a planning application (para. 4.4).</p> <p>Para 4.5 of the development brief refers to the principles of good design set out in TAN 12 and states that development proposals must demonstrate how these are applied.</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The development brief requires a financial contribution from the developer towards improving the capacity of local schools, where this is required (para. 5.29).</p> <p>The development brief sets out the assessments needed to accompany any planning application on these sites, as identified by national and local planning policies. Specific developer contributions will be dependent upon the outcome of these assessments.</p>	
(49) 4626	Mr & Mrs Darren & Annick Cummings	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Flood risk</li> <li>- Highways capacity and safety</li> <li>- Lack of school and health service capacity</li> <li>- Loss of greenfield sites when brownfield sites are available</li> <li>- Impact on wildlife and newts</li> <li>- Impact on the hamlet of Brookhouse</li> <li>- Loss of historic site.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation.</p> <p>The site are not within an identified area of flood risk and the development brief requires surface water run-off rates to be maintained or reduced (para.5.31).</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to be 95 vehicles during the busiest hour which</p>	No changes proposed



Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents on Old Ruthin Road.</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>Financial contributions towards increasing the capacity of local schools will be required as part of any development (para. 5.29). A</p> <p>Account has already been taken of the potential housing contribution from brownfield sites in the local area, including the former North Wales Hospital. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The development brief requires the inclusion of a wildlife corridor as part of any development. Ecological surveys (including bats) and mitigation/avoidance measures</p>	

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>will be required alongside any planning application (para. 5.17).</p> <p>The Brookhouse area falls within the Denbigh development boundary set out in the adopted LDP.</p> <p>The development brief requires any application to be accompanied by a desk-based archaeological assessment and, if necessary, geophysical surveying (para. 5.16).</p>	
(50) 3346	Heather Prydderch, Don't Destroy Dyserth Group	<p>Development sites are far from the town centre and will encourage car use, making the levels of traffic worse.</p> <p>Linking the houses to surrounding areas is pointless.</p> <p>Location of the wildlife corridor is odd as it adjoins fields, however it is supported if it limits the number of houses to be built.</p> <p>Flood risk will worsen as the area available for water to soak away will be reduced. More than a desk-top survey should be carried out. Climate change will further extend the existing flood risk zones.</p>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>There are already two existing bus services that use Old Ruthin Road (the X50 and the 14A). Further residential development will strengthen those existing services.</p> <p>The capacity of the Myddleton Park roundabout will be assessed as part of the Transport Assessment that will be required for the developments.</p> <p>The Development Brief recognises that footway links to the Town Centre need to be improved and Section 5.9 of the Brief includes a requirement for the provision of new footway on Old Ruthin Road and improvements to pedestrian facilities at the Myddleton Park roundabout.</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>The development brief recognises the importance of the surrounding built heritage and providing sustainable good-quality development, which should be key feature in any future design proposal.</p> <p>The proposed location for the wildlife corridor has been informed through consultation with the Council's Biodiversity Officer as the most suitable.</p> <p>The sites are not within an identified area of flood risk and the development brief requires surface water run-off rates to be maintained or reduced (para.5.31).</p> <p>Dwr Cymru Welsh Water have confirmed there is sufficient capacity to accommodate the proposed housing developments (para. 5.36).</p>	
(51)	Mrs Kathleen Mee	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- No demand locally for housing</li> <li>- Historic hamlet and agricultural land</li> <li>- Insufficient services and unsuitable road network</li> <li>- Alternative brownfield sites closer to the town centre should be developed first</li> <li>- Impact on nearby holiday let business.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites in the local area.</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to be 95 vehicles during the busiest hour which would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network.</p> <p>The surrounding built heritage and landscape is acknowledged and the development brief includes requirements and design objectives which address this (para. 5.24, 5.33 and page 21).</p>	
(52)	Mrs Glenda Bibby	<p>Angen gadeal fel y mae, yn agored I natur – ddim tai.</p> <p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Impact on Welsh language and the need for an impact assessment</li> <li>- Increased traffic and accidents due to narrow bend and access onto A525</li> <li>- Impact on wider road network and pedestrian safety</li> <li>- Poor visibility at existing junctions</li> <li>- Impact on a rural hamlet and loss of hedgerows</li> <li>- Loss of habitat and wildlife</li> <li>- Loss of valuable agricultural land</li> <li>- Loss of open space/amenity</li> <li>- Empty homes should be utilised first</li> <li>- Alternative brownfield sites should be developed first</li> <li>- Water and sewage system already full to capacity</li> <li>- High unemployment area.</li> </ul>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to</p>	<p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6 Old Ruthin Road:</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>be 95 vehicles during the busiest hour which would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network.</p> <p>The Transport Assessment will also need to take account of both the capacity and the safety of the junctions at either end of Old Ruthin Road. This will include measurement of visibility which impacts on both capacity and safety. In the five year period between 22/11/10 and 21/11/15 there were no recorded injury accidents at the Old Ruthin Road/Whitchurch Road junction. During the same period there was one recorded injury accident on the A525 near to the Old Ruthin Road junction caused by a motorist failing to observe a cyclist when turning left.</p> <p>The width of Old Ruthin Road is considered suitable for the level of traffic flow and low number of heavy goods vehicles that would be expected.</p> <p>Section 5.9 of the Development Brief states that any development proposals will need to include improvements to pedestrian access to improve access to the Town Centre, including the Myddleton Park roundabout. Despite the change in gradient and the slight bend part way along Old Ruthin Road,</p>	<p>Brookhouse Chapel is used regularly generating traffic and a need for on road parking. The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p> <p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>forward visibility still complies with the minimum standard set in Table A of TAN 18. The Transport Assessment should include swept path analysis of this bend and consider whether the footway on the outside of the bend could be offset to allow some localised widening. Consideration should be given to whether a small area of parking could be provided in the southeast corner of Site 2</p> <p>The sites are not within an identified area of flood risk and the development brief requires surface water run-off rates to be maintained or reduced (para.5.31).</p> <p>A construction management plan will be required as part of any planning application to ensure negative impacts on residents amenity are minimised during construction.</p> <p>Account has already been taken of the potential housing contribution from brownfield sites. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites and empty homes.</p> <p>Dwr Cymru Welsh Water have confirmed there is sufficient capacity to accommodate the proposed housing developments (para. 5.36).</p>	<p>Add new paragraph 5.38: The Council will require a 'Construction Plan' to be submitted with any planning applications, covering issues such as hours of work on site, construction access routes, delivery of materials, noise, dust and disturbance during construction and phasing of development.</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
(53)	Miss Elen Bibby	Ei adael yn fon agored – y fel y mae rwan.	Mae'r safleoedd wedi'u dyrannu ar gyfer tai yn y Cynllun Datblygu Lleol, felly mae'r egwyddor o ddatblygu yn y lleoliad hwn wedi'i sefydlu ac mae tu allan i gylch gwaith yr ymgynghoriad hwn.	Dim newidiadau yn cael ei gynnig
(54)	Mr Glyn Jones	I'w Gadw fel y mae. Fel a nodyn a restrwd yn blaenorol yn yr ymgynghoriad cyhoeddus.	Mae'r safleoedd wedi'u dyrannu ar gyfer tai yn y Cynllun Datblygu Lleol, felly mae'r egwyddor o ddatblygu yn y lleoliad hwn wedi'i sefydlu ac mae tu allan i gylch gwaith yr ymgynghoriad hwn.	Dim newidiadau yn cael ei gynnig
(55)	Mrs Carys Jones	Dim tai o gwbl. Y safle l'w aros yn safle agored a naturiol – dim yn safle l godi tai o gwbl – hinllaf. Fel awqrymwyd yn yr ymgynghoriad chyhoeddus yn Ninbych	Mae'r safleoedd wedi'u dyrannu ar gyfer tai yn y Cynllun Datblygu Lleol, felly mae'r egwyddor o ddatblygu yn y lleoliad hwn wedi'i sefydlu ac mae tu allan i gylch gwaith yr ymgynghoriad hwn.	Dim newidiadau yn cael ei gynnig
(56) 3121	M.W. Moriarty, Campaign for the Protection of Rural Wales (CPRW)	<p>No reference is made to the Agricultural Land Classification of the sites. Development of best and most versatile agricultural land should be in accordance with the requirements of Planning Policy Wales and Technical Advice Note 6.</p> <p>Lack of highways capacity to safely cater for the proposed development. Addressing this may impact on the financial viability of the sites.</p> <p>The SPG must require developers to demonstrate how the proposed development will relate to local routes created, or planning, in the area as a result of the Active Travel (Wales) Act 2013.</p>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to be 95 vehicles during the busiest hour which would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network.</p>	<p>Amend paragraph 5.9: The proposed site layout should fit in with and enhance existing walking routes. The site layout should encourage walking and make it easier and preferable to get around the area by foot.</p> <p>Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<p>Photograph 1 on page 5 is incorrectly captioned and fails to present an accurate view.</p> <p>Development of the sites will adversely affect the setting of St Marcella Church. Mitigation through tree planting would be difficult to achieve due to the width required and the number of years needed to attain a screening effect.</p> <p>Any study of the history of the area should include the post-medieval period, with records describing an armed engagement in 1645. An archaeological watching brief is required during the groundwork phase of any development on both sites.</p>	<p>The Transport Assessment will also need to take account of both the capacity and the safety of the junctions at either end of Old Ruthin Road.</p> <p>Site constraints and infrastructure requirements are highlighted in the development brief in order to ensure developers are aware of the development requirements before submitting any planning application.</p> <p>Comment noted. The development brief will be amended to include reference to Active Travel (Wales) Act.</p> <p>Comment noted. The caption for photograph 1 will be amended accordingly.</p> <p>The development brief provides guidance for developers in relation to the surrounding built heritage, archaeology and character, including a requirement for a visual/wildlife corridor to safeguard the views toward St Marcella's church (para. 5.24). Specific details relating to tree planting on the site will form part of any eventual planning application on the site.</p> <p>Cadw, Clwyd-Powys Archaeological Trust and the County Archaeologist have informed the requirements of the development brief. The development brief requires any application to be accompanied by a desk-</p>	<p>at improvements to the local walking and cycle network.</p> <p>Amend Photo 1 caption: View from Brookhouse Chapel towards St Marcella's Church</p> <p>Amend paragraph 5.16: ... However, the Council's Archaeologist notes that in an area close to Kilford Farm there was evidence of Mesolithic, bronze age, and early medieval activity. There are also records of an armed engagement in the area in 1645. ....</p>



Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			based archaeological assessment and, if necessary, geophysical surveying (para. 5.16). The development brief will be amended to include reference to records of historic battle.	
(57)	Hedd ap Emlyn	<p>Object to development of the sites:</p> <ul style="list-style-type: none"> <li>- Available brownfield sites should be developed instead of greenfield sites</li> <li>- Support the reasons submitted by other residents in objecting.</li> </ul> <p>Request that the sites be removed from the LDP at the earliest opportunity.</p>	The sites have been allocated for housing in the LDP, therefore the principle of development has been established and is outside the remit of this consultation. Account has already been taken of the potential housing contribution from brownfield sites in the local area. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.	No changes proposed
	Suzanne Whiting / Helen May, Cadw	<p>The development brief highlights the potential archaeological impacts in section 5.13 and the need for further archaeological assessment.</p> <p>The nearest scheduled monument, Denbigh Friary, will not be affected. There is likely to be some degree of impact on the settings of higher lying monuments (castle, town walls, Leicester's church) from which there will be views over the proposed site towards the prominent late medieval tower of St Marcella's. At a distance of over 2km from these monuments, residential development of this site would normally have no significant impact on their setting in itself, but would in our view have potential to affect views of the contemporary parish church from the castle and town walls through encroachment onto its rural setting. Such impacts should be evaluated as part of any proposals for this site.</p>	<p>Comments noted.</p> <p>Clwyd-Powys Archaeological Trust and the County Archaeologist have informed the requirements of the development brief, which has been amended as necessary. The development brief requires any application to be accompanied by a desk-based archaeological assessment and, if necessary, geophysical surveying (para. 5.16).</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
		<p>The development control archaeologist at the Clwyd Powys Archaeological Trust should be closely consulted over potential undesigned archaeological remains in the vicinity of Llanfarchell.</p>		
	Non ap Emllyn	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Loss of good quality agricultural land</li> <li>- Lack of need given development land at the hospital site</li> <li>- Impact on delivery of redevelopment at the hospital site.</li> </ul> <p>Concern over the last minute inclusion of the sites in the LDP, without proper consultation with residents.</p> <p>Sites should be removed from the LDP at the earliest opportunity.</p>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>Account has already been taken of the potential housing contribution from brownfield sites, including the former North Wales Hospital. As the Brookhouse sites have been allocated for housing, the Council cannot restrict their delivery ahead of brownfield sites.</p> <p>The sites were included in the LDP following the Planning Inspector's request for additional housing sites during the LDP examination process. The Inspector considered that the consultation on these additional housing allocations was adequate.</p> <p>Any amendments to the LDP, including changes to site allocations, can only be addressed through a formal review, which will commence before the end of 2017.</p>	No changes proposed

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
	Cllr. Raymond Bartley	<p>Object to development on the sites:</p> <ul style="list-style-type: none"> <li>- Principle of development</li> <li>- Loss of good agricultural land</li> <li>- Highways</li> <li>- Infrastructure</li> <li>- Biodiversity</li> <li>- Impact on the Welsh language and culture</li> <li>- Footpaths must be protected</li> <li>- Pressure on primary and secondary nursing care</li> <li>- Flooding issues</li> <li>- Number of school places</li> <li>- Detrimental to the area and hamlet</li> <li>- Loss of amenity.</li> </ul> <p>Oppose any form of development on the site and supports local residents in their objections.</p>	<p>The sites have been allocated for housing in the LDP, therefore the principle of development in this location has been established and is outside the remit of this consultation.</p> <p>The likely amount of traffic generated once both sites are fully developed is estimated to be 95 vehicles during the busiest hour which would be a weekday between 0800 and 0900. Traffic congestion is unlikely to be an issue, however, the developer(s) will be required to produce a Transport Assessment to fully assess the impact of the additional traffic on the highway network.</p> <p>The Transport Assessment will also need to take account of both the capacity and the safety of the junctions at either end of Old Ruthin Road.</p> <p>Site constraints and infrastructure requirements are highlighted in the development brief in order to ensure developers are aware of the development requirements before submitting any planning application.</p> <p>The development brief provides guidance on issues around biodiversity on the sites (para. 5.17), including the requirement for ecological surveys, avoidance/mitigation measures and the need for a wildlife corridor.</p>	<p>Amend paragraph 5.5, point 1: Improvements to pedestrian safety shall also be considered, such as by increasing the size of the roundabout splitter islands (subject to the ARCADY/JUNCTIONS 9 model indicating there is sufficient geometric capacity to allow this).</p> <p>Amend paragraph 5.5, point 3: Parking restrictions may be necessary to prohibit on-street parking in those locations which reduce forward visibility or require vehicles to manoeuvre into the oncoming vehicle lane where forward visibility is impaired.</p> <p>Amend paragraph 5.5, point 6: The TA should include swept path analysis of the bend by the Chapel and consider whether the footway on the outside of the bend could be offset to allow some localised widening of the carriageway. Provision shall be made for some parking for the Chapel in the south east corner of Site 2.</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>The LDP was subject to Sustainability Appraisal, including issues around language and culture. The Council has also adopted Supplementary Planning Guidance on Planning &amp; the Welsh Language, and the development brief provides guidance to developers in relation to LDP policy RD5 (para. 5.37).</p> <p>The development brief requires the site design and layout to fit in with, and enhance, existing walking routes (para. 5.9).</p> <p>The Council is in regular discussion with BCUHB and local GP practices regarding primary and secondary health provision in relation to new developments but cannot directly influence the location or size of facilities.</p> <p>The sites are not located within an identified flood plain and the development brief sets out requirements in regard to surface water run-off (para. 5.31). Development must maintain, or improve, current surface water run-off rates (para. 5.32).</p> <p>The development brief requires a financial contribution from the developer towards improving the capacity of local schools, where this is required (para. 5.29).</p> <p>The importance of the surrounding built heritage and landscape is acknowledged and</p>	<p>Amend paragraph 5.5, point 7: The relocation of the 30mph sign should <del>consider</del> incorporate the provision of street lighting to mark the change in speed and so as to not require a legal Order to be made.</p> <p>Amend paragraph 5.9: Consideration should be given to the requirements of the Active Travel (Wales) Act 2013, supported by enhancement measures and design features aiming at improvements to the local walking and cycle network. Provision of 2.0 metre wide footways on either side of Old Ruthin Road shall be provided along the frontages of both sites. As detailed in Paragraph 5.5, enhancements to the roundabout area shall be considered.</p>

Rep No.	Organisation	Comment (summary)	Council's response	Changes proposed
			<p>the development brief includes requirements and design objectives which address this (para. 5.24, 5.33 and page 21). The Brookhouse area falls within the Denbigh development boundary set out in the adopted LDP.</p>	

**Photographs submitted by Eiddwen Watkin (rep. number 4607(28))**

Photo 1 – Parking by church on Whitchurch Road



Photo 2 – Old Ruthin Road



Photo 3 – Old Ruthin Road





Photo 4 – Parking on Old Ruthin Road (by Brookhouse Mill)



Photo 5 – Old Ruthin Road



Photo 6 – Junction from Old Ruthin Road to Whitchurch Road



Photo 7 – Junction from Old Ruthin Road to Whitchurch Road



**Photographs submitted by Carole Roxburgh (rep. number 4624(47))**

**Note – Captions as provided by the representor**

Photo 1 – Site 2 (left) and site 1 (right)



Photos 2 & 3 - As you come to this junction there is a blind spot around the corner.





Photo 4 – Traffic often turns onto the Old Ruthin Road on the wrong side of the road



Photo 5 – On-street parking makes it impossible to turn



Photo 6 – When there is a funeral in Whitchurch Church, cars park along Whitchurch Road and Old Ruthin Road making access to this junction even more difficult to negotiate



Photo 7 – There is a blind spot over the brow of the hill, above the anticipated entrance to the two sites.



Photos 8, 9 & 10 – There is a pavement on one side of the road only and this is narrow in parts making it difficult for prams. Wheel chair access is very difficult. When buses are on the right side of the road they come very close to pedestrians.





Photo 11 – This corner was apparently the cause of many accidents prior to the new Ruthin Road being built. It remains a problematic corner. It is exacerbated when people park on the road during Chapel services, weddings and when there are functions at Brookhouse Mill.



Photo 12 – Traffic frequently comes around the corner on the wrong side of the side from the Brookhouse direction.



Photo 13 – Traffic frequently comes around the corner on the wrong side (from Denbigh direction).



Photo 14 – Seconds after the bus (above) was on the wrong side a trailer drives down the middle of the road.



Photos 15, 16 & 17 – Road unfeasible due to parking, traffic on the wrong side, large trucks trying to turn etc.







Photos 18-22 – The bridge cannot take two large vehicles at once, they frequently go on the wrong side or in the middle and can cause accidents when coming around the corners.









Appendix 3  
Site Development Brief:  
'Brookhouse sites', Denbigh  
16<sup>th</sup> March 2016

Equality Impact Assessment

# Site Development Brief: Brookhouse sites, Denbigh

Contact: Angela Loftus

Updated: 16/03/2016

## 1. What type of proposal / decision is being assessed?

A new or revised policy
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## 2. What is the purpose of this proposal / decision, and what change (to staff or the community) will occur as a result of its implementation?

The proposal is to seek approval from Planning Committee to adopt the Site Development Brief for the allocated 'Brookhouse' housing sites at Denbigh. The Site Development Brief supports the planning policies contained within the Denbighshire Local Development Plan and sets out the principles of development for the site in order to guide future proposals. If adopted, the Site Development Brief will be used in determining applications for planning permission on the sites.
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## 3. Does this proposal / decision require an equality impact assessment? If no, please explain why.

*Please note: if the proposal will have an impact on people (staff or the community) then an equality impact assessment **must** be undertaken*

No	The proposal is to adopt planning guidance relating to development on the 'Brookhouse' allocated housing sites in Denbigh. The content of the Site Development Brief does not set policy but consolidates, and provides site-specific guidance on, the relevant LDP policies. The LDP, including all policies, underwent a full EqIA prior to adoption.
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## 4. Please provide a summary of the steps taken, and the information used, to carry out this assessment, including any engagement undertaken

*(Please refer to section 1 in the toolkit for guidance)*

The Denbighshire LDP is the overarching policy document under which all Site
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Development Briefs sit and this underwent an EqlA prior to adoption by Council.

**5. Will this proposal / decision have a positive impact on any of the protected characteristics (age; disability; gender-reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation)?**  
*(Please refer to section 1 in the toolkit for a description of the protected characteristics)*

No

**6. Will this proposal / decision have a disproportionate negative impact on any of the protected characteristics (age; disability; gender-reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation)?**

No

**7. Has the proposal / decision been amended to eliminate or reduce any potential disproportionate negative impact? If no, please explain why.**

No Not required

**8. Have you identified any further actions to address and / or monitor any potential negative impact(s)?**

No Not required

Action(s)	Owner	By when?

**9. Declaration**

Every reasonable effort has been made to eliminate or reduce any potential disproportionate impact on people sharing protected characteristics. The actual impact of the proposal / decision will be reviewed at the appropriate stage.

Review Date: March 2017

Name of Lead Officer for Equality Impact Assessment	Date
Angela Loftus	16/03/2016

**Please note you will be required to publish the outcome of the equality impact assessment if you identify a substantial likely impact.**

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