

Denbighshire  
County Council  
Local Development Plan  
2006 - 2021

**LDP Review Report  
(July 2017)**

Denbighshire County Council  
Planning and Public Protection  
Strategic Planning & Housing  
P O Box 62  
Ruthin  
LL 15 9AZ



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## 1. Introduction

- 1.1 This draft Local Development Plan Review report was formally approved for public consultation by Denbighshire County Council's Planning Committee on the XX of XXXX 2017. The decision highlights the Council's commitment to ensure that there is an updated local plan in place; able to address current challenges, support corporate objectives and assist decision-making in the Planning & Public Protection department. If the final report is approved for submission to Welsh Government by the Council at the end of 2017, it will be crucial evidence in the process of producing a replacement local plan for the County.
- 1.2 It is important that Denbighshire has an up-to-date LDP because this ensures that the development needs of the County are catered for things like housing, employment, or recreation space. The adopted LDP is going to expire in 2021. This draft LDP Review report is accordingly the first step towards developing a replacement document.
- 1.3 The purpose of the draft LDP Review report is to substantiate the Council's intention to fully review the adopted plan; with the aim of proposing amendments in line with legislation and new evidence. The document briefly outlines the legal background, sets out which elements have been considered as part of the process, and will present the view of key stakeholders and members of the public (once public consultation has taken place).
- 1.4 After having set the procedural background in the next chapter, Chapter 3 will focus on primary legislation and the three principal elements of the LDP: LDP Vision, LDP Objectives and the LDP Growth Strategy. Being at the heart of the Plan, it is important that they are kept up-to-date and address current needs in the County. Without replicating the results of previously conducted Annual Monitoring Reports, Chapter 4 discusses the principal three topics that warrant a full review of the Denbighshire LDP. Chapter 5 presents the results of the Sustainability Appraisal (Scoping Report July 2017) and Habitat Regulations Appraisal (Update July 2017), whilst Chapter 6 outlines the chosen approach to working jointly with adjacent local planning authorities.
- 1.5 The Council has produced an 'Information Paper' for every LDP theme. These papers contain detailed assessments of LDP Objectives and local policy pertinent the LDP theme. It was decided to provide more comprehensive information as individual appendices. The LDP themes are:
- Respecting Distinctiveness (RD)
  - Building Sustainable Communities (BSC)
  - Promoting a Sustainable Economy (PSE)
  - Valuing Our Environment (VOE), and
  - Achieving Sustainable Accessibility (ASA).

## 2. Background

### *Procedural requirements*

- 2.1 'The Town and Country Planning (Local Development Plan (Wales) (Amendment) Regulations 2015' set out the legal requirements for producing a Local Development Plan (LDP), including procedural steps. LDP reviews are specifically referred to in Regulation 41, which requires a LDP review all four years and enables a choice between a 'full review' and a 'selective review'. Notwithstanding the chosen approach, the production of an amended or replacement LDP must be preceded by an LDP Review report that details the reasons and evidence for proposing changes to individual Plan elements.
- 2.2 Welsh Government provided further guidance on how to follow the provisions of the Regulations in form of the LDP Manual. The document defines three principal triggers for reviewing an adopted LDP and the production of a report to document the process:
- (1) Significant contextual change (e.g. in national policy or legislation; in local context e.g. closure of a significant employment site that undermines the local economy; in development pressures or needs and investment strategies of major public and private investors).
  - (2) Significant concerns from the findings of the AMR in terms of policy effectiveness, progress rates, and any problems with implementation.
  - (3) S69 / Regulation 41 review requirement.
- [Source: Local Development Plan Manual (Edition 2, August 2015), paragraph 10.1.3]
- 2.3 Regulation 41 (as amended) stipulates that Local Planning Authorities (LPAs) must commence a review of its LDP every four years from the date of its initial adoption. The Denbighshire Local Development Plan 2006 – 2021 was adopted in June 2013 which means that the Council is obliged to start carrying out the review in 2017. Besides hitting the time trigger, the following chapters focus on significant contextual change and any concerns from the findings of the Annual Monitoring Report (AMR).
- 2.4 The principal aim of reviewing the LDP is to establish whether the local plan still complies with the three tests of soundness as described in Planning Policy Wales. In short: (1) Does the adopted Plan still complies with legislation, strategies or programmes pertinent to the area; (2) are all adopted Plan elements substantiated by up-to-date evidence; and (3) can the adopted Plan be delivered throughout the remaining lifetime?
- 2.5 Besides producing the LDP main document and LDP proposals maps, the Council carried out a number of assessments to evaluate the effect of local policies and site designations on matters such as, local infrastructure, the natural environment and Welsh culture. Chapter 6 will specifically refer to the screening exercises carried out with regard to Sustainability Appraisal (SA) with Strategic Environmental Assessment (SEA) and the Habitat Regulations Appraisal (HRA).

- 2.6 This document will not present detailed amendments, new approaches to local policy or updated LDP Proposals Maps. Public engagement aims to gain support for the Council's ambition to start the process of producing a replacement LDP.

*Primary legislation*

- 2.7 The Well-being of Future Generations (Wales) Act 2015 came into force on the 1st of April 2016. It requires public bodies such as Denbighshire County Council to consider not only the present needs of local communities but also how their decisions affect people in the future. The Council is principally challenged to work towards all seven wellbeing goals contained in the Act: (1) A globally responsible Wales; (2) A prosperous Wales; (3) A resilient Wales; (4) A healthier Wales; (5) A more equal Wales; (6) A Wales of cohesive communities; and (7) A Wales of vibrant culture and thriving Welsh language.
- 2.8 Reinforced by the provisions of the Planning (Wales) Act 2015, the Council has a statutory duty to implement the principles of sustainable development in every decision-making process. This is achieved by adhering to locally set 'well-being objectives' to meet the seven nationally defined well-being goals.
- 2.9 Denbighshire County Council has developed the 'Well-being Impact Assessment' toolkit to comply with the provision of the Well-being of Future Generations (Wales) Act 2015 and the Planning (Wales) Act 2015. It is designed to assist the decision-maker in evaluating a specific proposal in light of the well-being goals. Accordingly, all elements contained in the replacement LDP will be subject to a well-being impact assessment and, if required, subject to amendments in line with recommendations derived from the assessment.
- 2.10 Part 3 of the Planning (Wales) Act 2015 introduces a new hierarchy of development plans into the Welsh planning system: National Development Framework (NDF) – Strategic Development Plans (SDPs) – Local Development Plans (LDPs). It is argued that the introduction of a NDF and SDPs will allow planning for larger than local issues such as housing numbers, strategic housing allocations, strategic employment sites and supporting transport infrastructure which cut across a number of local planning authority areas. Whilst the Act does not outline specific areas to be covered by a SDP Welsh Government may direct local planning authorities to prepare such a document.
- 2.11 There are currently no plans to introduce a SDP for North Wales but there were initial discussions around the scope for the A55 trunk road to form the basis for a Strategic Development Plan for North Wales. If parts of the County were going to be covered by a SDP this would have significant implications for the function and content of the emerging replacement Denbighshire Local Development Plan.

### 3. LDP Vision and LDP Objectives

3.1 Being at the heart of the Denbighshire Local Development Plan 2006 – 2021 (LDP), the LDP Vision sets out an ambitious set of objectives that should have been realised at the end of the plan period in 2021:

3.2 ‘That Denbighshire, through sustainable development, will have a vibrant urban coast, with thriving market towns and rural areas. The housing and employment needs of the County will be met, the high quality environment protected and enhanced and a high quality of life maintained for all communities with full recognition that we have a strong Welsh language and culture that should be maintained and protected throughout the County.’

3.3 The LDP Vision is supported by a number of LDP Objectives and local policy to deliver and implement its key elements. Progress is closely monitored as part of the Annual Monitoring Report. Initial assessments have shown, see Chapter 5 key findings of previous Annual Monitoring Reports, that there is ample opportunity to improve previous performance, especially with regard to meeting the housing needs in the County. At this point in the Plan period it remains however open to judge whether the LDP Vision requires an amendment on the basis of poor local policy performance.

3.4 In line with other Council Corporate strategies, programmes and plans in place at the time, Denbighshire’s LDP Vision was originally drafted in 2006 and subsequently updated up to Adoption in 2013. In 2017, the Council will produce a new Corporate Plan for 2017 – 2022. Corporate priorities may be subject to change depending on political programmes, ambitions and the Council’s political composition. The Council will therefore have to assess whether the LDP Vision needs to be altered, amended, or whether it can be carried forward into the next LDP.

3.5 Whilst the principles of sustainable development have been incorporated into Welsh Government Well-being objectives, it may be necessary to re-consider the LDP Vision in light of the provisions made in the Well-being of Future Generations (Wales) Act 2015.

3.6 There are 16 LDP Objectives contained in the Plan, reflecting key elements of the LDP Vision and aiming to address key issues identified in the former Denbighshire Pre-Deposit Local Development Plan (2008). Since the key issues facing the County have not significantly changed there are no proposals to amend them at the moment. Should the LDP Vision require a revision than the LDP Objectives are likely to have to be modified, too.

3.7 This report is accompanied by five Information Papers, see Appendices A to E, which set out in detail how the LDP Vision and LDP Objectives are reflected in local policy. There may be an opportunity to change the wording of individual LDP Objectives without altering the general thrust of it.

#### 4. LDP Strategy

4.1 The overall growth and spatial strategy in the adopted LDP was informed by a number of studies and projections of population and household growth provided by Welsh Government. These included Denbighshire Population and Household Projections (Roger Tym & Partners 2005), Welsh Government Household Projections 2006 and 2008 based. The data sources outlined above informed the 500 dwellings per year that was agreed as the growth level in the Local Development Plan. The growth level in the Local Development Plan was still below the estimated annual requirement from the Welsh Government population projections but this took into account the environmental capacity of the County and the ability of the construction industry locally to build at any higher rate.

4.2 Population and household change is made up of natural change; the balance between births and deaths within the population and net migration based on the numbers of people moving in and out of the County. Population and household projections use data on past trends and then roll forward that trend to predict what could potentially happen in the future. It should be noted that these assume elements of population change remain the same and also take no account of any major policy changes that may influence population change.

4.3 Net migration into Denbighshire is the major component of population and household change in the County. The rate of net migration can fluctuate significantly over a relatively short period of time. A drop in migration rates is often seen during a period of poor economic growth. The global economic downturn has had a significant effect upon migration rates into Denbighshire.

4.4 The figures shown in table 1 illustrate that the projected annual population growth using the most recent 2015 based projections is significantly below the 2008 based figures that the current LDP was based on. This will have again a significant impact on the projected household growth and the dwelling requirement for the forthcoming replacement LDP.

4.5 Table 1 Projected annual population growth based on 2008 and 2015 WG projections

Projections	Denbighshire (rounded)
2008 – based 5 year migration trend	590
2015 – based 5 year migration trend	120
2015 – based 10 year migration trend	270
2015 – based 15 year migration trend	410

Source: Corporate Research and Information Unit, Conwy County Borough Council 2017

4.6 If population levels remained static there would still be an increase in the number of households in the County as new households are created by primarily young people leaving home or through family breakdown. Table 2 below shows the projected household growth in the County.

4.7 Table 2 Projected annual household growth based on 2008 and 2015 WG projections

Projections	Denbighshire (rounded)
2008 – based 5 year migration trend	500
2015 – based 5 year migration trend	100
2015 – based 10 year migration trend	150
2015 – based 15 year migration trend	220

Source: Corporate Research and Information Unit, Conwy County Borough Council 2017

4.8 The projected annual household growth going forward for the County ranges from a fifth to just under half that predicted for the adopted LDP. Table 3 transfers the annual household growth into a projected annual dwelling requirement for the forthcoming replacement LDP.

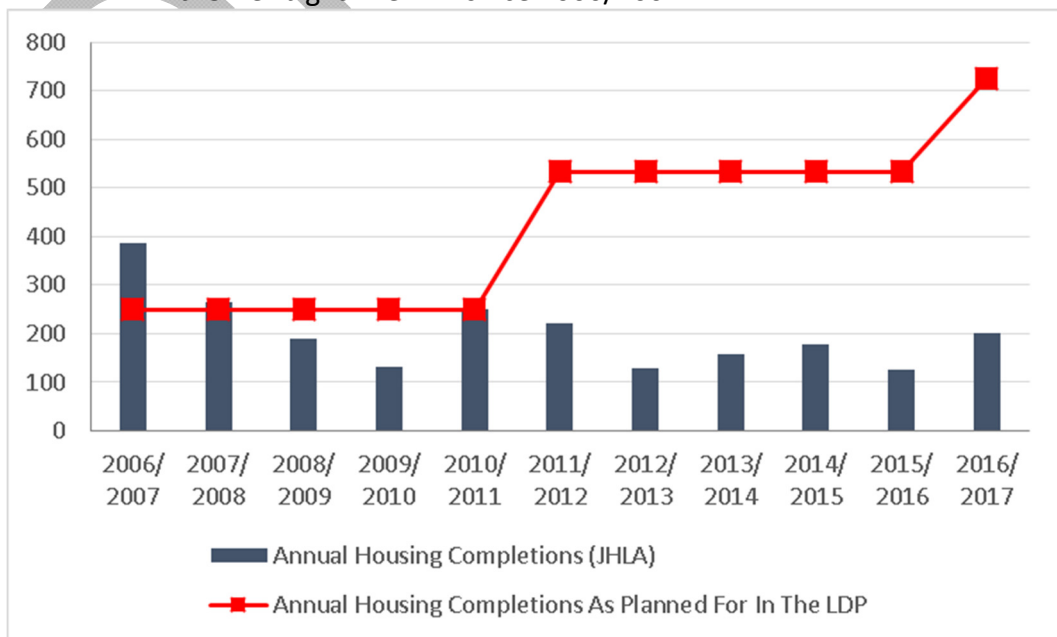
4.9 Table 3 Projected annual dwelling requirement based on 2008 and 2015 WG projections

Projections	Denbighshire (rounded)
2008 – based 5 year migration trend	530
2015 – based 5 year migration trend	100
2015 – based 10 year migration trend	160
2015 – based 15 year migration trend	230

Source: Corporate Research and Information Unit, Conwy County Borough Council 2017

4.10 The Denbighshire LDP was adopted in 2013; six years have passed since the start of the plan period. Figure 1 shows the annual housing completions in comparison with the growth levels set out in the LDP.

4.11 Figure 1 Annual housing completions compared with growth levels set out in the Denbighshire LDP since 2006/2007



Source: Denbighshire County Council (2017)



- 4.12 The housing completions dates have not reached the annual minimum requirement of 533 dwellings (727 dwellings for the period from 2016/2017 onwards) since the LDP was adopted in June 2013. Comprehensive discussions with landowners and potential developers have indicated that demand in the County for new housing is comparatively low, which is also reflected in the annual completions.
- 4.13 The LDP Growth Strategy will need to reflect the future need in light of the revised population and household projections. It is apparent that the annual growth levels is unrealistic and will not meet the initially projected growth over the remaining lifetime of the Plan.
- 4.14 Providing the objectively identified amount of affordable and market houses is a crucial part of implementing the LDP Growth Strategy but its performance must also have regard to the spatial distribution as determined by the settlement strategy and associated spatial strategy for Denbighshire.
- 4.15 The broad spatial distribution of additional houses was established at the Pre-Deposit stage with growth being mostly concentrated in the north of the County with more limited growth to meet local needs in all other areas.
- 4.16 The settlement strategy for the County is outlined in local policy BSC 1 – Growth Strategy for Denbighshire. There is a single Key Strategic Site selected in the County – Bodelwyddan. Lower growth areas have been identified at Rhyl, Prestatyn, St Asaph, Denbigh, Ruthin and Corwen. These are all established centres with a range of services to meet regional or local needs. Rhyl and Prestatyn are the main centres within the County but are heavily constrained by issues such as flood risk; topography; environmental designations and infrastructure capacity. These constraints have resulted in levels of growth for these areas being lower than those previously experienced.
- 4.17 There are 31 villages where appropriate sites for residential use, community facilities and recreational open space were allocated within identified development boundaries. These are also shown on the LDP Proposals Maps. In addition, 27 hamlets were also identified to allow for affordable housing growth to meet purely local needs in rural areas. Housing development in hamlets is limited to a quota set for each settlement, located within the areas of search defined on the Proposals Maps and tied to local needs.
- 4.18 Outside of villages and hamlets, other rural areas have been classified as open countryside where development opportunities will be controlled in line with national policy. A limited contribution to housing needs will be made through the conversion of redundant rural buildings and infill development.
- 4.19 The following two tables set out the number of dwellings that have been completed since the start of the Plan period in 2006 in accordance with their position in the settlement hierarchy (table 4) and spatial strategy (table 5).

4.20 Table 4 Housing completions in line with LDP settlement strategy

LDP Growth Strategy	Number of houses	Percentage
Key Strategic Site Bodelwyddan	0	0
Lower Growth Towns	1648	73
Villages	241	11
Hamlets	28	1
Open Countryside	326	15
<i>Total</i>	2243	100

Source: Denbighshire County Council (2017)

4.21 Table 4 indicates that the delivery of houses has been very much in line with the settlement hierarchy identified in the adopted LDP. More than 70% of new dwellings were completed in Lower Growth Towns. These are the most sustainable locations for new development as they offer a range of easily accessible services and facilities.

4.22 Table 5 Housing completions in line with LDP spatial strategy

Location	Number of houses	Percentage
North of the County	1220	54
Central area	728	33
South of the County	295	13
<i>Total</i>	2243	100

Source: Denbighshire County Council (2017)

4.23 Both tables indicate that housing completions are located in line with the spatial distribution and settlement hierarchy, as laid out in the LDP. The implementation of the LDP Growth Strategy primarily suffers from the significantly low number of new homes coming forward through the planning system.

4.24 The most up-to-date Welsh Government population and household growth projections will be the starting point for developing the forthcoming LDP Growth Strategy for County. Since previous WG population and household growth projections were grossly overestimated (they are just projections though), the Denbighshire Local Development Plan 2006 – 2021 completely failed to deliver the housing levels in the Plan Strategy.

*Affordable housing*

4.25 Technical Advice Note 2 – Planning and Affordable Housing 2006 requires local authorities to include an affordable housing target in their development plans and indicate how this target will be achieved using identified policy approaches. Local Housing Market Assessments provide the evidence base for policies to deliver both market and affordable housing.

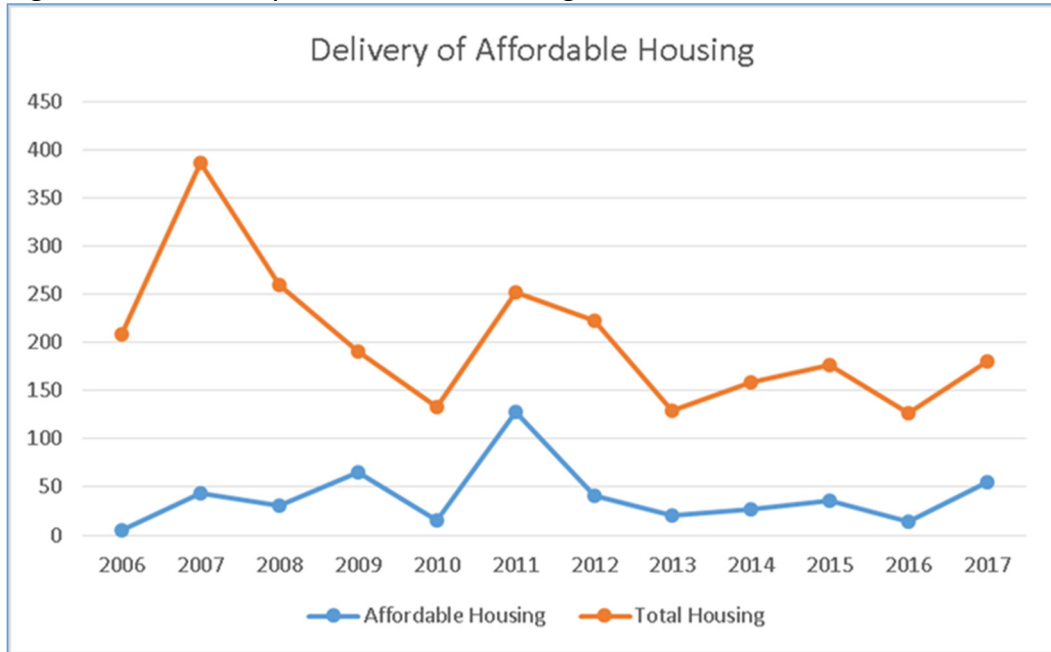
4.26 There is an identified need for affordable housing across the County, the Denbighshire Local Housing Market Assessment will be updated in 2018 to inform

the target for delivery in the replacement LDP. Policy BSC 4 'Affordable Housing' set out the target of 2,250 – 3,000 affordable homes being delivered across the plan period 2006 – 2021. 10% affordable housing is currently sought on all development sites of 3 or more units either by on-site provision on sites of more than 10 units or via a financial contribution on sites of 3-9 units. The policy allows for an increase in the percentage of affordable housing sought should house sales prices rise 10% above the 2009 base prices. This level of contribution sought was set following the results of the Affordable Housing Viability Study (District Valuers Office 2009). This study will be updated to inform the level of contributions that can be sought in the replacement LDP.

- 4.27 Rural Exceptions Sites – local policy BSC 8 outlines that all settlements which have development boundaries can make use of the 'rural exceptions' policy to provide 100% affordable housing. The policy was made more flexible by enabling 'Exceptions' sites to come forward where there are sites within the boundary that are undeveloped provided it could be established that these sites were unlikely to come forward. No rural exceptions sites have come forward over the plan period to date and the replacement LDP should consider whether this policy is still required.
- 4.28 Hamlets Policy – local policy BSC 6 apportioned a level of growth to each of the identified settlements and stated that all housing developments would need to be affordable to meet local needs. Given the scattered nature of many of the County's hamlets, this policy identified an Area of Search in and around the existing settlement where development would be allowed. By tying housing to local need this policy sought to ensure that the needs of local people were given priority and that rural housing made a contribution to affordable housing. A total of 3 affordable housing units have been delivered through this policy since adoption in 2013. Given the limited number of new homes that this policy has delivered and the problems experienced by applicants in securing finance for developing homes tied to local connections affordable housing this policy should be reviewed for the replacement LDP.
- 4.29 Infill Policy – local policy BSC 9 expanded on National Policy that allows for the development of very limited new housing within existing small groups and clusters. In order to ensure that local people can continue to live in rural areas all infill developments were to be restricted to affordable housing to meet local needs. Similar to the Hamlets policy above this policy has delivered very few new houses and should be reviewed for the replacement LDP.
- 4.30 Figure 2 shows the delivery of affordable housing in relation to the total numbers of new dwellings delivered via the planning system. A total of 481 affordable housing units have been delivered since 2006 through the planning system which is below the target of 2,250 in policy BSC 4. It must stressed however that as the total number of overall housing completions is well below the 500 per annum required in the current LDP, the percentage of affordable housing delivered is 21%. This is twice the 10% required by policy BSC 4. It should be noted that the Council

also delivers affordable housing through mechanisms other than the Local Development Plan. These include use of Social Housing Grant, work on bringing empty homes back into use and work with housing partners such as registered social landlords. A total of 691 affordable housing units have been delivered in Denbighshire since 2006.

4.31 Figure 2 Delivery of Affordable Housing



Source: Denbighshire County Council (2017)

### Employment land

4.31 The evidence base for the emerging Local Development Plan concluded that an employment land supply of about 50 ha was required up to 2021. This figure was arrived at on the basis of amalgamating three employment projection models, set out in the study undertaken by the University of Bangor in 2007. The study concluded that in terms of any forward planning contingency Denbighshire should be planning on the basis of around 3 ha per annum – which is about 45 ha over the plan period (rounded up to 50 ha for the LDP).

4.32 Table 6 New employment land allocations in Lower Growth Towns

Settlement	Employment Allocation	Hectares	Comments
Bodelwyddan	Key Strategic Site	26	Outline planning application (incl. Section 106) approved in March 2016
Rhyl	--	0	Demand for employment land is satisfied by using vacant or underused premises on existing sites
Prestatyn	--	0	

St Asaph	St Asaph Business Park	14	Demand for office accommodation is addressed by using existing facilities
Denbigh	Colomendy North	8	No progress; site has been allocated for employment use since 2002; consider de-allocating site
Ruthin	Lon Parcŵr	5.5	Demand for employment land is satisfied by using vacant or underused premises on existing sites
Corwen	Ty'n Llidiart	6	Land has been taken up for economic development in June 2017

Source: Denbighshire Local Development Plan 2006 – 2021, p 42

- 4.33 In line with the Local Development Plan Spatial Strategy the majority of new employment land was located within the Key Strategic Site identified under local policy BSC 5 at Bodelwyddan, and at the St Asaph Business Park. New employment land allocations have additionally been identified in the lower growth towns as shown on the LDP proposals maps. The aim was to provide a variety of sites in different locations. Besides new land allocations, the local plan emphasises the protection of existing employment premises for potential future re-use.
- 4.34 The Council carries out annual reviews of the employment land in the County. This exercise focusses on the availability of employment land, land take up and completion rates. All information relates to land allocations that are shown on the LDP Proposals Maps. Land take up has principally been low in the last five years, with the exception of 2014, due to a number of vacant offices and industrial units available in Denbighshire. The County's existing stock can still satisfy demand from businesses without translating demand into new land requirements.
- 4.35 Employment land delivery crucially depends on the viability of the proposed development and the potential value of land for alternative uses. The Council was challenged to release individual sites for alternative uses such as, retail and residential use. Approximately 2.1 ha of employment land was lost to residential use at Warren Drive in Prestatyn and approximately 2.75ha of employment land was lost to a mixed-use scheme at Ffordd Derwen in Rhyl. Whilst local policy BSC 2 does not prevent a change of use on brownfield land, retail uses have been established in Rhuddlan and Prestatyn on land that was previously in traditional employment use.
- 4.36 The Council is going to carry out a substantial review of allocated employment land in the County, i.e. land currently shown as 'PSE 2' on the LDP Proposals Maps. It is

going to stress viability, site infrastructure and potential constraints such as flood risk. This information will inform the review of both PSE 2 and PSE 3, which addresses the protection of employment premises.

## 5. **Key findings of previous Annual Monitoring Reports**

- 5.1 Under the obligations of section 76 of the Planning and Compulsory Purchase Act 2004, as amended, and section 37 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, the Council is duty bound to produce an Annual Monitoring Report (AMR) for submission to Welsh Government (WG) by 31st October each year.
- 5.2 The Council has submitted two AMRs to Welsh Government since LDP adoption in June 2013. Both of them identified three principal areas of concern with regard to local policy performance that the Council has to focus on when drafting new local policies. There will be a third monitoring report before the LDP Review is submitted to Welsh Government but it is anticipated that it may emphasise the same matters. If this report highlights additional areas of concern or significant improvements these will be reflected in the finalised LDP Review report.
- 5.3 Chapter 7 of the LDP contains the monitoring framework that has been used to assess the impact of local policies and whether sustainable development is delivered as originally set out. Having already produced two AMRs it became apparent that there is not only the need to change individual local policies but also to amend the relevant monitoring framework. It contains, for example, the national policy target of 'Amount of residential development meeting the Code for Sustainable Homes Level 3 and obtaining 6 credits under Ene 1 – Dwelling Emissions Rate' that has not been covered by planning policy since the publication of PPW Edition 7 (year). Since local plan implementation and local policy performance may depend on actions by third parties, there are reasons beyond the LPA's control that explain why local policies do not perform as expected at the time of Adoption.
- 5.4 The previous two Annual Monitoring Reports highlighted the following three topics and linked local policies for future consideration and potential amendment:
- (1) LDP Growth Strategy – significant low number of dwellings delivered and the '5-year housing land supply' requirement;
  - (2) Gypsy & Traveller Sites – addressing need as identified in the Gypsy & Traveller Accommodation Assessment (January 2017); and
  - (3) Waste Management & Minerals – new requirements derived from legislative requirements.

### *Technical Advice Note 1: 5-year housing land supply*

- 5.5 Planning Policy Wales (November 2016), paragraph 9.2.3, stresses the need for a local planning authority to demonstrate that a 5-year housing land supply is genuinely available in the County. The Denbighshire Joint Housing Land Availability

(JHLA) 2017 indicates a supply of 1.79 years which is a lower figure than the 5 years stipulated by PPW. Technical Advice Note (TAN) 1 ‘Joint Housing Land Availability Studies’, paragraphs 2.4 and 3.4, advises local planning authorities to consider a Plan review should the supply figure not be met.

5.6 Since the Council could not present sufficient available land for residential development in line with the TAN 1 requirement over the last five years (see table 7), it actually fell significantly short of 5 years, and this matter is a principal reason for pursuing a review of the LDP.

5.7 Table 7 DCC 5-year housing land supply (2013 – 2017)

Year	2013	2014	2015	2016	2017
5-year housing land supply (TAN 1 residual method)	3.49	1.80	2.10	2.02	1.79

Source: Denbighshire County Council (2017)

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

*Gypsy & Traveller Site*

5.9 A comprehensive understanding of Gypsy and Traveller accommodation needs and issues is essential to make properly planned provision and avoid the problems associated with ad hoc or unauthorised encampments. An accommodation assessment and strategy to meet the need which, if identified, will greatly strengthen the ability of local authorities to respond swiftly and firmly to inappropriate unauthorised developments and encampments and help to avoid future unauthorised camping and development.

5.10 The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became a statutory requirement under the Housing (Wales) Act 2014.

5.11 The Denbighshire 2016 Gypsy and Traveller Accommodation Assessment (GTAA) Report was approved by Welsh Government in March 2017, and concluded that there is a need for a residential site and transit site or stopping place in the north of the County and under the provisions of the Housing (Wales) Act, the Council is required to address this need.

5.12 This matter is considered to be a regional issue given the movement of Gypsies and Travellers along principal roads in North Wales and the limited amount of

finance provided by Welsh Government. New national guidance on Gypsy and Traveller – Site Capital Grant specifies that local authorities are ‘encouraged to consider a regional approach in relation to the development of new Gypsy and Traveller transit sites’.

- 5.13 Having received approval from Welsh Government on the Gypsy and Traveller accommodation needs assessment, the Council is working towards addressing the identified needs through site provision.
- 5.14 Local policy BSC 10 ‘Gypsy & Traveller Site’ monitoring has therefore taken into consideration the legal changes and the production of an updated GTAA that has rendered superfluous the original indicator and trigger level as defined in the Denbighshire LDP. Therefore, policy review and relevant monitoring mechanisms have to be identified and implemented in the revised LDP.

#### *Waste Management & Minerals*

- 5.15 The Local Development Plan was produced in the context of the National Waste Strategy (2010) Towards Zero Waste (TZW) and the North Wales Regional Waste Plan 1st Review. The National Waste Strategy remains of relevance, however, the Regional Waste Plans have since been withdrawn and are now longer of relevance. Following adoption of the TZW the Welsh Government published a suite of Sector Plans to assist in the delivery of the Waste Strategy, and which form part of the overall waste strategy for Wales, including the Collections, Infrastructure and Markets Sector Plan (2012) which advises on waste management infrastructure requirements.
- 5.16 To reflect the changes to National Waste Strategy, the Welsh Government revised Planning Policy Wales and Technical Advice Note 21: Waste in 2014. The Regional Waste Plans were effectively withdrawn and, apart from the Areas of Search Maps are no longer of relevance to Local Development Plans. Whilst the general policy direction has not changed, policies VOE 7 and VOE 8 will need to be changed to reflect the changes to national policy and guidance, particularly to avoid overprovision of certain facility types and to ensure that the LDP can deliver development which moves the management of waste up the waste hierarchy.
- 5.17 Significant changes are occurring at the European level through the Circular Economy Package which includes revised legislative proposals on waste. Whilst the measures are still emerging, the circular economy is recognised by Welsh Government as being of particular importance in helping deliver the long term aspirations of the National Waste Strategy through their support of the Circular Economy Capital Investment Fund. The publication of the Well Being and Future Generations (Wales) Act 2015 and Environment (Wales) Act 2016 both set the legislative background for sustainable development, which a circular economy can help deliver.



- 5.18 Construction Excellence Wales have published the 'Circular Economy: Opportunities for the Welsh Built Environment' which identifies how the construction sector can minimise the use of resources whilst maximising the benefit of resources which are used. Whilst not specifically referring to the Circular Economy, Planning Policy Wales (paragraph 12.6.3) requires development plans to seek to secure opportunities to reduce or recycle waste as part of the design, construction and operation of new buildings, with further advice provided in Technical Advice Notes 12 and 21.
- 5.19 The Local Development Plan has a potentially significant role to play in facilitating a move towards a circular economy, with Policy RD1 containing a suite of criteria which would apply to all development, including the requirement that proposals 'have regard to the generation, treatment and disposal of waste' (criteria (xiv)). The wording is not considered sufficient to ensure that applicants seek to design out waste and manage wastes which do arise in a sustainable way. A review of recent planning applications indicates that this criteria is given little more than a cursory consideration by applicants. Local policy RD1 will need to be reviewed to address this matter.
- 5.20 Policy VOE 7 includes allocations on the basis of the land takes identified within the Regional Waste Plan 1st Review which are no longer of relevance and doesn't provide sufficient criteria against which proposals for waste management within development boundaries can be assessed. Whilst national policy should not be repeated, it would be helpful to identify criteria which show how matters such as need, the waste hierarchy and amenity impacts will be dealt with. Policy VOE 8 recognises that not all waste development can be located within allocated and existing industrial estates. However, the policy wording is overly restrictive and relies on the Regional Waste Plan to identify need, which is no longer relevant. The Annual Monitoring identified that significant progress has been made across the region with respect to the provision of food waste treatment capacity and residual waste treatment capacity, so whilst the policies need to be revised, significant progress has been made to date with respect to meeting the policy targets.
- 5.21 National planning policy has not markedly changed with respect to minerals to date, with the exception of Minerals Planning Policy Wales being incorporated into PPW, however, there were no actual policy changes as a result. Since the adoption of the LDP the UK Government has indicated the phasing out of coal fired power stations by 2025. This will have a significant impact on the demand for indigenous coal. Whilst this is of limited significance to the LDP due to the limited distribution of shallow coal within the County, it is understood that a review of mineral planning policy is imminent to address this with changes likely to be focussed on coal, oil, gas and land safeguarding.
- 5.22 The Local Development Plan was produced using the Regional Technical Statement (2009) as part of the evidence base which has now been updated by the Regional Technical Statement (2014). The RTS 1st Review identifies a need for 0.1 million tonnes per year land-won sand and gravel over the plan period and for 7 years

thereafter and a need for 0.89 million tonnes per year crushed rock. This translates to a requirement to allocate 2.2 million tonnes of sand and gravel and 0.18 million tonnes of crushed rock up until the year 2036. This is compared to a requirement to identify 1 million tonnes of sand and gravel as required by the 2009 Regional Technical Statement. Chapter 14 of Planning Policy Wales sets out approaches which should be taken to make clear where mineral extraction should or is most likely to take place. Policy PSE17: Future Mineral Extraction, identified 'Preferred Areas' within which applications for the extraction of up to 1 million tonnes of sand and gravel would be supported. The annual monitoring includes a trigger of 'No extraction permitted by 2017'. No planning permissions for mineral extraction have been permitted to date and no pre-application discussions have taken place. This matter will need to be addressed through the review of the LDP, as will the need for additional crushed rock.

- 5.23 Annual monitoring indicates that both the safeguarding policy, Policy PSE 15 and the buffer zone policy, Policy 16 are being effective. It will be important to keep this matter under review in light of any future changes to national policy. Furthermore, the implications of additional allocations required as part of the LDP Review will need consideration against these policies.

## 6. **Sustainability Appraisal and Habitat Regulations Appraisal**

### *Introduction*

- 6.1 The Local Development Plan is a statutory land use plan that has to be subject to a Sustainability Appraisal (SA), including Strategic Environmental Assessment (SEA) and a Habitat Regulations Appraisal (HRA). The Council incorporated both assessments into a single document, i.e. 'The Sustainability Appraisal Report', when producing its first LDP in 2009. This report detailed the social, economic and environmental objectives by which development proposals were assessed and what opportunities for improving plan performance were identified at that point in time.
- 6.2 Whilst the overall sustainability of the Denbighshire LDP is regularly monitored as part of the LDP, this section looks at the greater framework of SA/SEA screening to identify any changes in the criteria that were used to assess individual LDP elements in the first place.
- 6.3 Whilst not applicable in 2013, the replacement LDP will have to comply with the requirements provided by the Well-being of Future Generations (Wales) Act 2015. This may have an effect on how future SA/SEA assessments are conducted in support of the Plan. Further information will be made available as the revised Plan progresses towards adoption.

## **Sustainability Appraisal (Scoping Report July 2017)**

- 6.4 The Sustainability Appraisal incorporates the Strategic Environmental Assessment in Wales. Its purpose is to appraise the impacts of emerging plans against a number of thematic objectives, responsible for the environmental, economic and social effects of development. Annex 1 of the SEA Directive classifies areas which sustainability appraisals should pay regard to in order to meet the requirements of the Directive.
- 6.5 The scoping report has been drafted to meet the stages outlined in the ODPM guidance. Each of the Strategic Environmental Assessment topic areas will be addressed in a separate section, which introduces the legislative framework and the local context related to that topic. Any notable sustainability issues that arise in each section will be noted, and indicators will be defined which will assist in testing proposals in the Local Development Plan to understand likely impacts.
- 6.6 Following the receipt of consultee comments, Denbighshire will continue with the preparation of the replacement LDP. The SA / SEA will assess the revision options and make recommendations about how the sustainability performance of the plan could be enhanced. The output from the process will be an initial Sustainability Appraisal Report that will be consulted upon alongside the draft replacement plan at Pre-Deposit LDP stage.

### *Habitat Regulations Assessment (Update July 2017)*

- 6.7 The purpose of the Habitat Regulations Assessment (HRA) screening exercise was to re-visit previously conducted HRAs with regard to the Denbighshire Local Development Plan 2006 -2021 (LDP); identify changes to individual European sites; and look at the effectiveness of previously suggested avoidance, cancellation or mitigation measures. It was not aimed at compliance with HRA methodology and legislative requirements but at setting the framework for future work.
- 6.8 None of the local policies and planning proposals contained in the LDP have caused significant effects on any European site since Plan adoption. Proposed measures to offset their occurrence are (where necessary) operational and effective. Nevertheless, further investigations must be carried out to explore opportunities to improve the air quality in the south of the County; especially the reduction of nitrogen depositions.
- 6.9 It was concluded that forthcoming HRAs will additionally have to have regard to the proposed extension of the 'Bae Lerpwl / Liverpool Bay' SPA and new information on 'Coedwigoedd Dyffryn Alun / Alyn Valley Woods' SAC. These changes may have an effect on local policy and the potential forms of land use.

## 7. **Joint-working with adjacent local planning authorities**

- 7.1 The Planning (Wales) Act 2015, Part 3 - section 14, provides Welsh Ministers with the power to direct two or more local planning authorities to produce a joint Local Development Plan for their area. Whilst Welsh Ministers have not made use of the provision yet, Welsh Government clearly set out the drive for joint Plans in Chapter 2.5 of the 'Local Development Plan Manual (Edition 2, August 2015)' and the White Paper on 'Reforming Local Government: Resilient and Renewed (January 2017)'.
- 7.2 Being aware of Welsh Government's stance, Denbighshire explored a number of potential options for a joint Local Development Plan with adjacent LPAs. The starting point was looking at the individual stages of Plan-preparation that our neighbours are at in June 2017: Wrexham CBC – consultation on Deposit LDP expected in Autumn 2017; Flintshire CC – pre-Pre Deposit stage; Powys CC – LDP Examination; Snowdonia NP – LDP Review submitted to WG with agreed 'selective review'; and Conwy CBC – production of LDP Review report.
- 7.3 Conwy CBC is the only local planning authority that would offer the potential for preparing a joint Local Development Plan; without causing significant delay to the Delivery Agreements made between the other local authorities and Welsh Government. Both strategic planning teams have developed a comprehensive work-relationship that includes the production of topic-based studies, data gathering, and assessments for their respective LDP evidence base. This is will continue in the future.
- 7.4 It must however be kept in mind that both local planning authorities are also independent, self-governing bodies. Both Councils have their own adopted Corporate / Strategic Plans and programmes to address County-specific opportunities, challenges and areas of improvements. Since Local Development Plans have to be prepared in line with those County-specific documents, see 'tests of soundness', the emerging Plan is unlikely to be succinct, concise, well-integrated and user-friendly with the need to refer throughout the document to two different sets of Councils' strategies and political objectives.

## 8. **Summary**

- 8.1 The purpose of the LDP Review report is to document the efforts undertaken by the Council to assess the performance and relevance of the adopted Plan. It looked at changes in primary legislation and national policy before examining the relevance of the LDP Growth Strategy. Having delivered a significantly lower number of dwellings since 2006, this had an adverse effect on the delivery of affordable housing and the Technical Advice Note 1 requirement of a 5-year housing land supply.
- 8.2 The Well-being of Future Generations (Wales) Act 2015 and the Planning (Wales) Act 2015 are two sources of primary legislation that have come into force within the last two years. Whilst Welsh Government is in the process of producing

secondary legislation, it remains unknown to the Council how these future provisions are going to effect the new Plan. This includes the production of a National Development Framework and the possibility of a Strategic Development Plan. Having explored in detail various options of preparing a replacement LDP with adjacent local planning authorities it is concluded that there are opportunities to build-up a joint-evidence base but not creating a joint-plan.

- 8.3 The Council is going to fully review the adopted Denbighshire County Council Local Development Plan 2006 – 2021 on the basis of information provided in this LDP Review report and accompanying LDP Information Papers; to develop a replacement LDP.

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## Appendix I - LDP Residential Land Allocations

1.1 Table 1 presents an overview on progress in delivering LDP residential land allocations as set out in the policy justification of local policy BSC 1 and local policy BSC 6.

1.2 Table 1 BSC 1 residential land allocations, BSC 6 – areas of search

Site	Indicative housing numbers*	Planning Status
<b>Rhyl</b>		
Land off Trelwelyn Road/Bro Deg	100	Site allocation only
Corner of Sydenham Avenue and West Parade	12	Site allocation only
Northgate School	22	Planning permission granted for 22 dwellings
Russel Road	15	Site allocation only, Planning permission has expired
Land at Westbourne Avenue	16	Planning permission granted for 16 dwellings
Ocean Plaza	230	Site benefits from planning permission for retail, restaurant, and leisure uses
Rhyl South East	242	Planning permission granted for 242 dwellings, site is under construction
Victoria Road	13	Site allocation only
Former Nursery, Rhuddlan Road	15	Site completed
85-90 West Parade	20	Site allocation only
Brookdale Road	18	Planning permission granted for 18, site is under construction
Grange Hotel	20	Planning permission granted for 44 units
<b>Prestatyn</b>		
Midnant Farmstead (Prestatyn)	65	Site allocation only
Rear of Maes Meurig (Meliden)	30	Site allocation only
Rear of Ffordd Hendre/ Mindale Farm(Meliden)	154	Planning permission refused for 133 dwellings, Appeal with Planning Inspectorate
Plas Dive Caravan Park (Meliden)	30	Site allocation only
Cefn y Gwrych (Meliden)	18	Planning permission granted for 18 dwellings, site is under construction

Tip Lane	21	Site completed – 21 dwellings
<b>St Asaph</b>		
Land at HM Stanley Hospital	75	Planning permission granted for 158 units, including conversions within the historic building, site is under construction
Additional land at HM Stanley	201	Site allocation only
Land off The Paddock	16	Site allocation only
Land off Bryn Gobaith	39	Planning permission granted by appeal for 14 units
Bishop's Walk	10	Site completed
Bronwylfa Nurseries	9	Planning permission granted for 15 dwellings, site is under construction
St Winfred's School	21	Site completed
<b>Denbigh</b>		
Land at Lodge Farm	25	Site allocation only
Land adj Ysgol Heulfre	99	Site allocation only
Land between old and new Ruthin Road	73	Planning permission under consideration by the Council
Land off Eglwys Wen	101	Planning permission refused for 75 dwellings, Council awaits outcome of public enquiry in Autumn 2017
Bryn Stanley	25	Site allocation only
Autoworld Garage, Smithfield Road	6	Site completed
Smithfield Garage	12	Site currently used as car wash facility
<b>Ruthin</b>		
Glasdir Phase 2	167	Site allocation only
Land adj Maes Hafod and Llys Famau	69	Site allocation only
Glasdir Phase 1	118	There has been no progress on site since flooding events in 2012
<b>Corwen</b>		
Council depot [Clawdd Poncen]	128	Site allocation only
Land adj Ysgol Caer Drewyn	89	Site allocation only
<b>Llangollen</b>		
Land at Wern Road	4	Site allocation only
Land adj Trem y Gwernant	14	Site allocation only
Vicarage Road	47	Planning permission granted for 95 dwellings
Rear of Castle View and The Hollies	41	
Old Berwyn Works	24	Site completed

<b>Rhuddlan</b>		
Land adj Hafod y Gan and Ysgol Tir Morfa	121	Outline planning permission granted for 89 dwellings
Maes y Castell	21	Site completed
Land off Rhyl Road	10	Site completed
<b>VILLAGES</b>		
Bodfari – Car Park Dinorben Arms	14	Site allocation only, ‘Dinorben Arms’ PH reopened
Bodfari – Land rear of Bryn Orme	15	Site allocation only
Bodfari – Ffynnon y Charwel	2	Site completed
Bodfari – Land next to 16 Maes y Graig	8	Site allocation
Bryneglwys – Trem y Foel	12	Outline planning permission granted without specifying dwelling numbers
Bryneglwys – Land rear of Bryn Arwel	10	Site allocation only
Carrog – Land adj Cemetary	12	Site allocation only
Carrog – Land adj Maes Sidan	15	Site allocation only
Clawddnewydd – Land adj Crued yr Arwel	10	Site allocation only
Clawddnewydd – Land rear of Paradvys	10	Planning permission granted for 2 dwellings
Clocaenog – Nant y Celyn	8	Site allocation only
Cyffylliog – Land to the rear of Llys Heulog	5	Site allocation only
Cynwyd – Maes Glyndwr	16	Development completed
Cynwyd – Land adj Bryn Gwynt	15	Site allocation only
Dyserth – Land adj Glan Ffyddion Estate	99	Site allocation only
Eryrys – Gwalia House	17	Outline planning permission granted without specifying dwelling numbers
Eryrys – Canol y Cae	10	Site allocation only
Gellifor – Land at Peniarth	10	Site allocation only
Glyndyfrdwy – Land rear of New Inn Terrace	30	Site allocation only
Graigfechan – Land south of Tan y Graig	10	Outline permission granted with indicative number of 9 dwellings
Gwyddelwern – Bryn Llan	12	Site allocation only
Gwyddelwern – Land rear of Beuno Terrace	12	Site allocation only



Gwyddelwern – Land south of local school	24	Site under construction
Henllan – former Henllan Centre	30	Planning permission granted for 37 units, site is under construction
Henllan – Ty Coch	15	Planning permission granted for 15 dwellings
Llanarmon yn Ial – Land south of Cam yr Alyn	12	Outline permission granted with indicative number of 12 dwellings
Llanarmon yn Ial – Land rear of Maes Garmon Estate	34	Site allocation only
Llanbedr Dyffryn Clwyd – Land adj Troed y Fenlli	10	Site allocation only
Llanbedr Dyffryn Clwyd – Land rear of Llwyn Derw	10	Site allocation only
Llanbedr Dyffryn Clwyd – Land between The Rectory and Brakendene	3	Site allocation only
Llanbedr Dyffryn Clwyd – Land to the northwest of Maes Derwen	18	Site allocation only
Llanbedr Dyffryn Clwyd – Land adj to the Old Rectory	29	Site allocation only
Llandrillo – Land rear of Bodowen	20	Outline permission granted with indicative number of 10 dwellings
Llandyrnog – Land adj Maes Llan	25	Outline permission granted with indicative number of 40 dwellings
Llanfair Dyffryn Clwyd – Vicarage Field	25	Site allocation only
Llanfair Dyffryn Clwyd – Land rear of Bryn y Clwyd	20	Planning permission granted for 63 dwellings
Llanfair Dyffryn Clwyd – Land to the rear of Crossroads and Bron y Clwyd	39	
Llanferres – Rectory Lane	4	Site completed
Llanferres – Land rear of Bod Eryl	10	Site allocation only
Pentre Llanrhaeadr – Land rear of Maeshwylfa	10	Planning permission granted for 15 dwellings
Pentre Llanrhaeadr – Land rear of Dolwar	15	Site allocation only
Pentre Llanrhaeadr – Land adj to Dolwar	8	Site allocation only

Pŵllglas – Land south of A494	15	Site allocation only
Pŵllglas – Land at Minffordd	20	Site allocation only
Rhewl (nr Ruthin) – Hafod Ynys	20	Planning permission granted for 10 dwellings
Rhewl (nr Ruthin) – Land rear of Rhyd y Bull	20	Planning permission granted for 20 dwellings, site is under construction
Rhuallt – Land rear of Dyffryn Teg	13	Site allocation only
Rhuallt – Land west of Dyffryn Teg	12	Site allocation only
Rhuallt – Land south of Dyffryn Teg	19	Site allocation only
Trefnant – Land adj Maes Gruffydd	15	Site allocation only
Trefnant – Land rear of Maes yr Erwain	25	Site allocation only
Trefnant – Bryn Glas Hotel	16	Planning permission expired
Tremeirchion – Land rear of Llys y Twysog	10	Site allocation only
<b>HAMLETS*</b>		
Abbey Terrace (Llangollen)	3	3 units permitted in area of search
Aberwheeler	4	nil permitted in area of search
Bontuchel	2	nil permitted in area of search
Cefn Mairwen	3	nil permitted in area of search
Cwm	2	nil permitted in area of search
Derwen	5	5 units permitted in area of search
Graianrhyd	3	2 units permitted in area of search
Groesffordd Marli (incl. Cae Onnen)	4	nil permitted in area of search
Hendrerwydd	2	nil permitted in area of search
Hirwaen	2	2 units permitted in area of search
Llanelidan	4	nil permitted in area of search
Llangynhafal	2	1 units permitted in area of search
Llanrhaeadr yng Nghinmeirch	6	nil permitted in area of search
Llanrhydd	1	nil permitted in area of search
Llanynys	4	nil permitted in area of search
Loggerheads	1	nil permitted in area of search
Maeshafn	2	3 units permitted in area of search
Marian Cwm	2	nil permitted in area of search
Melin-y-Wig	4	nil permitted in area of search
Pant Pastynog	1	nil permitted in area of search
Peniel	1	nil permitted in area of search
Pentre Saron	1	nil permitted in area of search

Pentrecelyn	2	3 units permitted in area of search
Pentredwr	12	4 units permitted in area of search
Prion	3	nil permitted in area of search
Tafarn y Gelyn	3	2 units permitted in area of search
Y Green (Dinbych)	13	3 units permitted in area of search

\* - figures include conversions, replacements, etc

Source: Denbighshire County Council (2017)

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## Appendix II - Summary of LDP local policy performance

1.1 The purpose of the following table is to outline reasons for potentially proposing changes to individual local policies on the basis of policy performance in the Annual Monitoring Report and Officers' experience in Development Management. These changes are only indicative. Further amendments could be made on the basis of newly-emerging evidence. Information is also provided on the likelihood of conducting additional research to update the evidence base.

1.2 The following table 1 contains three principal 'Review Codes' to classify the anticipated changes:

- 1 - Significant concerns from findings of the AMR in terms of local policy effectiveness;
- 2 - Changes in legislation, policy, or TANs require amendments to achieve (local policy) compliance; and
- 3 - Contextual change, experience from applying local policy.

1.3 Table 1 Local policy performance

Local Policy	Comment	Review Code
<i>LDP theme: Respecting Distinctiveness</i>		
Policy RD1 – Sustainable development and good standard design	Consider extending policy application on planning proposals outside development boundaries; minor re-wording	3
Policy RD2 – Green Barriers	Council is in the process of reviewing Green Barriers	3
Policy RD3 – Extensions and alterations to existing dwellings	Local policy functions effectively in line with adopted SPG on 'Residential Development'	n/a
Policy RD4 – Replacement of existing dwellings	Minor amendments are likely, depending on new evidence	3
Policy RD5 – The Welsh language and the social and cultural fabric of communities	Clarification is required on the need for submitting Community Linguistic Statements on sites allocated in the LDP	2
<i>LDP theme: Building Sustainable Communities</i>		
Policy BSC1 – Growth Strategy for Denbighshire	See LDP Review report (section 4)	1
Policy BSC2 – Brownfield development priority	Re-consider the need for local policy, duplication of national policy?	3
Policy BSC3 – Securing infrastructure contributions from Development	Minor amendment to include reference to SPG on Planning Obligations	3

Policy BSC4 – Affordable Housing	See LDP Review report (section 4.25); test viability of 10% affordable housing contributions	1
Policy BSC5 – Key Strategic Site Bodelwyddan	Outline planning application has been approved in 2016	n/a
Policy BSC6 – Local connections affordable housing in hamlets	See LDP Review report (section 4.25);	1
Policy BSC7 – Houses in multiple occupation and self-contained flats	Consider local policy in light of new Use Class for HMOs	2
Policy BSC8 – Rural exception sites	See LDP Review report (section 4.25)	1
Policy BSC9 – Local connections affordable housing within small groups or clusters	See LDP Review report (section 4.25)	1
Policy BSC10 – Gypsy and traveller sites	See LDP Review report (section 5.9)	1
Policy BSC11 – Recreation and open space	Council is in the process of conducting an open space assessment which will inform a new local policy	3
Policy BSC12 – Community facilities	Minor amendments could be required	3
<i>LDP theme: Promoting a Sustainable Economy</i>		
Policy PSE1 – North Wales Coast Strategic Regeneration Area	See LDP Information Paper (July 2017), section 3.2	3
Policy PSE2 – Land for employment uses	Re-consider individual policy criteria	3
Policy PSE3 – Protection of employment land and buildings	Re-consider individual policy criteria	3
Policy PSE4 – Re-use and adaptation of rural buildings in open countryside	Re-consider individual policy criteria	3
Policy PSE5 – Rural economy	Re-consider individual policy criteria	3
Policy PSE6 – Retail economy	Local policy likely to be amended in light of updated evidence	3
Policy PSE7 – Proposals for new retail development	Local policy likely to be amended in light of updated evidence	3

Policy PSE8 – Development within town centres	Local policy likely to be amended in light of updated evidence	3
Policy PSE9 – Out of centre retail development	Local policy likely to be amended in light of updated evidence	3
Policy PSE10 – Local shops and services	Local policy likely to be amended in light of updated evidence	3
Policy PSE11 – Major new tourism developments	Re-consider individual policy criteria	3
Policy PSE12 – Chalet, static and touring caravan and camping sites	Local policy to be amended	3
Policy PSE13 – Coastal tourism protection zones	Relevance of local policy to be tested	3
Policy PSE14 – Outdoor activity tourism	Local policy functions effectively	n/a
Policy PSE15 – Safeguarding minerals	See LDP Review report (section 5.15)	1
Policy PSE16 – Mineral buffer zones	See LDP Review report (section 5.15)	1
Policy PSE17 – Future mineral extraction	See LDP Review report (section 5.15)	1
<i>LDP theme: Valuing Our Environment</i>		
Policy VOE1 – Key areas of importance	Local policy amendment to reflect provisions of Historic Environment (Wales) Act 2016 and Environment (Wales) Act 2016	2
Policy VOE2 – Area of Outstanding Natural Beauty and Area of Outstanding Beauty	Local policy functions effectively; amendments may be required with regard to the Area of Outstanding Beauty	3
Policy VOE3 – Pontcysyllte Aqueduct and Canal World Heritage Site	Local policy functions effectively	n/a
Policy VOE4 – Enabling development	Test local policy compliance with new national guidance provided in TAN24 (May 2017)	2
Policy VOE5 – Conservation of natural resources	Test local policy compliance with Environment (Wales) Act 2016	3
Policy VOE6 – Water management	Re-consider individual policy criteria	3

Policy VOE7 – Locations for waste management	See LDP Review report (section 5.15)	1
Policy VOE8 – Waste management outside development boundaries	See LDP Review report (section 5.15)	1
Policy VOE9 – On-shore wind energy	Local policy functions effectively	n/a
Policy VOE 10 – Renewable energy technologies	Local policy functions effectively	n/a
<i>LDP theme: Achieving Sustainable Accessibility</i>		
Policy ASA1 – New transport infrastructure	Re-consider individual policy criteria	3
Policy ASA2 – Provision of sustainable transport facilities	Could the local policy thrust achieved through different means?	3
Policy ASA3 – Parking standards	Local policy functions effectively	n/a

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